

Islington Local Plan

# Integrated Impact Assessment -consolidated for adoption

September 2023



## NON TECHNICAL SUMMARY

This is the Non-Technical Summary of the Integrated Impact Assessment (IIA) of Islington's Local Plan.

- Following the examination and receipt of the Inspectors Report it was decided that a consolidated version of sustainability appraisal was the best approach to bring together different parts of the IIA into one place. This document presents the relevant information from the following three IIA reports:
  - Interim IIA September 2019 (introduction, the approach to IIA, sustainability issues and related appendices).
  - IIA examination addendum March 2021 (alternatives assessment, updated policy assessment, updated assessment of site allocations, review of cumulative effects, examination conclusions, mitigation and monitoring).
  - IIA examination addendum May 2022 (screening of modifications, updated policy assessments for SDMP modifications, Sites modifications and BCAAP modifications).
- The London Borough of Islington (LBI) is preparing a new Local Plan for the borough to cover the period 2020 to 2036. The Islington Local Plan is made up of four Development Plan Documents:
  - 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 (NLWP) - a joint waste plan together with six other boroughs within the North London Waste Authority area (Camden, Haringey, Hackney, Barnet, Enfield and Waltham Forest). The Waste Plan will identify a range of suitable sites for the management of all North London's waste up to 2035 and will include policies and guidelines for determining planning applications for waste developments. The NLWP is being produced separately to the other Local Plan documents and was adopted in March 2022.
- The IIA brings together into a single document a number of assessments which are required to assess the social, environmental and economic impact of the planning policies contained in the three Development Plan documents (The NLWP is not part of this assessment). The following statutory requirements are addressed and presented together in one document:
  - Sustainability Appraisal (SA) and Strategic Environmental Assessments (SEA), and

- o Health Impact Assessment (HIA) and
- o Equalities Impact Assessment (EqIA)
- o Habitats Regulation Assessment (HRA)
- o The methodology used for the IIA process for the Islington Local Plan review is based on the Sustainability Appraisal process set out in Government guidance.
- o The Sustainability Appraisal process is a five stage process and this document, which consolidates three previous reports, represents the conclusion of the reporting stage in the process. The final stage is production of an adoption report, which is published separately to this report.
- o The Islington Local Plan was submitted to the Secretary of State on 12 February 2020 along with the interim Sustainability Appraisal Report September 2019. The Secretary of State appointed two Inspectors to undertake an independent examination of the Local Plan; the last stage in the Plan making process. Through their initial questions the Inspectors identified concerns with housing supply and the Sustainability Appraisal assessment. To address the Inspectors concerns additional consultation and an update to the IIA were undertaken. The update to the IIA – the ‘IIA examination addendum’ (examination library reference PD4a) was published in March 2021.
- o The aim of the IIA from March 2021 was:
  - o to present new information to respond to the concerns raised by the Inspectors (Part 1).
  - o to present an appraisal of the changes to the plan that are subject to pre-hearings modifications consultation (Part 2).
- o The assessments produced in March 2021 replace the assessments from September 2019, they are set in section 3 of this document. A pre-hearing consultation on changes to the plan and the assessments produced took place in March 2021.
- o The Local Plan Examination Hearings took place between September and October 2021. Following the discussion at the hearings changes to the Plan policies were proposed. These changes, known as modifications, were subject to assessment. The IIA examination addendum May 2022 presents an assessment of the main modifications the Inspectors have deemed necessary to make the Plan sound. These are set out in section 4 of this report. Consultation on modifications took place in May 2022.
- o Some of the changes to the plan that were previously published as part of a pre-hearing modifications consultation in March 2021 were superseded, some remain the same whilst others have been amended.
- o The Inspectors report was published in July 2023. This contained further amendments which were considered and assessed where necessary. These are set out in section 5 of this document.

- o The Sustainability Appraisal process is iterative and on-going process, which has been in train from the start of the Local Plan review.

### **Other assessments**

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

### **Key Findings by Local Plan section**

The following bullets set out the key findings for the submission policies:

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

of housing such as student accommodation and large HMO also identifies the inflexibility inherent in the building design to meet a range of needs. Meeting needs for certain specific forms of housing; supported housing and gypsies and travellers have varied through the plan making process. Policy for supported housing has significant positive effects for social cohesion as it protects existing supported housing and supports the provision of new supported housing. Effects identified in relation to meeting gypsy and travellers needs remain positive with clarity provided over the process and timeframe in which sites will be identified in future policy documents. The policy to meet older peoples housing needs considers market extra care housing less of a priority which is considered to have a neutral effect in meeting needs identifying a lack of evidence of flexibility and adaptability in this form of housing compared to conventional housing. Overall the assessment of this policy and the more permissive alternative is quite finely balanced. When the policies within the section are considered together, they are considered by the assessment to have a particularly positive cumulative effect on the sustainability objectives for affordable housing, inclusion and equality, health and wellbeing, liveable neighbourhoods and the built environment.

- **Inclusive Economy:** the Sustainability Appraisal considered that the policies in this section will have a significant positive effect on economic growth with a significant quantum of business floorspace identified through site allocations. In addition the combined effect of delivering this growth will achieve positive effects on reducing worklessness by providing more opportunities for getting people back into work as well as supporting new business develop through the provision of affordable workspace. The protection of industrial land, in particular Vale Royal/Brewery Road was considered by the submission IIA assessment alongside alternative policy approaches. The assessment balanced the land use benefits of the co-location of office and residential uses with industrial and considered that housing and office needs can be met elsewhere in the borough, noting the importance of one of the last remaining industrial clusters within close proximity to central London had to be a factor in its continued protection for industrial use. The modifications introduced office co-location and the assessment considered that on balance this modification is positive given the policy requirements to intensify industrial use and demonstrate the continued industrial function of the LSIS. The assessments note that co-location could bring forward more intensification of industrial uses than would have happened otherwise but also notes that it could reduce the capacity for industrial growth. Overall there are no changes to the effects identified as a result of the modifications. The submission IIA considered that the effect of the retail policies will provide flexibility for town centres to respond to the changing retail environment which will help ensure residents various service and leisure needs continue to be met. In response to the flexibility introduced by Class E a number of modifications were made to the policy approach which creates uncertain impacts however the policy principle remains that new development should contribute to the retail function of the PSA at ground floor level and within the wider town centre. The other main change of the modifications is a more permissive approach to residential change of use of commercial uses in town centres which does have effects notwithstanding that policy expects adverse impacts on vibrancy, vitality, viability and character of the centre are fully mitigated. On the one hand this has the potential to reduce the floorspace for commercial uses in town centres and reduces the ability of the town centres to meet resident's needs albeit the policy is considered to still enable residents and business needs to be met, but on the other hand the approach provides additional land for housing to meet housing needs.
- **Green Infrastructure and Sustainable Design:** the Sustainability Appraisal considered that these sections evidence the significant positive effect this group of policies will have on reducing carbon emissions and reducing the effects of climate change through adaptation

and mitigation. The sustainable design policies will individually and cumulatively contribute to reducing fuel poverty in the borough. In addition requirements for open space / public realm and biodiversity improvements in the urban environment can help tackle air quality issues and will support a healthier population, encouraging people to use more sustainable forms of transport.

- **Public Realm and Transport:** the Sustainability Appraisal considered that overall the policies in this section will help encourage people to use more sustainable modes of transport helping reduce congestion and have a cumulative effect on reducing the impact of air pollution across the borough and beyond. There will be a positive effect on inclusion with the policy aim to improve transport for those with no access to private motor vehicles and practical, safe and convenient access to the public realm.
- **Design and heritage and Plan1:** the Sustainability Appraisal considered that when taken together the policies demonstrate the positive effects that design and a design led approach will have on improving peoples quality of life and reducing the potential amenity impacts of development. In particular the positive effect from ensuring the use of a site is optimised helps make the best use of the scarce land resource in the borough which combined with other policies in the plan helps meet and prioritise the various development needs in the borough in particular housing need and employment. It is noted that the assessment of the approach to tall buildings and the alternative identified a quite finely balanced argument with an alternative which identified more areas for tall buildings as positive for optimising land and growth however the less precise nature of broad areas or zones was considered to introduce some uncertainty in respect to local character and distinctiveness where a specific tall building proposal might create a negative effect, for example at the edge of the broad area or zone. Policy PLAN1 has a number of cross-cutting elements which will help to deliver synergistic and positive effects across the sustainability appraisal objectives.
- **Site Allocations:** the Sustainability Appraisal considered that the sites will have considerable benefits in delivering growth in terms of both housing and business floorspace. They will also have a positive cumulative effect in relation to sustainability assessment objectives as sites will help deliver improvements to the public realm and wider built environment, provide high quality housing and affordable housing, deliver services and infrastructure needed to serve wider needs across the borough, support town centres, benefit the environment through achieving reduced run off rates and a reduction in carbon emissions, make a significant contribution to economic growth both within and outside the borough and make more efficient use of land in the borough. It is noted that on some sites, the policy assessments against alternative uses are finely balanced, particularly where this involves different priority development needs and on mixed-use sites.
- **Bunhill and Clerkenwell AAP:** the Sustainability Appraisal considered that the policies and sites in the BCAAP have considerable benefits in delivering growth in terms of both housing but particularly business floorspace. The approach to focus development of business uses (which generate a large number of trips) in an area which is highly accessible by sustainable means of transport is positive against objective for climate change. The AAP will also have a positive cumulative effect in relation to sustainability assessment objectives and will help deliver improvements to the public realm and wider built environment. The particular significant positive effect of the AAP is on economic growth with a significant quantum of business floorspace identified in site allocations as well as the clear policy requirement.

- The table below pulls together the cumulative conclusions of the examination IIA for the submission policies and updates this following the modifications. The table seeks to bring together the overall cumulative effects of the plan against the sustainability framework objectives, drawing out positive effects between policy areas but also potential tensions. It is intended to make clear the effects identified for the modifications in the IIA examination addendum May 2022, add to those identified in the examination IIA March 2021 unless they do not replace effects identified in examination IIA March 2021 and add reference where necessary following receipt of the Inspectors Report in July 2023.

Objectives	Cumulative effects submission IIA	Updated consideration of cumulative effects following modifications assessment
<p><b>Objective 1 - Promote a high quality, inclusive, safe and sustainable built environment</b></p>	<p>The effect of the Local Plan on the Built Environment objective is positive with housing policies supporting development at optimal densities which combines with other policies – PLAN1 and DH1 to fully optimise density levels. and combine well with other policies in the plan such as policies PLAN1 and G4 which will help a proposal fully integrate within, and relate positively to, their immediate locality. The policy in DH1 supports innovative approaches to design as a means to increasing development capacity whilst recognising that the scale of development is dependent on design and character. PLAN1, T1, T4 and G4 also help a proposal fully integrate within, and relate positively to, their immediate locality which combined with the Area Spatial Strategies, which promote public realm improvements helps to create buildings and places that are both high quality and safer and more inclusive.</p>	<p>There is some uncertainty of the effects from the policy changes to submission policies in response to introduction of Class E, particularly in relation to retail, however the modifications across various policy areas are considered to maintain positive effects and continue to focus development in the right areas that enhances local character.</p>
<p><b>Objective 2 - Ensure efficient use of land, buildings and infrastructure</b></p>	<p>The Local Plan makes the best use of the scarce land resource in the borough and balances the competing demands for land use across the borough. There is an overall positive effect against the built environment objective with housing policies supporting housing development at optimal densities which combines with other policies – PLAN1 and DH1 which also seeks to fully optimise density levels. This efficient use of land and infrastructure can also have wider environmental benefits in terms of helping protect green spaces from development and reducing carbon emissions. There is a tension between optimising density and the historic environment with the potential impacts on heritage value potentially increased by higher density. Policy DH1 recognises this potential impact</p>	<p>The effect of Class E in particular in town centres but also in the LSIS is recognised as a risk in terms of the efficient use of land. Class E was introduced by the Government through legislation in September 2020 to amend and simplify the system of use classes in England and create one new broad ‘Commercial, business and service’ use class to allow for a mix of uses to reflect changing retail and business models. The risk is the potential for cumulative impacts and dilution of retail development in the most appropriate locations in</p>



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	<p>and seeks innovative approaches to address the risk. The Inclusive Economy policies B1/B2 and R1 work in concert with the Area Spatial Strategy policies to focus development in the right locations in the borough which combines with the approach in Policy T1 which recognises that land use should take account of accessibility and ensure proposals promote connectivity. The Thriving Communities section also sets a principle of restricting inefficient forms of development; student accommodation, large HMO and purpose built private rented sector on the basis of land supply. The development of visitor accommodation is also restricted by Policy R12 for the same reason. Infrastructure needs are addressed both through policy and Site Allocations where relevant.</p>	<p>town centres. Similarly light industrial floorspace in LSIS could change to other E Class Uses. However, through the use of conditions the modifications go some way to mitigating this change in national policy. It is also noted that there is some uncertainty in relation to the take up of Class E.</p> <p>There is policy relaxation in respect of residential uses in town centres, changes in requirements to protect against loss of business floorspace and also changes to marketing requirements. Whilst these changes have the potential to lead to an overall reduction in commercial floorspace the assessment recognises that there could be positive effects by encouraging landowners to optimise the use of buildings for alternate uses and intensify their land through the planning process. Also, the assessment recognises that in some cases the development of underutilised upper floors for residential development could aid in the efficient use of buildings and meet different development needs including those for housing. Whilst overall the modifications to retail and business policy may have cumulative effects which combine to reduce opportunities for commercial, social and cultural floorspace it is considered that the policies in the plan will ensure that retail and business needs can be met.</p>
<p><b>Objective 3 - Conserve and enhance the</b></p>	<p>The approach to heritage ensures that heritage assets will be strongly protected while recognising the need to accommodate new development. Where relevant Area Spatial Strategies in the Local Plan reference</p>	<p>None of the modifications have significantly changed the assessments outcomes against this objective.</p>

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<p><b>significance of heritage assets and their settings, and the wider historic and cultural environment</b></p>	<p>heritage assets highlighting their importance, alongside local views and landmarks. Site allocations also make reference where there are relevant heritage development considerations. Growth could impact heritage value but it is considered that this is mitigated by the relevant policies and will help new development to add to the borough's character and distinctiveness - Policy DH1 recognises this potential impact and seeks innovative approaches to address the risk of adverse heritage impacts. Policy also considers cultural value in the borough recognising the inherent sensitivity these uses can have to the introduction of new uses. Area Spatial Strategies identify where culture is a priority and the identification of cultural quarters will help support and enhance the uses in these locations.</p>	
<p><b>Objective 4 - Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles</b></p>	<p>The Local Plan policies seek to ensure that the appropriate level of infrastructure is available for the local population with policies in the Thriving Communities section protecting social and community facilities and policy ST1 supporting new strategic infrastructure where needed. In addition policy seeks to respond to where facilities already exist with a link in Policy H2 to supporting existing facilities. This is supported by Policy H1, which seeks new housing development that is fully integrated within, and relates positively to, the immediate locality and policies SC1 and SC2 which contribute to improving access to health and social care services/facilities by protecting existing facilities and providing a robust approach to considering changes in service provision are managed appropriately. The Area Spatial strategies identify relevant social and community infrastructure which helps maintain residents access to facilities. The retail policies seek to strike the right balance of retail, leisure, culture and business uses which will help maintain the access to these services close to people's homes. Policy recognise the need to protect residential amenity e.g. through suitable noise assessment and application of the agent of change principle which is covered by housing, retail and design policies. PLAN1 draws this all together with the connected and inclusive principles which helps development to</p>	<p>The submission policy with modifications is more permissive of residential uses in town centres, which could increase local accessibility to services for the new residents living within town centres which is positive. Conversely this could reduce access to services cumulatively by reducing the amount of commercial floorspace available in town centres albeit the policy enables residents and business needs to still be met. The assessment considered the wider impact on town centre vibrancy from the potential for Class E uses which do not form active frontages (such as offices at ground floor), which could cumulatively and in specific locations individually, have a negative impact on the diversity, vibrancy and economic prosperity of town centres and LSAs. Overall these changes are beyond the scope of Local Plan policy and the overall effects remain positive.</p>

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	encourage permeability and movement and maintain and support access to services and facilities.	The additional site allocations specifically to address housing supply will deliver wider improvements beyond housing quality and supply that will help create a safer and more inclusive environment and promote more liveable neighbourhoods through landscaping, safety measures, improved play spaces and community facilities.
<b>Objective 5 - Ensure that all residents have access to good quality, well-located, affordable housing</b>	<p>The objective has clear positive effects resulting from policy which seeks delivery of affordable housing from all development and responds to the number one objective of the Local Plan to maximise the delivery of genuinely affordable housing. This improves fairness and integration, addressing inequality and tackling social exclusion with the delivery of mixed and balanced communities. As identified in Thriving Communities section above the policies in the Sustainability Appraisal section have significant positive cumulative effects by helping ensure all residents have access to good quality housing through ensuring all housing meets high standards of energy efficiency and relevant sustainable design standards; which helps to reduce fuel poverty and contributes to reducing inequality. This also contributes health benefits with residents benefiting from warmer homes and more affordable homes to heat. There is a significant tension between balancing housing with other needs in the plan, primarily employment needs. The tension with other forms of housing has already been identified – large scale HMO accommodation and student accommodation. Ensuring that employment needs are met is a key consideration of the Local Plan. Striking the right balance with a focus on employment uses in the right locations has been taken, with employment growth focused in the CAZ and priority employment locations and LSIS where residential uses are restricted. The restriction on residential uses in town centre Primary Shopping Areas is also an example of the tension. Site Allocations play a key role in the borough in</p>	<p>The policy change which sets out a more flexible and permissive approach to residential use in town centres alongside the additional policy clauses for relevant spatial policies could cumulatively help to increase land available for housing and therefore affordable housing, contributing to meeting housing need which combined with the additional site allocations specifically to address housing supply will make a significant contribution to affordable housing which will help to meet need in the borough as well as contribute to wider improvements on housing estates. The Inspectors Report confirmed the modifications which amended the policy approach and removed the sites identified to meet Gypsy and Traveller needs. This reduces the significant positive cumulative effects identified previously, although effects remain positive with clarity provided over the process and timeframe in which sites will be identified in future policy documents. The increased clarity for meeting boat dwellers needs increases cumulative positive effects.</p>

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	demonstrating that both employment and housing needs will be met with significant levels of growth identified.	
<b>Objective 6 - Promote social inclusion, equality, diversity and community cohesion</b>	<p>The same positive effect from the Local Plan approach to maximise the delivery of genuinely affordable housing results on this objective too. Other policies in the Thriving Communities section also aim to improve fairness and integration and tackle social exclusion, through the delivery of mixed and balanced communities which are economically, environmentally and socially resilient. Policy PLAN1 and the inclusive principle supports policies across the plan both in terms of the mix of uses but also the design of development and the broader built environment. The Inclusive Economy section supports the economy through supporting creation of a variety of new business floorspace, protecting existing floorspace and securing affordable workspace and jobs/training opportunities from development which helps promote equity, provide opportunity and remove barriers to employment.</p>	<p>Similarly to objective 5 regarding the changes in relation to meeting Gypsy and Traveller needs that reduced the significant positive cumulative effects identified previously, with the decrease in certainty around how gypsy and traveller needs will be met, although effects remain positive with clarity provided over the process and timeframe in which sites will be identified in future policy documents. There is a reduction in percentage requirement for both wheelchair accessible Purpose Built Student Accommodation bedspaces in Policy H6 and Large-Scale HMOs in Policy H10 from 10% to 5% of the total bedspaces and a further change to make requirements adaptable on completion rather than accessible on completion. Overall these changes are still considered to have positive effects. However, the modification to remove the requirement for bursary contributions towards students leaving council care and students facing hardship does not help in reducing inequality and therefore the overall effect of the policy changes are considered to be neutral.</p> <p>Policy H4 which applies to conventional housing and various Wheelchair Accessible Unit requirements has also been subject to modifications, although for these changes the screening notes that there is considerable</p>

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<p><b>Objective 7 - Improve the health and wellbeing of the population and reduce health inequalities</b></p>	<p>Policies throughout the plan help address the health and wellbeing objective, in particular housing policies which determine housing quality which combine with other policies in the plan to help a proposal fully integrate within, and relate positively to, their immediate locality. The Area Spatial Strategy policies promote specific public realm improvements which combined with high quality housing helps encourage people into more active travel through a healthier public and built environment supported by car free transport policies and adequate cycle parking. The Social and Community policies contribute to improving access to health and social care services/facilities by protecting existing facilities and providing a robust approach to considering changes in service provision are managed appropriately. Public Realm and Transport policies will have significant positive cumulative effects against objectives relating to health and climate change as they seek to reduce pollutants and improve air quality. This works with policy for Green Infrastructure which preserve open spaces and increases the amount of green open space, plants, trees, green walls and roofs in the urban environment which will also contribute to improving air quality and encouraging people to participate in more active travel, sport and recreation in the borough. The sustainable design policies also contribute health benefits with residents benefiting from warmer homes and more affordable homes to heat and housing design policies that highlight the importance of designing the home as a place of retreat which can contribute to wellbeing, improving both physical and mental health.</p>	<p>uncertainty identified in part because the effect would depend on the demand for these units.</p> <p>The modifications to the retail policies which clarify the Council's approach following the 2020 amendments to the Use Classes Order and the introduction of Class E will provide a framework which goes some way to supporting the facilities which can meet the needs and wellbeing of communities. Whilst the protection afforded by individual policy is not considered to be significantly reduced there maybe effects at a borough level due in terms of cumulative total floorspace which meets community needs, although as the assessment makes clear these effects are considered uncertain at this stage.</p>
<p><b>Objective 8: Foster sustainable economic growth</b></p>	<p>Policies B1 to B4 recognise the importance of supporting the economy through the creation of a variety of new business floorspace, protecting existing floorspace - in particular industrial land through new LSIS designations. Meeting employment needs is a clear priority for the Local</p>	<p>As noted above under objective 2 the changes to retail and business policy may have cumulative effects which combine to reduce opportunities for commercial, social and cultural floorspace albeit</p>

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<p><b>and increase employment opportunities</b></p>	<p>Plan with other uses restricted to ensure that these needs are adequately met – the Site Allocations which prioritise employment space help to contribute to this meeting this need as will the Area Spatial Strategies which provides further policy support for employment growth in key areas such as the knowledge economy in Kings Cross and Tech City in the Bunhill and Clerkenwell AAP. As mentioned under the affordable housing objective striking the right balance between meeting housing and employment needs is a tension that the Local Plan has to deal with. The focus on employment uses in the right locations has been taken, with employment growth focused in the CAZ and priority employment locations and LSIS where residential uses are restricted. The restriction on residential uses in town centre Primary Shopping Areas is also an example of the tension. Retail policies also contribute to economic growth and London’s wider economy by seeking the right balance of retail, leisure, culture and business uses to meet residents, business and visitor needs through seeking to protect and enhance provision of services in town centres, local centres and dispersed shops. The requirement to secure affordable workspace and jobs/training opportunities from development helps to widen opportunities for residents and tackle barriers to employment. The Sustainable Design policies support the delivery of an inclusive economy by helping to contribute to a green economy with commercial buildings that have high environmental standards and can be designed to be flexible and adaptable.</p>	<p>the policy is considered to still enable residents and business needs to be met. There is policy relaxation in respect of residential uses in town centres, changes in requirements to protect against loss of business floorspace and also changes to marketing requirements. In addition policy supporting office co-location in Locally Significant Industrial Sites (LSISs) is introduced. These changes when combined with the flexibility provided by UCO changes creates a potential cumulative effect on providing sufficient space in the right locations for different types of businesses to develop, grow and thrive. There are positive aspects to some of the changes to protecting existing business floorspace (for example retaining the 24 month marketing period but instead requiring vacancy to be demonstrated at the time of application rather than 24 months of vacancy) which reduces the negative impact of short term vacancy. This change may also encourage landowners to seek alternative uses through the planning system in the medium and long term rather than consider changing use within Class E. Using Class E could result in not intensifying an existing office use of a building but simply changing existing floorspace to another Class E use.</p> <p>The wider positives of Class E are noted in particular the creation of a wider range of employment opportunities which could potentially help remove some barriers to employment across the borough with the increased flexibility around where uses can locate. The assessments</p>

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		<p>recognise the uncertainty in the longer term effect on the existing economic function of parts of the borough if a significant quantum of floorspace changes via Class E to flexible uses over time. Where new development is concerned this effect is mitigated against through use of conditions. There could also be a detrimental effect on LSISs, in particular Vale Royal, Islington's most significant LSIS where light industrial floorspace is potentially at risk of being lost to other non-industrial class E use that attract higher values. This effect is considered uncertain and the update to the policy will help to ensure that potential impacts can be mitigated through the planning system as far as possible. Protecting the industrial function of LSIS has wider benefits serving other economic functions in both the local and wider London economy, so there could be a detrimental effect in neighbouring boroughs depending on their dependency on the activities usually found in LSIS which support businesses in other boroughs. Overall the protection given by demonstrating the continued industrial function mitigates the risk of displacement of this important and unique cluster of industrial businesses. In addition the use of conditions for new light industrial floorspace also helps to mitigate the potential loss of light industrial class E uses.</p>
<p><b>Objective 9: Minimise the need to travel and create</b></p>	<p>The locational benefits of the Local Plan are also considered with cumulative benefits from reduced transport emissions from focusing office development in the most accessible locations in the borough through policy in the Thriving Economy section; the AAP area, CAZ, town</p>	<p>The uncertainty over where uses will be located from Class E in particular could have a minor negative impact on road networks and sustainable transport modes when there is an accumulation of</p>

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<p><b>accessible, safe and sustainable connections and networks by road, public transport, cycling and walking</b></p>	<p>centres and CAZ fringe. These locational benefits are reinforced by policy in the Area Spatial Strategies, site allocations alongside strategic policies on specific land uses and policies for public realm and design/ PLAN 1 which support improvements in the built environment. The policy approach in the Bunhill and Clerkenwell AAP in particular aims to maximise floorspace with a percentage requirement which will help achieve most floorspace in the most accessible location in the borough. This combined with Transport, Public Realm policies and PLAN1 encourages more sustainable and accessible transport and cycle parking requirements will all help people transition to more sustainable modes of travel. The cumulative benefit of protecting the industrial function also helps to reduce the need for goods and services to travel too which also reduces congestion and air pollution. The Area Spatial Strategies through promoting public realm improvements also help to create places that are both high quality and safer and therefore more inclusive.</p>	<p>uses that have loading and parking requirements. Class E was introduced by the Government through legislation in September 2020 to amend and simplify the system of use classes in England and create one new broad 'Commercial, business and service' use class to allow for a mix of uses to reflect changing retail and business models. Where new development is concerned this effect is mitigated against as far as possible through the use of conditions.</p>
<p><b>Objective 10: Protect and enhance open spaces that are high quality, networked, accessible and multi-functional</b></p>	<p>The approach ensures that open spaces are preserved and seeks to increase the amount of green open space. Area Spatial Strategies will help to create a high quality built environment with public realm improvements and also identify improvements to access existing green open spaces or add additional open space. This will have wider health benefits when combined with Urban Greening policies and enhancement of green infrastructure. Combined with other policies in the Local Plan this helps to promote physical and mental health, health benefits associated with access to nature, responds to impacts of climate change (flood risk and urban heat island) as well as improving air quality.</p>	<p>The changes to Policy G2, SP2 and BC4 provide clarification on how proposals for moorings and facilities to support moorings should be approached in the context of the canal as public open space. No effects were identified as the policy states that development can only take place where there is no detrimental impact on nature conservation and biodiversity value, and the character and amenity of the waterway corridor including its function as public open space. The modifications clarify the approach in terms of future operation of the canal for different uses and the development of a Waterspace Strategy for Islington's canal network which will help balance the competing demands on use of the canal and its role as open space.</p>



Objectives	Cumulative effects submission IIA	Updated consideration of cumulative effects following modifications assessment
<p><b>Objective 11: Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity</b></p>	<p>Cumulative positive benefits for biodiversity are created through a strategic approach to green infrastructure, biodiversity and wildlife habitat with requirement for developers to maximise green infrastructure and biodiversity provision consistent with G1. Several Site Allocations identify landscape and green infrastructure improvements as do Area Spatial Strategies which respond to the context of nearby open spaces/SINCs and the Regent’s Canal. Delivery of development on these sites can also help with the achievement of objectives in the Council’s Biodiversity Action Plan. Policy approach to biodiverse green roofs, green walls and soft landscaping through PLAN1 will also contribute to enhancing biodiversity. The Green Infrastructure policies will also combine with the Sustainable Design policies and the integrated approach to flood risk management and sustainable drainage to have cumulative benefits together which reduce the risk of flooding and helping to manage water sustainably and ensure wider benefits such as biodiversity and a drainage hierarchy that promotes green features over grey.</p>	<p>The submission Policy G4 with modifications is revised in respect to SINCs being protected commensurate with their classification. The assessment considers that the mitigation measures alongside other measures in the policy mean that overall there is no change in the effects identified in respect to this modification with a strong emphasis on maintaining biodiversity and there is no cumulative effect.</p>
<p><b>Objective 12: Reduce contribution to climate change and enhance community resilience to climate change impacts</b></p>	<p>Cumulatively the Sustainable Design policies set out the council’s strategic approach to delivering sustainable design with the aim of minimising the contribution of development to climate change and ensure that developments are designed to mitigate the effects of climate change. There is a fundamental tension between any development, which contributes to climate change through emissions and resource use and meeting social needs through development, in particular housing and employment but also other infrastructure needs. The Sustainable Design policies go some way to addressing this tension through energy efficiency measures for example and also introduces new policy approach – Policy S10 circular economy and adaptive design which will help mitigate the effect of resource use of development. The locational benefits of the Local Plan are also considered to have cumulative benefits from reduced transport emissions from focusing office development in the most accessible locations in the borough. There is also a benefit of protecting the industrial function in LSIS and Area</p>	<p>The policy changes add to the submission Sustainable Design policies by responding to technological evolution and will help to minimise carbon emissions from heating systems and promote sustainable energy infrastructure, which will contribute towards a more sustainable built environment improving air quality through reduced NOx and a reduction in carbon emissions.</p>

Objectives	Cumulative effects submission IIA	Updated consideration of cumulative effects following modifications assessment
	<p>Spatial Strategies which also helps to reduce the need for goods and services to travel too which also reduces emissions from this source. Islington's car-free policy in Policy T3 and Policy T5 which seeks to minimise air pollution from the construction process as well as reducing deliveries will also help reduce transport emissions. The Sustainable Design policies in setting out the approach to flood risk management and sustainable drainage have cumulative benefits together to reduce the risk of flooding and help to manage water sustainably. These policies working alongside green infrastructure policies which also play a role in helping to reduce surface water run-off and reduce flood risk. Sustainability is identified in PLAN1 as one of the four key design principles for development in the borough.</p>	
<p><b>Objective 13: Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste</b></p>	<p>The policies in the Sustainable Design section set out requirements for development proposals to promote resource efficiency through application of an approach to the Circular Economy. Policy in the Thriving Economy section supports the intensification, renewal and modernisation of business floorspace. The approach to circular economy and adaptive design has cumulative benefits when considered alongside other policies in the plan, this include PLAN 1 which required development to be durable and adaptable, policies ST2, H4 and B2 which seek to maximise re-use and recycling as well as Sustainable Design policies by reducing the environmental impacts, including embodied carbon emissions, that new development can have. Policy for high quality housing provides seeks well designed facilities for the management of recycling for residents and Strategic Infrastructure ensures that the waste management facility in the borough is protected. The borough is also working jointly with neighbouring boroughs on the North London Waste Plan, that will plan for waste management needs for the borough.</p>	<p>None of the modifications have significantly changed the assessments outcomes against this objective.</p>
<p><b>Objective 14: Maximise</b></p>	<p>Air quality is a cross cutting issue addressed by a number of policies that cumulatively will help to tackle air quality issues in the borough, this</p>	<p>There is a potential negative impact on efficient, sustainable travel from class E through impacting</p>

Objectives	Cumulative effects submission IIA	Updated consideration of cumulative effects following modifications assessment
<p><b>protection and enhancement of natural resources including water, land and air</b></p>	<p>includes design policies, locational policies set out in the Area Spatial Strategies, site allocations alongside strategic policies on specific land uses which seek to locate uses in the most appropriate locations, green infrastructure and public realm and transport policies which all have a role in helping to improve air quality and minimise exposure. The policies in the Sustainable Design section set out requirements for conserving water resources and managing flood risk and dealing with contaminated land.</p>	<p>on the retail hierarchy. Class E was introduced by the Government through legislation in September 2020 to amend and simplify the system of use classes in England and create one new broad 'Commercial, business and service' use class to allow for a mix of uses to reflect changing retail and business models. High trip generating Class E uses located outside of town centres could see these uses not located in the most well served locations for public transport infrastructure specifically bus, tube and rail connections. The take up of Class E is uncertain although it is recognised as working against some of the policies which sought to balance the tensions between land uses in a fine grain way. The modifications go some way to mitigating this by encouraging retail uses to locate according to the retail hierarchy e.g. at ground floor in the core of town centres, application of the sequential test and impact assessments but ultimately there is considerable uncertainty over the effectiveness of this given Class E changes do not require planning permission.</p>

- **Monitoring** - The regulations set out that local planning authorities should monitor the significant environmental effects of implementing the Local Plan and a series of indicators were identified in the IIA Examination addendum March 2021 and are set out in section 9.

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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**



## **Islington Local Plan Consultations**

1.2 There were a total of six consultation stages of consultation on the draft Local Plan. The following consultations have been undertaken:

- 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.
- The Regulation 19 consultation on the SDMP, Site Allocations and BCAAP ran for 6 weeks between Thursday 5 September 2019 and Sunday 13 October 2019. In total, 184 email / letter responses were received and a total 1,465 'set responses' were received. Further detail on the above consultations is set out in the Local Plan Regulation 19 Consultation Statement.
- During the examination of the local plan two rounds of consultation were conducted. The pre-hearing consultation on proposed modifications to the SDMP, Site Allocations and BCAAP ran for 9 weeks between Friday 19 March 2021 and Wednesday 19 May 2021. In total 88 email / letter responses were received.
- Following the examination hearings there was consultation on the draft Local Plan main modifications SDMP, Site Allocations and BCAAP. This ran for 20 weeks between Friday 24 June 2022 and Sunday 30 October 2022 and in total 624 email / letter responses were received.

## **Local Plan pre-submission amendments**



- 1.3 Following the meeting of full Council on 27 June 2019, there were two further changes needed to the Local Plan – Strategic and Development Management Policies proposed submission draft document:
- 1.4 The first change reflects the Council’s declaration of an environment and climate emergency, with changes considered necessary to reflect the Council’s aim to achieve net zero carbon by 2030.
- 1.5 The second change reflects updated evidence. The Council commissioned a Gypsy and Traveller Accommodation Assessment to inform the Local Plan which was considered in draft form when the Local Plan proposed submission draft was finalised. The assessment was finalised after the full Council meeting and reduced the level of Gypsy and Traveller pitches that need to be planned for over the Local Plan period from 12 to 10 pitches.
- 1.6 Neither of these changes required amendments to the Sustainability Appraisal assessments or the other assessments.

#### **Local Plan examination and modifications**

- 1.7 The Islington Local Plan was submitted to the Secretary of State on 12 February 2020 along with the interim Sustainability Appraisal Report. The Secretary of State appointed two Inspectors to undertake an independent examination of the Local Plan; the last stage in the Plan making process. Through their initial questions the Inspectors identified concerns with housing supply and the Sustainability Appraisal assessment. To address the Inspectors concerns additional consultation and an update to the IIA were undertaken. This was approved at a meeting of full Council on 25 February 2021. The update to the IIA – the ‘IIA examination addendum’ (examination library reference PD4a) was published in March 2021. The updated assessments are presented in section 3 of this consolidated report.
- 1.8 The Local Plan Examination Hearings took place between September and October 2021. Following the discussion at the hearings changes to the Plan policies were proposed. These changes, known as modifications, were subject to assessment. The IIA examination addendum May 2022 presents an assessment of the main modifications the Inspectors have deemed necessary to make the Plan sound and that are subject to consultation. These are presented in this consolidated report in section 4.
- 1.9 The Inspectors report was published on 5 July 2023 and contained further changes relating to gypsy and traveller sites. These are considered in section 5.

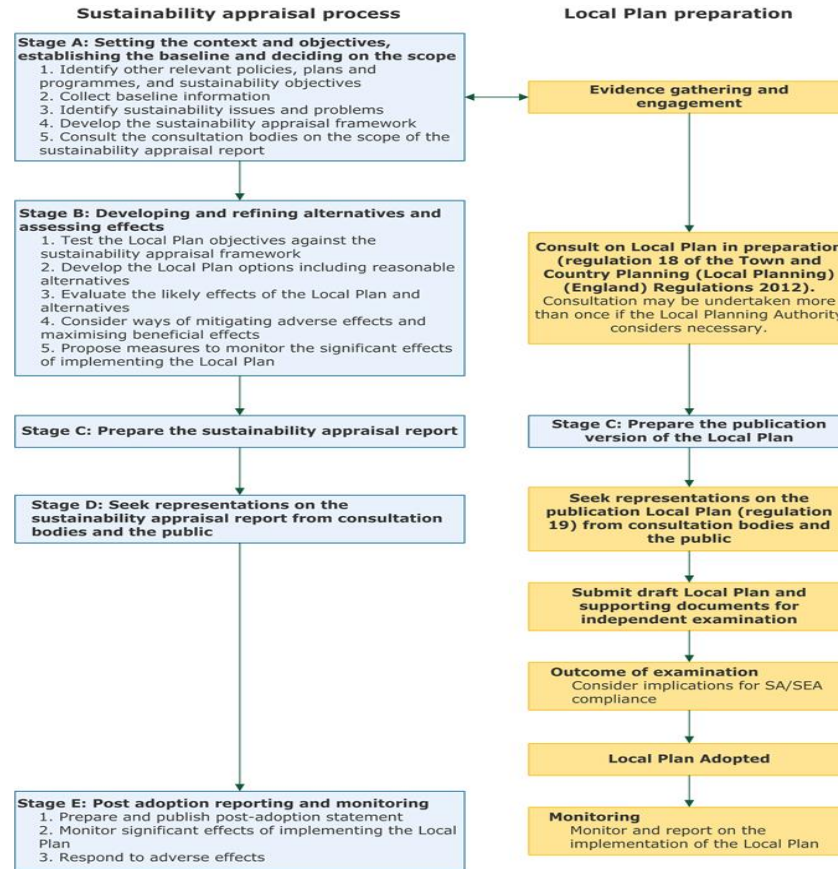
## 2 The approach to IIA

- 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 Figure 2.1 below.



**Figure 2.1: The Sustainability Appraisal Process**  
**Planning Practice Guidance: Paragraph: 013 Reference ID: 11-013-20140306**

- 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. The process for consideration of alternatives and the alternatives considered was set out in in the Regulation 19 IIA section 2 paragraph 2.12 to 2.15. This section makes clear that there were various alternatives discounted. Subsequently the IIA examination addendum – March 2021 updated the assessment of policies and reasonable alternatives and refined the presentation of the consideration of reasonable alternatives which was clearly set out and followed a three stage process which considered each of the policies in turn:
- Step 1 – sift out policies where there is clearly no reasonable need to explore reasonable alternatives;
  - Step 2 – screen-out further policies where there is judged to be no reasonable need to explore reasonable alternatives on balance;
  - Step 3 – define and appraise reasonable alternatives for the remaining (‘screened-in’) policies.

- 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 summary on the comparison with the preferred policy approach was provided after each assessment. See Section 3a.
- 2.16 In some instances the appraisal of reasonable alternatives found there to be limited potential to confidently and meaningfully differentiate between the reasonable alternative in terms of significant effects, which serves to demonstrate that a precautionary approach was taken when determining what should be a focus of appraisal work.
- 2.17 Alternatives for site allocations were considered as part of the examination update published in March 2021. Different uses or a mix of different uses were considered and the approach taken was to either A) explain that there were no reasonable alternatives that warrant appraisal; or B) presenting an appraisal of reasonable alternatives for each site. Reasonable alternatives were not considered where sites have planning permission on the basis that is expected to be implemented. Also, reasonable alternatives were not considered for existing LBI housing estates, with policy supportive only of residential led estate regeneration. Alternatives were also considered as part of the modifications assessment.

## **Sustainability Framework**

- 2.18 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.
- 2.19 The Full Sustainability Framework is set out below with related 'prompt' questions. 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. '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 (examination document ref PD17) and the Framework incorporates recommended changes including those made by statutory consultees, through consultation. 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.

**Table 2.1: Islington Local Plan Sustainability Framework**

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"> <li>Secure high quality architecture and urban design that enhances local character and distinctiveness?</li> <li>Promote location sensitive density and design?</li> <li>Ensure consideration of the spaces between buildings to provide an attractive, functional and sustainable public realm?</li> <li>Create robust and adaptable buildings that can respond to change over their life?</li> <li>Make the built environment safer and more inclusive?</li> <li>Promote an approach to design that places people at the heart of the design process?</li> <li>Encourage measures to reduce crime and fear of crime including anti-social behaviour?</li> </ul>
USE OF LAND	2. Ensure efficient use of land, buildings and infrastructure	<p>Will the policy...</p> <ul style="list-style-type: none"> <li>Optimise use of previously developed land, buildings and existing infrastructure?</li> <li>Optimise the use of previously developed sites and new builds to implement Green Infrastructure in unused areas such as footpath sides, blank walls and roof space?</li> <li>Focus development in the most appropriate locations?</li> <li>Balance competing demands between land uses to provide for the full range of development needs of the area?</li> <li>Provide the necessary infrastructure in the right locations to support development e.g. water, sewerage, energy transport etc?</li> <li>Ensure that development is sufficiently flexible and adaptable to accommodate evolving social and economic needs</li> </ul>
HERITAGE	3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	<p>Will the policy....</p> <ul style="list-style-type: none"> <li>Protect sites, features and areas of historical, archaeological and cultural value and their setting in and around Islington?</li> <li>Enable the borough's heritage and culture to be understood, explored and appreciated as much as possible and by as wide a range of people as possible?</li> <li>Protect views of historically important landmarks and buildings and valued local views?</li> <li>Ensure Islington's historic environment contributes to social and cultural life in the borough?</li> <li>Successfully balance access and energy efficiency requirements with the conservation and enhancement of heritage assets?</li> <li>Encourage management plans to be actively prepared and implemented?</li> </ul>
LIVEABLE	4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	<p>Will the policy...</p> <ul style="list-style-type: none"> <li>Improve access for all residents to all essential services, facilities and amenities near their home? Such as health facilities, schools, early years provision, council services, advice services, libraries, community and faith facilities, leisure centres, open space and play areas, food growing space, and neighbourhood shops.</li> <li>Promote diverse, vibrant and economically thriving town and local centres that serve the needs and wellbeing of the population?</li> <li>Improve connections of neighbourhoods with facilities/amenities?</li> <li>Encourage a vibrant social environment that attracts visitors to the borough while respecting the needs of residents?</li> <li>Reduce the impacts of noise, vibration and pollution on the public realm?</li> <li>Support the expansion and enhancement of cultural provision and maximise opportunities for the cultural life of the borough to flourish?</li> </ul>

AFFORDABLE HOUSING	5. Ensure that all residents have access to good quality, well-located, affordable housing	<p>Will the policy...</p> <ul style="list-style-type: none"> <li>• Ensure all housing is of a good standard, including for energy efficiency?</li> <li>• Increase the supply of affordable housing to meet identified need as far as possible?</li> <li>• Improve the diversity of housing sizes, types, prices and tenures?</li> <li>• Ensure tenures are fully integrated?</li> <li>• Encourage development at an appropriate density, standard, size and mix?</li> <li>• Provide for housing that meets the diverse and changing needs of the population?</li> </ul>
INCLUSION	6. Promote social inclusion, equality, diversity and community cohesion	<p>Will the policy...</p> <ul style="list-style-type: none"> <li>• Reduce inequality and the negative consequences of relative poverty?</li> <li>• Reduce social exclusion and ensure that everyone has access to the same opportunities?</li> <li>• Promote fairness, social cohesion and integration?</li> <li>• Promote equity between population groups and those with protected characteristics?</li> <li>• Support active engagement of the wider community in decisions that affect their area?</li> <li>• Encourage active and connected, strong and cohesive community?</li> <li>• Support the delivery of integrated and accessible early years services necessary to ensure that vulnerable children have the best start in life?</li> <li>• Remove barriers to employment and increase the skills of residents?</li> <li>• Improve opportunities and facilities for formal, informal and vocational learning for all ages?</li> </ul>
HEALTH	7. Improve the health and wellbeing of the population and reduce health inequalities	<p>Will the policy...</p> <ul style="list-style-type: none"> <li>• Improve mental and physical health and wellbeing?</li> <li>• Increase use and ease of access to green spaces for all residents, particularly those with mental and physical health concerns?</li> <li>• Reduce health inequalities?</li> <li>• Reduce the proliferation of activities with negative health externalities?</li> <li>• Improve access to a full range of coordinated health and social care services/facilities in all sectors for all residents?</li> <li>• Ensure that the built and natural environments promote health and wellbeing, including by facilitating physical activity and active travel and encouraging social interaction?</li> <li>• Increase food growing opportunities?</li> <li>• Support fully inclusive health, recreation, leisure and sport facilities that meet the needs of the whole community?</li> <li>• Reduce fuel poverty?</li> <li>• Manage noise issues and their effect on individual health?</li> <li>• Improve air quality?</li> </ul>



<p><b>ECONOMIC GROWTH</b></p>	<p>8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes</p>	<p>Will the policy...</p> <ul style="list-style-type: none"> <li>● Sustain and increase the borough's contribution to the London and national economy?</li> <li>● Support a range of local businesses of different types and sizes?</li> <li>● Provide sufficient space in the right locations for different types of businesses to develop, grow and thrive?</li> <li>● Support the development of green industries and a low carbon economy?</li> <li>● Widen the opportunities for local residents to access employment, particularly those groups experiencing above average worklessness?</li> <li>● Provide a range of employment opportunities?</li> <li>● Tackle barriers to employment, such as affordable childcare and skill levels?</li> <li>● Provide training and job opportunities for local residents?</li> </ul>
<p><b>NEED TO TRAVEL</b></p>	<p>9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking</p>	<p>Will the policy...</p> <ul style="list-style-type: none"> <li>● Improve connectivity both within the borough and to neighbouring boroughs and wider London?</li> <li>● Encourage a shift to more sustainable forms of travel and away from private vehicle use?</li> <li>● Reduce the need to travel, especially by car?</li> <li>● Improve road safety for all, particularly pedestrians and cyclists?</li> <li>● Improve accessibility of the borough's transport network?</li> <li>● Provide facilities that will support sustainable transport options?</li> <li>● Enhance capacity of the transport network?</li> <li>● Reduce harmful emissions from transport?</li> <li>● Reduce the negative impacts of servicing and freight?</li> </ul>
<p><b>OPEN SPACE / ACCESSIBLE</b></p>	<p>10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional</p>	<p>Will the policy...</p> <ul style="list-style-type: none"> <li>● Protect existing public and private open spaces?</li> <li>● Contribute to meeting the increasing need for open space?</li> <li>● Link existing open spaces?</li> <li>● Prioritise open space in areas of deficiency?</li> <li>● Improve the quality of open space?</li> <li>● Promote or improve public accessibility of open space now and in the future?</li> <li>● Ensure that open space is considered within the wider context of green infrastructure and delivering multiple benefits?</li> <li>● Improve inclusive access to a range of open space types to meet local needs?</li> </ul>

<p><b>BIODIVERSITY</b></p>	<p>11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.</p>	<p>Will the policy...</p> <ul style="list-style-type: none"> <li>• Increase protection and improve opportunities for biodiversity?</li> <li>• Ensure that development has no harmful effects on biodiversity and that development resulting in biodiversity net gain is given priority?</li> <li>• Encourage development that implements strategic and connected green infrastructure?</li> <li>• Ensure development does not increase flood risk ?</li> <li>• Protect existing trees and increase tree planting?</li> <li>• Increase biodiverse green roofs, green walls and soft landscaping?</li> <li>• Protect the populations of priority species identified in Islington's BAP?</li> <li>• Maximise opportunities to enhance biodiversity?</li> <li>• Impact on access to nature?</li> <li>• Increase green infrastructure and improve connectivity?</li> <li>• Maximise opportunities for engagement with wildlife, including environmental education?</li> <li>• Support positive management of green infrastructure (green roofs, walls, soft landscaping etc) for biodiversity?</li> <li>• Support biodiversity enhancement of The Regents Canal?</li> </ul>
<p><b>CLIMATE CHANGE</b></p>	<p>12. Reduce contribution to climate change and enhance community resilience to climate change impacts.</p>	<p>Will the policy...</p> <ul style="list-style-type: none"> <li>• Improve energy efficiency and carbon emissions associated with buildings and transport?</li> <li>• Promote the use of low and zero carbon technologies including decentralised energy networks?</li> <li>• Improve energy security?</li> <li>• Encourage buildings and places designed to respond to changing conditions?</li> <li>• Reduce the impact of climate change, including flooding and urban heat island effect?</li> <li>• Improve the microclimate?</li> <li>• Reduce greenhouse gas emissions?</li> <li>• Reduce fuel poverty?</li> <li>• Provide the necessary infrastructure to support development?</li> <li>• Steer development to the areas at lowest risk of flooding in the borough?</li> </ul>

<b>RESOURCE EFFICIENCY</b>	13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	Will the policy... <ul style="list-style-type: none"> <li>• Use local, sustainable materials and resources?</li> <li>• Promote the use of renewable sustainable energy sources?</li> <li>• Minimise the use of non-renewable resources?</li> <li>• Ensure design is appropriate for lifetime of development?</li> <li>• Support the circular economy?</li> <li>• Provide opportunities for businesses to benefit from the circular economy?</li> <li>• Minimise the volume of waste produced in Islington, including construction and deconstruction waste, food and household waste?</li> <li>• Support the 'Waste Hierarchy'?</li> <li>• Increase the proportion of waste recycled or composted?</li> <li>• Provide the right type of infrastructure to deal with residual waste in the most sustainable way?</li> </ul>
<b>NATURAL RESOURCES</b>	14. Maximise protection and enhancement of natural resources including water, land and air	Will the policy... <ul style="list-style-type: none"> <li>• Minimise air, water, and soil pollution and their negative impacts on human health?</li> <li>• Improve air quality in line with national and international standards?</li> <li>• Protect surface and groundwater quality?</li> <li>• Promote the sustainable use of water resources?</li> <li>• Prevent soil pollution and restore contaminated land?</li> <li>• Ensure sustainable use and protection of natural resources, including water?</li> <li>• Ensure the necessary water and sewerage infrastructure to service development?</li> </ul>

2.20 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.

2.21 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 interim IIA September 2019 SA identifies very little mitigation/positive improvements based on the preferred policy approach. Subsequently the IIA examination addendum March 2021 and IIA examination addendum May set out more detail on mitigation. These are set out in section 8a and 8b.

2.22 Table 2.2 sets out the scoring system used to record potential effects.

**Table 2.2: 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	--

- 2.23 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 policy revision and discussions occur organically and are not necessarily captured by the assessment. Therefore, at submission the assessment of the SA identified very little mitigation/positive improvements based on the preferred policy approach. Through the further work undertaken during the examination hearings the IIA examination addendum March 2021 included an expanded section on mitigation, which summarised the tensions between the plan and sustainability objectives, and considers ways by which these tensions could feasibly be resolved.
- 2.24 Initially a pragmatic approach was taken to assessment of short/medium/long term effects, cumulative effects, synergistic effects, secondary effects and permanent / temporary effects. The approach taken reflected an implicit consideration in the individual policy and site assessments that most policies will have a variety of potential effects; therefore, while these may not all be explicitly noted in individual assessments, there was considered to have been a detailed consideration of the effects. Initially sections on cumulative effects were included in section 4 of the submission IIA report September 2019 however following the Inspectors letter in June 2020 further work was undertaken.
- 2.25 The further work was presented in the IIA examination addendum March 2021 and gave a more in-depth and systematic examination of each of the eight sections of the Local Plan in turn. Also, a new section presented a discussion of the Local Plan as a whole and the IIA Examination Conclusions – re-presents this discussion on the effects of the Local Plan as a whole, and also considers the effects of proposed modifications in combination. These are set out in section 6.

- 2.26 Initially the presentation of the Site Allocations appraisal set out in the submission IIA report September 2019 used a reduced set of appraisal criteria as it was considered at the time that some of the IIA objectives have little or no effect for many of the sites. However following the Inspectors letter in June 2020 the assessment of sites were assessed against the full set of objectives. The format for presentation was also amended, this work was presented in the IIA examination addendum March 2021.
- 2.27 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 was included in the Appendix 8 of the submission IIA report September 2019 and new sites were considered in the IIA examination addendum March 2021. These are set out in section 3a and 3b.

## **Health Impact Assessment (HIA)**

- 2.28 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".
- 2.29 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.
- 2.30 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.
- 2.31 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.

2.32 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;

2.33 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).

2.34 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.

2.35 The results of the exercise were presented in Appendix 10a of the interim IIA September 2019 and included at appendix 5 of this document.

## **Equalities Impact Assessment (EqIA)**

2.36 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.

2.37 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.

2.38 The results of the exercise as set out in interim IIA September 2019 in appendix 9, the IIA examination addendum March 2021 and the IIA examination addendum May 2022 are included at appendix 4 of this document. The impacts of the further changes outlined in the Inspectors report have also been considered.

## **Habitats Regulations Assessment**

2.39 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.

2.40 The full assessment is set out in the interim IIA September 2019 at appendix 11. A HRA screening update is included in this document at appendix 2

## **Background: Scoping Report summary**

- 2.41 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.
- 2.42 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 publicly available on Council's website.
- 2.43 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?
- 2.44 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 1. A summary of responses to the regulation 19 consultation, pre-hearing consultation and modifications consultation is also included.

## **Baseline Information**

- 2.45 The baseline information was originally contained in the scoping report published in 2017. This was updated and published as part of the interim IIA September 2019 and can be reviewed in that document. The baseline information informed the main sustainability issues relevant to the Local Plan. The main sustainability issue are set out below.



## **Sustainability Issues: Identifying the sustainability, health & equality issues for Islington**

- 2.10 The main sustainability issues for Islington were identified in the Scoping Report (first published February 2017) (examination document ref PD17). They were identified following review of the relevant plans and programmes (see interim IIA September 2019 Appendix A) and the baseline information (see interim IIA September 2019). The issue relevant to the Local Plan are set out below.

### **High population density and projected growth**

- 2.11 Managing and coping with growth is a key issue for the borough. Islington is both the third smallest (by land area) and the most densely populated local authority area in the UK. The borough has experienced significant population growth in recent years, outpacing that of London, and the population is projected to continue to grow. As well as being a significant issue in itself, the high level of projected growth is likely to exacerbate or increase the significance of other issues identified.
- 2.12 Islington has a young population with an average age of 34.7, and a diverse population with a large number of BAME residents and approximately 37 percent of residents born abroad. The proportion of children and older people is below the London and UK average, and this is not projected to change substantially with growth; while the older population is projected to grow, the proportion of older people will remain below the London average.
- 2.13 However, despite the proportions of children and older people remaining lower than London and the UK, the population overall is expected to increase and estimates suggest an additional 6,400 children and young people aged 17 and under, and an additional 9,100 people aged 65 and over in Islington by 2031. The borough also has a very high population turnover, with approximately 20 percent of residents entering/leaving the borough every year.

### **Shortage of developable land**

- 2.14 Islington is a densely built up urban area with many areas of important local character and historical or cultural value – 38 percent of the borough is within a conservation area and there are significant concentrations of cultural uses in Angel town centre. Population growth combined with the borough's central London location results in significant demand for all types of development despite the borough having few underutilised or large sites and the generally intensive use of the existing built stock. For example, 83 percent of the borough's housing is within flatted development.
- 2.15 Islington has a strong economy, and employment projections suggest that Islington's employment will grow by c. 25 percent by 2036. However, employment space is not evenly distributed throughout the borough, with 70 percent of the borough's employment concentrated in two wards within the CAZ, this focus on the CAZ/CAZ fringe area in accommodating employment space is projected to

continue. Despite the strong economy, the borough has experienced a loss of employment floorspace to other uses and should this trend continue there will not be an adequate supply of employment land to support business and enterprise in the borough, particularly the large number of SMEs.

- 2.16** While the borough benefits from a generally sustainable pattern of development, the constrained land supply and associated rising land values places pressure on the quality of the built environment/local character, the ability to provide for the different development needs of the area, and ultimately the quality of life of those who live and work in the borough. There is a need to improve quality of life for residents by creating safe and pleasant environments with a strong sense of place.

### **Housing unaffordability**

- 2.17** There is a shortage of good quality, genuinely affordable housing and a significant unmet housing need with approximately 19,000 households on the housing register and a decrease in the proportion of overall dwellings that are social rented over recent years. The borough has a high relative proportion of social rent tenure, and there is a mismatch between the need for and supply of council-owned homes – 40 percent of council properties are one bedroom whereas the majority of need is for two bedroom and larger family-sized homes. Just over 5000 households on the housing register are overcrowded.
- 2.18** Median house prices are 16 times median earnings (up from 7.63 in 2003) and private sector rents are out of reach even for middle income earners, despite private rental increasing its share of the total housing stock. The proportion of both social rental and mortgage-owned housing has decreased. 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, with the result that low and middle-income households are being priced out of the borough, increasing polarisation and leading to less mixed communities.
- 2.19** A lack of affordable housing impacts directly on residents' health and education attainment, while difficulties in accessing affordable housing can also limit the ability of people to move to find work (and for employers to recruit locally), and be a barrier to living close to and caring for elderly parents and relatives, or for grandparents to support their children with child care.

### **Providing access to services for all**

- 2.20** To ensure that the Islington's diverse communities benefit from the high level of predicted growth, it is essential that this growth is supported by the necessary infrastructure and services. While Islington has an active voluntary and community sector and a relatively even spatial distribution of social infrastructure within accessible locations, certain types of provision are not evenly spread, for example the two youth centres in the borough are in the centre. There is also a need to consider how best to provide coordinated services for vulnerable/deprived residents and older people to facilitate social interaction and inclusion, and access to the right services when they are needed.

- 2.21 Retaining existing good levels of essential service provision and continuing to deliver effective, accessible and appropriate services as the population grows and diversifies will be a challenge. The borough's town and local centres play an important and increasing role in ensuring delivery of local services, as town centre uses move away from traditional retail provision to provide for a wider range of cultural and social activities, therefore retaining and improving their vitality and viability is a priority.

### **Increasing inequality and enduring deprivation**

- 2.22 Islington is a very unequal place with rising inequality and high levels of poverty, with wealthy and deprived areas are closely co-located throughout the borough. It is one of the most expensive places to live in London yet it is the fifth most deprived borough in London and the 24<sup>th</sup> most deprived overall in England; Islington is particularly deprived according to the income deprivation index, rating as the second most deprived in England. In terms of the Income Deprivation Affecting Children Index (IDACI) Islington ranks 3<sup>rd</sup> most deprived, and in terms of the Income Deprivation Affecting Older People Index (IDAOPI) it ranks 5<sup>th</sup> most deprived.
- 2.23 Those who are poorest also most likely to experience poor physical and mental health, lower educational attainment, and be engaged in or be a victim of crime. Currently, a third of children live in low income families, compared to 22 percent overall in London. Disabled people are 50 percent more likely to be unemployed, and BME residents have twice the unemployment rate of white residents.
- 2.24 There is a pressing need to reduce income inequality and the negative consequences of relative poverty to ensure that the borough's diverse communities benefit from Islington's success so that everyone, regardless of background, has the same opportunity to reach their potential. The creation of a fairer borough to ensure that all residents benefit from the thriving economy and central location is a crucial issue for Islington today and into the future.

### **Relatively high unemployment and skills gap**

- 2.25 Despite 1.3 jobs per resident, Islington has high levels of economic inactivity and many jobs in the borough by are filled by people living outside Islington. Although the number of NEETs has been decreasing since its peak in 2012, at 5.2 percent in 2014 the figure is still higher than the Inner London average, as is the unemployment rate; nearly a quarter of the population aged 16-64 is classed as economically inactive. More than half of lone parents were not in employment in 2011, notably higher compared to London (48%) and England (41%).
- 2.26 The majority of jobs growth in Islington has been in knowledge-intensive industries with high educational and skills barriers to entry. While Islington has higher than average levels of qualification, there is also a significant proportion of the population that have poor literacy and numeracy skills. Working age residents without qualifications are four times more likely to be workless than those with a degree level qualification. There is a need to increase the opportunities for local residents to access the potential benefits of good work and reduce the number of residents with no qualification.

## **High levels of health deprivation and inequalities**

- 2.27 Islington residents experience poorer physical and mental health that results in early deaths from cancer and circulatory disease. This is mainly because of 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.
- 2.28 According to the 2011 census, the borough has the highest percentage of people reporting they are in bad or very bad health among London boroughs, higher than both London and England averages. Islington has the fourth highest levels of limiting long term illness/disability in London, and ranks bottom of all London boroughs in self-reported happiness levels. Levels of childhood obesity are also high, at 22 percent, and men in Islington have the lowest life expectancy in London at around 75 years.
- 2.29 There are also significant health inequalities amongst residents in the borough. The prevalence of mental health conditions is significantly higher in the most deprived areas, and people – especially men – from Black communities are significantly represented among people with serious mental illness diagnoses. While there is no clear trend between deprivation and dementia, areas with a high density of social housing have a significantly higher prevalence of dementia among those aged 65 and over.

## **Safety and security**

- 2.30 While general crime rates have been falling consistently over the past fifteen years, there has been a recent rise in youth crime and overall crime rates in the borough remain higher than both the Inner London and national average. Crime – and the fear of crime – is not uniformly distributed throughout the borough. The types of crimes are not evenly distributed either, though some wards have higher crimes rates than others. There are significant differences between different groups' perceptions of safety. Women feel less safe than men after dark and the over 60s feel less safe than other age groups. Social housing tenants are much more likely to feel unsafe at night than people in other forms of tenure.

## **Pressure on transport capacity**

- 2.31 Despite Islington having the second-lowest rate of car ownership in London, the borough's roads are very congested, with significant flows of through traffic due to the borough's strategic location and opposition in relation to London's road traffic network. Road traffic is one of the main causes of carbon emissions, poor air quality and noise pollution; noise pollution is especially an issue around busy roads such as the A1 corridor.
- 2.32 While the borough reports high levels of journeys by foot, bike and public transport, there is a need to address road space conflicts between cyclists, pedestrians and motorists; the densely developed nature of the borough makes it difficult to provide attractive and safe cycle routes. Although the borough has generally high PTAL levels, there are some areas with poor local permeability. None of the borough's 11 railway/underground stations have fully step-free accessible access, and overcrowding on public transport during peak

times is commonplace. Research from TfL suggests that although many journeys in Islington are made on foot, there is potential to encourage growth in short walking trips of 24%<sup>1</sup>.

### **Poor air quality**

- 2.33 The entirety of the borough has been designated an Air Quality Management Area (AQMA) since 2003. Islington had the fourth highest proportion of deaths attributable to fine particulate air pollution in London in 2013<sup>2</sup>, and the majority of Islington's primary and secondary schools recorded concentrations of NOx that exceeded EU limits in 2015.
- 2.34 Vehicles are responsible for approximately 50 percent of the emissions contributing to air pollution, mainly through traffic congestion and the use of diesel powered engines. Islington is used as a traffic through-route to central London, which results in the highest concentrations of air pollution being located along the main arterial roads that dissect the borough. This presents a challenge to the borough as it limits the scope of influence at the local level.
- 2.35 Climate change has the potential to further exacerbate poor air quality as warmer, hotter sunny days lead to an increase in ozone (O<sub>3</sub>) concentrations, which is formed by reactions of sunlight with NOx. Therefore with climate change, the potential impact of air pollution on health and wellbeing will increase.

### **Demand for and consumption of resources**

- 2.36 There is a pressing need to encourage sustainable consumption and production patterns. London's water consumption is above the national average. This demand being located within a severely stressed water catchment has meant that in some dry years water demand outstrips supply. London's demand for water is forecasted to continue to rise with population growth and densification. This in turn has implications for Islington's contribution to climate change due to the link identified between water efficiency and carbon emissions. There is a clear need to continue to promote water efficiency from all sectors. In terms of water and sewerage infrastructure, it is essential that capacity exists to serve and net increase in demand, and that net increase in demand as part of new development is minimised, to avoid unacceptable impacts on the environment.
- 2.37 Islington generates large amounts of waste however data suggests that Islington has the second lowest recycling rate in London. With only one waste facility in the borough and no processing facilities, the majority of Islington's waste is exported out of the borough. Pressure on disposal makes waste minimisation, reuse and recycling ever more important issues for the borough to resolve.

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<sup>1</sup> Transport for London (awaiting publication in 2016)

<sup>2</sup> Public Health Outcomes Framework indicator 3.01 <http://www.phoutcomes.info/>

- 2.38 There is significant opportunity to increase Islington's self-sufficiency by adopting circular economy principles of keeping resources in use for as long as possible, extracting the maximum value from them whilst in use, then recovering and regenerating products and materials at the end of each service life. This would involve wider system change as well as supporting infrastructure and associated space, which presents a significant challenge in such a densely development urban environment such as Islington.
- 2.39 Islington continues to be a high energy user. Energy security is an issue particularly for central London, and with the high heat profiles of buildings in these locations, the opportunities for decentralised energy networks (DENS) are considerable. Islington has two operational DENS concentrated in the south, with more networks in master planning phase that have potential to realise opportunities across various other locations in the borough.

### **Transitioning to a low carbon future**

- 2.40 Carbon emissions have been reducing over time, but remain above the London average. The majority (55 percent) of CO2 emissions come from industry/commercial sector and significant majority from domestic sector. With a significant proportion of carbon emissions coming from the built environment, there is a need to improve the energy performance of buildings in a way that does not decrease air quality.
- 2.41 Because 75 percent of the existing building stock is expected to be standing in 2050, delivering improvements to the energy efficiency of the existing building stock as well as improving the performance of new developments is critical to reducing carbon emissions. Energy efficiency of much of the existing housing stock is low, and poorly performing buildings can result in disproportionate negative impacts on end users, particularly vulnerable groups such as the elderly, disabled and those on lower incomes (fuel poverty).

### **Vulnerability to climate variation**

- 2.42 In London, predictions are that climate change will result in an increase in extreme weather events such as heat waves and floods. There is an overarching need to address the borough's climate vulnerability by increasing resilience to the impacts of climate change for all residents and averting/minimising the loss and damage associated with adverse effects.
- 2.43 London generates its own microclimates known as Urban Heat Islands, which has been observed to result in central London having temperatures up to 10 degrees warmer than in the outskirts of the city. Islington's central location means the rising heat island effect will continue to have impacts, particularly in the south of the borough where there is the highest concentration of built form.
- 2.44 Impacts of high temperatures on Islington are exacerbated by the borough's dense urban character with limited areas of open space. There are also health impacts associated with heat stress, particularly for vulnerable groups such as the elderly. Unless green infrastructure can be increased across the borough, these impacts will continue to increase through densification. Increased and

prolonged warmer temperatures also place high demand on London's energy network due to the increased demand for cooling, at times resulting in brown outs.

- 2.45 Islington is at risk from surface water flooding, primarily caused by urbanisation and the capacity of existing sewer networks, and is at low risk of flooding from other sources. Modelling of surface water has identified three critical drainage areas in Islington all of which cross borough boundaries and therefore likely to have an impact beyond the borough boundaries.

### **Open space deficiency and lack of green infrastructure**

- 2.46 Islington has a high level of existing open space deficiency, and this comparative lack 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. There are only two wards where more than 50 percent of homes have good access (e.g. within 400m) to a local, small or pocket park, playspace is unevenly distributed throughout the borough and access to open space is particularly low in areas of deprivation.
- 2.47 Green infrastructure, which facilitates essential ecosystems services such as pollution abatement, urban cooling and climate change adaptation, is vital for healthy and prosperous communities. Although the borough's open spaces and green infrastructure is diverse – including parks (large and small), nature sites, playgrounds, squares, civic spaces, food growing spaces, amenity green spaces, private gardens, railway cuttings and canals, they are generally small and fragmented. There is an increasing need for these spaces to perform a number of functions, as the pressure for development of open space continues to build, and the population which rely upon these spaces continues to increase.
- 2.48 This pressure combined with incremental losses of green infrastructure through urban creep and densification, means there needs to be a strategic approach taken to the ongoing protection of private as well as public open space. Alongside maximising the functionality of existing open spaces it is vital that all opportunities for increasing open space and green infrastructure are fully exploited.

### **Protecting and enhancing biodiversity**

- 2.49 There are a finite amount of naturalised areas left in the borough, and the ability to re-provide or increase the amount is highly constrained, particularly because much of the borough's open space is within private gardens and/or fragmented, resulting in poor ecological connectivity. The water quality status of The Regents Canal is 'moderate' and therefore management actions have been identified to help the water body achieve 'good ecological potential' in accordance with the Water Framework Directive 2000.

Given the lack of open space and the fact that 33% of the borough is considered an area of natural deficiency, the built environment itself is becoming an increasingly important habitat, underscoring the need to promote a green infrastructure approach in new development.

# 3 Assessment of Local Plan

This section sets out the assessments as they are presented in the IIA examination addendum March 2021 and the IIA examination addendum May 2022. The assessment of the Local plan policies that were submitted was reviewed and additional effects identified in the IIA examination addendum March 2021. Further clarification in the assessment text was also added. The IIA examination addendum March 2021 also presented a Part 2 which considered the changes to policies since Regulation 19. These were known as pre-hearing modifications – the assessment of pre-hearing modifications set out in the March 2021. Part 2 is not included in this document as they were superseded by modifications agreed with the Inspectors following the examination hearings. Following hearings the main modifications that the Inspectors deemed necessary to make the Plan sound were published for consultation. Some of the changes to the plan that were previously published as part of a pre-hearing modifications consultation in March 2021 were superseded by the modifications, some remained the same whilst others were amended. The IIA examination addendum May 2022 presents an assessment of these main modifications and replaces the assessment presented in Part 2 of IIA examination addendum March 2021.

The section has the following sub-sections:

- Assessment of Local Plan policy alternatives
- Assessment of Local Plan objectives and policies
- Assessment of Local Plan site allocations and alternatives



**a. Assessment of Local Plan: policy alternatives**

# 1. Introduction

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

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

- Step 1 – sift out policies where there is clearly no reasonable need to explore reasonable alternatives;
- Step 2 – screen-out further policies where there is judged to be no reasonable need to explore reasonable alternatives on balance;
- Step 3 – define and appraise reasonable alternatives for the remaining ('screened-in') policies.

The outcome of this three step process is summarised in Table 1.1 Subsequent headings then consider all policies in turn. The consideration of the alternative(s) has been presented alongside the assessment of the relevant policy with a summary then included beneath the table that discusses the alternative. The assessment of alternatives for site allocations is identified separately in section c.

Table 3.1 : Overview of the three step approach to exploring policy alternatives

Policy	Step reached in the process
PLAN1: Site appraisal, design principles and process	Screened-out at step 2
Area spatial strategy (SP policies x8)	Screened-out at step 2*
H1: Thriving communities	Sifted-out at step 1
H2: New and existing conventional housing	RAs defined and appraised
H3: Genuinely affordable housing	RAs defined and appraised
H4: Delivering high quality housing	RAs defined and appraised
H5: Private outdoor space	Sifted-out at step 1

H6: Purpose-built Student Accommodation	RAs defined and appraised
H7: Meeting the needs of vulnerable older people	RAs defined and appraised
H8: Self-build and Custom Housebuilding	Sifted-out at step 1
H9: Supported Housing	Sifted-out at step 1
H10: Houses in Multiple Occupation (HMOs)	RAs defined and appraised
H11: Purpose Built Private Rented Sector development	RAs defined and appraised
H12: Gypsy and Traveller Accommodation	Sifted-out at step 1
SC1: Social and Community Infrastructure	Sifted-out at step 1
SC2: Play space	Screened-out at step 2
SC3: Health Impact Assessment	Screened-out at step 2
SC4: Promoting Social Value	Sifted-out at step 1
B1: Delivering business floorspace	RAs defined and appraised*
B2: New business floorspace	RAs defined and appraised*
B3: Existing business floorspace	Sifted-out at step 1
B4: Affordable workspace	Screened-out at step 2
B5: Jobs and training opportunities	Screened-out at step 2
R1: Retail, leisure and services, culture and visitor accommodation	Screened-out at step 2
R2: Primary Shopping Areas	RAs defined and appraised
R3: Islington's Town Centres	RAs defined and appraised
R4: Local Shopping Areas	Screened-out at step 2

R5: Dispersed retail and leisure uses	Sifted-out at step 1
R6: Maintaining and enhancing Islington's unique retail character	Screened-out at step 2
R7: Markets and specialist shopping areas P	RAs defined and appraised
R8: Location and Concentration of Uses	RAs defined and appraised
R9: Meanwhile/temporary uses	Screened-out at step 2
R10: Culture and the Night-Time Economy	Screened-out at step 2
R11: Public Houses	Screened-out at step 2
R12: Visitor accommodation	RAs defined and appraised
G1: Green infrastructure	Screened-out at step 2
G2: Protecting open space	Screened-out at step 2
G3: New public open space	Screened-out at step 2
G4: Biodiversity, landscape design and trees	Sifted-out at step 1
G5: Green roofs and vertical	Sifted-out at step 1
S1: Delivering Sustainable Design	Sifted-out at step 1
S2: Sustainable Design and Construction	Sifted-out at step 1
S3: Sustainable Design Standards	Sifted-out at step 1
S4: Minimising greenhouse gas emissions	Sifted-out at step 1
S5: Energy Infrastructure	RAs defined and appraised
S6: Managing heat risk	Sifted-out at step 1
S7: Improving Air Quality	Sifted-out at step 1

S8: Flood Risk Management	Sifted-out at step 1
S9: Integrated Water Management and Sustainable Drainage	Sifted-out at step 1
S10: Circular Economy and Adaptive Design	Sifted-out at step 1
T1: Enhancing the public realm and sustainable transport	Sifted-out at step 1
T2: Sustainable Transport Choices	Sifted-out at step 1
T3: Car-free development	Sifted-out at step 1
T4: Public realm	Sifted-out at step 1
T5: Delivery, servicing and construction	Sifted-out at step 1
DH1: Fostering innovation and conserving / enhancing the historic environment	Sifted-out at step 1
DH2: Heritage assets	Sifted-out at step 1
DH3: Building heights	RAs defined and appraised
DH4: Basement development	Sifted-out at step 1
DH5: Agent-of-change, noise and vibration	Sifted-out at step 1
DH6: Advertisements	Sifted-out at step 1
DH7: Shopfronts	Sifted-out at step 1
DH8: Public art	Sifted-out at step 1
ST1: Infrastructure Planning and Smarter City Approach	Sifted-out at step 1
ST2: Waste	Sifted-out at step 1
ST3: Telecommunications, communications and utilities equipment	Sifted-out at step 1
ST4: Water and wastewater infrastructure	Sifted-out at step 1

BC1: Prioritising office use	RAs defined and appraised
BC2: Culture, retail and leisure uses	Sifted-out at step 1
BC Area Spatial Strategies (x8)	Sifted-out at step 1
AAP1: Delivering development priorities	Sifted-out at step 1
* SP3, B1 and B2	RAs are defined and appraised as a group across the three policies

## 2. Consideration of alternative for Policy PLAN 1

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

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

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

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

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

Through its integrated design approach, PLAN1 is a design-led response to building strong and inclusive communities. PLAN1 is the overarching design policy for the implementation of the Local Plan and the Local Plan is clear that high quality design is very important. The four key design principles are considered an essential part of delivering the vision and objectives of the Local Plan, these have evolved from the Government's Lifetime Neighbourhood principles. Policy PLAN1 has adopted the Lifetime Neighbourhood principles that are directly related to planning and development in forming appropriate key design principles for use in a Local Plan and can apply to all chapters of the Local Plan. The four principles: Connected; Contextual, Inclusive and Sustainable are all crucial to delivering development that meets Islington's needs.

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

### **3. Area Spatial Strategies**

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

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

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

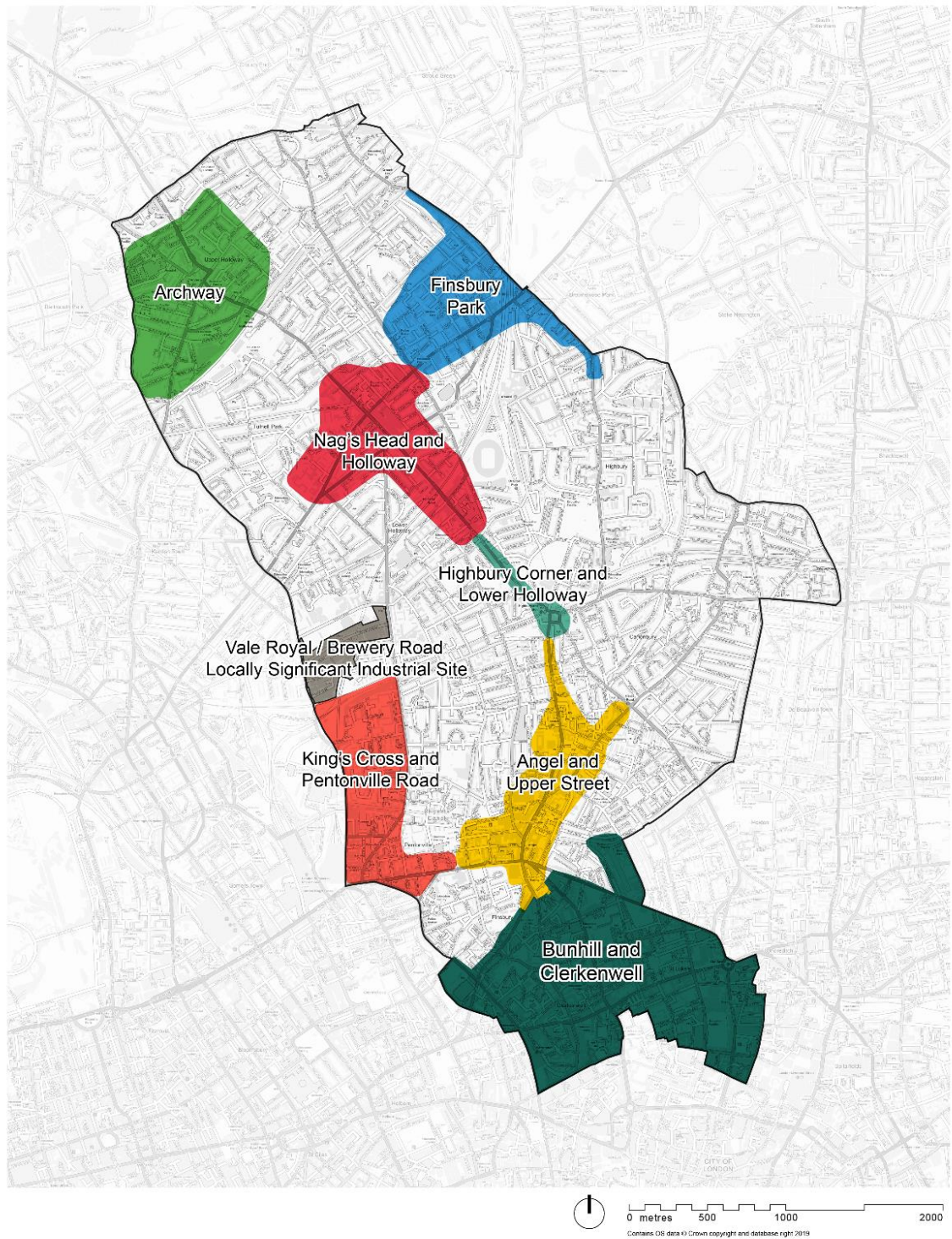


The area spatial strategies help deliver the Local Plan objectives and are the spatial expression of the Local Plan policies which are assessed in full. All site allocations in the area spatial strategies have been assessed. For completeness and consistency the spatial strategy policies have been considered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

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

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

**Figure 3.1: Map showing Area Spatial Strategies**



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

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

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

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

Most of the spatial areas accommodate a range of uses and do not restrict other uses. In terms of alternative uses which should have been assessed by the IIA as reasonable alternatives, the one use which is restricted, to an extent, across the town centre focused spatial areas is residential uses in town centres. This is set out in Policy R3. Other restricted uses such as hotels and Purpose built student accommodation have had a more permissive alternative considered which could potentially be an alternative in some of the spatial strategy areas<sup>3</sup>. With regards conventional residential use the topic paper for Retail, Leisure and Services, Culture and Visitor Accommodation (SD22) sets out why the council considers residential uses to be problematic in terms of how they co-exist with a broad range of commercial uses found in Town Centres as well as the risks posed in terms of their potential negative impacts on commercial uses. Residential uses are not precluded. Policy R3 strongly resists residential uses at ground floor level. Changes of use at upper floor levels, whilst permitted, would have to comply with criteria in relation to residential quality, impact on continued operation of other town centre uses and loss of ancillary floorspace. The significant additional promotion of residential use in the town centre spatial strategy areas has not been included as an alternative as it would conflict with the borough wide approach.

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

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<sup>3</sup> Paragraphs 4.206 to 4.211 Integrated Impact Assessment Islington Local Plan Proposed Submission (Regulation 19), September 2019

## 4. Thriving Communities

### Consideration of alternative for Policy H1

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

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

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

The reasonable alternative relates to criterion H 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.

Table 3.2 Policy H2 alternative description

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

Table 3.3: Assessment of alternative for Policy H2: New and existing conventional housing (criterion H)

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

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

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



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

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

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

## Summary

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

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

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

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

Table 3.4: Policy H3 Alternative Description

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

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

Table 3.5 Assessment of Alternatives for Policy H3 – Affordable Housing and Viability

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

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

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

IIA Objective	Policy H3	Alternative 1 to Policy H3	Alternative 2 to Policy H3	Alternative 3 to Policy H3	Alternative 4 to Policy H3	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
5. Ensure that all residents have access to good quality, well-located, affordable housing	++	--	-	-	--	<p>Policy H3 will have significant positive effect. It will increase the delivery of affordable housing through implementation of robust policy and the refusal of applications which do not provide the appropriate level of AH; and through collection of financial contributions which will go toward measures to further increase AH supply. The policy requires that the majority of AH secured is social rent, which reflects housing need established by evidence.</p> <p>There is a significant negative effect for policy H3 alternative 1, as it would likely result in less affordable housing being delivered when considered over the plan period and therefore contribute less to meeting the boroughs identified need for affordable housing. Given the Viability evidence which demonstrates that more than 35% affordable housing can be achieved through this approach whilst positive when considered against the baseline, in comparison to the preferred approach has a minor negative effect.</p> <p>There is a minor negative effect for policy H3 alternative 3. The alternative would result in less contributions towards affordable housing and may dis-incentivise higher density development (as 1 or 2 unit schemes may be preferred due to the non-imposition of contributions).</p> <p>Alternative 4 for policy H3 would have a significant negative effect on access to affordable housing - the London Borough of Islington has received small sites affordable housing contributions amounting to £12.4 million since 2014. Reducing the contributions for affordable housing from small sites contributions to zero would result in a loss in contributions and have a direct effect on the delivery of council housing to meet significant identified affordable housing needs. Meeting the affordable need in Islington is likely to</p>



IIA Objective	Policy H3	Alternative 1 to Policy H3	Alternative 2 to Policy H3	Alternative 3 to Policy H3	Alternative 4 to Policy H3	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
						<p>be impossible. The level of need is greater than the entire housing target for the plan period, therefore even if Islington meets its housing targets entirely through the provision of social rented accommodation, this would not meet affordable need. Islington has the eighth highest quartile house price in the country yet close to a third of Islington households have incomes of less than £20,000 per year, a higher proportion than the London average. This is why a key objective for the Local Plan is the delivery of affordable housing. Whilst there may be a positive effect on stimulating housing delivery overall from small developers by allowing minor development to be exempt from affordable housing contributions this will not make the housing provided any more affordable in the Islington context and therefore not contribute to helping meet the need for affordable housing in the borough.</p> <p>In addition, the effect of permitted development rights for upwards extensions is likely to reduce the quantum of contributions from small scale development by taking away the ability to require affordable housing contributions from this development. This further increases the need for development which can provide affordable housing contributions to deliver this.</p> <p>Alternative 2, whilst similar to alternative 1, introduces more flexibility to provide site specific viability evidence for every development proposal, an approach akin to the achieving 'the maximum reasonable amount' set out in the current adopted policy. The effect is considered to have a minor negative effect in the short and medium term. Developers providing individual site viability evidence for every individual scheme should achieve the same outcome as the preferred approach based on the results of a viability assessment. Seeking the maximum amount possible based on individual site viability should achieve similar results to the</p>

IIA Objective	Policy H3	Alternative 1 to Policy H3	Alternative 2 to Policy H3	Alternative 3 to Policy H3	Alternative 4 to Policy H3	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
						<p>preferred approach which is reliant on the evidence that sites can viably deliver 45% or more affordable housing. Also alternative 2 provides the most flexibility for developers to demonstrate individual site circumstances where there might be possible issues with viability. However this very flexibility is considered to create greater uncertainty in the longer term as providing developers the opportunity to put forward a viability case for every scheme will likely lead to delays, which could reduce the rate of delivery of housing and potentially the quantum of affordable housing with protracted negotiations for each site. In the longer term this negative effect is considered to become more significant and could affect the wider delivery of housing by creating greater uncertainty affecting the land market by distorting the price developers pay for land where they consider there is the opportunity to challenge policy on viability grounds. When developers overpay for land then they are unable to provide adequate viability evidence which can lead to lengthy procedural challenges and ultimately the sale of the site as has been evidenced in a number of cases in the borough previously.</p>
6. Promote social inclusion, equality, diversity and community cohesion	+	-	-	-	--	<p>Policy H3 will have minor positive effects. Increased delivery of AH could help reduce the negative consequences of relative poverty by reducing the proportion of income spent on accommodation and therefore freeing up a greater proportion of income for other living costs. AH is also an important component in delivering mixed and balanced communities which will improve social cohesion and integration.</p> <p>Minor negative effects for alternatives 1 and 3 and a significant negative effect for alternative 4 for policy H3. For the reasons</p>

IIA Objective	Policy H3	Alternative 1 to Policy H3	Alternative 2 to Policy H3	Alternative 3 to Policy H3	Alternative 4 to Policy H3	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
						<p>outlined in response to objective 5 the alternatives would deliver less affordable housing, which would do less to reduce poverty and result in less community cohesion. Alternative 4 is judged to have a more significant effect with considerable impacts on reducing contributions from small sites. Small sites are set to contribute significant amounts of housing to the boroughs housing target and therefore will contribute significant contributions to affordable housing. The London Borough of Islington has received small sites affordable housing contributions amounting to £12.4 million since 2014.</p> <p>Alternative 2 is considered to have a minor negative effect. For the reasons outlined in response to objective 5 the alternatives would deliver less affordable housing, which would do less to reduce poverty and social exclusion.</p>
7. Improve the health and wellbeing of the population and reduce health inequalities	+	-	-	-	-	<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>Minor negative effects have been identified for alternatives 1, 3 and 4 as explained under objective 5 they would deliver less affordable housing, which means there would be less reduction in poverty which could affect health and wellbeing with links between housing costs and mental health issues for example.</p>

IIA Objective	Policy H3	Alternative 1 to Policy H3	Alternative 2 to Policy H3	Alternative 3 to Policy H3	Alternative 4 to Policy H3	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
						<p>Alternative 2 is considered to have a minor negative effect on the objective. Under objective 5 the alternative would deliver less affordable housing, which means there would be less reduction in poverty which could affect health and wellbeing with links between housing costs and mental health issues for example. Housing is one of the key determinants of health and wellbeing.</p>
<p>8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes</p>	+	0	0	0	-	<p>New effects for Policy H3 have been identified which changes the effect from neutral to minor positive following review of the IIA as part of the examination process. The provision of affordable housing can help retain labour in Islington which can help key public service areas and lower skilled employment. The significant expense of housing in the borough can act as a significant barrier to employment driving people out of the borough and potentially out of the capital.</p> <p>There are likely to be neutral effects from alternatives 1, 2 and 3 for policy H3. The provision of affordable housing can help retain labour in Islington which can help key public service areas and lower skilled employment. The significant expense of housing in the borough can act as a significant barrier to employment driving people out of the borough and potentially out of the capital. All the policy alternatives reduce the potential quantum of affordable housing delivered to varying extents as set out in more detail in response to objectives 2 and 5 above. Alternative 4 would reduce the contributions for affordable housing from small sites contributions to zero so would have a negative effect.</p>
<p>9. Minimise the need to travel and create accessible, safe and sustainable</p>	+	0	0	0	-	<p>A new effect has been identified which changes the effects from neutral to minor positive for H3 following review of the IIA as part of the examination process. The provision of affordable housing can help retain labour in Islington which can help key public service areas and lower skilled employment. The significant expense of housing in the borough can act as a significant barrier to</p>

IIA Objective	Policy H3	Alternative 1 to Policy H3	Alternative 2 to Policy H3	Alternative 3 to Policy H3	Alternative 4 to Policy H3	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
connections and networks by road, public transport, cycling and walking						<p>employment driving people out of the borough and potentially out of the capital this therefore can help reduce the need to travel.</p> <p>There are likely to be neutral effects from alternatives 1, 2 and 3 for policy H3. The provision of affordable housing can help retain labour in Islington which can help key public service areas and lower skilled employment. The significant expense of housing in the borough can act as a significant barrier to employment driving people out of the borough and potentially out of the capital increasing the need to travel. All the policy alternatives reduce the potential quantum of affordable housing delivered to varying extents as set out in more detail in response to objectives 2 and 5 above. Alternative 4 would reduce the contributions for affordable housing from small sites contributions to zero so would have a negative effect.</p>
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	0	0	0	No effect for alternatives to policy H3 or policy H3.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	0	0	0	No effect for alternatives to policy H3 or policy H3.

IIA Objective	Policy H3	Alternative 1 to Policy H3	Alternative 2 to Policy H3	Alternative 3 to Policy H3	Alternative 4 to Policy H3	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	+	0	0	0	0	<p>New effect has been identified which changes the effects from neutral to minor positive for H3 following review of the IIA as part of the examination process.. The provision of affordable housing can help retain labour in Islington which can help key public service areas and lower skilled employment. The significant expense of housing in the borough can act as a significant barrier to employment driving people out of the borough and potentially out of the capital this therefore can help reduce the need to travel and contribution to climate change.</p> <p>There are likely to be neutral effects from alternatives 1, 2 and 3 for policy H3. The provision of affordable housing can help retain labour in Islington which can help key public service areas and lower skilled employment. The significant expense of housing in the borough can act as a significant barrier to employment driving people out of the borough and potentially out of the capital and can increase the need to travel and consequently increase emissions. All the policy alternatives reduce the potential quantum of affordable housing delivered to varying extents as set out in more detail in response to objectives 2 and 5 above. Alternative 4 would reduce the contributions for affordable housing from small sites contributions to zero so would have a negative effect.</p>
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that	0	0	0	0	0	No effect for alternatives to policy H3 or policy H3.

IIA Objective	Policy H3	Alternative 1 to Policy H3	Alternative 2 to Policy H3	Alternative 3 to Policy H3	Alternative 4 to Policy H3	<b>Commentary on assessment of likely significant effects of policies</b> (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
optimises resource use and minimises waste						
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	0	0	0	No effect for alternatives to policy H3 or policy H3.

## Summary

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

The appraisal highlights the quite wide ranging draw-backs to exempting either all small sites or some small sites, including because it can lead to development sites being under-utilised, e.g. delivery of a small number of overly large new homes (so as to be exempt from making a contribution to affordable housing) rather than a larger number of appropriately sized new homes. The significant reduction in financial contributions of not requiring any contributions from small sites was identified as having a significant negative effect on the delivery of

affordable housing overall. Whilst it is recognised that the policy could lead to viability challenges for some small sites, there is flexibility in policy to take account of site specific viability evidence in exceptional circumstances. The submission policy is supported by the Local Plan Small Sites Viability Study tested the viability for different types of small site and concluded that the majority of development typologies will be able to absorb the required level of financial contributions set out in the submission policy.



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

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

Table 3.6 Policy H4: Alternative Description

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

The following list are the areas where Policy H4 provides further detail to that set out in the National Standards:

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

- suitable and flexible bathrooms
- wheelchair accessible refuse storage

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

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

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

Table 3.7: Assessment of Alternatives for Policy H4: Delivering high quality housing

IIA Objective	Policy H4	Alternative 1 to Policy H4	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
1. Promote a high quality, inclusive, safe and sustainable built environment	++	-	<p>Policy H4 will have a significant positive effect. Delivery of the policy requirements will create inclusive, robust and adaptable buildings that can respond to changes over their life, for example, ensuring minimum space standards and wheelchair accessible/adaptable standards will enable a unit to be occupied by families with young children, and older people. The standards set out in H4 are people-focused to ensure that the needs of individuals and families are at the heart of new housing in the borough.</p> <p>There is a minor negative effect for the policy H4 alternative as implementation of the National Technical Housing Standard would not create the same level of robust and adaptable buildings that can respond to change over their lifetime. The National Technical Housing Standard would be applied to new build proposals only and does not consider redevelopment of existing buildings, which would mean a number of applications not be subject to specific design standards.</p>
2. Ensure efficient use of land, buildings and infrastructure	++	+	<p>Policy H4 will have significant positive effect. It ensures that where housing is developed, it is high quality which helps make the most out of land available. Policy H4 includes a number of design standards which mean that homes are adaptable to meet a range of needs over their lifetime. These standards link with other plan policies including sustainable design requirements to ensure that development contributes to a broad range of plan priorities and hence meets a broad range of identified needs. It is noted that H4 includes minimum space standards which have an impact on how efficiently land is used and mitigates the impact of potentially low quality small units/person. Space standards would also apply to the alternative.</p> <p>The National Technical Housing Standard does not preclude the provision of two storey wheelchair housing with an internal lift, which, based on Islington experience, is inconvenient, expensive and unsustainable and rejected by the vast majority of those on the housing waiting list. Similarly, where units are located above ground level and no second (back-up) lift is provided, they have proven to be less desirable, due to concerns about mechanical breakdown of single lifts and the impacts this could cause on access and movement of wheelchair users. These issues mean that wheelchair units may not end up housing disabled people, which means that needs for wheelchair housing would go unfulfilled.</p> <p>However not applying the local standards in relation to accessibility, ceiling heights and restricting two storey wheelchair housing, would result in a minor positive effect through making even more out of the land available albeit to the detriment of some aspects of quality. For example if more units</p>

IIA Objective	Policy H4	Alternative 1 to Policy H4	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
			<p>could access off one core, ceiling heights could be lower and corridors / entrances narrower then it may result in a small increase in overall unit delivery from a scheme. Cumulatively across the borough this could be considered a minor positive effect for the policy H4 alternative, regarding optimising the use of previously developed land.</p>
<p>3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.</p>	0	0	<p>No effect for policy H4 and alternative to policy H4.</p>
<p>4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles</p>	0	0	<p>No effect for policy H4 and alternative to policy H4.</p>
<p>5. Ensure that all residents have access to good quality, well-located, affordable housing</p>	++	0	<p>Policy H4 will have significant positive effect. It will ensure that all housing is of a high quality through requirement to meet specific design standards, including minimum space standards. Taken together and with other policy requirements of the Local Plan, the standards in H4 will deliver homes that are adaptable to meet the diverse and changing needs of Islington's population. The policy requires adherence to tenure blind principles to ensure that affordable and market housing is integrated.</p>

IIA Objective	Policy H4	Alternative 1 to Policy H4	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
			<p>There is a neutral effect for the policy H4 alternative as implementation of the National Technical Housing Standard would provide a quality of housing that may not adequately meet the diverse needs of Islington's population, as it does not specify sufficient detail with regards to:</p> <ul style="list-style-type: none"> <li>• transport/drop off/storage to individual dwelling entrance will be limited to 75m</li> <li>• opening weight of common entrances and accessible ironmongery and entryphones</li> <li>• minimum width communal circulation corridors</li> <li>• sufficiently large enough common/ shared entrances for people to manoeuvre with shopping and/or baby buggies, and in wheelchairs, with ease</li> <li>• maximum number of dwellings accessed from a single core</li> <li>• flush internal thresholds</li> <li>• step free access to balconies and terraces</li> <li>• suitable and flexible bathrooms</li> <li>• wheelchair accessible refuse storage</li> </ul> <p>Lower ceiling heights of 2.3m would adversely affect levels of daylight and sunlight, over-heating and ventilation, flexibility and use of a room and the sense of space and general comfort of a dwelling. In the Islington context where higher density development is supported, higher ceilings are particularly important to off-set any impacts of higher density development.</p> <p>However not applying the local standards in relation to accessibility, ceiling heights and restricting two storey wheelchair housing, would result in a minor positive effect through making even more out of the land available albeit to the detriment of the aspects of quality noted. For example if more units could access off one core, ceiling heights could be lower and corridors / entrances narrower then it may result in a small increase in overall unit delivery from a scheme. Cumulatively across the borough this could be considered a minor positive effect for the policy H4 alternative, regarding optimising the use of previously developed land.</p> <p>On balance the positive effect of increasing supply and meeting more housing need is not considered to outweigh the potential negative effects on overall quality of housing that the alternative to Policy H4 would have and the overall the effect is considered to be neutral.</p>

IIA Objective	Policy H4	Alternative 1 to Policy H4	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
6. Promote social inclusion, equality, diversity and community cohesion	++	0	<p>Policy H4 will have a significant positive effect. The requirement for new development to be ‘tenure blind’ will promote social cohesion and integration. This requirement, and others included in H4 such as requiring certain proportions of wheelchair accessible and adaptable properties, could lead to greater equity between population groups and those with protected characteristics.</p> <p>No effect for alternative to policy H4.</p>
7. Improve the health and wellbeing of the population and reduce health inequalities	++	-	<p>Policy H4 will have significant positive effect. The policy is underpinned by the idea of the home as a place of retreat where people can feel comfortable and safe. Delivery of high quality homes in line with H4 is therefore likely to improve health and wellbeing. H4 has specific requirements relating to noise and vibration to ensure that potential impacts are identified and mitigated. The policy also includes detailed measures to promote natural ventilation (and thereby reducing reliance on mechanical ventilation which would increase energy usage); this could assist with reducing fuel poverty. The policy requires development to maximise natural light into rooms with a requirement for direct sunlight to enter main habitable rooms for a reasonable period of the day and a requirement for minimum floor to ceiling heights. Higher ceiling heights create a sense of space and improve quality of accommodation and also help keep rooms cooler in summer, which help improve peoples’ health and wellbeing.</p> <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>
8. Foster sustainable economic growth and increase employment opportunities across a range of	0	0	No effect for policy H4 and alternative to policy H4.

IIA Objective	Policy H4	Alternative 1 to Policy H4	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
sectors and business sizes			
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	0	0	No effect for policy H4 and alternative to policy H4.
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	No effect for policy H4 and alternative to policy H4.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	No effect for policy H4 and alternative to policy H4.

IIA Objective	Policy H4	Alternative 1 to Policy H4	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	+	-	<p>There are minor positive effects for policies H1 and H4. Both policies promote high quality housing which is comfortable, improves the quality of life of residents and contributes to improvements in health. What constitutes 'comfortable' is ever changing given the increasing impacts of climate change, but the policies promote the mitigation and adaptation of climate change impacts through design without reliance on technological and/or retrofitted solutions. For example, Policy H4 includes detailed housing standards including measures to reduce impacts of noise and vibration and to promote natural ventilation (and thereby reducing reliance on mechanical ventilation which would increase energy usage). The policy requires development to maximise natural light into rooms with a requirement for direct sunlight to enter main habitable rooms for a reasonable period of the day and a requirement for minimum floor to ceiling heights. Higher ceiling heights help keep rooms cooler in summer reducing need for mechanical ventilation and maximising light reduces period when electrical light is used.</p> <p>There is a minor negative effect for the policy H4 alternative. The National Technical Housing Standard does not preclude two storey wheelchair housing with an internal lift. As well as being inconvenient and expensive (which often leads to wheelchair dwellings with a lift being rejected by the vast majority of those on the housing waiting list), lifts also require additional energy and therefore contributes to an increase in carbon emissions and fuel poverty.</p> <p>In addition, lower ceiling heights would increase the likelihood of over-heating through reduced ventilation and therefore not encourage resilience of the housing stock to address changing conditions due to climate change.</p>
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource	++	-	<p>Policy H4 will have significant positive effect. The policy requires new homes to consider how recycling and waste arising from occupation of the development will be stored, collected and managed, which could contribute to increased levels of recycling. Policy H4 includes a number of design standards which mean that homes are adaptable to meet a range of needs over their lifetime. This will contribute to the delivery of a circular economy.</p> <p>There is a minor negative effect for the policy H4 alternative, regarding ensuring a design is appropriate for the lifetime of the development. Implementation of the National Technical Housing Standard would be applied to new build proposals only and not the development of existing buildings so misses the opportunity to create an overall stock of homes that is adaptable and capable of flexing</p>



IIA Objective	Policy H4	Alternative 1 to Policy H4	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
use and minimises waste			to diverse and changing needs. The lesser standards than those proposed in the policy approach would also mean that more resource intensive future adaptations may be necessary, rather than considering meeting a range of occupier needs from the outset.
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	No effect for policy H4 and alternative to policy H4.

## Summary

Whilst there could be benefits to increasing the supply of housing from the alternative, it is not possible to conclude that these would be significant enough and that both more homes and more affordable homes would be delivered to outweigh the negative effect of lower quality housing. It is noted that the Local Plan Viability Study (2018) applies construction costs that mirror construction standards contained in the London Plan therefore the study broadly considers standards similar to the local standards - ceiling heights for example are similar in the adopted London Plan which strongly encourages ceiling heights of at least 2.5 metres.

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

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

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

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

Table 3.8 Policy H6: Alternative Description

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

Table 3.9 Assessment of Alternatives for Policy H6: Purpose-built student accommodation

IIA Objective	Policy H6	Alternative 1 to Policy H6	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and	0	0	New effects have been identified which improve the effects for H6 and H10 following review of the IIA as part of the examination process. The policies will have minor positive effects through the requirement for site management plans which will help to manage potential for anti-social behaviour such as noise affects helping contribute to a safer environment.

IIA Objective	Policy H6	Alternative 1 to Policy H6	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
sustainable built environment			<p>New effects have been identified which changes the effects from neutral to minor negative for H6, H7, H10 and H11 following review of the IIA as part of the examination process. These uses in most cases would not deliver sufficiently flexible and adaptable buildings for evolving social and economic needs, compared to conventional housing which meets the broadest spectrum of housing need.</p> <p>Large-scale HMOs and student accommodation in particular tend to be small in terms of space, which in most cases is not sustainable in terms of the ability to meet a range of needs, e.g. families, in the future.</p> <p>Overall considering the above minor negative effects for H6 and H10 around flexible and adaptable buildings together with the minor positive effects for site management plans is considered to have an overall neutral effect for these policies.</p>
2. Ensure efficient use of land, buildings and infrastructure	-	-	<p>There is a minor negative effect for the policies H6, H7, H10 and H11. The <b>land uses</b> would not be sufficiently flexible and adaptable <b>in most cases</b> to accommodate evolving social and economic needs, compared to conventional housing which meets the broadest spectrum of housing need. There is no evidence to suggest that any of these forms of accommodation can provide the same level of flexibility and adaptability as conventional housing in meeting housing need over the short, medium and long term as conventional housing development can. Policy H11 would reduce the ability of development to meet wider development needs through likelihood of delivering less affordable housing. Providing these forms of accommodation would therefore not optimise the use of land.</p> <p>There is a minor negative effect for policy H6 alternative. The alternative would not be sufficiently flexible and adaptable to accommodate evolving social and economic needs, compared to conventional housing which meets the broadest spectrum of housing need. There is no evidence to suggest that purpose built student accommodation can provide the same level of flexibility and adaptability as conventional housing in meeting housing need over the short, medium and long term as conventional housing development can. Providing this form of accommodation would therefore not optimise the use of land.</p>
3. Conserve and enhance the significance of heritage assets and their settings,	0	0	No effect for policy H6 and alternative to policy H6.

IIA Objective	Policy H6	Alternative 1 to Policy H6	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
and the wider historic and cultural environment.			
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	+	+	<p>New effects have been identified which changes the effects from neutral to minor positive for H6 and H10 following review of the IIA as part of the examination process. The policy will have minor positive effects through the requirement for a site management plan which will in part manage potential for noise related anti-social behaviour which can help contribute to a safer environment. In addition the policy makes clear that change of use on a temporary basis to visitor accommodation is not acceptable.</p> <p>The alternative to Policy H6 would have same effect as policy H6 which would be more positive if the alternative delivers more student accommodation.</p>
5. Ensure that all residents have access to good quality, well-located, affordable housing	-	--	<p>There is a minor negative effect for the land uses H6, H10 and H11. They would likely provide less genuinely affordable housing overall than conventional models of housing although it is noted that they expect application of policy H4; in particular, these alternative models can make it more difficult to deliver social rented housing that is effectively integrated within a development. Whilst Policy H6 expects provision of affordable student accommodation, its recognised that this is not meeting affordable housing need so can't be considered to help meet an identified need in the borough. In addition it is unclear whether affordable student accommodation would be likely to meet accommodation needs of Islington students. Therefore effect is considered negative. Policy H7 strongly resists market extra care accommodation and is supportive of social rent extra care so is considered neutral.</p> <p>Large-scale HMOs and student accommodation in particular tend to be small in terms of space, which is not sustainable in terms of the ability to meet a range of needs, e.g. families, in the future and do not represent a diversity of housing sizes.</p> <p>There is a significant negative effect for the alternative effect for policy H6 alternative as it would not increase the supply of affordable housing, rather it would provide affordable student accommodation and be a forgone opportunity for conventional housing delivery.</p>

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

IIA Objective	Policy H6	Alternative 1 to Policy H6	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	0	0	No effect for policy H6 and alternative to policy H6.
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	No effect for policy H6 and alternative to policy H6.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	No effect for policy H6 and alternative to policy H6.
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	0	No effect for policy H6 and alternative to policy H6.
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular	-	--	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.

IIA Objective	Policy H6	Alternative 1 to Policy H6	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
economy that optimises resource use and minimises waste			There is a significant negative effect for the alternative to policy H6 as due to their design, purpose-built student accommodation may be less able to respond to changing needs (such as accommodating families), and would therefore require potentially considerable resource to renovate the design to meet such needs. There is a significant negative effect for the alternative policy H6 compared to H6 given the potential increase in quantity of purpose-built student accommodation the alternative would support.
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	No effect for policy H6 and alternative to policy H6.

## Summary

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

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

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

Table 3.10: Policy H7 Alternative Description

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

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

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



Table 3.11 Assessment of Alternatives to Policy H7: Meeting the Needs of Vulnerable Older People

IIA Objective	Policy H7	Alternative 1 Policy H7	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	0	-	<p><b>New effects have been identified which improve the effects for neutral to minor positive for H7 following review of the IIA as part of the examination process. The policy will have minor positive effects as it expects the suitability of a site for older persons accommodation to consider the context of the surrounding neighbourhood and the development of other priority land uses and creation of mixed and balanced communities.</b></p> <p><b>New effects have been identified which changes the effects from neutral to minor negative for H6, H7, H10 and H11 following review of the IIA as part of the examination process. These uses in most cases would not deliver sufficiently flexible and adaptable buildings for evolving social and economic needs, compared to conventional housing which meets the broadest spectrum of housing need.</b></p> <p><b>Overall considering the above minor negative effects for H7 around flexible and adaptable buildings together with the minor positive effects for consideration of surrounding context the policy is considered to have an overall neutral effect.</b></p> <p>The alternative more permissive approach would lead to more market older peoples housing which would not be sufficiently flexible and adaptable and is considered to have an overall minor negative effect.</p>
2. Ensure efficient use of land, buildings and infrastructure	0	-	<p>There is a minor negative effect for the policies H6, H7, H10 and H11. The land uses would not be sufficiently flexible and adaptable in most cases to accommodate evolving social and economic needs, compared to conventional housing which meets the broadest spectrum of housing need. There is no evidence to suggest that any of these forms of accommodation can provide the same level of flexibility and adaptability as conventional housing in meeting housing need over the short, medium and long term as conventional housing development can. <b>New effects have been identified which have a minor positive for H7 following review of the IIA as part of the examination process. There is a positive effect from policy H7 as it focuses development of older peoples accommodation in the right locations appropriate to the needs of the occupiers. The policy alternative will have the same positive effect. This positive effect would not outweigh the negative effect on flexibility and adaptability for the alternative but is considered overall neutral for the policy.</b></p>

IIA Objective	Policy H7	Alternative 1 Policy H7	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
			<p>Overall there is a minor negative effect for the policy alternative to policy H7.</p> <p>A more permissive approach would lead to more market older peoples housing which would not be sufficiently flexible and adaptable to accommodate evolving social and economic needs, compared to conventional housing which meets the broadest spectrum of housing need. There is no evidence to suggest that market older peoples housing can provide the same level of flexibility and adaptability as conventional housing in meeting older persons housing need over the short, medium and long term as conventional housing development can. Meeting the broadest spectrum of need is the most efficient use of land in the short term but also in the longer term. If needs change in the longer term the flexibility of conventional housing means that it can provide the opportunity to meet other needs as well as general housing needs.</p> <p>The assessment of the policy H7 identified a similar minor negative effect, although it can be considered to be of less significance than the more permissive alternative.</p> <p>New effects have been identified which have a minor positive for H7 following review of the IIA as part of the examination process. There is a positive effect from policy H7 as it focuses development of older peoples accommodation in the right locations appropriate to the needs of the occupiers. The policy alternative will have the same positive effect. The assessment does not consider that this negative effect outweighs the negative effect for both policy H7 and the alternative to policy H7.</p>
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	0	No effect for the alternative to Policy H7 or policy H7.
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	+	+	<p>New effects have been identified which changes the effects from neutral to minor positive for H7 and H9 following review of the IIA as part of the examination process. The policies will have minor positive effects as they expect sites for older persons accommodation / supported housing to be easily accessible to shops, services and community facilities which helps provide access to and support to existing services.</p> <p>The alternative for policy H7 would have the same minor positive effect as policy H7.</p>

IIA Objective	Policy H7	Alternative 1 Policy H7	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	-	<p>Policy H7 strongly resists market extra care accommodation and is supportive of social rent extra care so is considered neutral. <b>New explanation has been identified as part of the assessment of the alternative to Policy H7. Policy H7 strongly resists market extra care, therefore provides more conventional housing and avoids difficulties around social rented provision. Policy H7 is also supportive of social rent extra care is considered neutral because it does not maximise the quantum of housing provided compared to conventional housing.</b></p> <p>The more permissive approach alternative to policy H7 would lead to more market older peoples housing which would not be sufficiently flexible and adaptable to accommodate evolving social and economic needs, compared to conventional housing which meets the broadest spectrum of housing need. There is no evidence to suggest that market older peoples housing can provide the same level of flexibility and adaptability as conventional housing in meeting older persons housing need over the short, medium and long term as conventional housing development can. In addition alternative models such as market extra care can make it more difficult to deliver social rented housing that is effectively integrated within a development.</p> <p>Use of the London Plan benchmark would help promote provision of specialist housing, with 60 units a year sought in Islington and when combined with a permissive approach may lead to more proposals for specialist housing provision coming forward. This would contribute to meeting wider London needs in addition to any local older peoples specialist housing needs, which would be a positive effect, although this would detract from meeting the full range of housing needs in the borough given the less flexible nature of the accommodation as noted above. This support for market extra care accommodation would contrast with the evidence set out locally in the SHMA and other evidence which supports a greater need for social rent extra care in the borough.</p> <p>On balance the positive effect of the alternative of meeting more than Islington needs could be considered to neutralise the negative effect of the lack of flexibility and adaptability of specialist accommodation for older people but it is not considered to outweigh the negative effects. There are difficulties in delivering social rented housing from this source of supply and it is considered likely that integrating affordable extra care alongside market care would be more difficult. It is also noted that meeting more housing need for older people would detract from meeting wider housing needs. Policy H7 which strongly resists market extra care, therefore provides more conventional housing and avoids difficulties around social rented provision. Policy H7 is also supportive of social rent extra care is considered neutral because it does not maximise the quantum of housing provided compared to conventional housing.</p>

IIA Objective	Policy H7	Alternative 1 Policy H7	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
6. Promote social inclusion, equality, diversity and community cohesion	0	0	<p>Policy H7 could be conceived to reduce the opportunity to provide market extra care homes but is considered to have no discernible effect on inclusion given the support that older people have for remaining in their own homes and living independently. This is considered in light of the Councils intention to support older people to remain in their own homes and live independently, with the assumption made that the Council will further develop ways and means of enabling this. Therefore it is considered to have a neutral effect.</p> <p>The alternative to Policy H7 and use of the London Plan benchmark would help promote provision of specialist housing and combined with a permissive approach may lead to more proposals for specialist housing provision coming forward which go beyond meeting local needs. This would improve social exclusion for those able to access market extra care. Therefore this aspect is considered to have a minor positive effect, although the effect of doing this would be to the detriment of delivering general purpose housing which meets wider needs would exclude more from housing and social exclusion which cancels out this positive effect.</p>
7. Improve the health and wellbeing of the population and reduce health inequalities	+	+	<p>Policy H7 has a minor positive effect. The policy would enable people to stay in their own home which can have positive benefits in terms of mental and physical health. Policy H7 would also have a minor positive effect as care home accommodation has to demonstrate compliance with various design issues including providing access to communal outdoor space.</p> <p>The alternative to Policy H7 and use of the London Plan benchmark would help promote provision of specialist housing and combined with a permissive approach may lead to more proposals for specialist housing provision coming forward which go beyond meeting local needs. This is likely to have a minor positive effect on the health inequalities for older people who need the facilities provided by specialist older peoples accommodation. It is noted that not all the facilities provided by market extra care are necessary for improving peoples health and wellbeing.</p>
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	0	0	No effect for Policy H7 or the alternative to Policy H7.

IIA Objective	Policy H7	Alternative 1 Policy H7	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	+	+	There is a minor positive effect for both policy H7 and the alternative to policy H7 which ensure that proposals have easy access to public transport, shops, services and community facilities.
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	No effect for Policy H7 or the alternative to Policy H7.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	No effect for Policy H7 or the alternative to Policy H7.
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	0	No effect for Policy H7 or the alternative to Policy H7.

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

## Summary

The appraisal is quite finely balanced. The assessment considers that there is no evidence to suggest that market older peoples housing can provide the same level of flexibility and adaptability as conventional housing in meeting older persons housing need as conventional housing development can. In addition alternative models such as market extra care can make it more difficult to deliver social rented housing that is effectively integrated within a development. However the more permissive approach would contribute to meeting wider London needs in addition to local older peoples specialist housing needs, which would be a positive effect, although this would detract from meeting the full range of housing needs in the borough as noted above. On balance the positive effect of the alternative of meeting more than Islington needs could be considered to neutralise the negative effect of the lack of flexibility and adaptability of specialist accommodation for older people but it is not considered to outweigh the negative effects.

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

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

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

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

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

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

Table 3.12: Alternative Description for H10

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

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

Table 3.13: Assessment of Policy alternatives to: Policy H10: Houses in Multiple Occupation (large HMO)

IIA Objective	Policy H10	Alternative 1 to Policy H10	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and	0	0	New effects have been identified which changes the effects from neutral to minor positive for H6 and H10 following review of the IIA as part of the examination process. The policies will have minor positive effects



IIA Objective	Policy H10	Alternative 1 to Policy H10	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
sustainable built environment			<p>through the requirement for site management plans which will help to manage potential for anti-social behaviour such as noise affects helping contribute to a safer environment.</p> <p>New effects have been identified which changes the effects from neutral to minor negative for H6, and H10 following review of the IIA as part of the examination process. These uses in most cases would not deliver sufficiently flexible and adaptable buildings for evolving social and economic needs, compared to conventional housing which meets the broadest spectrum of housing need.</p> <p>Large-scale HMOs and student accommodation in particular tend to be small in terms of space, which in most cases is not sustainable in terms of the ability to meet a range of needs, e.g. families, in the future.</p> <p>Overall considering the above minor negative effects for H6 and H10 around flexible and adaptable buildings together with the minor positive effects for site management plans is considered to have an overall neutral effect for these policies.</p>
2. Ensure efficient use of land, buildings and infrastructure	-	-	<p>There is a minor negative effect for both the alternative to policy H10 and policy H10. The alternative would not be sufficiently flexible and adaptable to accommodate evolving social and economic needs, compared to conventional housing which meets the broadest spectrum of housing need. There is no evidence to suggest that large HMO accommodation can provide the same level of flexibility and adaptability as conventional housing in meeting housing need over the short, medium and long term as conventional housing development can. Providing these forms of accommodation would therefore not optimise the use of land. The more permissive alternative policy approach to large-scale HMO would increase the significance of this effect.</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 policy H10 or alternative for policy H10.</p>

IIA Objective	Policy H10	Alternative 1 to Policy H10	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	+	+	New effects have been identified which changes the effects from neutral to minor positive for H6 and H10 following review of the IIA as part of the examination process. The policy and the alternative to policy H10 will have minor positive effects through the requirement for a site management plan which will in part manage potential for noise related anti-social behaviour which can help contribute to a safer environment. In addition the policy makes clear that change of use on a temporary basis to visitor accommodation is not acceptable.
5. Ensure that all residents have access to good quality, well-located, affordable housing	-	--	There is a negative effect for both policy H10 and the alternative to policy H10 as both would likely provide less genuinely affordable housing overall than conventional models of housing although it is noted that they expect application of policy H4; in particular, alternative models can make it more difficult to deliver social rented housing that is effectively integrated within a development. The more permissive alternative policy approach to large-scale HMO would increase the significance of this effect.  In addition large-scale HMOs in particular tend to be small in terms of space, which is not sustainable in terms of the ability to meet a range of needs, e.g. families, in the future.
6. Promote social inclusion, equality, diversity and community cohesion	0	-	There is a minor negative effect which is created by this housing model potentially creating communities which are more itinerant because they are not designed for long term occupation therefore undermining social cohesion.
7. Improve the health and wellbeing of the population and reduce health inequalities	-	-	Policy H6 and H10 are both minor negative as they do not provide the same quality of residential accommodation as conventional housing with no private outdoor space for example undermining the concept of the home as a place of retreat. There is a minor negative effect for Policy H10 large-scale HMOs and the more permissive alternative policy approach to large-scale HMO would increase the significance of this effect but it is still considered minor negative.
8. Foster sustainable economic growth and increase employment opportunities	0	0	No effect for policy H10 or alternative for policy H10.

IIA Objective	Policy H10	Alternative 1 to Policy H10	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
across a range of sectors and business sizes			
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	0	0	No effect for policy H10 or alternative for policy H10.
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	No effect for policy H10 or alternative for policy H10.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	No effect for policy H10 or alternative for policy H10.
12. Reduce contribution to climate change and enhance	0	0	No effect for policy H10 or alternative for policy H10.

IIA Objective	Policy H10	Alternative 1 to Policy H10	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
community resilience to climate change impacts.			
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	-	--	There is a significant negative effect for the alternative to policy H10. Due to their design, large-scale HMOs may be less able to respond to changing needs (such as accommodating families), and would therefore require potentially considerable resource to renovate the design to meet such needs. The more permissive alternative policy approach to large-scale HMO would increase the significance of this effect.
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	No effect for policy H10 or alternative for policy H10.

## Summary

The assessment recognises that large-scale shared living developments may provide a housing option for non-family households who cannot or choose not to live in self-contained homes or HMOs; however, on balance there is considered to be a need to resist large-scale HMOs in the Islington context. This context – the shortage of land and overwhelming need to meet the broadest spectrum of need is the key reason for

guarding against a proliferation of large HMOs which in most cases is not sustainable in terms of the ability to meet a range of needs, e.g. families, in the future.

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

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

Table 3.14 Alternative description for Policy H11

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

Table 3.15 Assessments of Alternatives for Policy H11: Purpose Built Private Rented Sector development

IJA Objective	Policy H11	Alternative 1 Policy H11	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	-	-	New effects have been identified which changes the effects from neutral to minor negative for H6, H7, H10 and H11 following review of the IJA as part of the examination process. These uses in most cases would not deliver sufficiently flexible and adaptable buildings for evolving social and economic needs, compared to conventional housing which meets the broadest spectrum of housing need. The more permissive alternative policy approach to private rented sector development would increase the significance of this effect.
2. Ensure efficient use of land,	-	-	There is a minor negative effect for policy H11 and policy alternative to H11. Both policy approaches to land uses would not be sufficiently flexible and adaptable in most cases to accommodate evolving social and

IIA Objective	Policy H11	Alternative 1 Policy H11	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
buildings and infrastructure			economic needs, compared to conventional housing which meets the broadest spectrum of housing need. There is no evidence to suggest that PRS can provide the same level of flexibility and adaptability as conventional housing in meeting housing need over the short, medium and long term as conventional housing development can. Providing these forms of accommodation would therefore not optimise the use of land. The more permissive alternative policy approach to private rented sector development would increase the significance of this effect.
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	0	No effect for policy H11 and policy alternative to H11.
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	0	0	No effect for policy H11 and policy alternative to H11.
5. Ensure that all residents have access to good quality, well-located, affordable housing	-	--	There is a minor negative effect for policy H11 and significant negative effect for policy alternative to H11. Purpose built Private Rented Sector would likely provide less genuinely affordable housing overall than conventional models of housing although it is noted that they expect application of policy H4; in particular, these alternative models can make it more difficult to deliver social rented housing that is effectively integrated within a development. The more permissive alternative policy approach to private rented sector development would increase the significance of this effect.
6. Promote social inclusion, equality, diversity and	0	0	No effect for policy H11 and policy alternative to H11.

IIA Objective	Policy H11	Alternative 1 Policy H11	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
community cohesion			
7. Improve the health and wellbeing of the population and reduce health inequalities	+	+	New effects have been identified which changes the effects from neutral to minor positive for Policy H11 following review of the IIA as part of the examination process. The policy expects high quality housing in line with H4 which has various aspects to which is overall likely to improve health and wellbeing. The same effect will be created for the alternative to Policy H11.
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	0	0	No effect for policy H11 and policy alternative to 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	No effect for policy H11 and policy alternative to H11.
10. Protect and enhance open spaces that are high quality, networked,	0	0	No effect for policy H11 and policy alternative to H11.



IIA Objective	Policy H11	Alternative 1 Policy H11	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
accessible and multi-functional			
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	No effect for policy H11 and policy alternative to H11.
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	0	No effect for policy H11 and policy alternative to H11.
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	No effect for policy H11 and policy alternative to H11.

IIA Objective	Policy H11	Alternative 1 Policy H11	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	No effect for policy H11 and policy alternative to H11.

## Summary

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

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

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

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

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

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

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

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

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

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

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

## 4. Inclusive Economy

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

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

Table 3.16: Alternative Description for Policies SP3, B1 and B2 – Locally Significant Industrial Sites (LSIS)

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

#### Background to alternatives

Alternatives 1 and 2 assess the co-location of industrial floorspace with housing or offices. New London Plan policy E7 refers to boroughs exploring co-location of industrial with housing and/or other mixed uses. Co-location in this context refers to both intensification of industrial and housing and/or other mixed uses. Alternative 3 integrates the co-location of industrial with both housing and offices. The co-location of residential or other mixed uses with industrial is likely to lead to the intensification of all the uses in question, including industrial uses. The intensification of industrial floorspace is a desired outcome to sustain the economic function of the Vale Royal and Brewery Road Strategic

Spatial Area which is Islington's most significant LSIS. In recent years, the Vale Royal/Brewery Road LSIS has seen increased pressure from applications proposing large-scale office buildings, mixed office with industrial and residential. Whilst most of the applications have re-provided existing industrial floorspace, the extent to which the industrial floorspace has been intensified is very small or marginal compared to the losses experienced in recent years. In addition, a characteristic of the Vale Royal/Brewery Road LSIS is that space is limited. Whilst there is still scope for intensification in some areas currently occupied by warehouse buildings of one or two storeys, there are other areas which are already more densely developed with existing four storey buildings (particularly along Brewery Road and some sections of Brandon Road and Tileyard Road). The area has a distinctive industrial character and design features which are clearly linked to the industrial function of its business cluster. In addition, most of its internal routes have narrow to very narrow street profiles. Although the co-location of non-industrial uses with residential, offices or other mixed uses could in theory lead to the intensification of industrial uses, the assessments of alternatives 1, 2 and 3 consider the already constrained nature of the Vale Royal/Brewery Road LSIS. The long term sustainability of the LSIS as an industrial business cluster depends on the extent to which other uses are intensified along with industrial uses. Further, whilst residential use can be compatible with some industrial activities such as light industrial uses, this is less the case with other industrial uses such as warehousing and distribution/logistics. Similarly to the alternatives considered in this part of the assessment for policy SP3, the various uses considered within class E could have impacts in the operation of industrial businesses, which could lead to issues such as lack of space for loading facilities and negative effects on air quality and amenity. The assessment of potential impacts of Class E for this policy is included in part 2 of this IIA addendum.

Table 3.17 Assessment of Alternatives for Policies SP3, B1 and B2 – Locally Significant Industrial Sites (LSIS)

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

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



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

IIA Objective	Policy SP3 (and parts of B1 and B2): protecting and promoting industrial uses in the LSIS	Alternative 1 to Policy SP3 (and parts of B1 and B2): housing co-location in LSIS	Alternative 2 to Policy SP3 (and parts of B1 and B2): office co-location in LSIS	Alternative 3 to Policy SP3 (and parts of B1 and B2): housing and office co-location in LSIS	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
					<p>potential for the land use balance to quickly shift to offices which could start to exclude industrial use. Also, there are other locations promoted for office use across the borough. But there are land use benefits from the co-location of offices with industrial, depending on the extent to which offices are intensified, which if it remains small scale then on balance, this alternative is considered to have neutral effects for the objective.</p> <p>For alternative 3, the co-location of mixed office and residential uses could optimise the use of sites and bring more efficient uses which are adaptable to future economic needs. However, there could be negative effects on the primary economic function of the area because the range of industrial uses or size of resulting facilities may not be viable for all the range of existing and future operations in the LSIS (i.e. yard space), which would have a negative impact on balancing competing demand for development needs in the area.</p>
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	0	0	0	<p>New effects have been identified for Policy SP3 following review of the IIA as part of the examination and changed the effects from minor positive to neutral. Whilst the policy sets out height restrictions, part of the rationale for which is due to specific heritage considerations in the area the updated assessment considers that some of the maximisation of employment space and intensification supported by policy B1 and B2 might have a minor negative impact on the significance of heritage assets and their settings. This would depend on the wider historic environment and on implementation. This could happen if development has negative impacts in terms of massing, scale, visual impacts. However this is counterbalanced by other local plan policies such as PLAN1 and DH1, DH2 and DH3 and to an extent SP3 which favours refurbishment projects. The impact is therefore considered to be neutral.</p>

IIA Objective	Policy SP3 (and parts of B1 and B2): protecting and promoting industrial uses in the LSIS	Alternative 1 to Policy SP3 (and parts of B1 and B2): housing co-location in LSIS	Alternative 2 to Policy SP3 (and parts of B1 and B2): office co-location in LSIS	Alternative 3 to Policy SP3 (and parts of B1 and B2): housing and office co-location in LSIS	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
					Alternatives 1,2 and 3 are assumed to have a similar effect to the assessment for policy SP3.
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	+	-	0	-	<p>New effects have been identified for Policy SP3 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. The Policy seeks to improve pedestrian connections throughout the LSIS. This could improve connections for residents with the primary school which is located in the LSIS.</p> <p>Alternative 1 would overall have a minor negative effect against the objective to promote liveable neighbourhoods. It may have a minor positive effect as the co-location of industrial with residential development may provide opportunities to connect to other neighbourhoods nearby with residents access to nearby Caledonian Road's shopping area. It could also provide opportunities to improve pedestrian access and develop further the sustainable transport networks in the area. The area also has a primary school. However, these benefits would need to be balanced against the existing industrial nature of the neighbourhood which would impact in particular on alternative 1 and the amenity of residential use. The presence of loading facilities and 24 hour operation are essential for many of the industrial activities which take place in the LSIS and result in amenity impacts, in particular noise, not compatible with residential use.</p> <p>No effect identified for alternative 2 to policies SP3, B1 and B2.</p> <p>Similarly, alternative 3 would have a minor negative effect against this objective. The mix of residential and office uses could promote more liveable neighbourhoods and bring opportunities to improve sustainable transport networks in the area. However, this is likely to impact on the extent to which</p>

IIA Objective	Policy SP3 (and parts of B1 and B2): protecting and promoting industrial uses in the LSIS	Alternative 1 to Policy SP3 (and parts of B1 and B2): housing co-location in LSIS	Alternative 2 to Policy SP3 (and parts of B1 and B2): office co-location in LSIS	Alternative 3 to Policy SP3 (and parts of B1 and B2): housing and office co-location in LSIS	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
					industrial activities operate and has the potential to undermine the primary function of the LSIS.
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	++	0	+	<p>There is no effect for policy SP3. There could be a minor negative impact in the supply of affordable housing. However, the LSIS is a functional industrial cluster, which includes some more traditional industrial uses that cannot coexist with housing. In addition other policies in the plan will help to meet housing targets in other locations. The assessment for policies B1 and B2 consider there is potential for a minor negative effect as the policies affect the supply of housing in certain locations across the borough, through prioritising business floorspace. However the assessment considers this to have no effect overall as other policy ensures housing is delivered outside the locations identified which will ensure housing targets are met.</p> <p>There would be a significant positive effect from Alternative 1 in that allowing residential uses in the LSIS would increase land available for housing and therefore affordable housing contributing to meeting housing need. In addition industrial land has relatively lower values so would be expected to be able to exceed affordable housing targets. The development of housing in the LSIS may present greater challenges than elsewhere for ensuring high quality design given the mitigation which may be required to address the amenity impacts of developing in LSIS.</p> <p>No effect for alternative 2. It could be considered that the alternative would have a minor negative impact in the supply of affordable housing. However, the LSIS</p>

IIA Objective	Policy SP3 (and parts of B1 and B2): protecting and promoting industrial uses in the LSIS	Alternative 1 to Policy SP3 (and parts of B1 and B2): housing co-location in LSIS	Alternative 2 to Policy SP3 (and parts of B1 and B2): office co-location in LSIS	Alternative 3 to Policy SP3 (and parts of B1 and B2): housing and office co-location in LSIS	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
					<p>is a functional industrial cluster, which include some more traditional industrial uses that cannot coexist with housing. Therefore, the LSIS it is not generally considered suitable location for the maximisation of affordable housing in the borough.</p> <p>Alternative 3 would lead to a smaller amount of affordable housing than alternative 1 as development would need to accommodate offices and industrial uses. Overall, this alternative will have a minor positive effects for housing.</p>
6. Promote social inclusion, equality, diversity and community cohesion	++	0	0	0	<p>The assessment of Policy SP3 considers that there are effects. Policy B1 has a significant positive effect with the policy aim in line with the Local Plan objective to deliver an inclusive economy which the policy does through delivering policy supporting creation of new business floorspace, protecting existing floorspace and securing affordable workspace and jobs/training opportunities from development. This should support the economy in Islington and help share success across different sections of society. New text has been added following review of the IIA as part of the examination process. Policy B2 The maximisation of new business floorspace will strengthen the local economy. New business floorspace can help to support the diverse needs of the SME sector, provide flexibility for a range of occupiers and help to meet specialist and local employment needs. Encouraging development of employment floorspace will help to meet demand and unlock potential economic growth. This can help to improve employment opportunities and increase the skills of residents. The requirements around the quality of new business floorspace will also support community cohesion, inclusion, equality and diversity by ensuring that new spaces are accessible to everyone. In addition, industrial sectors provide job opportunities for local residents. Opportunities within these sectors may offer more diverse ways of accessing employment through learning skills on the job for those who have low qualification levels or no qualifications, who often face</p>

IIA Objective	Policy SP3 (and parts of B1 and B2): protecting and promoting industrial uses in the LSIS	Alternative 1 to Policy SP3 (and parts of B1 and B2): housing co-location in LSIS	Alternative 2 to Policy SP3 (and parts of B1 and B2): office co-location in LSIS	Alternative 3 to Policy SP3 (and parts of B1 and B2): housing and office co-location in LSIS	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
					<p>more barriers to access work. If these sectors are lost in the local area, residents dependent on these job opportunities may be at risk of unemployment.</p> <p>Alternatives 1 and 2 should deliver intensification of employment space as well as either office or residential floorspace. For alternative 2 this should both support the economy in Islington and help share success across different sections of society, in the short and medium term. The intensification of new business floorspace will strengthen the local economy and provide new jobs by encouraging development of employment floorspace which will meet demand and unlock potential economic growth. However this would need to be balanced with the potential negative effects on the evolving economic industrial needs of the area because it would limit the availability of premises suitable for industrial land uses and could potentially displace the primary economy activity of the area. Overall this is considered a neutral impact.</p> <p>For alternative 1, which would provide affordable housing this would increase the delivery of affordable housing which could help reduce the negative consequences of relative poverty by reducing the proportion of income spent on accommodation and therefore freeing up a greater proportion of income for other living costs. Similar to alternative 2 this would have to be balanced against potential impact on limiting wider industrial needs so is considered neutral overall. Alternative 3 is considered neutral as it would have similar effects to alternatives 1 and 2.</p>
7. Improve the health and wellbeing of the population and	+	0	0	0	There is a minor positive effect identified for Policy SP3 as it will protect the principal function of the LSIS. The strategic location of the LSIS enables shorter journeys and supply chains, which has a more positive effect on air quality, while providing industrial, storage, distribution and other uses that are increasingly essential to the functioning of London's economy and meeting the needs of its

IIA Objective	Policy SP3 (and parts of B1 and B2): protecting and promoting industrial uses in the LSIS	Alternative 1 to Policy SP3 (and parts of B1 and B2): housing co-location in LSIS	Alternative 2 to Policy SP3 (and parts of B1 and B2): office co-location in LSIS	Alternative 3 to Policy SP3 (and parts of B1 and B2): housing and office co-location in LSIS	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
reduce health inequalities					<p>growing population and the aspect of its role in servicing the Central London Economy. Without the policy protection, industrial businesses are likely to be displaced to Outer London locations and this will have significant impacts on transport routes into London, leading to increased traffic congestion and emissions from traffic which will impact on the health of residents. In addition, the proposed policy for the area integrates requirements to improve pedestrian and vehicle connections in the area, where possible, having regard to routes identified to improve connections in the area.</p> <p>New effects have been identified for Policies B1 to B2 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. New effects have been identified following review of the IIA as part of the examination process. Policies B1 to B2 support a range of employment spaces that are high quality and will support diverse jobs in different sectors, including SMEs, training opportunities and affordable workspace for local people. The type of employment supported by the policies has the potential to protect health and contribute to reduced health inequalities. Employment space in Islington, providing local jobs opportunities can also contribute to healthy, independent lifestyles which can improve health.</p> <p>For alternative 1 it is recognised that there are health benefits from housing development, however, there would be negative effects from co-location of industrial with housing as there is a risk of late night or early morning noise arising from industrial uses, which rely on large-scale deliveries. This would have negative effects on those living in new housing development in the LSIS which it may not be possible to mitigate. Considering this, alternative 1 would have a neutral effect overall.</p>

IIA Objective	Policy SP3 (and parts of B1 and B2): protecting and promoting industrial uses in the LSIS	Alternative 1 to Policy SP3 (and parts of B1 and B2): housing co-location in LSIS	Alternative 2 to Policy SP3 (and parts of B1 and B2): office co-location in LSIS	Alternative 3 to Policy SP3 (and parts of B1 and B2): housing and office co-location in LSIS	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
					<p>For alternative 2 there would be no effect. There is no evidence to suggest that industrial uses have any more long term impacts on air quality compared to office uses or vice versa. Therefore, an alternative that allowed more office uses instead of industrial uses, would have no pronounced effect on health and wellbeing.</p> <p>Alternative 3 will have combined effects from alternatives 1 and 2 which on balance, have neutral effects for this objective. However, with intensification of all, mixed residential and offices with industrial, there is a risk of combining uses which could have negative effects on housing quality.</p>
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	+	-	0	0	<p>Policy SP3 would continue to protect existing businesses in the LSIS and would promote the intensification and renovation of old industrial sites. This would attract a wider range of different sized occupiers in need of industrial premises. The Vale Royal/Brewery Road LSIS accommodates many of the type of uses suggested in the Mayor's evidence for the London Plan, including 'clean' activities that provide for the expanding Central London business market. As identified in Islington's Employment Land Study (2016), this area comprises a mix of traditional industrial activities and storage facilities that coexist with emerging industrial uses, including a significant concentration of creative production businesses which are based primarily in industrial units and support Islington's wider creative sector. Proposed policy reflects the Council's commitment to support creative production industries where is more needed in the borough. Policy B2 will have a significant positive effect. Protecting the 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>



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

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

IIA Objective	Policy SP3 (and parts of B1 and B2): protecting and promoting industrial uses in the LSIS	Alternative 1 to Policy SP3 (and parts of B1 and B2): housing co-location in LSIS	Alternative 2 to Policy SP3 (and parts of B1 and B2): office co-location in LSIS	Alternative 3 to Policy SP3 (and parts of B1 and B2): housing and office co-location in LSIS	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
					<p>being compatible for residential uses, therefore having an impact on range of business and jobs. The intensification of residential uses would not create long-term employment opportunities and would likely limit the capacity for the existing business sectors to expand and the economic activity of the area. This could have negative effects on the wider economy and Central London services which rely on the support of production activities in the LSIS. However, the intensification of some business floorspace as office space co-located with industrial will strengthen the local economy and provide a higher density of jobs albeit this could create negative effects on the longer term sustainability of the LSIS as a functional industrial area because the capacity to which industrial floorspace can be intensified will compete with offices. As part of the balance, whilst there are other locations for housing and offices be promoted in the borough, industrial uses are only sought in LSISs and therefore the scope for intensification of industrial is particularly important in this context. The scale of this effect would be dependent on the degree of the impact on the industrial function of the area caused by office development over time, and the scale of industrial activities lost, displaced and /or prevented from expanded in this location. Considering this, a neutral effect has been identified overall.</p>
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	+	-	-	-	<p>There is a minor positive effect for policy SP3 which will help encourage a shift to more sustainable forms of travel with reference to improving pedestrian connections. Policy SP3 would protect the principal function of the LSIS. The strategic location of the LSIS enables shorter journeys and supply chains, which has a more positive effect on air quality, while providing industrial, storage, distribution and other uses that are increasingly essential to the functioning of London's economy and meeting the needs of its growing population and the aspect of its role in servicing the Central London Economy. Without the policy protection, industrial businesses are likely to be displaced to Outer London</p>

IIA Objective	Policy SP3 (and parts of B1 and B2): protecting and promoting industrial uses in the LSIS	Alternative 1 to Policy SP3 (and parts of B1 and B2): housing co-location in LSIS	Alternative 2 to Policy SP3 (and parts of B1 and B2): office co-location in LSIS	Alternative 3 to Policy SP3 (and parts of B1 and B2): housing and office co-location in LSIS	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
					<p>locations and this will have significant impacts on transport routes into London, leading to increased traffic congestion and emissions from traffic which will impact on the health of residents. In addition, the proposed policy for the area integrates requirements to improve pedestrian and vehicle connections in the area, where possible, having regard to routes identified to improve connections in the area. Similarly Policy B1 and B2 will have a significant positive effect. It will direct business development to the most appropriate and accessible locations in the borough, therefore reducing the need to travel by car and encouraging more sustainable transport choices.</p> <p>Whilst alternatives 1, 2 and 3 could lead to the intensification of industrial uses, the scope for intensification of industrial operations in the LSIS is lessened and the range of industrial uses could lead to the displacement of industrial businesses to Outer London industrial locations while still needing to travel to central London to access their markets. This could increase vehicle mileage through Islington, which risks increased congestion and emissions, and have negative impacts on climate change and air quality.</p> <p>For alternatives 1 and 3, residential development would pose limitations to on-site loading and parking requirements of industrial uses. This could lead to increased traffic congestion and further pressures on road networks. For alternatives 2 and 3, office uses are likely to create more journeys to work than many industrial uses, and for this reason are usually supported in locations which are more accessible than the LSIS ( which has low PTAL ratings along the western edge along York Way), such as town centres and CAZ where transport infrastructure better supports the intensity of journeys created. The alternatives would therefore have a minor to significant negative effect, dependent on the</p>

IIA Objective	Policy SP3 (and parts of B1 and B2): protecting and promoting industrial uses in the LSIS	Alternative 1 to Policy SP3 (and parts of B1 and B2): housing co-location in LSIS	Alternative 2 to Policy SP3 (and parts of B1 and B2): office co-location in LSIS	Alternative 3 to Policy SP3 (and parts of B1 and B2): housing and office co-location in LSIS	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
					level of industrial activities lost, displaced and /or prevented from expanded in this location.
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	0	0	No effect for policy or alternatives to policies SP3, B1 and B2.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	0	0	No effect for policy or alternatives to policies SP3, B1 and B2.

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

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

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



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

## Summary

The LSIS has a distinctive industrial character which is linked to its primary economic function. Whilst intensification can bring building design improvements to make the buildings more adaptable to future economic demands, there is a risk of losing essential design features which are key for industrial activities.

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

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

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

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

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

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

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

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

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

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

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

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

Table 3.18 Alternative Description for Policy R1 SP3, B1 and B2

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

Table 3.19 Assessment of Alternatives for Policy R1 – Primary Shopping Areas s SP3, B1 and B2 – Locally Significant Industrial Sites (LSIS)

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

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

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

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



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

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

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

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

## Summary

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

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

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

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

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

Table 3.20 Alternative Descriptions for Policy R2:

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

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

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

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

Table 3.21: Assessment of Alternatives for Policy R2: Retain primary and secondary frontages

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

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



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

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

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

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

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

## Summary

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

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

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

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

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

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

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

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

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

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

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

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

Table 3.22: Alternative Description for Policy R7

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

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

Table 3.23: Assessment of Alternatives for Policy R6: Maintaining and enhancing Islington's unique retail character

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



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

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

IIA Objective	Policy R7	Alternative 1 to Policy R7	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	+	0	<p>Policy R7 could see a minor positive effect by protecting markets and SSAs in accessible locations that help to promote local trips by sustainable and active travel transport modes.</p> <p>No effect for alternative to policy R7.</p>
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	No effect for policy R7 and alternative to policy R7.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	No effect for policy R7 and alternative to policy R7.
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	0	No effect for policy R7 and alternative to policy R7.

IIA Objective	Policy R7	Alternative 1 to Policy R7	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	No effect for policy R7 and alternative to policy R7.
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	No effect for policy R7 and alternative to policy R7.

## Summary

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

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

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

Table 3.24: Alternative Description for Policy R8:

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

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

Table 3.25: Assessment of Alternatives for Policy R8: Location and Concentration of Uses

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

IIA Objective	Policy R8	Alternative 1 to Policy R8	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	++	-	<p>There is a significant positive effect for Policy R8. There is no specific need for hot food takeaways, betting shops and adult gaming centres; and evidence suggests that they can undermine vitality, viability and vibrancy of town and local centres. A quantitative restriction within centres will help prevent a level of hot food takeaways, betting shops and adult gaming centres that would affect the ability of these centres to serve local needs, by virtue of both lack of available space for more priority uses which directly serve a local need; and through a cumulative undermining of the vitality and viability of the centres which could affect their medium to long term outlook.</p> <p>There is a minor negative effect for the policy alternative. There is no specific need for hot food takeaways, betting shops and adult gaming centres; and evidence suggests that they can undermine vitality, viability and vibrancy of town and local centres. Without a quantitative restriction within certain centres, this could lead to a level of hot food takeaways, betting shops and adult gaming centres that would affect the ability of these centres to serve local needs, by virtue of both lack of available space for more priority uses which directly serve a local need; and through a cumulative undermining of the vitality and viability of these centres which could affect their medium to long term outlook.</p>
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	0	No effect for alternative to policy R8.
6. Promote social inclusion, equality, diversity and community cohesion	0	0	No effect for alternative. There is evidence that betting shops locate in more deprived areas, areas which are also more likely to see a higher prevalence of problem gambling. Incidences of problem gambling correlates with higher unemployment and very severe financial problems, which is directly relevant to any assessment of poverty. However, there is no guarantee that the alternative would exacerbate this over and above the proposed policy approach.

IIA Objective	Policy R8	Alternative 1 to Policy R8	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
7. Improve the health and wellbeing of the population and reduce health inequalities	+	-	<p>Policy R8 will have a minor positive effect. The policy working in tandem with other health initiatives should improve physical and mental health through restricting an overconcentration of HFT and BS which contribute to poor health and wellbeing. In particular, reducing the proliferation of HFT fast food within 200m of a school which school children would be easily able to access will be particularly beneficial.</p> <p>There is a minor negative effect for the policy alternative. Although there is no guarantee that hot food takeaways, betting shops and adult gaming centres would increase as a result of the alternative, this would be a possibility, for one if not all the uses. Each of these uses brings about potential impacts on health and wellbeing, both physical and mental, hence the cumulative impact of the alternative is considered to be negative in terms of the impact on health inequalities, mental and physical health and wellbeing and the level of activities with negative health externalities.</p>
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	0	+	<p>Policy R8 will have neutral effect by providing a quantitative restriction within centres which will help prevent a level of hot food takeaways, betting shops and adult gaming centres. On a purely economic basis the policy could have a minor negative impact by limiting jobs in the betting and hot food takeaway industries, however from a sustainable economic development point of view the adverse economic impacts caused by obesity and personal debt is a far greater negative effect than the restrictions on these sectors growth. Controls on the location and concentration of uses can also have wider economic benefits by supporting a range of businesses by mitigating the cumulative adverse impacts some uses can have on the viability and vitality of areas which can include impacts on character and rents.</p> <p>There is a minor positive effect for the policy alternative. Additional hot food takeaways, betting shops and adult gaming centres would add to the range of local businesses and would provide a range of employment opportunities, including provision of opportunities for lower skilled jobs. Whilst this might not constitute sustainable economic development, due to the potential adverse social impacts, in purely economic terms they could have a minor positive impact.</p>



IIA Objective	Policy R8	Alternative 1 to Policy R8	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	0	0	No effect for Policy R8 or alternative to policy R8. It may lead to more hot food takeaways, betting shops and adult gaming centres being developed, but this would be in the same location as the policy approach, therefore there would be no additional benefit.
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	No effect for alternative to policy R8.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	No effect for alternative to policy R8.
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	0	No effect for alternative to policy R8.

IIA Objective	Policy R8	Alternative 1 to Policy R8	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	No effect for alternative to policy R8.
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	No effect for alternative to policy R8.

## Summary

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

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

Policy R9 sets out the approach that encourages making use of vacant buildings/sites for temporary (6 month) commercial use. The potential alternatives to Policy R9; would be variations in the period for which the temporary use is considered. Variations were not considered possible to assess as the assessment would not be able to provide a meaningful comparison of the various effects and the significance that different periods of time that a vacant unit could be used for flexible uses. There could be an alternative to the range of uses. It was not considered

realistic to expand the range of uses further as the approach adopted was already permissive. A more limited range of uses was a possible alternative however this was considered unreasonable given the flexibility the policy is seeking to promote.

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

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

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

As to the Cultural Quarter designations themselves and their boundaries, it is considered unrealistic for the IIA to consider alternatives. Boundaries for Archway and Angel cultural quarters are identified as the town centre boundaries and these are set, albeit amendments to Angel town centre boundary are made in response to changes over time from development. The boundaries cover the whole of Archway and Angel town centres as the policy intends to promote development to consider its contribution to the cultural offer of these centres that operate as a connected spatial locality. To designate only part of the town centres as cultural quarters could have a limiting effect on enhancing the cultural capital. The findings from the retail study identify the role culture has to play in the future of town centres. This increased cultural and leisure function seems inevitable with online shopping reducing the demand for traditional A1 retailing which is a trend which may well have been accelerated by the Covid-19 crisis. The cultural quarter approach is an evolution of policy in the existing Local Plan and should apply to the whole of the town centre.

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

The boundary for the Farringdon Cultural Quarter could have considered an alternative, although it was judged that this would not be a meaningful assessment. The boundary was identified in collaboration with officers with a responsibility for culture who advised on where was considered appropriate in terms of existing venues and likely future growth based on knowledge of the area and expertise. In addition, policy

BC2 contains flexibility with a sequential approach to cultural development which permits where appropriate cultural development outside the cultural quarter in other areas of the CAZ.

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

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

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

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

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

Table 3.26: Alternative Description for Policy R12

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

Table 3.27: Assessment of Alternatives for Policy R12: Visitor accommodation

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

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

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

IIA Objective	Policy R12: Visitor accommodation	Alternative 1 to Policy R12	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	0	0	No effect for alternative to policy R12. It may lead to more visitor accommodation being developed, but this would be in the same location (Town Centres and the CAZ) as the policy approach, therefore there would be no additional benefit.
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	No effect for policy R12 and alternative to policy R12.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	No effect for policy R12 and alternative to policy R12.
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	-	-	There is a minor negative effect for both the policy R12 and the policy R12 alternative. Visitor accommodation, especially larger hotels, are very energy and water intensive. A proliferation of visitor accommodation would be likely to increase energy and water intensive uses, even if other Local Plan policies – for example sustainable design policies – had requirements to mitigate the impact of this increased intensity of use. The more permissive alternative policy approach to visitor accommodation would increase the significance of this effect although not widespread across the borough enough to be considered a significant negative effect.



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

## Summary

The assessment did not find the alternative to be preferable in respect of any of the SA objectives; however, it highlighted several specific positive effects recognising that visitor accommodation could facilitate an increase in the number of visitors which could add to the vibrancy of an area and contribute to economic improvement, but it was noted that this would depend on the focus of the visitor accommodation (business or leisure visitors), given the different impacts of each group. Positive effects were also identified with opportunities for employment, particularly for local people although again this is caveated recognising that the jobs provided would be lower-skilled at a relatively low employment density. These benefits are minor in the face of the drawbacks – the less sustainable built form, the environmental implications and above all the reduction in the availability of land to meet more pressing development needs.

## **5. Green Infrastructure**

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

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

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

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

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

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

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

Policy G4 requires all development to protect and enhance site biodiversity and the surrounding area and demonstrate this through the submission of a Landscape Design Strategy. Policy G5 sets out the requirements for the installation of green roofs and vertical greening. There are no reasonable policy alternatives to G4: Biodiversity, landscape and trees and G5: Green Roofs and Vertical Greening.

## 6. Sustainable Design

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

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

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

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

Table 3.28: Alternative Description for Policy S5: Energy Infrastructure

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

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

Table 3.29: Assessment of Alternatives for Policy S5: Energy Infrastructure

IIA Objective	Policy S5:Energy Infrastructure	Alternative to Policy S5: Energy Infrastructure	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	+	0	<p>New effects have been identified for Policies S5 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policy S5 will have a minor positive effect because it sets out requirements which seek to prioritise low and zero carbon heat sources for all development. This will contribute to minimising greenhouse gas emissions and promote a more sustainable built environment.</p> <p>No effect for alternative to policy S5. Larger minor developments would be required to prioritise low carbon heat sources in accordance with the heating hierarchy even if heat network connection was not required.</p>
2. Ensure efficient use of land, buildings and infrastructure	+	-	<p>For policy S5 there is a minor positive effect as it will ensure that low-carbon energy infrastructure is provided in the right locations. In particular, this policy promotes the development and extension of the borough's heat networks so that connection is possible for a greater number of developments.</p> <p>There is a minor negative effect for the policy alternative. In relation to provision of infrastructure, by not requiring any minor developments to connect to a heat network, the alternative policy may potentially limit the development and extension of heat networks in the borough because opportunities for minors (especially larger minors) located very near to a network to connect would not be realised. This in turn could potentially limit the availability of low and zero carbon heat sources for all development.</p>

IIA Objective	Policy S5:Energy Infrastructure	Alternative to Policy S5: Energy Infrastructure	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	0	There is a neutral effect for both the policy and the policy alternative. Connection to a heat network may have a more limited impact on a heritage asset compared to other low carbon heat sources, such as air source heat pumps which affect the exterior of a building. Therefore the alternative, by not requiring any minor developments to connect, may indirectly result in an increased risk of harm to heritage assets. Not requiring any minors to connect may also indirectly lead to some larger minors that could have connected to a network being more likely to install more extensive coverage of solar PV panels, which affect the exterior of a building, in order to meet carbon reduction targets. However, these potential impacts would depend on the specific proposal and heritage assets, and may be able to be mitigated. The policy approach reduces the potential for these impacts.
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	0	0	Policy S5 adopts an integrated approach to energy supply and seeks to ensure that the selection of heat sources will result in low or zero emissions of carbon dioxide and NOx, with CHP and ultra-low NOx gas boiler communal or heat network systems designed to ensure they have no significant impact on local air quality. Overall a neutral effect has been identified.  No effect for alternative.
5. Ensure that all residents have access to good quality, well-located, affordable housing	++	0	Policy S5 will have a significant positive effect and help to ensure that all residents have access to good quality housing by requiring housing developments to prioritise low and zero carbon heat sources meets and supply energy efficiently.  No effect for alternative.
6. Promote social inclusion, equality, diversity and community cohesion	+	0	Policy S5 will have a minor positive effect because it will contribute to promoting energy resilience and reducing fuel poverty in the borough, which has economic and health benefits for Islington residents.  No effect for alternative.

IIA Objective	Policy S5:Energy Infrastructure	Alternative to Policy S5: Energy Infrastructure	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
7. Improve the health and wellbeing of the population and reduce health inequalities	++	0	<p>Policy S5 will have a significant positive effect and help to ensure that all residents have access to good quality housing by supplying energy efficiently and cleanly which will help to reduce fuel poverty.</p> <p>There is a neutral effect for the alternative to policy S5. Not requiring any minor developments to connect to a heat network may have an indirect impact on fuel poverty for people living in new-build minor developments that could connect to a network (i.e. larger minors located very close to a network) as connection to a network may affect heating costs. The cost impacts, in comparison to other heating options such as individual gas boilers or electric air source heat pumps, will vary depending on the particular development, and therefore it is difficult to generalise. A heat network may appear more expensive when comparing the cost of heat alone, but often offers reduced costs elsewhere, for example through avoidance of servicing, maintenance and gas safety checks associated with individual boilers. Therefore, the alternative policy may have indirect positive and negative impacts on fuel poverty depending on the particular development and heating system.</p>
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	+	-	<p>Policy S5 will have a minor positive effect and support the development of green industries and a low-carbon economy through its use of low and zero carbon heating options, particularly heat networks and secondary heat sources.</p> <p>There is a minor negative effect for the policy alternative. Not requiring any minor developments to connect to a heat network may affect the development and expansion of green industries and a low carbon economy, particularly opportunities related to the heat network itself, including opportunities to link with other networks to achieve wider agglomeration benefits.</p>
9. Minimise the need to travel and create accessible, safe and sustainable	0	0	No effect for Policy S5 or alternative to Policy S5.

IIA Objective	Policy S5:Energy Infrastructure	Alternative to Policy S5: Energy Infrastructure	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
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	0	No effect for Policy S5 or alternative to Policy S5.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	No effect for Policy S5 or alternative to Policy S5.
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	++	-	<p>Policy S5 will have a significant positive effect. It will directly contribute to minimising Islington's contribution to climate change by ensuring that developments prioritise energy efficient low and zero carbon heating options. This will contribute to the decarbonisation of heat and the reduction of carbon emissions.</p> <p>There is a minor overall negative effect for the alternative to policy S5. In relation to contribution to and impacts of climate change, the level of heat loss means that in the majority of low density developments other low carbon heat options are likely to be more efficient and result in lower carbon emissions compared to connection to a heat network. Removing the requirement for minor developments to connect may encourage applicants to consider other low carbon heat options instead of connecting to heat networks.</p>



IIA Objective	Policy S5:Energy Infrastructure	Alternative to Policy S5: Energy Infrastructure	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
			<p>Consideration of potential heat losses would, however, be assessed prior to connection even if heat network connection was required for minors.</p> <p>There will, however, be some larger minor developments which are higher density and also located very close to a heat network, so therefore should not have significant heat losses. For these developments connection to a heat network is likely to be the lowest carbon option, although this will depend on the distance to a network and the specific development type, e.g. residential can have a higher heat demand than commercial. Removing the requirement for minors to connect to a heat network would therefore prevent these particular opportunities from being captured, leading to missed opportunities to reduce carbon emissions, decarbonise heat, increase energy security, and reduce fuel poverty.</p>
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 S5 will have a minor positive effect as it will support the use of low and zero carbon heating options, including heat networks and air source heat pumps, which will encourage the use of renewable resources.</p> <p>There is a minor negative effect for the alternative to policy S5. Not requiring any minor developments to connect to a heat network may have a negative effect on promoting the use of renewable sustainable energy sources, and would limit the development and extension of heat networks (especially if larger minor developments were not captured).</p>
14. Maximise protection and enhancement of natural resources including water, land and air	0	-	<p>There is no effect for Policy S5.</p> <p>There is a minor negative effect for the alternative to policy S5. Not requiring any minor developments to connect to a heat network may have an indirect impact on improving air quality, as minor developments that could connect to a network (especially larger minors located very close to a network) may instead opt for gas boilers which could worsen to air pollution.</p>

## Summary

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

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

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

No alternatives to policies S6 to S10 were considered reasonable.

## 7. Public Realm and Transport

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

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

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

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

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

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

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

## 8. Design and Heritage

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

The other policies in this section are:

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

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

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

Table 3.30: Alternative Description for Policy DH3: Tall Buildings

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

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

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

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

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

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

Table 3.31: Assessment of Alternatives for Policy DH3: Tall Buildings

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

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



IIA Objective	Policy DH3	Alternative 1 to Policy DH3	Alternative 2 to Policy DH3	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
				remainder of the borough. However as this is a broad area or zone approach and not a site based policy, and with historic assets densely developed throughout the borough, some specific heritage assets may still be impacted under this policy therefore there is some uncertainty, for example at the edge of the broad area or zone.
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	0	0	0	No effect for policy alternatives to Policy DH3.
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	0	0	<p>New assessment detail has been added following review of the IIA as part of the examination process: Policy DH3 may limit opportunities for tall buildings which can provide housing on specific sites which could impact to some degree on housing delivery. However research has shown that high densities of housing can be achieved in lower rise development, which also offer a better range of unit types and sizes. High densities will be secured through policy DH1 which requires that development optimises density. The total effect on housing delivery in the borough is not likely to be sufficiently to justify a negative scoring and housing targets are being achieved. In addition under DH3 some sites identified as potentially appropriate for tall buildings are allocated to include residential development, therefore also delivering affordable housing.</p> <p>No effect for policy alternatives to Policy DH3.</p>
6. Promote social inclusion, equality, diversity and	0	0	0	No effect for policy alternatives to Policy DH3.

IIA Objective	Policy DH3	Alternative 1 to Policy DH3	Alternative 2 to Policy DH3	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
community cohesion				
7. Improve the health and wellbeing of the population and reduce health inequalities	0	0	0	No effect for policy alternatives to Policy DH3.
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	-	0	0	<p>New effects have been identified which changes the effects from neutral to minor negative following review of the IIA as part of the examination process. Policy DH3 may have a minor negative effects on economic development as the development of tall buildings will be directed to key locations where they are most appropriate, which may result in a lower overall quantum of floorspace delivery than an approach where tall buildings could be developed in more locations across the borough. These effects are minor as lower rise buildings will meet the vast majority of this need, and on many sites lower rise buildings can rival tall buildings for floorspace delivery.</p> <p>No effect for policy alternatives to Policy DH3.</p>
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport,	+	0	+	<p>Proposed Policy DH3 will have a minor positive effect. The suitable locations for tall buildings have been identified in principle based on a co-ordinated and holistic approach which focuses development in the most appropriate locations considering transport accessibility, infrastructure and land use. The policy criteria ensure that tall buildings do not prejudice the ongoing functionality of sites in the local area including the functionality of the existing transport network.</p> <p>No effect for alternative 1 to Policy DH3.</p> <p>Policy Alternative 2 will have a minor positive effect. The broad locations for tall buildings would be selected based partly on their transport accessibility, ensuring that tall buildings, which</p>

IIA Objective	Policy DH3	Alternative 1 to Policy DH3	Alternative 2 to Policy DH3	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
cycling and walking				generate large numbers of trips, are located where these trips can be made by public transport, walking and cycling.
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	-	+	<p>New effects have been identified which changes the effects from positive to neutral effect following review of the IIA as part of the examination process. New analysis has been added following review of the IIA as part of the examination process: Policy DH3 will have no significant effect on open spaces. Policy DH3 ensures that where tall buildings are developed they do not harm nearby open spaces including through overshadowing and microclimate. This will ensure no negative impacts are caused as the impacts are addressed by policy but will not be scored as a positive impact.</p> <p>The alternative 1 to Policy DH3 will have a minor negative effect. The impact on open space depends on how robust any policy criteria are; however, a criteria-based approach creates uncertainty and opens up greater potential for case-by-case decisions which would harm particular open spaces.</p> <p>Policy alternative 2 will have a minor positive effect. The broad locations for tall buildings would be selected partly based on their impacts to open spaces, so their development would not impact negatively on open spaces.</p>
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	+	0	0	<p>New effects have been identified which changes the effects from neutral to minor positive following review of the IIA as part of the examination process. New effect has been added following review of the IIA as part of the examination process: Policy DH3 requires that development of tall buildings does not adverse impact biodiversity. This will have a minor positive effect on protecting habitats and species diversity.</p> <p>No effect for policy alternatives to Policy DH3.</p>
12. Reduce contribution to climate	+	0	0	New effects have been identified which changes the effects from neutral to minor positive following review of the IIA as part of the examination process. Policy DH3 will have a minor

IIA Objective	Policy DH3	Alternative 1 to Policy DH3	Alternative 2 to Policy DH3	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
change and enhance community resilience to climate change impacts.				<p>positive effect on reducing climate change by requiring new tall buildings to be of exceptional design standards.</p> <p>No effect for policy alternatives to Policy DH3.</p>
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>New effects have been identified which changes the effects from neutral to minor positive following review of the IIA as part of the examination process. Policy DH3 will have minor positive effects by limiting the overall number of tall buildings, which are more resource intensive and less adaptable than low rise buildings with longer lifespans. The complex engineering and use specific design of tall buildings make repair and adaptation over time challenging or uneconomic, often resulting in demolition, and associated construction waste impacts.</p> <p>No effect for policy alternatives to Policy DH3.</p>
14. Maximise protection and enhancement of natural resources including water, land and air	+	0	0	<p>New effects have been identified which changes the effects from neutral to minor positive following review of the IIA as part of the examination process. Policy DH3 will have a minor positive effect by ensuring that development of tall buildings does not impact impacts on the wider environmental including watercourses and water bodies and their hydrology.</p> <p>No effect for policy alternatives to Policy DH3.</p>

## Summary

The assessment highlights that the choice between alternative 2 and the preferred approach is quite finely balanced, there are limited arguments for favouring alternative 1 - the design led approach. Alternative 2, which would involve taking a permissive approach to tall buildings within the eight 'Strategic Search Areas' identified by the Islington Tall Buildings Study and representing the broad zones represents a plan-led approach. There could be said to be confidence in respect of avoiding negative effects and realising opportunities which could provide benefits in respect of optimising use of land / delivering higher densities in those parts of the borough associated with the highest levels of connectivity and transport accessibility. However, as explained in the appraisal: "... the less precise nature of broad areas or zones would introduce some uncertainty in respect to local character and distinctiveness where a specific tall building proposal might create a negative effect, for example at the edge of the broad area or zone." Variations to these zones could be envisaged, but this approach was ruled out as unreasonable to define.

## 9. Strategic Infrastructure

The policies in this section are:

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

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

## 10. Bunhill and Clerkenwell Area Action Plan

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

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

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

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

Table 3.32: Alternative description for BC1: Prioritising office use.

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

Local Plan Policy BC1 requires that any development providing more than 500sqm of uplift in floorspace is office led, meaning the net additional development must be a minimum of 90% in office use in the City Fringe area, or 80% in the remainder of the Bunhill and Clerkenwell AAP area. An alternative which was considered and discounted was a residential mixed use led approach to the balance of uses. Given the location and support in the evidence base for employment land use in this location it would have been unreasonable to consider residential as a priority. In addition residential is considered as part of the mix of uses in the alternative assessment.

Table 3.33: Assessment of Alternatives BC1: Prioritising office use.

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



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

IIA Objective	Policy BC1	Alternative 1 to Policy BC1	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
affordable housing			<p>provided as a proportion of new residential developments. However the Council has assessed future housing delivery and considers that it can meet its housing target with this policy in place.</p> <p>The alternative to policy BC1 will likely have a neutral effect on the provision of affordable housing. The alternative may mean that more housing and affordable housing will likely be developed. 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>Policy BC1 will have a minor positive effect, in terms of social inclusion, equality, diversity, and community cohesion. The policy will strengthen the local economy and provide new jobs by encouraging development of employment floorspace which will meet demand and unlock potential economic growth. The Council has policies whereby new office developments must provide a proportion of affordable workspace. These policies will result in more office development and therefore more affordable workspace. The increase in businesses and employment in the area will also lead to a greater number of training and apprenticeships opportunities for local residents.</p> <p>The alternative will lead to minor negative effects in terms of social inclusion, equality, diversity, and community cohesion in comparison to policy BC1. Whilst the alternative will focus development of employment uses (which generate a large number of trips) in an area which is highly accessible by sustainable means of transport it does not maximise the amount of employment floorspace in a location which the Islington Employment Study states is the location with the most demand for Grade A office space.</p>
7. Improve the health and wellbeing of the population and reduce health inequalities	0	0	No effect for policy BC1 and the alternative to policy BC1.

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

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

IIA Objective	Policy BC1	Alternative 1 to Policy BC1	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
resource use and minimises waste			
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	No effect for alternative.

## Summary

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

**b. Assessment of Local Plan: objectives and policies**

## Assessment of likely effects of Local Plan objectives

- 1.1 The following section sets out in full the seven Local Plan objectives contained in Section 1 of the Local Plan followed by the assessment. This was presented in the interim IIA September 2019 and was not reassessed in the examination addendum. It has been presented for completeness as it was in the interim IIA September 2019 with the assessment table included following the narrative. The assessment also includes the key points identified by the EqIA and HIA.
- 1.2 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**

- 1.3 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.
- 1.4 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.
- 1.5 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**

- 1.6 The assessment identified that there will be a significant positive effect against IIA Objective 2: Use of land as it will address a key development need for provision of new homes, 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. Finally it will have a positive effect against Objective 12: Climate change as it will ensure the delivery of high quality sustainable homes which will mitigate impacts on climate change.

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

- 1.7 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 boroughs residents.
- 1.8 The council is currently developing it's 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.
- 1.9 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**

- 1.10 The Local Plan objective 2: Jobs and Money will have a significant positive effect against IIA objectives 2, 6 and 8 as it is focused on delivering a key development need; the creation of new jobs and 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 against 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 against 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 when considered against IIA objective 7.



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

- 1.11 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.
- 1.12 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
- 1.13 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**

- 1.14 Objective 3 will have a significant positive effect against the IIA objectives, in particular those relating to social and environmental impacts because it aims to make the borough are 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 and it may also be beneficial to general access and quality of wider open spaces. 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**

- 1.15 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.
- 1.16 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**

- 1.17 Objective 4 will have a significant positive effect against the various social IIA objectives and the minimising transport objective. 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. Creating child friendly places which may necessitate to reduce emissions and improve road safety will have a positive effect. The same principle applies for high quality housing and open spaces, the benefits which will be felt by everyone. A significant positive effect is against the objective for the protection of open spaces, which is positive for open spaces but also all spaces, particularly those which will encourage play, and will also be beneficial to general access and quality of open spaces.

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

- 1.18 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.
- 1.19 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.
- 1.20 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. The delivery of more well designed places within the public realm, which provide the opportunity and a reason for people to dwell, will also facilitate the personal connections that underpin wider social/community cohesion.
- 1.21 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.

- 1.22 Places and spaces must be designed with diversity in mind, so that they are convenient and enjoyable for all to use. 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.
- 1.23 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.
- 1.24 Islington's historic environment is one of the borough's defining characteristics, including a variety of heritage assets. Conservation of this historic environment will help to deliver wider social, cultural, economic and environmental benefits. Opportunities to enhance the historic environment should be sought wherever possible.
- 1.25 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.
- 1.26 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
- 1.27 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.
- 1.28 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.

- 1.29 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**

- 1.30 Objective 5 will have a significant positive effect against 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.
- 1.31 Objective 5 will also have a positive effect against the IIA objective for the historic environment as it recognises that the historic environment is one of the borough's defining characteristics and 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 consider the wider context including social and cultural aspects and 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 including through buildings that are designed sustainably.

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

- 1.32 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.
- 1.33 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.
- 1.34 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.

- 1.35 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**

- 1.36 Objective 6 has specific significant positive effects against the IIA objectives regarding the wider determinants of health, liveable neighbourhoods, access to quality housing, equalities and climate change. It aims to shape a healthier environment for all by affecting the; pattern of development, urban design, provision of high quality adaptable homes, access to local services and facilities; tackling inequality and poverty, increased urban greening and open space and safe places for active play and food growing, resilience to climate change, air quality, and accessibility by walking, cycling and public transport which will all have significant positive effects in terms of the IIA objectives. With regards climate change measures to improve mental and physical health and wellbeing will include climate change mitigation and adaptation. There may also be indirect benefits through urban greening and biodiversity which can also benefit peoples' health as well as the creation of social and civic spaces which can help combat loneliness. Related to the health benefits was a minor positive identified by the assessment against IIA objective 1: Built Environment as the creation of social, civic spaces, aims to combat loneliness which will contribute improving health and wellbeing of various residents.
- 1.38 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**

- 1.39 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.

- 1.40 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**

- 1.41 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. Minor positive impacts are identified by the assessment in relation to health and wellbeing and liveable neighbourhoods through ensuring the provision of co-ordinated services for residents. Fundamentally the assessment could be positive against 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 for example energy efficiency which reduce home energy bills which will help to reduce fuel poverty. The assessment recognises that the Council's declaration of an environment and climate emergency will also be positive for the IIA objective to reduce contribution to climate change as it highlights the importance of tackling climate change as part of all Council activities.

**Table 3.34: Assessment of Local Plan Objectives**

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	<p>Objective 1 will have no effect against this objective.</p> <p>Objective 2 will have no effect against this objective.</p> <p>Objective 3 will have a significant positive effect against 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 against 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 against 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 a minor positive effect against this objective, as it aims to combat loneliness through the creation of social, civic spaces, and therefore will improve health and wellbeing of various residents.</p> <p>Objective 7 will have no effect against this objective.</p>

	Objective 1:	Objective 2:	Objective 3:	Objective 4:	Objective 5:	Objective 6:	Objective 7:	
2. Ensure efficient use of land, buildings and infrastructure	++	++	0	0	++	0	0	<p>Objective 1 will have a significant positive effect against the IIA objective through provision of new homes which address a key development need.</p> <p>Objective 2 will have a significant positive effect against the IIA objective through the creation of new jobs which address a key development need.</p> <p>Objective 3 will have no effect against this objective.</p> <p>Objective 4 will have no effect against this objective.</p> <p>Objective 5 will have a significant positive effect against 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 against this objective.</p> <p>Objective 7 will have no effect against 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	<p>Objective 1 will have no effect against this objective.</p> <p>Objective 2 will have no effect against this objective.</p> <p>Objective 3 will have no effect against this objective.</p> <p>Objective 4 will have no effect against this objective.</p> <p>Objective 5 will have a significant positive effect against 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.</p> <p>Objective 6 will have no effect against this objective.</p> <p>Objective 7 will have no effect against this objective.</p>



<p>4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles</p>	0	0	++	++	++	++	+	<p>Objective 1 will have no effect against this objective.  Objective 2 will have no effect against this objective.  Objective 3 will have a significant positive effect against 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 against 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 against 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 a significant positive effect against the IIA objective as it aims to facilitate healthy lifestyles through good access to services and facilities.  Objective 7 will have a minor positive effect against this objective as it will ensure provision of various services for residents..</p>
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	Objective 1:	Objective 2:	Objective 3:	Objective 4:	Objective 5:	Objective 6:	Objective 7:	
5. Ensure that all residents have access to good quality, well-located, affordable housing	++	0	0	+	0	++	0	<p>Objective 1 will have a significant positive effect against 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.</p> <p>Objective 2 will have no effect against this objective.</p> <p>Objective 3 will have no effect against this objective.</p> <p>Objective 4 will have a minor positive effect against this objective as it recognises the importance that providing good quality housing has for enabling children to get the best start in life.</p> <p>Objective 5 will have no effect against this objective.</p> <p>Objective 6 will have a significant positive effect against the IIA objective as it aims to ensure residents can lead healthy independent lives, which will necessitate provision of high quality, adaptable homes..</p> <p>Objective 7 will have no effect against this objective.</p>

	Objective 1:	Objective 2:	Objective 3:	Objective 4:	Objective 5:	Objective 6:	Objective 7:	
6. Promote social inclusion, equality, diversity and community cohesion	++	++	++	++	++	0	+	<p>Objective 1 will have a significant positive effect against the IIA objective as it aims to reduce inequality through maximising the delivery of genuinely affordable housing in order to meet the significant need.</p> <p>Objective 2 will have a significant positive effect against 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.</p> <p>Objective 3 will have a significant positive effect against 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.</p> <p>Objective 4 will have a significant positive effect against this IIA objective through provision of facilities and housing that enables children to get the best start in life.</p> <p>Objective 5 will have a significant positive effect against this IIA objective as it enables consideration of the wider context including social and cultural aspects, and reflects the importance of integrating new developments into existing communities.</p> <p>Objective 6 will have a significant positive effect against the IIA objective as it aims to improve health and wellbeing, a significant part of which relates to tackling inequality and poverty.</p> <p>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 fuel poverty.</p>

	Objective 1:	Objective 2:	Objective 3:	Objective 4:	Objective 5:	Objective 6:	Objective 7:	
7. Improve the health and wellbeing of the population and reduce health inequalities	++	++	++	++	++	++	+	<p>Objective 1 will have a significant positive effect against 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 significant positive effect against 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 against 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 against 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 against 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 against 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 a minor positive effect against the IIA objective as it aims to deliver co-ordinated services, including health services..</p>

	Objective 1:	Objective 2:	Objective 3:	Objective 4:	Objective 5:	Objective 6:	Objective 7:	
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	0	++	0	0	+	0	0	<p>Objective 1 will have no effect against this objective.</p> <p>Objective 2 will have a significant positive effect against 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 against this objective.</p> <p>Objective 4 will have no effect against this objective.</p> <p>Objective 5 will have a minor positive effect against 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 against this objective.</p> <p>Objective 7 will have no effect against this objective.</p>

	Objective 1:	Objective 2:	Objective 3:	Objective 4:	Objective 5:	Objective 6:	Objective 7:	
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>Objective 1 will have no effect against this objective.</p> <p>Objective 2 will have a minor positive effect against 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 against the IIA objective as it aims to improve peoples 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 a minor positive effect against the IIA objective as it aims to create child friendly places which may necessitate to reduce emissions and improve road safety.</p> <p>Objective 5 will have a minor positive effect against 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 against 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 against this objective.</p>

	Objective 1:	Objective 2:	Objective 3:	Objective 4:	Objective 5:	Objective 6:	Objective 7:	
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 against this objective.</p> <p>Objective 2 will have no effect against this objective.</p> <p>Objective 3 will have a minor positive effect against 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, which may improve the quality and/or access to open space in the borough.</p> <p>Objective 4 will have a significant positive effect against the IIA objective as it recognises the importance of protecting a range of spaces of all shapes and sizes, not just open spaces, to encourage play. Although the emphasis is on children and their access to playspace it may also be beneficial to general access and quality of open spaces.</p> <p>Objective 5 will have a significant positive effect against 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 against 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>

	Objective 1:	Objective 2:	Objective 3:	Objective 4:	Objective 5:	Objective 6:	Objective 7:	
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 against this objective.</p> <p>Objective 2 will have no effect against this objective.</p> <p>Objective 3 will have no effect against this objective.</p> <p>Objective 4 will have no effect against this objective.</p> <p>Objective 5 will have a significant positive effect against 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 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 against 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 encourages measures that have holistic benefits, for example ensuring urban greening and green roofs and the contribution these make to health and wellbeing, climate change mitigation and biodiversity.</p>



	Objective 1:	Objective 2:	Objective 3:	Objective 4:	Objective 5:	Objective 6:	Objective 7:	
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	++	+	+	0	++	+	++	<p>Objective 1 will have a significant positive effect against the IIA objective, as it will ensure the delivery of high quality sustainable homes which will mitigate impacts on climate change.</p> <p>Objective 2 will have a minor positive effect against 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 against 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 against this objective.</p> <p>Objective 5 will have a significant positive effect against 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 a significant positive effect against the IIA objective. Climate change is causing increasingly significant health impacts, especially for more vulnerable people. Measures to improve mental and physical health and wellbeing will include climate change mitigation and adaptation.</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 fuel poverty. The Council's declaration of an environment and climate emergency will also be positive for this IIA objective as it highlights the importance of tackling climate change as part of all Council activities.</p>

	Objective 1:	Objective 2:	Objective 3:	Objective 4:	Objective 5:	Objective 6:	Objective 7:	
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	+	Objective 1 will have no effect against this objective. Objective 2 will have no effect against this objective. Objective 3 will have no effect against this objective. Objective 4 will have no effect against this objective. Objective 5 will have a minor positive effect against this IIA objective as it recognises the important multi-faceted role that planning has in reducing the borough's contribution to climate change, including through buildings that are designed sustainably. Objective 6 will have no effect against this objective. Objective 7 will have a minor positive effect as it recognises the holistic benefits that planning can have, which would include a variety of measures to reduce resource use.
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	0	0	+	0	+	Objective 1 will have no effect against this objective. Objective 2 will have no effect against this objective. Objective 3 will have no effect against this objective. Objective 4 will have no effect against this objective. Objective 5 will have a minor positive effect against this IIA objective as it recognises the multiple benefits that providing open space has including improving air quality. Objective 6 will have a minor positive effect against this objective. Objective 7 will have a minor positive effect as it recognises the holistic benefits that planning can have, which would include protecting and enhancing natural resources.

### Consideration of cumulative and other effects of Local Plan objectives

- 1.42 The Plan's objectives will have significant positive cumulative impacts. In particular against the Sustainability Framework objectives for Liveable Neighbourhoods, Affordable Housing, Inclusion and Equality and Health and Wellbeing. With regards inequality and affordable housing the delivery of genuinely affordable housing is a key aspect of the Local Plan under objective 1: Homes, which combines with the objective 2: Jobs and Money which aims to create an inclusive economy which will help improve opportunity for Islington residents.

These will bring long term positive effects to borough residents with positive impacts on peoples' health and wellbeing through the Local Plan creating better employment opportunities and helping meet housing need through addressing the priorities for the competing demands for the use of the limited land resource in the borough.

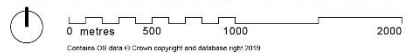
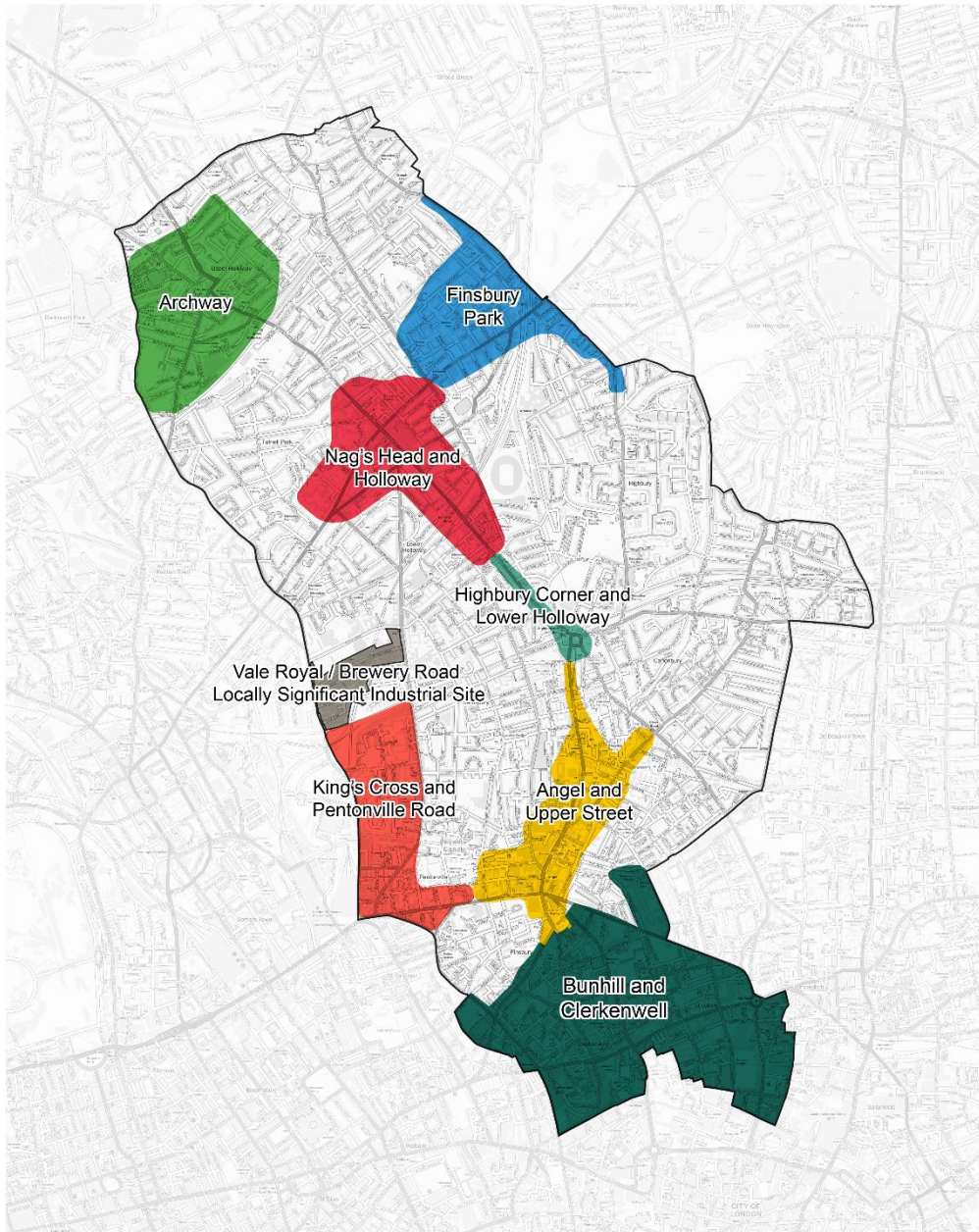
- 1.43 There will also be cumulative benefits to Sustainability Framework objectives for health and wellbeing of residents arising from the effect of various objectives combining; Objective 3: Safety, Objective 4: Children and Young People, Objective 5: Place and environment and Objective 6: Health and independence which will all provide a healthier living environment for residents. This will work with the health benefits created by delivering high quality housing under objective 1: homes.
- 1.44 Objective 2: Jobs and Money seeks to create jobs locally which will have cumulative positive impacts against the Sustainability Framework objective for climate change and resource use when considered with Objective 5: Likely Effects of Place and environment as it will help people make more sustainable transport choices in particular when combined with the positive effects from the emerging Islington Transport Strategy and other policies in the plan such as the car-free policy approach set out in T3: Car-free development.
- 1.45 The objectives collectively represent the Council's planning strategy over the plan period, meaning that their effect will be short, medium and long-term.

#### **Mitigation considered for Assessment of Objectives**

- 1.46 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.
- 1.47 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.
- 1.48 The full assessment is contained in Appendix 4: Table 4.1: Assessment of Local Plan Objectives.

## **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 3.2: Map showing Area Spatial Strategies**

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

## Area Spatial Strategies policy assessment

Table 3.35: Assessment of Area Spatial Strategies for SP1, SP2 and SP3

IIA Objective	Policy SP1: Bunhill and Clerkenwell	Policy SP2: King's Cross and Pentonville Road	Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	0	+	+	<p>There is no effect for Policy SP1. SP1 identifies the spatial strategy areas for the Bunhill and Clerkenwell area. The Bunhill and Clerkenwell Area Action Plan (AAP) has policies for each Spatial Strategy area, which set out the key strategic considerations. The AAP spatial strategy policies (BC3 to BC8) have been assessed separately.</p> <p><b>New effects have been identified for Policy SP2 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. The policy seeks to repair, improve and unify existing frontages on Caledonian Road which will help to secure high quality architecture and attractive public realm. In addition the policy seeks general improvements to the public realm to improve walking and cycling experience which will contribute towards making a safer built environment.</b></p> <p>Policy SP3 would have a minor positive effect because the proposed policy aims to protect the primary economic function of the industrial cluster. Whilst industrial activities may not be traditionally linked to the creation of sustainable and safe built environments, proposed policy T5 requires businesses to explore potential for delivery and servicing by non-motorised sustainable modes, such as cargo cycles and 'clean' vehicles. The policy also encourages delivery activities to take place outside peak hours for delivery and servicing. The strategic policy protection assigned to this area will nurture the future sustainability of the industrial cluster and will ensure that new development supports the economic activity of the area. There is a minor positive effect for policy SP3. The policy</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)
				provides specific guidance on building heights within the area, informed by evidence. Height restrictions will ensure that future development will enhance the local character and distinctiveness of the industrial area.
2. Ensure efficient use of land, buildings and infrastructure	+	+	+	<p>There is a minor positive effect for policies SP1, SP2 and SP3. These areas are considered to be the most appropriate locations for development, being the areas where growth and change is expected to occur within the plan period. The areas are located in close proximity to key infrastructure such as public transport hubs and/or are located on key commercial routes. Opportunities for continued cross boundary working with London Borough of Camden are identified for SP2.</p> <p><b>SP2 focuses development in the most appropriate areas by recognising existing priority employment locations and the need for employment intensification in them, the relevance of the Knowledge Quarter and the need to maintain and enhance the retail and service the Local Shopping Areas.</b></p> <p>There is a minor positive effect for Policy SP3 as it focuses development in the most appropriate areas by making specific reference to retaining and strengthening industrial floorspace to protect the economic activity in the Vale Royal and Brewery Road LSIS. Policy SP3 will have a minor positive effect in the LSIS as it supports the economic activity in this area. The proposed policy protects existing industrial activity and promotes the intensification of industrial activity in the area akin to B8, B2 and light industrial uses. It is noted that the rise of e-commerce and distribution activities has been significant in recent years.</p>



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)
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	+	0	<p>There is no effect for policy SP1.</p> <p><b>New effects have been identified for Policy SP2 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. The policy makes reference to the distinct character of Kings Cross and heritage assets making clear these will be protected and enhanced.</b></p> <p><b>New effects have been identified for Policy SP3 following review of the IIA as part of the examination and changed the effects from minor positive to neutral.</b> Whilst the policy sets out height restrictions, part of the rationale for which is due to specific heritage considerations in the area the updated assessment considers that some of the maximisation of employment space and intensification supported by policy B1 and B2 might have a minor negative impact on the significance of heritage assets and their settings. This would depend on the wider historic environment and on implementation. This could happen if development has negative impacts in terms of massing, scale, visual impacts. However this is counterbalanced by other local plan policies such as PLAN1 and DH1, DH2 and DH3 and to an extent SP3 which favours refurbishment projects. The impact is therefore considered to be neutral.</p>
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	0	+	+	<p>There is no effect for policy SP1. See response to IIA Objective 1.</p> <p>There is a minor positive effect for Policy SP2 as the policy recognises the need to continue to provide important services for local communities along Caledonian Road. Improvements to permeability are also identified with reference to removing barriers a key priority for the whole area.</p> <p><b>New effects have been identified for Policy SP3 following review of the IIA as part of the examination and changed the effects from neutral to minor</b></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)
				<b>positive. The Policy seeks to improve pedestrian connections throughout the LSIS. This could improve connections for residents with the primary school which is located in the LSIS.</b>
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	+	0	<p>There is no effect for policy SP1. See response to IIA Objective 1.</p> <p>There is a minor positive effect for policy SP2. The policy sets out criteria for residential moorings, which will help address the housing need for boat dwellers identified in Local Plan evidence.</p> <p>There is no effect for policy SP3. It could be considered that there could be a minor negative impact in the supply of affordable housing. However, the LSIS is a functional industrial cluster, which includes some more traditional industrial uses that cannot coexist with housing. In addition other policies in the plan will help to meet housing targets in other locations. The assessment for policies B1 and B2 consider there is potential for a minor negative effect as the policies affect the supply of housing in certain locations across the borough, through prioritising business floorspace. However the assessment considers this to have no effect overall as other policy ensures housing is delivered outside the locations identified which will ensure housing targets are met.</p>
6. Promote social inclusion, equality, diversity and community cohesion	0	0	++	<p>There is no effect for policy SP1 or SP2.</p> <p>New text has been added following review of the IIA as part of the examination process. The assessment of Policy SP3 considers that there are long term positive effects. Policy SP3 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 retaining and strengthening the provision of industrial floorspace. The policy can help to support the diverse needs of businesses</p>

IIA Objective	Policy SP1: Bunhill and Clerkenwell	Policy SP2: King's Cross and Pentonville Road	Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
				<p>dedicated to industrial sectors, provide flexibility for a range of occupiers and help to meet the specialist and local employment needs of the LSIS. Encouraging development of suitable employment floorspace in the LSIS will help to meet demand and unlock potential economic growth in the local area, and can provide a diverse range of employment opportunities. Industrial sectors provide job opportunities for local residents. Opportunities within these sectors may offer more diverse ways of accessing employment through learning skills on the job for those who have low qualification levels or no qualifications, who often face more barriers to access work. If these sectors are lost in the local area, residents dependent on these job opportunities may be at risk of unemployment.</p>
7. Improve the health and wellbeing of the population and reduce health inequalities	0	+	+	<p>There is no effect for policy SP1.</p> <p><b>New effects have been identified for Policy SP2 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. The policy seeks to remove barriers to movement which will help support health and recreation and promote active travel. Also the Regent's canal corridor is recognised as a recreational space. There is also a minor positive effect for policy SP2 as the policy sets out specific criteria for residential moorings on Regent's Canal in relation to air pollution which can be an issue with residential moorings and helps reduce health impacts.</b></p> <p><b>New effects have been identified for Policy SP3 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. There is a minor positive effect identified for Policy SP3 as it will protect the principal function of the LSIS. The strategic location of the LSIS enables shorter journeys and supply chains, which has a more positive effect on air quality, while providing industrial, storage, distribution and</b></p>

IIA Objective	Policy SP1: Bunhill and Clerkenwell	Policy SP2: King's Cross and Pentonville Road	Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
				<p><b>other uses that are increasingly essential to the functioning of London's economy and meeting the needs of its growing population and the aspect of its role in servicing the Central London Economy. Without the policy protection, industrial businesses are likely to be displaced to Outer London locations and this will have significant impacts on transport routes into London, leading to increased traffic congestion and emissions from traffic which will impact on the health of residents. In addition, the proposed policy for the area integrates requirements to improve pedestrian and vehicle connections in the area, where possible, having regard to routes identified to improve connections in the area.</b></p>
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	+	+	+	<p>There is a minor positive effect for policy SP1. There is specific reference to the importance of the area to providing office floorspace which helps contribute to economic growth.</p> <p>There is a minor positive effect for policy SP2. There is specific reference to the importance of the area to providing office floorspace which helps contribute to economic growth.</p> <p>There is a minor positive effect for policy SP3. Policy SP3 would continue to protect existing businesses in the LSIS and would promote the intensification and renovation of old industrial sites. This would attract a wider range of different sized occupiers in need of industrial premises. The Vale Royal/Brewery Road LSIS accommodates many of the types of uses suggested in the Mayor's evidence for the London Plan, including 'clean' activities that provide for the expanding Central London business market. As identified in Islington's Employment Land Study (2016), this area comprises a mix of traditional industrial activities and storage facilities that coexist with emerging industrial uses, including a significant concentration of creative production businesses</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)
				which are based primarily in industrial units and support Islington's wider creative sector. Proposed policy reflects the Council's commitment to support creative production industries where this is more needed in the borough. Protecting the industrial function of LSIS in particular has wider benefits serving other economic functions in both the local and wider London economy.
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	0	+	+	<p>There is no effect for policy SP1.</p> <p>There is a minor positive effect for policy SP2 which will help encourage a shift to more sustainable forms of travel with reference to specific improvements to the public realm along York Way and Caledonian Road, with the aim to create a safer and better-quality environment for pedestrians and cyclists.</p> <p>There is a minor positive effect for policy SP3 which will help encourage a shift to more sustainable forms of travel with reference to improving pedestrian connections. Policy SP3 would protect the principal function of the LSIS. The strategic location of the LSIS enables shorter journeys and supply chains, which has a more positive effect on air quality, while providing industrial, storage, distribution and other uses that are increasingly essential to the functioning of London's economy and meeting the needs of its growing population and the aspect of its role in servicing the Central London Economy. Without the policy protection, industrial businesses are likely to be displaced to Outer London locations and this will have significant impacts on transport routes into London, leading to increased traffic congestion and emissions from traffic which will impact on the health of residents. In addition, the proposed policy for the area integrates requirements to improve pedestrian and vehicle connections in the area, where possible, having regard to routes identified to improve connections in the area.</p>
10. Protect and enhance open	0	+	0	There is no effect for policy SP1.

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)
spaces that are high quality, networked, accessible and multi-functional				<p>There is a minor positive effect for policy SP2. The policy sets out specific criteria for residential moorings on Regent's Canal, a designated open space in to protect use and function of this space.</p> <p>There is no effect for policy SP3.</p>
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	+	0	<p>There is no effect for policy SP1.</p> <p>There is a minor positive effect for policy SP2. The policy sets out specific criteria for residential moorings on Regent's Canal, a designated open space in to protect use and function of this space. <b>Also the policy recognises the Regent's Canal's importance as a wildlife corridor and need for development which increases access for recreational purposes and should not cause detrimental impacts.</b></p> <p>There is no effect for policy SP3.</p>
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	0	+	<p>There is no effect for policy SP1.</p> <p>There is no effect for policy SP2. This was changed from minor positive to neutral following review of the IIA as part of the examination process. Air quality impacts are accounted for under objectives 7 and 14.</p> <p>There is a minor positive effect identified for Policy SP3. Policy SP3 will support the strategic location of the LSIS which enables shorter journeys and supply chains, while providing industrial, storage, distribution and other uses that are increasingly essential to the functioning of London's economy, and meeting the needs of its growing population and the aspect of its role in servicing the Central London Economy. Without the policy protection, industrial businesses are likely to be displaced to Outer London locations and this will have significant impacts on transport routes into London, leading to increased traffic congestion and</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)
				emissions from traffic which will impact on the health of residents. In addition, the proposed policy for the area integrates requirements to improve pedestrian and vehicle connections in the area, where possible, having regard to routes identified to improve connections in the area.
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.</p> <p>There is no effect for policy SP2.</p> <p>There is no effect for policy SP3.</p>
14. Maximise protection and enhancement of natural resources including water, land and air	0	+	+	<p>There is no effect for policy SP1.</p> <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 a minor positive effect for Policy SP3. Policy SP3 will support the strategic location of the LSIS which enables shorter journeys and supply chains, while providing industrial, storage, distribution and other uses that are increasingly essential to the functioning of London's economy, and meeting the needs of its growing population and the aspect of its role in servicing the Central London Economy. Without the policy protection, industrial businesses are likely to be displaced to Outer London locations and this will have significant impacts on transport routes into London, leading to increased traffic congestion and emissions from traffic which will impact on the health of residents. In addition, the proposed policy for the area integrates requirements to improve pedestrian</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)
				and vehicle connections in the area, where possible, having regard to routes identified to improve connections in the area.

### SP1: Bunhill and Clerkenwell

Is the area in the borough expected to see the most significant levels of growth, particularly business floorspace but also cultural, and entertainment uses. The area is the key commercial and employment centre in Islington, and is also home to a variety of education, cultural, and medical uses. It is a focus for creative and tech clusters including Tech City. Bunhill and Clerkenwell has a rich variety of entertainment and leisure uses, restaurants, bars, pubs, and cafes.

The Sustainability Appraisal identified few effects for Policy SP1 as SP1 identifies the spatial strategy areas for the Bunhill and Clerkenwell area. The assessment did identify a minor positive effect for SP1 as the most appropriate location for development, being the area where growth and change is expected to occur within the plan period. A positive effect for economic growth was also identified with specific reference to the importance of the area to providing office floorspace which helps contribute to economic growth.

The Bunhill and Clerkenwell Area Action Plan (AAP) has policies for each Spatial Strategy area, which set out the key strategic considerations. The AAP spatial strategy policies (BC3 to BC8) have been assessed separately.

### SP2: King's Cross and Pentonville Road

The Spatial Policy **SP2: King's Cross and Pentonville Road** is continuing to develop as a key commercial destination and important transport hub. High-density development delivering office, retail and leisure space, as well as housing, has taken place on both sides of the Camden/Islington boundary. Given the central London location, and excellent local, national and international transport links, this has enabled the high quality regeneration of the area to successfully attract high profile commercial tenants and the area is expected to



continue to develop supporting the spatial strategy to help manage this growth. Opportunities for continued cross boundary working with London Borough of Camden are identified by the assessment.

The Sustainability Assessment of spatial strategy SP2 identified a minor positive effect against the objective for built environment as the policy seeks to repair, improve and unify existing frontages on Caledonian Road which will help to secure high quality architecture and attractive public realm. In addition the policy seeks general improvements to the public realm to improve walking and cycling experience which will contribute towards making a safer built environment. The policy also recognises the distinct character of Kings Cross which is positive against the heritage objective. The policy focuses development in the most appropriate areas by recognising existing priority employment locations and the need for employment intensification in them, the relevance of the Knowledge Quarter and the need to maintain and enhance the retail and service the Local Shopping Areas. The Sustainability Assessment of spatial strategy SP2 identified a minor positive effect against the objective for liveable neighbourhoods as the policy recognises the need to continue to provide important services for local communities along Caledonian Road. Improvements to permeability are also identified with reference to removing barriers a key priority for the whole area. The policy seeks to remove barriers to movement which will help support health and recreation and promote active travel - the Regent's canal corridor is recognised as a recreational space. Unrelated is the minor positive effect against the objective for access to housing for SP2 as the policy sets out criteria for residential moorings, which will help address the housing need for boat dwellers identified in Local Plan evidence. Related to this aspect of the policy there are also minor positive effects against objectives for open space and natural resources as the policy will consider air pollution and the use and function of the open space. This is also a benefit against health objective.

There is also a minor positive effect for policy SP2 against the objective for economic growth with specific reference to the importance of the area to providing office floorspace which reinforces the policy position set out in policy B2 and helps contribute to economic growth. There is also a minor positive effect against the objective for minimising the need to travel for policy SP2 which will help encourage a shift to more sustainable forms of travel with reference to specific improvements to the public realm along York Way and Caledonian Road, with the aim to create a safer and better-quality environment for pedestrians and cyclists.

### **SP3 Vale Royal/Brewery Road Locally Significant Industrial Site (LSIS)**

The LSIS has been identified as a spatial strategy area to help maintain and intensify the industrial function of the LSIS. This will also ensure that businesses can continue to benefit from being located in close proximity to one another. The LSIS is the largest concentration of industrial uses in the borough. The unique function of the area should be protected and nurtured to allow for an intensification of industrial uses which is considered justification for the spatial strategy.

The Sustainability Assessment identified a minor positive effect against the objective for the built environment as SP3 focuses development in the most appropriate areas by making specific reference to retaining and strengthening the area for providing industrial floorspace. The policy is assessed positively against the heritage objective as it provides specific guidance on building heights within the

area, which is informed by evidence. Height restrictions will ensure that future development will enhance the local character and distinctiveness of the industrial area.

There is a minor positive effect for policy SP3 against the objective for economic growth with specific reference to retaining and strengthening the area for providing industrial floorspace which reinforces the policy position set out in policy B2 and helps contribute to economic growth.

There is a minor positive effect against the objective minimising the need to travel for policy SP3 which will help encourage a shift to more sustainable forms of travel with reference to improving pedestrian connections. Improving pedestrian connections throughout the LSIS could improve connections for residents with the primary school which is located in the LSIS helping create a positive effect for the objective to achieve more liveable neighbourhoods.

Table 3.36: Assessment of Area Spatial Strategies for SP4 to SP8

IIA Objective	Policy SP4: Angel and Upper Street	Policy SP5: Nag's Head and Holloway	Policy SP6: Finsbury Park	Policy SP7: Archway	Policy SP8: Highbury Corner and Lower Holloway	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	+	+	+	+	++	<p><b>New effects have been identified for Policies SP4 to SP8 following review of the IIA as part of the examination and changed the effects from neutral to minor positive.</b></p> <p><b>Policy SP4 seeks to prioritise opportunities for public realm improvements for walking and cycling experiences which will contribute towards making a safer built environment. Reference is made in particular in relation to Crossrail 2 and Angel station but also reducing the dominance of through traffic on main road junctions.</b></p> <p><b>Policy SP5 strongly encourages public realm and environmental improvements throughout Nag's Head town centre which will contribute towards making a safer built environment.</b></p>

IIA Objective	Policy SP4: Angel and Upper Street	Policy SP5: Nag's Head and Holloway	Policy SP6: Finsbury Park	Policy SP7: Archway	Policy SP8: Highbury Corner and Lower Holloway	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
						<p>Both policy SP6 and SP7 support creation of a high quality environment that is accessible to residents, employees and visitors and good connectivity that will improve walking and cycling experience.</p> <p>Policy SP8 supports the transformation project which will make Highbury Corner safe and accessible for all users, in particular pedestrians and cyclists. In addition the policy also supports improvements to the current station and accessibility including potential use of the former entrance.</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> <p><b>SP4 focuses development in the most appropriate areas by recognising the area as appropriate for a range of commercial uses with office intensification in White Lion Street, retail, service and leisure uses across the town centre and the market and Camden passage identified for protection. In addition the role of the area for cultural and night-time economy uses is also recognised.</b></p> <p><b>SP5 focuses development in the most appropriate areas by recognising the area as appropriate for retail, encouraging increased night time economy, housing on specific sites and new office floorspace.</b></p>

IIA Objective	Policy SP4: Angel and Upper Street	Policy SP5: Nag's Head and Holloway	Policy SP6: Finsbury Park	Policy SP7: Archway	Policy SP8: Highbury Corner and Lower Holloway	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
						<p>SP6 expects development to maintain the predominant commercial role of the area with a focus on retail and services recognised on ground floors, the specialist shopping area of Fonthill Road and the potential of the area to develop as a CAZ satellite for office floorspace. The leisure and cultural attraction of the area is also recognised.</p> <p>SP7 expects development to maintain the predominant commercial function of the area with a focus on retail and services recognised on ground floors. The leisure function and identification of the area as a cultural quarter is also recognised.</p> <p>SP8 supports maintaining the function of the existing Local Shopping Areas and encourage new office floorspace in the employment areas.</p>
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	+	+	+	0	+	<p>New effects have been identified for policies SP4, SP5, SP6 and SP8 following review of the IIA as part of the examination. These are identified below.</p> <p>For Policy SP4 the effects have been changed from neutral to minor positive. The policy makes reference to the historic character of the Angel and Upper Street area, making specific reference to the Islington Tunnel that runs underneath the spatial strategy area.</p> <p>For Policy SP5 the effects have been changed from neutral to minor positive. The policy makes reference to the heritage assets of the area, making specific reference to key buildings.</p>

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

IIA Objective	Policy SP4: Angel and Upper Street	Policy SP5: Nag's Head and Holloway	Policy SP6: Finsbury Park	Policy SP7: Archway	Policy SP8: Highbury Corner and Lower Holloway	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
						<p>the London Metropolitan University is recognised which will help improve access of this facility for residents.</p> <p><b>New effects have been identified for Policy SP6 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. SP6 recognises the rich offer of community uses and cultural spaces that are available and seeks to protect and enhance these. This is alongside the recognition of the area as appropriate for a range of commercial uses including retail, leisure, service, and office uses which will help serve the needs and wellbeing of the population. Opportunities for continued cross boundary working with both neighbouring boroughs are identified with regards the SP6: Finsbury Park town centre in order to support access to services.</b></p> <p><b>New effects have been identified for Policy SP7 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. SP7 focuses development in the most appropriate locations by recognising the area as appropriate for a range of commercial uses including retail and also cultural uses. This will help serve the needs and wellbeing of the population.</b></p> <p><b>New effects have been identified for Policy SP8 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. SP8 focuses development in the most appropriate locations by recognising the area as appropriate for commercial uses including retail and business use. This will help serve the needs and wellbeing of the population.</b></p>

IIA Objective	Policy SP4: Angel and Upper Street	Policy SP5: Nag's Head and Holloway	Policy SP6: Finsbury Park	Policy SP7: Archway	Policy SP8: Highbury Corner and Lower Holloway	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	+	+	+	0	<p>There is no effect for Policies SP4, and SP8.</p> <p><b>New effects have been identified for Policy SP5 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. SP5 includes reference to Holloway Prison as a key site which will help to meet identified housing need in the borough and contribute towards affordable housing need.</b></p> <p><b>New effects have been identified for Policy SP6 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. SP6 includes reference to residential development only being suitable on upper floors and therefore provides some opportunity for new housing to meet identified needs.</b></p> <p><b>New effects have been identified for Policy SP7 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. SP7 includes reference to residential development only being suitable on upper floors and sites allocated for this purpose. This provides some opportunity for new housing to meet identified needs.</b></p>
6. Promote social inclusion, equality, diversity and community cohesion	0	0	0	0	0	There is no effect for Policies SP4, SP5, SP6, SP7 and SP8.

IIA Objective	Policy SP4: Angel and Upper Street	Policy SP5: Nag's Head and Holloway	Policy SP6: Finsbury Park	Policy SP7: Archway	Policy SP8: Highbury Corner and Lower Holloway	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
7. Improve the health and wellbeing of the population and reduce health inequalities	0	0	+	+	0	<p>There is no effect for Policies SP4, SP5, and SP8.</p> <p><b>New effects have been identified for Policy SP6 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. The policy seeks to improve permeability and prioritise opportunities to increase access to Finsbury Park open space which will contribute towards encouraging people to access the space which will benefit physical health and wellbeing.</b></p> <p><b>New effects have been identified for Policy SP7 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. The policy supports the re-provision of the St Pancras Mental health hospital on the Whittington hospital site which will improve access to health facilities/social infrastructure in the borough.</b></p>
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	+	+	+	+	+	<p>There is a minor positive effect for policy SP4 Angel and Upper Street which identifies business use as the priority land use with specific areas identified which reinforces the policy position set out in policy B2 and helps contribute to economic growth.</p> <p>There is a minor positive effect for policy SP5 Nags Head which aims to diversify the local economy which reinforces the policy position set out in policy B2 and helps contribute to economic growth.</p> <p>There is a minor positive effect for policy SP6 Finsbury Park which identifies the centre as having potential to develop as a satellite location for B use classes which reinforces the policy position set out in policy B2 and helps contribute to economic growth.</p>



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)
						There is a minor positive effect for policies SP7 Archway, and SP8 Highbury Corner and Lower Holloway, which reinforces the Inclusive Economy policies, notably policies B2 and R3, and helps contribute to economic growth.
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	+	+	+	+	++	<p><b>New effects have been identified for Policies SP4 to SP7 following review of the IIA as part of the examination and changed the effects from neutral to minor positive.</b></p> <p><b>Policy SP4 seeks to prioritise opportunities for public realm improvements which will contribute towards encouraging more sustainable forms of travel.</b></p> <p><b>Policy SP5 seeks to prioritise opportunities for public realm improvements which will contribute towards encouraging more sustainable forms of travel. In addition there is reference to removing the gyratory system and junction improvements to improve cycle route linkages.</b></p> <p><b>Policy SP6 seeks to improve permeability and prioritise opportunities for public realm improvements which will contribute towards encouraging more sustainable forms of travel.</b></p> <p><b>Policy SP7 seeks to improve permeability and prioritise opportunities for public realm and road safety improvements which will contribute towards encouraging more sustainable forms of travel.</b></p> <p><b>New effects have been identified for Policy SP8 following review of the IIA as part of the examination and changed the effects from neutral to significant positive. The policy supports the transformation project</b></p>

IIA Objective	Policy SP4: Angel and Upper Street	Policy SP5: Nag's Head and Holloway	Policy SP6: Finsbury Park	Policy SP7: Archway	Policy SP8: Highbury Corner and Lower Holloway	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
						which will make Highbury Corner safe and accessible for all users, in particular pedestrians and cyclists with creation of dedicated cycle lanes as part of road junction improvements. In addition the policy also supports improvements to the current station and accessibility including the former entrance.
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	0	0	+	<p>There is no effect for Policies SP4, SP6 and SP7.</p> <p><b>New effects have been identified for Policy SP5 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. There is reference to providing public open space as part of redevelopment of the Morrisons site which will contribute to meeting the need for open space.</b></p> <p>There is a minor positive for policy SP8 which recognises the important function that Highbury Fields which aims to protect and enhance the open space.</p>
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	0	0	0	<p>There is no effect for Policies SP4, SP5, SP6, SP7 and SP8.</p> <p><b>New effects have been identified for Policy SP8 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Although not in the spatial area the policy seeks to protect or enhance the function of Highbury Fields recognising the uniqueness of this asset in Islington. This would include protecting and enhancing the biodiversity value of the site.</b></p>

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	0	0	0	0	0	There is no effect for Policies SP4, SP5, SP6, SP7 and SP8.

IIA Objective	Policy SP4: Angel and Upper Street	Policy SP5: Nag's Head and Holloway	Policy SP6: Finsbury Park	Policy SP7: Archway	Policy SP8: Highbury Corner and Lower Holloway	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
resources including water, land and air						

#### **Policy SP4: Angel and Upper Street**

Angel and Upper Street spatial area is the most significant, distinctive and vibrant Town Centre in Islington. Angel and Upper Street have an important role as the largest Town Centre and commercial area within the borough that is part of the CAZ and is one of the most important areas for employment and economic growth in Islington.

There is a minor positive effect for policy SP4 against the objectives for the built environment and need to travel as the policy will contribute towards making a safer built environment and public realm, also improvements will occur in relation to Crossrail 2. The heritage objective is also positive with reference to the historic character of the Angel and Upper Street area. There is a minor positive against both economic growth and the objective for use of land with specific reference to the importance of the area to providing office floorspace which reinforces the policy position set out in policy B2 and helps contribute to economic growth. In addition SP4 recognises the importance of retail, service and leisure uses across the town centre and the market and Camden passage are identified for protection as well as the role of the area for cultural and night-time economy.

#### **SP5 Nag's Head and Holloway**

This area is a busy and vibrant major Town Centre offering a range of both independent and national retailers. There is potential for improving the Town Centre's food and beverage offer which could significantly increase the attraction of both daytime and night-time economies for different customers and support the wider Town Centre retail function. New office floorspace will be encouraged to support diversity in the local economy.

There is a minor positive effect for policy SP5 against the objectives for the built environment and need to travel as the policy will contribute towards making a safer built environment and public realm, with reference to cycling improvements and aspiration to remove the gyratory. There is a minor positive effect for policy SP5 against the objective for economic growth with specific reference to diversify the local economy which reinforces the policy position set out in policy B2 and helps contribute to economic growth. SP5 also focuses commercial retail development in the most appropriate locations which will help meet needs and wellbeing of the population. In addition the role of the Metropolitan University is recognised which will help improve access of this facility for residents.

The effect identified against objective 5 is considered positive as Holloway Prison is considered a key site which will help meet identified housing need in the borough. Holloway Prison is also assessed as site allocation NH7. The assessment also has a positive effect against objective 10: open space with reference to providing public open space as part of redevelopment of the Morrisons site which will contribute to meeting the need for open space.

#### **SP6 Finsbury Park**

Finsbury Park is a busy, multi-cultural area with cafes and shops that reflect this diversity and is spread across the three boroughs of Islington, Haringey and Hackney. It has a predominant commercial role with significant potential to develop as a unique satellite location, outside the CAZ, for additional B-Use Class uses, due to its excellent transport links to Central London and to the wider South East, and its relatively low rents. Opportunities for continued cross boundary working with both neighbouring boroughs are identified with regards the town centre and provision of services.

There is a minor positive effect for policy SP6 against the objectives for the built environment and need to travel as the policy will support creation of a high quality environment that is accessible to residents, employees and visitors and good connectivity that will improve walking and cycling experience. The policy also recognises the rich offer of community uses and cultural spaces that are available and seeks to protect and enhance these supporting liveable neighbourhoods objective. There is a minor positive effect for policy SP6 against the objective for economic growth in reference to the policy identifying the centre as having potential to develop as a satellite location for B use classes which reinforces the policy position set out in policy B2 and helps contribute to economic growth. In addition to this effect with respect to the objective; use of land, SP6 also focuses development in the most appropriate areas by recognising the area as appropriate for retail, encouraging increased night time economy, housing on specific sites and new office floorspace. The effect on Objective 7 and health and wellbeing is positive as the policy seeks to improve permeability and prioritise opportunities to increase access to Finsbury Park open space which will contribute towards encouraging people to access the space which will benefit physical health and wellbeing.

### **SP7 Archway**

The area should support the commercial function of the area reinforcing the Inclusive Economy policies, particularly the retail function of the Town Centre. There is a growing reputation for culture in Archway, which is a designated cultural quarter. The area currently has a diverse cluster of community-led arts, culture organisations and music venues, providing a dynamic, inclusive cultural offer.

There is a minor positive effect for policy SP7 against the objectives for the built environment and need to travel as the policy will support creation of a high quality environment that is accessible to residents, employees and visitors and good connectivity that will improve walking and cycling experience. The Sustainability Assessment highlighted that SP7 identifies support for Archway town centres role as a cultural quarter and focuses development in the most appropriate locations by recognising the area as appropriate for a range of commercial uses including retail and leisure uses which is positive against objective 2. This will help serve the needs and wellbeing of the population which is positive for objective 4. The effect on Objective 7 and health and wellbeing is positive as the policy supports the reprovision of the St Pancras Mental health hospital on the Whittington hospital site which will improve access to health facilities/social infrastructure in the borough.

### **SP8 Highbury Corner and Lower Holloway**

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

There is a minor positive effect for policy SP8 against the objective for use of land and economic growth as policy for Highbury Corner and Lower Holloway reinforces the policy position set out in policy B2 and helps contribute to economic growth and protects the existing employment areas and supports the function of the existing Local Shopping Areas. There is also positive effect against heritage assets of the area, making specific reference to key buildings and views of local landmark building. Policy SP8 has significant positive effects against the need to travel as the policy supports the Highbury Corner transformation project which will make Highbury Corner safe and accessible for all users, in particular pedestrians and cyclists with creation of dedicated cycle lanes as part of road junction improvements. In addition the policy also supports improvements to the current station and accessibility including the former entrance.

There is a minor positive for against framework objective for open space for policy SP8 which recognises the important function that Highbury Fields and aims to protect views to and from the open space. There is also a positive effect on objective 11 and biodiversity value as the policy seeks to protect or enhance the function of Highbury Fields recognising the uniqueness of this asset in Islington.

## Thriving Communities: Housing Policies

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

- Policy H1: Thriving communities - Policy H1 sets out the strategic policy approach to meeting the range of various housing needs in the borough and meeting need for social and community infrastructure.
- Policy H2: New and existing conventional housing - Policy H2 is focused on housing delivery; quantity of units, new build, protection of existing, conversion of and unit size mix.
- Policy H3: Genuinely affordable housing - Policy H3 focuses on securing affordable housing from all development and suitable tenure mixes to meet local housing need.
- Policy H4: Delivering high quality housing - Policy H4 sets out how high quality housing will be delivered in the borough including requirements covering space standards, accessibility, aspect, ceiling heights, noise and vibration, natural light and tenure blind principles. The policy is underpinned by the idea of the home as a place of retreat where people can feel comfortable and safe, where noise impacts and vibration is mitigated, and natural ventilation is promoted.
- Policy H5: Private outdoor space - Policy H5 sets out how private outdoor amenity space should be provided in the borough which is an important issue given the deficiency of open space in the borough.

Table 3.37: Assessment of policies H1 to H5

IIA Objective	Policy H1: Thriving Communities	Policy H2: New and existing conventional housing	Policy H3: Genuinely affordable housing	Policy H4: Delivering high quality housing	Policy H5: Private outdoor space	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	++	++	0	++	+	Policies H1 and H2 will have a significant positive effect. H1 promotes high quality new homes which fully integrate within, and relate positively to, the immediate locality. Both policies promote optimal densities having regard, inter alia, to the specific site context, which will allow for location sensitive density levels to be determined. Gated development - which can isolate new development and impact on local character, as well as reducing opportunities for crime reduction through increased passive surveillance – is explicitly identified as unsuitable in policy H1. Policy H1



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>sets out the expectation that new homes should be adaptable over their lifetime and meet a variety of needs, which contributes to the positive long term effect.</p> <p><b>New positive effects have been identified following review of the IIA as part of the examination for Policy H2 which does not change the overall effect. Policy H2 restricts bedsits on the basis that there is no evidence of need so they are not a priority unit size and the approach sets out priorities for larger unit sizes, in particular 2 bedroom units. Larger unit sizes are more likely to create robust and adaptable dwellings and buildings.</b></p> <p>There are no effects for policy H3.</p> <p>Policy H4 will have a significant positive long term effect. Delivery of the policy requirements will create inclusive, robust and adaptable buildings that can respond to changes over their life, for example, ensuring minimum space standards and wheelchair accessible/adaptable standards will enable a unit to be occupied by families with young children, and older people. The standards set out in H4 are people-focused to ensure that the needs of individuals and families are at the heart of new housing in the borough.</p> <p><b>New effects have been identified for Policy H5 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policy H5 sets out requirements for private amenity space provided via gardens, balconies or shared private amenity space, including accessibility requirements, which</b></p>

IIA Objective	Policy H1: Thriving Communities	Policy H2: New and existing conventional housing	Policy H3: Genuinely affordable housing	Policy H4: Delivering high quality housing	Policy H5: Private outdoor space	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
						is positive and will help create robust and adaptable dwellings and buildings which respond to evolving social needs.
2. Ensure efficient use of land, buildings and infrastructure	++	++	+	++	+	<p>Policy H1 will have significant positive effect against the objective to ensure efficient use of land. The policy promotes optimal density levels, in reference to high density housing with specific reference to other Development Plan policies, and specific site context meaning that optimisation will be an active consideration and balancing of competing demands between land uses and considering a sites location. H1 also promotes homes that are designed to be adaptable over their lifetime to meet a range of needs that can arise at various stages of the buildings life. <b>Text updated as part of the review of the IIA during the examination: The policy also sets a principle of restricting inefficient forms of development; student accommodation, large HMO and purpose built private rented sector on the basis of land supply and sustainable use of land. The approach aims to balance competing demands for land use and these forms of housing in most cases would not be sufficiently flexible and adaptable to accommodate evolving social and economic needs, compared to conventional housing which meets the broadest spectrum of housing need.</b></p> <p>Policy H2 will have significant positive effect. It requires development proposals involving new housing to optimise the use of the building/site. This includes consideration of competing demands from other land uses. The policy resists smaller studio and bedsit units, and high</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>concentrations of one-bed units, which will ensure that there is a greater supply of larger residential units which meet a broader range of housing need and can be more easily adapted to evolving social and economic needs more generally. H2 also prevents housing supply being wasted by ensuring new homes will be occupied; this is a direct measure to ensure that land will actually be used for its permitted purpose, and hence directly leads to the efficient use of land.</p> <p>Policy H3 will have minor positive effect. It provides a strong requirement for the delivery of affordable housing, which ensures that this key priority is appropriately factored in to any judgement on balancing competing development needs. Delivery of affordable housing is one of the key development needs of the area.</p> <p>Policy H4 will have significant positive effect. It ensures that where housing is developed, it is high quality which makes the most out of land available. Policy H4 includes a number of design standards which mean that homes are adaptable to meet a range of needs in the long term over their lifetime. These standards link with other plan policies including sustainable design requirements to ensure that development contributes to a broad range of plan priorities and hence meets a broad range of identified needs. <b>It is noted that H4 includes minimum space standards which have an impact on how efficiently land is used and mitigates the impact of potentially low quality small units/person.</b></p> <p><b>New effects have been identified for Policy H5 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policy H5 sets out requirements private amenity space provided via gardens, balconies or shared private</b></p>

IIA Objective	Policy H1: Thriving Communities	Policy H2: New and existing conventional housing	Policy H3: Genuinely affordable housing	Policy H4: Delivering high quality housing	Policy H5: Private outdoor space	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
						amenity space, including accessibility requirements, which is positive and will help create flexible and adaptable dwellings and buildings which respond to evolving social needs and which can also help to support green infrastructure.
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	+	0	0	0	0	There are no effects for policies H2 to H5.  <b>New effects have been identified for Policy H1 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policy H1 promotes optimal density levels, in reference to high density housing with specific reference to other Development Plan policies, and specific site context meaning that optimisation will be an active consideration alongside other aspects such as considering Islington’s historic environment is protected. This provides mitigates for potential negative cumulative effects on the historic environment.</b>
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	+	+	+	0	0	Policies H1 and H3 will have a minor positive effect. The core aim of policy H1 is the delivery of mixed and balanced communities which are economically, environmentally and socially resilient. It also seeks new housing development that is fully integrated within, and relates positively to, the immediate locality; this would include consideration of access to services. <b>H1 in particular will support the provision of necessary social infrastructure to support residents, workers and visitors helping meet needs and improve access to essential services in the right locations.</b>

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 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 to good quality, well-located, affordable housing	++	++	++	++	+	<p>Policy H1 will have significant positive effect. It includes delivery of genuinely affordable housing as a key priority, and specifies that such housing must be affordable for those in need. Financial contributions are also sought from the policy. Overall, the policy is likely to significantly increase the supply of AH, both directly and through spending of any financial contributions secured to deliver AH elsewhere in the borough. <b>The policy promotes optimal density levels, size mix which reflects local need, and also references meeting needs of vulnerable older people and gypsies and travellers.</b></p> <p>Policy H2 will have significant positive effect. The policy seeks a mix of housing sizes informed by evidence of need and population growth; this includes specific size priorities for different affordable tenures. Encouraging a diverse mix ensures that affordable housing provision can</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>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 over the long term. The policy requires adherence to tenure blind principles to ensure that affordable and market housing is integrated.</p> <p>Policy H5 will have a minor positive effect. It will ensure the delivery of private outdoor space which helps improve the quality and diversity of housing and enables occupiers to benefit from outdoor space which addresses their needs, for example the needs of families with children could be met through provision of outdoor space where children can play in a safe environment.</p>
6. Promote social inclusion,	++	+	+	++	+	Policy H1 will have a significant positive effect. The policy aims to improve fairness and integration and tackle social exclusion, through the

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)
equality, diversity and community cohesion						<p>delivery of mixed and balanced communities which are economically, environmentally and socially resilient. It also seeks new housing development that is fully integrated within, and relates positively to, the immediate locality, and resists gated development. These measures combined are likely to be of significant benefit in terms of creating a fairer, more integrated Islington. <b>The policy seeks to meet needs of general housing and for gypsies and travellers which promotes equity between population groups and those with protected characteristics helping reduce social exclusion.</b></p> <p><b>New effects have been identified for Policy H2 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. The policy seeks a mix of housing sizes informed by evidence of need and population growth; this includes specific size priorities for different affordable tenures. Encouraging a diverse mix ensures that housing provision can meet the broadest range of need possible and reduce equality providing more opportunity and potentially addressing overcrowding issues.</b></p> <p>Policy H3 will have minor positive effects. Increased delivery of AH could help reduce the negative consequences of relative poverty by reducing the proportion of income spent on accommodation and therefore freeing up a greater proportion of income for other living costs. AH is also an important component in delivering mixed and balanced communities which will improve social cohesion and integration.</p> <p>Policy H4 will have a significant positive effect. The requirement for new development to be 'tenure blind' will promote social cohesion and integration. This requirement, and others included in H4 such as</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>requiring certain proportions of wheelchair accessible and adaptable properties, could lead to greater equity between population groups and those with protected characteristics.</p> <p><b>New effects have been identified for Policy H5 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policy H5 sets out requirements for private amenity space provided via gardens, balconies or shared private amenity space. Ensuring provision of private amenity space is positive and will help support active communities and cohesive communities where shared space is provided.</b></p>
7. Improve the health and wellbeing of the population and reduce health inequalities	+	+	+	++	+	<p>Policy H1 will have minor positive effect. The delivery of mixed and balanced communities and high quality housing can have a number of benefits (both direct and indirect) in terms of improving health and wellbeing, e.g. policy explicitly highlights the importance of designing the home as a place of retreat which can contribute to wellbeing, improving both physical and mental health .</p> <p><b>New effects have been identified for Policy H2 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. H2 requires the optimal use of sites/buildings and consideration of social infrastructure (SI) requirements and impact on existing SI. This will help to support existing facilities and ensure that the appropriate level of SI is available for the local population.</b></p>



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. 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 long term health and wellbeing. H4 has specific requirements relating to noise and vibration to ensure that potential impacts are identified and mitigated. The policy also includes detailed measures to promote natural ventilation (and thereby reducing reliance on mechanical ventilation which would increase energy usage); this could assist with reducing fuel poverty. <b>The policy requires development to maximise natural light into rooms with a requirement for direct sunlight to enter main habitable rooms for a reasonable period of the day and a requirement for minimum floor to ceiling heights. Higher ceiling heights create a sense of space and improve quality of accommodation and also help keep rooms cooler in summer, which help improve peoples' health and wellbeing.</b></p> <p>Policy H5 will have minor positive effect. It will improve access to outdoor space which improves amenity, can encourage more activity/exercise and can have positive impacts on health and wellbeing. Islington has a lot of sources of noise in close proximity to residential uses, so in principle any space which increases outdoor activity could be</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)
						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.
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	0	+	+	0	0	<p>There are no effects for policies H1, H4 and H5.</p> <p><b>New effects for Policy H2 have been identified which changes the effects from neutral to minor positive following review of the IIA as part of the examination process. Policy H2 considers the interaction with other policy priorities in particular new business floorspace helping ensure sufficient space is provided in the right locations where appropriate.</b></p> <p><b>New effects for Policy H3 have been identified which changes the effects from neutral to minor positive following review of the IIA as part of the examination process. The provision of affordable housing can help retain labour in Islington which can help key public service areas and lower skilled employment. The significant expense of housing in the borough can act as a significant barrier to employment driving people out of the borough and potentially out of the capital.</b></p>
9. Minimise the need to travel and create accessible, safe and sustainable connections and	0	0	+	0	0	<p>There are no effects for policies H1 to H5.</p> <p><b>A new effect has been identified which changes the effects from neutral to minor positive for H3 following review of the IIA as part of the examination process. There are is a minor positive effect for Policy H3 provision of affordable housing. The provision of</b></p>

IIA Objective	Policy H1: Thriving Communities	Policy H2: New and existing conventional housing	Policy H3: Genuinely affordable housing	Policy H4: Delivering high quality housing	Policy H5: Private outdoor space	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
networks by road, public transport, cycling and walking						affordable housing can help retain labour in Islington which can help key public service areas and lower skilled employment. The significant expense of housing in the borough can act as a significant barrier to employment driving people out of the borough and potentially out of the capital this therefore can help reduce the need to travel.
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	0	0	+	<p><b>Reduced effects for Policy H5 have been identified which changes the effects from significant positive to minor positive following review of the IIA as part of the examination process.</b> Provision of private outdoor space will help address the deficiency of open space in the borough and help reduce the pressure on existing spaces. While the policy does not prescribe green private outdoor space, such space could include gardens <b>which could</b> contribute to delivery of green infrastructure.</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	+	<p>There are no effects for policies H1 to H4.</p> <p><b>A new effect has been identified which changes the effects from neutral to minor positive for H5 following review of the IIA as part of the examination process. The policy prioritises the integration of biodiversity benefits where roofs are used for amenity purposes.</b></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)
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	+	0	+	+	+	<p>There are minor positive effects for policies H1 and H4. Both policies promote high quality housing which is comfortable, improves the quality of life of residents and contributes to improvements in health. What constitutes 'comfortable' is ever changing given the increasing impacts of climate change, but the policies promote the mitigation and adaptation of climate change impacts through design without reliance on technological and/or retrofitted solutions. For example, Policy H4 includes detailed housing standards including measures to reduce impacts of noise and vibration and to promote natural ventilation (and thereby reducing reliance on mechanical ventilation which would increase energy usage). <b>The policy requires development to maximise natural light into rooms with a requirement for direct sunlight to enter main habitable rooms for a reasonable period of the day and a requirement for minimum floor to ceiling heights. Higher ceiling heights help keep rooms cooler in summer reducing need for mechanical ventilation and maximising light reduces period when electrical light is used.</b></p> <p><b>New effect has been identified which changes the effects from neutral to minor positive for H3 following review of the IIA as part of the examination process. There are is a minor positive effect for Policy H3 provision of affordable housing. The provision of affordable housing can help retain labour in Islington which can help key public service areas and lower skilled employment. The significant expense of housing in the borough can act as a significant barrier to employment driving people out of the borough and potentially out of the capital this therefore can help reduce the need to travel and contribution to climate change.</b></p>

IIA Objective	Policy H1: Thriving Communities	Policy H2: New and existing conventional housing	Policy H3: Genuinely affordable housing	Policy H4: Delivering high quality housing	Policy H5: Private outdoor space	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
						<p><b>A new effect has been identified which changes the effects from neutral to minor positive for H5 following review of the IIA as part of the examination process. The policy recognises the need to seek to balance the use of green roofs for amenity purposes with renewable energy equipment which helps development meet their priorities to reduce carbon emissions.</b></p> <p>There are no effects for policies H2.</p>
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	+	0	0	++	0	<p>Policy H1 will have a minor positive effect. It promotes homes that are designed to be adaptable over their lifetime to meet a range of needs that can arise at various stages of life.</p> <p>Policy H4 will have significant positive effect. The policy requires new homes to consider how recycling and waste arising from occupation of the development will be stored, collected and managed, which could contribute to increased levels of recycling. Policy H4 includes a number of design standards which mean that homes are adaptable to meet a range of needs over their lifetime. This will contribute to the delivery of a circular economy.</p> <p>There are no effects for policies H2, H3 and H5.</p>
14. Maximise protection and enhancement of natural resources	0	0	0	0	0	There are no effects for policies H1 to H5.

IIA Objective	Policy H1: Thriving Communities	Policy H2: New and existing conventional housing	Policy H3: Genuinely affordable housing	Policy H4: Delivering high quality housing	Policy H5: Private outdoor space	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
including water, land and air						

### Policy H1: Thriving communities

Policy H1 is the strategic policy approach to meeting housing needs so the **Sustainability Appraisal** identified that it will have a particularly significant positive effect against the societal objectives contained in the Sustainability Framework. The aim of policy is to improve fairness and integration and tackle social exclusion through the delivery of mixed and balanced communities which are economically, environmentally and socially resilient. High quality new homes which fully integrate within, and relate positively to, the immediate locality and promotes optimal density levels are required and policy promotes high quality housing which is comfortable, improves the quality of life of residents and contributes to improvements in health. Delivery of genuinely affordable housing is a key priority which addresses inequality. The policy promotes optimal densities in regard to the specific site context, which will allow for location sensitive density levels to be determined. The policy promotes high density housing, an efficient use of land but considers this alongside other policy aspects such as Islington’s historic environment. At the same time the policy also has another positive effect on efficient use of land as it resists inefficient forms of development such as student accommodation and large HMO on the basis of land supply and sustainable use of land.

### Policy H2: New and existing conventional housing

Policy H2 is focused on housing delivery; quantity of units, new build, protection of existing, conversion of and unit size mix. The **Sustainability Appraisal** of Policy H2 will have significant positive effects against the efficient use of land objective through providing a mix of housing sizes informed by evidence of need and optimising housing and the use of a building/site. The policy resists smaller studio and bedsit units, and high concentrations of one-bed units, which will ensure that there is a greater supply of larger residential units which meet a broader range of housing need and can be more easily adapted to evolving social and economic needs more generally. Policy H2 also has a positive effect against the objective for liveable neighbourhoods as it seeks the consideration of social infrastructure requirements and impact on existing social infrastructure. H2 also prevents housing supply being wasted by ensuring new homes will be occupied. This aspect of the policy has an alternative policy approach, considered below.

**Policy H3: Genuinely affordable housing**

The **Sustainability Appraisal** of Policy H3 considered it would have a significant positive effect against the objectives to; deliver mixed and balanced communities; balancing competing land use needs; and helping reduce poverty. Setting a robust requirement for the delivery of as much genuinely affordable housing as possible from every site and requiring the majority of provision at social rent level will increase the amount of affordable housing delivered which helps reduce living costs and addressing inequality. Other benefits identified included in particular health benefits and also positive effects on the economy as affordable housing can help retain labour in Islington which can help key public service areas and lower skilled employment.

**Policy H4: Delivering high quality housing**

Policy H4 sets out how high quality housing will be delivered in the borough. The **Sustainability Appraisal** results demonstrate the policy will have a significant positive effect against the objectives by creating inclusive, robust and adaptable buildings that can respond to changes over their life, helping meet the needs of individuals and families whilst making the most out of land available. The policy applies tenure blind principles which will promote social cohesion and integration and require a proportion of wheelchair accessible and adaptable properties, and could lead to greater equity between population groups and those with protected characteristics.

**Policy H5: Private outdoor space**

Policy H5 is considered to have a minor positive effect by the **Sustainability Appraisal** as it has positive effects against the objective to improve diversity of housing, improves amenity and has positive impacts against the objective for health and wellbeing. The delivery of private outdoor space will enable occupiers to benefit from outdoor space helping address needs, for example the needs of families with children could be met through provision of outdoor space where children can play in a safe environment and helps create robust and adaptable dwellings which respond to evolving social needs. The policy is flexible as it allows for alternatives where the level of noise experienced by private outdoor space would exceed relevant standards. A minor change to policy between Regulation 18 and Regulation 19 which removed regard to be had to adverse noise impacts on adjacent land is not considered to have an effect as it is covered by existing policy DH5 which deals with noise impacts.

## Assessment of policies H6 to H12

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

- Policy H6: Purpose built Student Accommodation - Policy H6 restricts new development to allocated site and redevelopment and/or intensification of existing purpose-built student accommodation and ensures a high standard of amenity for future occupiers.
- Policy H7: Meeting the needs of vulnerable older people - Policy H7 sets out policy to meet the need for accommodation for older people and provides related design quality.
- Policy H8: Self-build and Custom Housebuilding - Policy H8 sets out the need for and requirements that proposals including Self-build and Custom build unit(s) must meet.
- Policy H9: Supported Housing - Policy H9 defines the wide range of supported housing types including permanent, long term and shorter term accommodation which meets temporary need. The policy states when the Council will support and resist supported housing.
- Policy H10: Houses in Multiple Occupation (HMOs) - Policy H10 focuses on when HMOs will be protected and supported as well as requirements for their size and quality and generally resists large-scale HMO
- Policy H11: Purpose Built Private Rented sector development - Policy H11 resists purpose built Private Rented Sector (PRS) development and sets out requirements if it is to be built.
- Policy H12: Gypsy and Traveller accommodation - Policy H12 identifies how the need for Gypsy and Traveller accommodation will be met and the requirements of these sites.



Table 3.38: Assessment of policies H6 to H12

IIA Objective	Policy H6: Purpose-built Student Accommodation	Policy H7: Meeting the needs of vulnerable older people	Policy H8: Self-build and Custom Housebuilding	Policy H9: Supported Housing	Policy H10: Houses in Multiple Occupation (HMOs)	Policy H11: Purpose Built Private Rented Sector Development	Policy H12: Gypsy and Traveller Accommodation	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	0	0	+	0	0	-	0	<p>There are no effects for policy H12.</p> <p>Whilst some of the policies require a high quality design response in terms of internal design for the occupants the objective seeks consideration of the response of a proposal to the policy in the wider context.</p> <p><b>New effects have been identified which improve the effects for H6 and H10 following review of the IIA as part of the examination process. The policies will have minor positive effects through the requirement for site management plans which will help to manage potential for anti-social behaviour such as noise affects helping contribute to a safer environment.</b></p> <p><b>New effects have been identified which improve the effects for neutral to minor positive for H7 following review of the IIA as part of the examination process. The policy will have minor positive effects as it expects the suitability of a site for older persons accommodation to consider the context of the surrounding neighbourhood and the development of other priority land uses and creation of mixed and balanced communities.</b></p>

IIA Objective	Policy H6: Purpose-built Student Accommodation	Policy H7: Meeting the needs of vulnerable older people	Policy H8: Self-build and Custom Housebuilding	Policy H9: Supported Housing	Policy H10: Houses in Multiple Occupation (HMOs)	Policy H11: Purpose Built Private Rented Sector Development	Policy H12: Gypsy and Traveller Accommodation	<b>Commentary on assessment of likely significant effects of policies</b>  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
								<p><b>New effects have been identified which changes the effects from neutral to minor positive for H8. The policy promotes the most efficient use of land and optimal densities having regard to the specific site context thereby helping to promote location.</b></p> <p><b>New effects have been identified which changes the effects from neutral to minor negative for H6, H7, H10 and H11 following review of the IIA as part of the examination process. These uses in most cases would not deliver sufficiently flexible and adaptable buildings for evolving social and economic needs, compared to conventional housing which meets the broadest spectrum of housing need.</b></p> <p><b>Large-scale HMOs and student accommodation in particular tend to be small in terms of space, which in most cases is not sustainable in terms of the ability to meet a range of needs, e.g. families, in the future.</b></p> <p><b>Overall considering the above minor negative effects for H6 and H10 around flexible and adaptable buildings together with the minor positive effects for site management plans is considered to have an overall neutral effect for</b></p>

IIA Objective	Policy H6: Purpose-built Student Accommodation	Policy H7: Meeting the needs of vulnerable older people	Policy H8: Self-build and Custom Housebuilding	Policy H9: Supported Housing	Policy H10: Houses in Multiple Occupation (HMOs)	Policy H11: Purpose Built Private Rented Sector Development	Policy H12: Gypsy and Traveller Accommodation	<b>Commentary on assessment of likely significant effects of policies</b>  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
								<b>these policies. A similar balance and overall neutral effect is considered to apply for policy H7 too.</b>
2. Ensure efficient use of land, buildings and infrastructure	-	0	+	0	-	-	0	<p>There is a minor negative effect for the policies H6, H7, H10 and H11. The <b>land uses</b> would not be sufficiently flexible and adaptable <b>in most cases</b> to accommodate evolving social and economic needs, compared to conventional housing which meets the broadest spectrum of housing need. There is no evidence to suggest that any of these forms of accommodation can provide the same level of flexibility and adaptability as conventional housing in meeting housing need over the short, medium and long term as conventional housing development can. Policy H11 would reduce the ability of development to meet wider development needs through likelihood of delivering less affordable housing. Providing these forms of accommodation would therefore not optimise the use of land.</p> <p>Policy H9 and H12 have no effects.</p> <p><b>New effects have been identified which have a minor positive for H7 following review of the IIA as part of the examination process. There is a</b></p>

IIA Objective	Policy H6: Purpose-built Student Accommodation	Policy H7: Meeting the needs of vulnerable older people	Policy H8: Self-build and Custom Housebuilding	Policy H9: Supported Housing	Policy H10: Houses in Multiple Occupation (HMOs)	Policy H11: Purpose Built Private Rented Sector Development	Policy H12: Gypsy and Traveller Accommodation	<b>Commentary on assessment of likely significant effects of policies</b>  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
								<p><b>positive effect from policy H7 as it focuses development of older peoples accommodation in the right locations appropriate to the needs of the occupiers. The policy alternative will have the same positive effect. Overall a neutral effect is considered to apply for policy H7 when taking into account the negative effect from insufficient flexibility and adaptability.</b></p> <p><b>New effects have been identified which changes the effects from neutral to minor positive for H8. The policy for self-build housing promotes the most efficient use of land and optimal densities having regard to the specific site context.</b></p>
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural	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)	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)
environment.								
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	+	+	0	+	+	0	0	<p>No effect for the policies H8 and H10 to H12.</p> <p><b>New effects have been identified which changes the effects from neutral to minor positive for H6 and H10 following review of the IIA as part of the examination process. The policy will have minor positive effects through the requirement for a site management plan which will in part manage potential for noise related anti-social behaviour which can help contribute to a safer environment. In addition the policy makes clear that change of use on a temporary basis to visitor accommodation is not acceptable.</b></p> <p><b>New effects have been identified which changes the effects from neutral to minor positive for H7 and H9 following review of the IIA as part of the examination process. The policies will have minor positive effects as they expect sites for older persons accommodation / supported housing to be easily accessible to shops, services and community facilities which helps provide access to and support to existing services.</b></p>

IIA Objective	Policy H6: Purpose-built Student Accommodation	Policy H7: Meeting the needs of vulnerable older people	Policy H8: Self-build and Custom Housebuilding	Policy H9: Supported Housing	Policy H10: Houses in Multiple Occupation (HMOs)	Policy H11: Purpose Built Private Rented Sector Development	Policy H12: Gypsy and Traveller Accommodation	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
5. Ensure that all residents have access to good quality, well-located, affordable housing	-	0	+	+	-	-	+	<p>There is a minor negative effect for the <b>land uses</b> H6, H10 and H11. They would likely provide less genuinely affordable housing overall than conventional models of housing <b>although it is noted that they expect application of policy H4</b>; in particular, these alternative models can make it more difficult to deliver social rented housing that is effectively integrated within a development. <b>Whilst Policy H6 expects provision of affordable student accommodation, its recognised that this is not meeting affordable housing need so can't be considered to help meet an identified need in the borough. In addition it is unclear whether affordable student accommodation would be likely to meet accommodation needs of Islington students. Therefore effect is considered negative.</b></p> <p>Policy H7 strongly resists market extra care accommodation and is supportive of social rent extra care so is considered neutral. <b>New explanation has been identified as part of the assessment of the alternative to Policy H7. Policy H7 strongly resists market extra care, therefore provides more conventional housing and avoids difficulties around social rented provision. Policy H7 is also supportive of social rent extra care is considered neutral because it does not maximise the quantum of housing provided compared to conventional housing.</b></p>

IIA Objective	Policy H6: Purpose-built Student Accommodation	Policy H7: Meeting the needs of vulnerable older people	Policy H8: Self-build and Custom Housebuilding	Policy H9: Supported Housing	Policy H10: Houses in Multiple Occupation (HMOs)	Policy H11: Purpose Built Private Rented Sector Development	Policy H12: Gypsy and Traveller Accommodation	<b>Commentary on assessment of likely significant effects of policies</b>  <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
								<p>Large-scale HMOs and student accommodation in particular tend to be small in terms of space, which is not sustainable in terms of the ability to meet a range of needs, e.g. families, in the future and do not represent a diversity of housing sizes.</p> <p>There is a minor positive effect assumed for policies H8 and H9 in that they help to diversify housing types.</p> <p><b>New effects have been identified which changes the effects from neutral to minor positive for H12 following review of the IIA as part of the examination process. Policy H12 is considered to have a minor positive effect as it seeks to meet needs for gypsy and travellers which will help to meet the diverse and changing needs of Islington.</b></p>
6. Promote social inclusion, equality, diversity and community cohesion	+	0	0	++	0	0	+	<p>No effect for policies H8, H10 and H11.</p> <p><b>New effects have been identified which changes the effects from neutral to minor positive for H6 following review of the IIA as part of the examination process. A minor positive effect is considered as a result of the requirement for bursary contributions towards students leaving council care and students facing hardship which contributes to reducing inequality.</b></p>

IIA Objective	Policy H6: Purpose-built Student Accommodation	Policy H7: Meeting the needs of vulnerable older people	Policy H8: Self-build and Custom Housebuilding	Policy H9: Supported Housing	Policy H10: Houses in Multiple Occupation (HMOs)	Policy H11: Purpose Built Private Rented Sector Development	Policy H12: Gypsy and Traveller Accommodation	<b>Commentary on assessment of likely significant effects of policies</b>  <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
								<p>Policy H7 could be conceived to reduce the opportunity to provide market extra care homes but is considered to have no discernible effect on inclusion given the support that older people have for remaining in their own homes and living independently. This is considered in light of the Councils intention to support older people to remain in their own homes and live independently, with the assumption made that the Council will further develop ways and means of enabling this. Therefore it is considered to have no discernible effect.</p> <p>Policy H9 will have a significant positive effect as it protects existing supported housing and supports the provision of new supported housing would have a positive effect on inclusion and social cohesion helping improve peoples' opportunity for independence for those more disadvantaged.</p> <p>There is a minor positive effect for Policy H12 on promoting social inclusion as the Council is seeking to meet needs for gypsies and travellers, through use of its own sites and/or working sub-regionally with the GLA/other boroughs to identify sites.</p>
7. Improve the health	-	+	0	++	-	+	0	No effect for policies H8, and H12.



IIA Objective	Policy H6: Purpose-built Student Accommodation	Policy H7: Meeting the needs of vulnerable older people	Policy H8: Self-build and Custom Housebuilding	Policy H9: Supported Housing	Policy H10: Houses in Multiple Occupation (HMOs)	Policy H11: Purpose Built Private Rented Sector Development	Policy H12: Gypsy and Traveller Accommodation	<p>Commentary on assessment of likely significant effects of policies</p> <p>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</p>
and wellbeing of the population and reduce health inequalities								<p><b>New effects have been identified which changes the effects from neutral to minor positive for Policy H11 following review of the IIA as part of the examination process. The policy expects high quality housing in line with H4 which has various aspects to which is overall likely to improve health and wellbeing.</b></p> <p>Policy H7 has a minor positive effect. The policy would enable people to stay in their own home which can have positive benefits in terms of mental and physical health. Policy H7 would also have a minor positive effect as care home accommodation has to demonstrate compliance with various design issues including providing access to communal outdoor space.</p> <p>H9 would have a significant positive effect as it aims to improve peoples' opportunity for independence for those more disadvantaged.</p> <p>Policy H6 and H10 are both minor negative as they do not provide the same quality of residential accommodation as conventional housing with no private outdoor space for example undermining the concept of the home as a place of retreat. <b>In addition trends in student accommodation are seeing studios preferred over communal flats reducing the opportunity for social interaction between students.</b></p>

IIA Objective	Policy H6: Purpose-built Student Accommodation	Policy H7: Meeting the needs of vulnerable older people	Policy H8: Self-build and Custom Housebuilding	Policy H9: Supported Housing	Policy H10: Houses in Multiple Occupation (HMOs)	Policy H11: Purpose Built Private Rented Sector Development	Policy H12: Gypsy and Traveller Accommodation	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	+	0	0	0	0	0	0	No effect for the policies H7, H8, H9, H10, H11 and H12.  <b>New effects have been identified which changes the effects from neutral to minor positive for H6 following review of the IIA as part of the examination process. A minor positive effect is considered as a result of the requirement for bursary contributions towards students leaving council care and students facing hardship which can also contribute towards training support for local people helping to increase their employment opportunities.</b>
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	0	+	0	+	0	0	0	No effect for the policies H6, H8, H10, H11 and H12.  There is a minor positive effect for policies H7 and H9 which ensures that proposals have easy access to public transport, shops, services and community facilities.

<b>IIA Objective</b>	<b>Policy H6: Purpose-built Student Accommodation</b>	<b>Policy H7: Meeting the needs of vulnerable older people</b>	<b>Policy H8: Self-build and Custom Housebuilding</b>	<b>Policy H9: Supported Housing</b>	<b>Policy H10: Houses in Multiple Occupation (HMOs)</b>	<b>Policy H11: Purpose Built Private Rented Sector Development</b>	<b>Policy H12: Gypsy and Traveller Accommodation</b>	<b>Commentary on assessment of likely significant effects of policies</b>  <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	0	0	0	0	0	No effect for the policies H6, H7, H8, H9, H10, H11 and H12.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	0	0	0	0	0	No effect for the policies H6, H7, H8, H9, H10, H11 and H12.
12. Reduce contribution to climate change and enhance	0	0	0	0	0	0	0	No effect for the policies H6, H7, H8, H9, H10, H11 and H12.

IIA Objective	Policy H6: Purpose-built Student Accommodation	Policy H7: Meeting the needs of vulnerable older people	Policy H8: Self-build and Custom Housebuilding	Policy H9: Supported Housing	Policy H10: Houses in Multiple Occupation (HMOs)	Policy H11: Purpose Built Private Rented Sector Development	Policy H12: Gypsy and Traveller Accommodation	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
community resilience to climate change impacts.								
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	-	-	0	0	-	0	0	No effect for alternative to policies H7, H8, H9, H11 and H12.  There is a minor negative effect for policies H6, <b>H7</b> and H10. Due to their design, student accommodation, <b>older persons accommodation</b> and large-scale HMOs may be less able to respond to changing needs (such as accommodating families), and would therefore require potentially considerable resource to renovate the design to meet such needs.
14. Maximise	0	0	0	0	0	0	0	No effect for the policies H6, H7, H8, H9, H10, H11 and H12.

IIA Objective	Policy H6: Purpose-built Student Accommodation	Policy H7: Meeting the needs of vulnerable older people	Policy H8: Self-build and Custom Housebuilding	Policy H9: Supported Housing	Policy H10: Houses in Multiple Occupation (HMOs)	Policy H11: Purpose Built Private Rented Sector Development	Policy H12: Gypsy and Traveller Accommodation	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
protection and enhancement of natural resources including water, land and air								

**Policy H6: Purpose built Student Accommodation**

**Policy H10: Houses in Multiple Occupation (HMOs)**

Policy H6 and H10 are considered together because the assessment results in similar overall negative impacts against the framework for these policies as a result of the affect created by the accommodation which the policies are trying to mitigate. There is an overwhelming need to provide housing and affordable housing with limited amount of developable land in the borough, and conventional housing meets the broadest spectrum of need, so any form of housing that detracts from meeting this overwhelming need is going to have a negative impact on use of land in the Sustainability Appraisal. This negative impact against the efficient use of land is extended in the Sustainability Appraisal for the alternatives to both policy H6 and H10. The two policy alternatives would apply the London Plan policy which would permit more student housing in well-connected accessible locations such as town centres with local services. For large scale HMOs the London Plan is also supportive and considers that this kind of accommodation may have a role in meeting housing needs in London. Note that the Local Plan is supportive of small scale HMO – those considered C4 use class and resists large scale purpose built HMO – those considered sui generis.

The Sustainability Appraisal for policies H6 and H10 considers there is no evidence to suggest that any of these forms of accommodation can provide the same level of flexibility and adaptability as conventional housing in meeting housing need over the short, medium and long term. Large-scale HMOs and student accommodation in particular tend to be small in terms of space, which is not sustainable in terms of the ability to meet a range of needs and does not respond to changing needs over a buildings life. They do not provide the same quality of residential accommodation with no private outdoor space for example undermining the concept of the home as a place of retreat. The assessment also considered the policies would also likely provide less genuinely affordable housing overall in particular, these alternative models can make it more difficult to deliver social rented housing that is effectively integrated within a development. Finally the appraisal considered these forms of accommodation undermined community cohesion through potentially creating a more itinerant community as they are not designed for long term occupation. The assessment identified positive effects through the requirement for site management plans which will help to manage potential for anti-social behaviour such as noise affects helping contribute to objective 1 and helping create a safer environment for both H6 and H10. In addition, H6 has positive effects against the objective for inclusion and economy as a result of the requirement for bursary contributions towards students leaving council care and students facing hardship which contributes to reducing inequality and improving employment opportunities.

#### **Policy H7: Meeting the needs of vulnerable older people**

The issue of meeting needs again comes into play with Policy H7 as the approach supports affordable extra care but the policy could be conceived to reduce the opportunity to provide market extra care homes. The policy also is not sustainable in terms of the ability to meet a range of needs and extra care homes are less able to respond to changing needs over a buildings life. The policy is considered to have minor positive effects as it expects the suitability of a site for older persons accommodation to consider the context of the surrounding neighbourhood, access to shops and services and the development of other priority land uses and creation of mixed and balanced communities. However the policy approach is clear that where there is evidence of local unmet need in the social sector then it would be possible to provide a care home or extra care home so the Sustainability Appraisal considers that it will have no discernible effect against the inclusion objective. This is also considered in light of the Councils intention to support older people to remain in their own homes and live independently, with the assumption made that the Council will further develop ways and means of enabling this - the assessment considers this will have a minor positive effect on mental and physical health. Policy H7 also has positive impact through good quality care and extra care accommodation through compliance with various design issues including providing access to communal outdoor space, and easy access to public transport, shops, services and community facilities.

#### **Policy H8: Self-build and Custom Housebuilding**

Policy H8 creates minor positive effect when assessed, and there is little actual evidence of interest in self build in the borough. The policy is considered by the Sustainability Appraisal to be positive given that self-build housing would be built in accordance with policies H3 and H4 – providing high quality and delivery of affordable housing and the policy also responds to the objective to ensure efficient use of land by referencing use of optimal densities with regard to the specific site context. A possible alternative would be no policy but this would be an unreasonable alternative given the need to consider the self-build duty, so it has not been assessed. Legislation has

been introduced to support self-build and custom build with the Council required to have regard to the self-build register when undertaking planning.

### **Policy H9: Supported Housing**

Policy H9 is considered by the Sustainability Appraisal to have a significant positive effect against the sustainability appraisal objective for social cohesion as it protects existing supported housing and supports the provision of new supported housing in suitable locations in terms of services. This would have a positive effect on inclusion and social cohesion helping improve peoples' opportunity for independence in particular for those more disadvantaged.

### **Policy H11: Purpose Built Private Rented Sector development**

The Sustainability Appraisal considers that the negative impact of Policy H11 is the inability of the policy to entirely restrict purpose built private rented sector housing with the consequence that less genuinely affordable housing is provided overall than if conventional housing were to be built. Providing these forms of accommodation would therefore not optimise the use of land and have a negative effect against the objective to make best use of land. In particular, these alternative models can make it more difficult to deliver social rented housing that is effectively integrated within a development. In addition promoters of this type of development often claim to have 'distinct economics' due to the fact that homes are rented not sold, which in turn is used as an argument for a more flexible approach to policy requirements including provision of affordable housing. Apart from the issue of land use and efficient use of land and provision of affordable housing there are no other significant effects considered against the sustainability objectives.

### **Policy H12: Gypsy and Traveller Accommodation**

**Policy H12** is considered positive by the Sustainability Appraisal as it promotes social inclusion with the Council seeking to meet the defined needs of gypsies and travellers as set out in the Gypsy and Traveller Needs Assessment and will consider finding suitable land either through the Councils ongoing house building programme and/or through a potential review of the Site Allocations document, and/or working sub-regionally with the GLA and other boroughs.

## **Social and community infrastructure**

The following social and community infrastructure policies have been considered in the same sustainability appraisal table:

- Policy SC1: Social and Community Infrastructure - Policy SC1 focuses on protecting, supporting, assessing and meeting needs for social and community infrastructure.
- Policy SC2: Play space - Policy SC2 seeks to protect existing play space and ensure playspace is provided in all major developments and playable public space is provided in all development.
- Policy SC3: Health Impact Assessment - sets out when Health Impact Assessments will be required.

- Policy SC4: Promoting Social Value - Policy SC4 encourages development to maximise social value and sets requirement for major development proposals to undertake a Social Value self-assessment.

Table 3.39: Assessment of policies SC1 to SC4

IIA Objective	SC1: Social and Community Infrastructure	SC2: Play space	SC3: Health Impact Assessment	SC4: Promoting Social Value	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	++	+	0	0	<p>Policy SC1 will have a significant positive effect as it will ensure that new social and community infrastructure is built in an accessible location which is convenient to the users and also that the design is inclusive, accessible, flexible and sustainable. In particular reference is made to ensuring that the design responds to the needs of the users of the social and community infrastructure.</p> <p>Policy SC2 will ensure play space is provided in all major developments and playable public space is provided in all development which will make development more sustainable. This will have a positive effect helping create high quality development which provides families with convenient access encouraging healthy and active lifestyles for children.</p> <p>There is no effect for policy SC3. While the policy does potentially apply to all major and health related applications through a screening assessment there are no explicit requirements attached to the policy. As such, it cannot be said to have any effect for the purposes of this assessment.</p> <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</p>



					consider at the outset whether the planned development can be approached in a different way which could add additional social value.
2. Ensure efficient use of land, buildings and infrastructure	++	+	0	0	<p>Policy SC1 will have a significant positive effect on the efficient use of land, buildings and infrastructure. The policy provides the opportunity to redevelop social and community infrastructure sites where justified through meeting tests of market demand and community need thereby ensuring genuinely redundant land and buildings are released for alternative uses. The policy identifies estates rationalisation of recognised public sector bodies as an exception to marketing demand although ensuring community needs are considered remains.</p> <p>Policy SC2 will have a minor positive effect. It requires new playspace to be provided in line with best practice standards, helping to provide the necessary infrastructure to support development.</p> <p>There is no effect for policy SC3. See assessment against objective 1.</p> <p>There is no effect for policy SC4. See assessment against objective 1.</p>
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	0	0	0	<p>No effect for policy SC1. Although various social infrastructure are identified heritage assets for example Finsbury Health Centre is a Grade 1 listed building, and was the first healthcare centre of its kind, policy SC1 does not explicitly protect heritage; this is covered by other plan policies.</p> <p>No effect for policy SC2.</p> <p>There is no effect for policy SC3. See assessment against objective 1.</p> <p>There is no effect for policy SC4. See assessment against objective 1.</p>
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	++	++	0	0	<p>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.</p>

					<p>Policy SC2 will have a significant positive effect. It will ensure play space is both maintained through protecting existing play space and new play space is provided in all major developments.</p> <p>There is no effect for policy SC3. See assessment against objective 1.</p> <p>There is no effect for policy SC4. See assessment against objective 1.</p>
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	0	0	0	<p>No effect for policies SC1 and SC2.</p> <p>There is no effect for policy SC3. See assessment against objective 1.</p> <p>There is no effect for policy SC4. See assessment against objective 1.</p>
6. Promote social inclusion, equality, diversity and community cohesion	+	+	0	0	<p>Policies SC1 and SC2 will have a minor positive effect. Social infrastructure and play space can contribute to social cohesion and integration by providing buildings and spaces where different groups of people can come together.</p> <p>There is no effect for policy SC3. See assessment against objective 1.</p> <p>There is no effect for policy SC4. See assessment against objective 1.</p>
7. Improve the health and wellbeing of the population and reduce health inequalities	++	++	0	0	<p>Policy SC1 will have significant positive effects as it will seek to protect existing social and community infrastructure, and ensure new facilities are built to be accessible and inclusive. Where policy identifies estates rationalisation for recognised public sector bodies the proposals will be required to evidence community needs through a community impact assessment which will help ensure that health needs are met in the borough.</p> <p>Policy SC2 will have significant positive effects as it will seek to ensure there are sufficient play facilities and play space provided as part of new development and where proposals would result in a loss of play space, replacement provision is required. The adventure playgrounds in the borough will be protected.</p> <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><b>The effects have been updated for Policy SC1 following review of the IIA as part of the examination and changed the effects from minor positive to neutral. There may be indirect economic benefits of various social and community infrastructure which may help to maintain and improve the range of employment opportunities for people but these positive effects are considered to be uncertain and dependent on individual proposals coming forward. Community centres and third sector spaces provide a wide range of support to help people gain experience and achieve skills to help improve employment prospects.</b></p> <p>Policy SC2 will have no effect.</p> <p>There is no effect for policy SC3. See assessment against objective 1.</p> <p>There is no effect for policy SC4. See assessment against objective 1.</p>
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	+	0	0	0	<p>Policy SC1 will have minor positive effects as it will seek to protect existing social and community infrastructure, and ensure new facilities are built to be accessible and inclusive. This should help reduce the need for people to travel further afield to access social and community infrastructure.</p> <p>Policy SC2 will have no effect.</p> <p>There is no effect for policy SC3. See assessment against objective 1.</p> <p>There is no effect for policy SC4. See assessment against objective 1.</p>
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	+	0	0	<p>Policy SC1 will have no effect.</p> <p>Policy SC2 will have a minor positive effect as it aims to both protect existing play spaces and adventure playgrounds and also provide additional play space where required. Developments are required to provide playable public space in addition to any formal play space provision which connects to formal play provision and open spaces. This will help enhance and improve quality of open spaces for purposes of play as well as connections to them.</p> <p>There is no effect for policy SC3. See assessment against objective 1.</p>

					There is no effect for policy SC4. See assessment against objective 1.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	0	0	No effect for policies SC1 and SC2.  There is no effect for policy SC3. See assessment against objective 1.  There is no effect for policy SC4. See assessment against objective 1.
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	0	0	0	No effect for policies SC1 and SC2.  There is no effect for policy SC3. See assessment against objective 1.  There is no effect for policy SC4. See assessment against objective 1.
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	0	0	No effect for policies SC1 and SC2.  There is no effect for policy SC3. See assessment against objective 1.  There is no effect for policy SC4. See assessment against objective 1.
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	0	0	No effect for policies SC1 and SC2.  There is no effect for policy SC3. See assessment against objective 1.  There is no effect for policy SC4. See assessment against objective 1.

## **Policy SC1: Social and community infrastructure**

The **Sustainability Appraisal** considered Policy SC1 will have a significant positive effect as it will ensure that new social and community infrastructure facilities are built in accessible locations convenient to users as well as protecting existing social and community facilities. The policy approach will also allow redevelopment where it is justified through an assessment of both community need and market demand. This should mean that the range of community facilities necessary to meet community need are protected but will ensure efficient use of land where they are genuinely redundant. The policy recognises that certain public sector users wish to rationalise their estate, although evidence that community need is still being met will be retained through provision of a 'Community Impact Assessment'. The assessment recognised there may be indirect economic benefits of various social and community infrastructure which may help to maintain and improve the range of employment opportunities for people but these positive effects are considered to be uncertain and dependent on individual proposals coming forward.

New social and community infrastructure will be built in accessible locations which are convenient to their intended users and the design is required to be inclusive, accessible, flexible and sustainable. Particular reference is made to ensuring that design responds to the needs of users of social and community infrastructure. For these factors in particular the **EqIA** considered social and community policies are entirely positive for all groups with protected characteristics.

## **Policy SC2: Play space**

Policy SC2 will ensure play space is provided in all major developments and playable public space is provided in all development. This will have a positive effect against the sustainability objectives for the built environment and health and wellbeing, helping to create high quality development which provides families with convenient access to play and encouraging healthy and active lifestyles for children. Provision of play space also helps social cohesion and integration by providing buildings and spaces where different groups of people can come together. Where proposals would result in a loss of play space, replacement provision to meet the needs of the local population is required

## **Policy SC3: Health Impact Assessment**

There is no effect for policy SC3. While the policy does potentially apply to all major and health related applications through a screening assessment there are no explicit requirements attached to the policy. As such, it cannot be said to have any effect for the purposes of this assessment.

**Policy SC4: Promoting Social Value**

Policy SC4 has no effect against delivery of the **Sustainability Appraisal** objectives. While the policy does encourage all development to maximise social value and, for certain development, set out exactly what social value is added by the development, there are no explicit requirements attached to the policy. As such, it cannot be said to have any effect for the purposes of this assessment, although it is noted that the policy could deliver additional social value benefits by encouraging developers to consider at the outset whether the planned development can be approached in a different way which could add additional social value.

## Inclusive economy: Business floorspace

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

- B1: Delivering business floorspace - Policy B1 sets out the strategic approach to meeting employment needs in the borough and the aim to achieve an inclusive economy and identifies the most appropriate locations for new business.
- B2: New business floorspace - Policy B2 provides detail on the locational and design requirements for the different types of new business floorspace.
- B3: Existing business floorspace - Policy B3 sets out the approach to protecting existing business floorspace.
- B4: Affordable workspace - Policy B4 sets out the requirements for the provision of affordable workspace.
- B5: Jobs and training opportunities - Policy B5 sets out the requirements for providing jobs and training opportunities from new development especially new business floorspace.

Table 3.40: Assessment of policies B1 to B5

IIA Objective	B1: Delivering business floorspace	B2: New business floorspace	B3: Existing business floorspace	B4: Affordable workspace	B5: Jobs and training opportunities	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	+	+	0	+	+	<p>Policies B1 and B2 will have minor positive effect by encouraging development which primarily supports the existing economic function of an area. It will reinforce the economic sustainability of an area and may see design which complements the existing character of an area. For example, Grade A offices in the Central Activities Zone; co-working space in Priority Employment Locations. The policies require incorporation of inclusive design features and also ensure safety and inclusivity as part of the design process.</p> <p>Policy B3 has no effect</p> <p>Policy B4 will have a minor positive effect requiring affordable workspace to be of a high standard of amenity for occupiers.</p>

						<p><b>New effects have been identified for Policy B5 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policy B5 requires the creation of employment and training opportunities for Islington residents and financial contributions which help tackle worklessness in the borough. Participation in education and training provides young disadvantaged residents the opportunity to gain qualifications which make a difference to future life chances and can help tackle problems of anti-social behaviour. Therefore, the policy promotes inclusive communities, which lead to safer build environments.</b></p>
2. Ensure efficient use of land, buildings and infrastructure	++	++	+	+	0	<p>Policies B1 and B2 will have significant positive effects as they require maximisation of new business floorspace for a range of types of space to support the primary function of an area of existing relevant economic activity, for example, Grade A offices in the Central Activities Zone; co-working space in Priority Employment Locations. Policy B2 will optimise use of land through requiring the maximisation of business floorspace and development of business space will be designed to be flexible to meet a variety of business needs.</p> <p>Policy B3 will have a minor positive effect. It protects existing business floorspace including older / secondary business stock which is generally more affordable / suitable for occupation by SMEs and will help to meet the needs of local businesses and also help maintain a balance of employment land across the borough meeting a range of business needs.</p> <p>Policy B4 will have a minor positive effect. It will ensure provision of affordable workspace to meet the needs of local businesses. The policy specifies the types of space and locations where affordable workspace is required.</p> <p>Policy B5 has no effect</p>
3. Conserve and enhance the significance of heritage assets and	0	0	0	0	0	<p><b>New text has been added following review of the IIA as part of the examination process. It could be considered that some of the maximisation of employment space and intensification supported by policy B1 and B2 might have a minor negative impact on the significance of heritage assets and their settings, and the wider historic environment depending on implementation. This could happen if development has negative impacts in terms of massing, scale, visual</b></p>



their settings, and the wider historic and cultural environment.						<p><b>impacts. However this is counterbalanced by other local plan policies such as PLAN1 and DH1, DH2 and DH3 and to an extent SP3 which favours refurbishment projects. The impact is therefore considered to be neutral.</b></p> <p>There are no effects for policies B3 to B5</p>
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	+	+	+	+	0	<p>Policies B1 and B2 will direct new employment floorspace to the CAZ and town centres with a range of units in terms of size and type expected which will help support diversity in town centres and should benefit existing services in these locations. Policy B4 will have similar minor positive effects given its associated with provision of new floorspace in these locations.</p> <p>Policy B3 will have a minor positive effect through protecting existing business floorspace, which will help maintain diversity outside the CAZ and town centres and counter predominantly residential neighbourhoods, promoting economic activity in these locations.</p> <p>Policy B5 will have no effect as this policy is concerned with securing jobs and training opportunities from new development.</p>
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	0	0	0	0	<p>There are no effects for policies B1 to B5. There is potential for a minor negative effect as the policies affect the supply of housing in certain locations across the borough, through prioritising business floorspace. However the assessment considers this to have no effect overall as other policy ensures housing is delivered outside the locations identified which will ensure housing targets are met.</p>
6. Promote social inclusion, equality, diversity and community cohesion	++	+	+	++	++	<p>Policy B1 has a significant positive effect with the policy aim in line with the Local Plan objective to deliver an inclusive economy which the policy does through delivering policy supporting creation of new business floorspace, protecting existing floorspace and securing affordable workspace and jobs/training opportunities from development. This should support the economy in Islington and help share success across different sections of society.</p> <p><b>New text has been added following review of the IIA as part of the examination process. Policy B2 The maximisation of new business floorspace will</b></p>

						<p><b>strengthen the local economy. New business floorspace can help to support the diverse needs of the SME sector, provide flexibility for a range of occupiers and help to meet specialist and local employment needs. Encouraging development of employment floorspace will help to meet demand and unlock potential economic growth. This can help to improve employment opportunities and increase the skills of residents. The requirements around the quality of new business floorspace will also support community cohesion, inclusion, equality and diversity by ensuring that new spaces are accessible to everyone.</b></p> <p>Policy B3 The protection of existing business floorspace will likely have a minor positive effect. Maintaining local jobs in Islington can contribute to a more equitable society.</p> <p>Policy B4 will have long term positive effects as affordable workspace is provided in the Borough and leased to the Council who will in turn sub-lease the space to an organisation, in return for social value. These organisations will be selected in relation to the extent in which they support local businesses and provide training and education outcomes to remove barriers to employment therefore the policy is directly seeking to address social exclusion and promotes fairness.</p> <p>Policy B5 will have a significant positive effect with jobs and training opportunities secured from the development of new business floorspace which will help local people access job and training opportunities from new development. Construction jobs will also be secured meaning that there will be opportunities for local residents to access vocational learning and jobs opportunities.</p>
7. Improve the health and wellbeing of the population and reduce health inequalities	+	+	+	+	+	<p><b>New effects have been identified for Policies B1 to B5 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. New effects have been identified following review of the IIA as part of the examination process. Policies B1 to B5 support a range of employment spaces that are high quality and will support diverse jobs in different sectors, including SMEs, training opportunities and affordable workspace for local people. The type of employment supported by the policies has the potential to protect health and contribute to reduced health inequalities. Employment space in Islington, providing local jobs opportunities can also contribute to healthy, independent lifestyles which can improve health.</b></p>

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 supporting creation of new business floorspace, protecting existing floorspace and securing affordable workspace and jobs/training opportunities from development. This should support the economy in Islington and help share success across different sections of society and promote growth and sustain the economy. The policies also support a variety of businesses through ensuring there is a range of business space to meet varying business needs, and focus development in the most appropriate locations. Opportunities for local residents to access employment are widened through the collection contributions towards jobs and training opportunities, including apprenticeships and construction jobs.</p> <p>Policy B2 will have long term positive effects. The development of new business floorspace sustains and improves Islington's economy. New business floorspace will be required to provide a range of units, in terms of size and type, which can support a range of businesses. Space will be directed to certain areas including the Central Activities Zone and existing business clusters, this will allow agglomeration benefits to be felt and will allow businesses to grow and thrive. New business floorspace in the CAZ will contribute towards sustaining the London and national economy. Protecting the industrial function of LSIS in particular has wider benefits serving other economic functions in both the local and wider London economy. Protecting the industrial function also helps reduce the need for goods and services to travel reducing congestion and air pollution. These areas also offer a range of jobs providing greater employment opportunity.</p> <p>Policy B3 will have a significant positive effect. The protection of existing business floorspace will support Islington's economy and can allow existing business and sectors to continue to grow within the Borough. Protection of existing space can ensure a sufficient supply of secondary business space, which generally meets the needs of local businesses and SMEs. Small and micro businesses make up a large proportion of Islington's enterprises and make a significant contribution to the success of the local economy, reinforcing the need to ensure they are able to remain within the Borough.</p> <p><b>New effects have been identified for Policy B3 following review of the IIA as part of the examination and changed the effects from significant positive to minor positive. A potential negative impact of Policy B3 is identified where</b></p>
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9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport,	++	++	+	+	+	<p>Policy B1 and B2 will have a significant positive effect. It will direct business development to the most appropriate and accessible locations in the borough, therefore reducing the need to travel by car and encouraging more sustainable transport choices.</p> <p>Policy B3 through protecting existing business floorspace will have a minor positive effect particularly through maintaining diversity outside the CAZ and town centres, helping counter predominantly residential neighbourhoods, and reducing people's journeys to work albeit to less connected locations.</p>

cycling and walking						<b>New effects have been identified for Policies B4 and B5 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policies B4 and B5 benefit from B1-B2 to provide employment opportunities in the borough of local people. This supresses the need to travel and could have a minor positive impact on transport.</b>
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	0	0	0	There are no effects for policies B1 to B5
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	0	0	0	There are no effects for policies B1 to B5
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	+	+	+	+	+	<p>Policy B1 and B2 will direct business development to the most appropriate and accessible locations in the borough, therefore reducing the need to travel by car and encouraging more sustainable transport choices thereby reducing effect on climate change.</p> <p><b>New effects have been identified for Policy B3 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policy B3 through protecting existing business floorspace will have a minor positive effect particularly through maintaining diversity outside the CAZ and town centres, helping counter predominantly residential neighbourhoods, and reducing people’s journeys to work, which has the potential to reduce transport related emissions and have a minor positive impact on climate change.</b></p>

						<p><b>B3 also has a positive impact on air quality as it protects LSISs which are located strategically in inner London to ‘service’ the CAZ, which shortens supply chains and the length of vehicular journeys to deliver goods, which has the potential to reduce transport related emissions and have a minor positive impact on climate change.</b></p> <p><b>New effects have been identified for Policies B4 and B5 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policies B4 and B5 benefit from B1-B2 to provide employment opportunities in the borough of local people. This supresses the need to travel and has a minor positive impact on transport, which can in turn have the potential to reduce transport related emissions and have a minor positive impact on climate change.</b></p>
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	0	0	0	There are no effects for policies B1 to B5

14. Maximise protection and enhancement of natural resources including water, land and air	+	+	+	+	+	<p><b>New effects have been identified for Policies B1 to B5 following review of the IIA as part of the examination and changed the effects from neutral to minor positive.</b></p> <p><b>Policy B1 and B2 will have a minor positive effect. It will direct business development to the most appropriate and accessible locations in the borough, therefore reducing the need to travel by car and encouraging more sustainable transport choices, which can in turn improve air quality.</b></p> <p><b>It should be acknowledged that B2, which support the intensification of industrial land in the LSIS could have the potential to have a negative impact on air quality, if they lead to an increase in vehicular movements or support activities that lead to an increase in air pollution. However other strategic policies in the Plan such as SP3, S7, T2, T3 and T5, which will ensure new industrial land does not impact natural resources adversely. The impact on the policy is therefore still a minor positive.</b></p> <p><b>Policy B3 through protecting existing business floorspace will have a minor positive effect particularly through maintaining diversity outside the CAZ and town centres, helping counter predominantly residential neighbourhoods, and reducing people’s journeys to work, which can have a positive impact on air quality.</b></p> <p><b>B3 also has a positive impact on air quality as it protects LSISs which are located strategically in inner London to ‘service’ the CAZ, which shortens supply chains and the length of vehicular journeys to deliver goods, and therefore has a positive impact on air quality.</b></p> <p><b>Policies B4 and B5 benefit from B1-B2 to provide employment opportunities in the borough of local people. This supresses the need to travel and has a minor positive impact on transport, which can in turn have a positive impact on air quality.</b></p>
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**B1: Delivering Business Floorspace & B2: New business floorspace**

**The Sustainability appraisal** considered that **Policy B1 and policy B2** are in tandem given the similar effects with both creating a significant positive effect against the **Sustainability Appraisal objectives**. The policy aim is in line with the Local Plan objective to deliver an inclusive economy which the policy does through supporting creation of a variety of new business floorspace, protecting existing floorspace, in particular industrial land through new LSIS designations and securing affordable workspace and jobs/training opportunities from development. This will support the economy in Islington and help share success across different sections of society.

The policies have a significant positive effect against the **sustainability objective for the efficient use of land** and meeting needs as the policies require maximisation of new business floorspace for a range of types of space to support the primary function of an area of existing relevant economic activity. Industrial uses are protected which will help. For example, a large quantum of office space in the Central Activities Zone including Grade A offices; and co-working space in Priority Employment Locations. Policy B2 will optimise use of land through requiring the maximisation of business floorspace and development of business space will be designed to be flexible to meet a variety of business needs and requires incorporation of inclusive design features as part of the design process. Maximisation of employment space could have a minor negative impact on the significance of heritage assets and their settings depending on implementation although this was considered neutral as it is counterbalanced by other local plan policies such as PLAN1 and DH1, DH2 and DH3. Also, to an extent SP3 which favours refurbishment projects. Policies B1 to B5 will help improve health and wellbeing by supporting a range of employment spaces that are high quality and will support diverse jobs in different sectors, including SMEs, training opportunities and affordable workspace for local people.

Policy B2 will help positive effects against the inclusive objective where new business floorspace can help to support the diverse needs of the SME sector, provide flexibility for a range of occupiers and help to meet specialist and local employment needs. Employment space in Islington, providing local jobs opportunities can also contribute to healthy, independent lifestyles which can improve health. Encouraging development of employment floorspace will help to meet demand and unlock potential economic growth. This can help to improve employment opportunities and increase the skills of residents.

Protecting the industrial function of LSIS in particular has wider benefits serving other economic functions in both the local and wider London economy. Protecting the industrial function also helps reduce the need for goods and services to travel reducing congestion and air pollution. The assessment notes that supporting the intensification of industrial land in the LSIS could have the potential to have a negative impact on air quality, if it leads to an increase in vehicular movements or support activities that lead to an increase in air pollution. However other strategic policies in the Plan such as SP3, S7, T2, T3 and T5, will ensure new industrial land does not impact natural resources adversely and the impact of the policy is therefore still a minor positive. In addition directing business development outside LSIS to the most appropriate and accessible locations in the borough, also reduces the need to travel by car and encourages more sustainable transport choices, which can in turn improve air quality. These areas also offer a range of jobs providing greater employment opportunity.

### **B3: Existing business floorspace**



**The Sustainability Appraisal** considers that Policy B3 has a positive effect overall, principally against the sustainability objective to meet needs and facilitate economic growth. The policy approach protects existing business floorspace which helps to meet the needs of local businesses and also help maintain a balance of employment land across the borough meeting a range of business needs. This will support Islington's economy and allow existing business and sectors to continue to grow within the Borough and will help maintain diversity of employment space outside the CAZ. Protection of existing space can ensure a sufficient supply of secondary business space, which generally meets the needs of local businesses and SMEs. Small and micro businesses make up a large proportion of Islington's enterprises and make a significant contribution to the success of the local economy, reinforcing the need to ensure they are able to remain within the Borough. However the protection of business floorspace is considered to result in a potential negative impact of Policy B3 where requirements to market existing business space for 24 months before any net-loss of business space could lead to reduced footfall and further vacancy in neighbouring business floorspace and might be more likely during periods of economic uncertainty. However this potential immediate temporary minor negative impact is offset by the fact that the 24 months period plays a key role in helping protect and sustain business floorspace to support businesses of different types and sizes. In the medium and long term it is likely to have benefits in helping to protect business floorspace for which there is evidenced demand. Policy B3 is also considered to have a positive effect on reducing contribution to climate change through protecting existing business floorspace which help maintain diversity outside the CAZ and town centres and help counter predominantly residential neighbourhoods, and reduce people's journeys to work which will also have a positive impact on air quality. Protecting LSIS also has a similar effect as they are located strategically in inner London to 'service' the CAZ, which shortens supply chains and the length of vehicular journeys to deliver goods, which has the potential to reduce transport related emissions and have a minor positive impact on climate change.

#### **B4: Affordable workspace**

Policy B4 requires provision of affordable workspace which the **Sustainability Appraisal** identifies will have a significant positive effect against the objective addressing social exclusion and promoting fairness. Affordable workspace is space leased to the Council at peppercorn rate and who will in turn sub-lease the space to operators through a commissioning process. These organisations will be selected in relation to the extent in which they support local businesses and provide training and education outcomes to remove barriers to employment. The development of affordable workspace also contributes towards creating a strong and diverse economy, allowing a variety of businesses to locate across the Borough meeting a range of business needs. Both policies B4 and B5 benefit from B1-B2 to provide employment opportunities in the borough of local people. This suppresses the need to travel and has a minor positive impact on transport, which can in turn have a positive impact on air quality.

#### **B5: Jobs and training opportunities**

Policy B5 is considered by the **Sustainability Appraisal** to have a significant positive effect against the objective addressing social exclusion and promoting fairness. The Policy secures jobs and training opportunities from development of new business floorspace. Construction jobs will also be secured meaning that there will be opportunities for local residents to access vocational learning and jobs opportunities. The creation of employment and training opportunities for Islington residents and financial contributions which help tackle worklessness in the borough.

Participation in education and training provides young disadvantaged residents the opportunity to gain qualifications which make a difference to future life chances and help tackle problems of anti-social behaviour. Therefore, the policy promotes inclusive communities, which can help lead to safer build environments. Both policies B4 and B5 benefit from B1-B2 to provide employment opportunities in the borough of local people. This supresses the need to travel and has a minor positive impact on transport, which can in turn have a positive impact on air quality.

## **Inclusive Economy: Retail policies**

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

- R1: Retail, leisure and services, culture and visitor accommodation - Policy R1 sets out the strategic vision for retail, leisure and services, culture and visitor accommodation uses.
- R2: Primary Shopping Areas - Policy R2 defines Primary Shopping Areas and seeks to protect and enhance the retail function of Islington's four town centres Primary Shopping Areas.
- R3: Islington's Town Centres - Policy R3 sets out the approach to development in town centres, including the retail hierarchy, town centre first approach, ensuring high quality development which ensures accessibility, amenity and sustainability is considered.
- R4: Local Shopping Areas - Policy R4 sets out the approach to which seeks to maintain and enhance the retail and service function of LSAs.
- R5: Dispersed retail and leisure uses - Policy R5 seeks to protect retail and café/restaurant uses in locations not covered by a retail designation such as town centres and LSAs.

Table 3.41: Assessment of policies R1 to R5

IIA Objective	R1: Retail, leisure and services, culture and visitor accommodation	R2: Primary Shopping Areas	R3: Islington's Town Centres	R4: Local Shopping Areas	R5: Dispersed retail and leisure uses	Commentary on assessment of likely significant effects of policies
1. Promote a high quality, inclusive, safe and sustainable built environment	+	+	+	+	+	<p><b>Text was updated following review of the IIA as part of the examination process. Policies R1 and R2 will have a minor positive effect in terms of directing appropriate retail, services and leisure development to key locations in the borough in line with the retail hierarchy, particularly the core of town centres - the Primary Shopping Areas. This will help to achieve an appropriate balance and mix of uses within a public realm that is most capable of supporting these commercial functions. Policy R1 seeks to actively manage streets within retail areas to balance demand on the public realm, whilst both R1 and R2 promote active frontages which can contribute to a more attractive, functional and sustainable public realm within retail areas.</b></p> <p>Policy R1 will support and manage a thriving and safe night-time economy. Policy R1 would likely increase the amount of visitor accommodation delivered, which by itself would be a minor negative; visitor accommodation is generally built to a unique specification which does not lend itself to be easily adapted for other uses, hence can be a less sustainable built form. For example, visitor accommodation has smaller room sizes, less or no outdoor private amenity space and reduced accessibility requirements which all contribute to less flexible buildings. This is partially mitigated through the Policy R12 requirement that the development or redevelopment/intensification of visitor accommodation must adhere to inclusive design requirement for 10% of rooms to be wheelchair accessible. Overall, policy R1 and R2 are</p>

						<p>considered to have a minor positive effect in relation to Objective 1.</p> <p><b>The effects have been updated for Policy R3 following review of the IIA as part of the examination and changed the effects from significant positive to minor positive. The effect of the policy will focus appropriately scaled development in line with the retail hierarchy. This will help to achieve an appropriate balance and mix of uses within a public realm that is capable of supporting these commercial functions – the public realm in the major town centres is generally more expansive. Policy R3 also ensures high quality development, accessibility, amenity and sustainability are considered which can contribute to a more attractive and sustainable public realm.</b></p> <p>Policies R4 and R5 will have a minor positive effect as they seek to protect LSA's and dispersed shops which helps to protect and enhance the local character of Islington and maintain a retail environment where units provide active frontages and engagement with the street scene providing safety and convenience.</p>
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 (PSAs) and LSAs. Outside a PSA there will be more flexibility and adaptability for non-A1 use which allows town centres to accommodate evolving social and economic needs as shopping behaviours and functions of town centres shift to more leisure and experience based activities. Within the PSA will be a condensed and more focused retail (A1) area. <b>New effects have been identified for policy R2 following review of the IIA as part of the examination process. This includes the</b></p>

					<p><b>two-year vacancy and marketing period for change of use away from A1 in the PSA potentially limiting a range of main town centre uses establishing here that would benefit from the high PTAL rating and ability for the area to absorb adverse amenity impacts. A short term minor negative effect could potentially arise from a downturn in viability of A1 retailing resulting in an increase of vacant units in the PSA. However, on balance, as the plan period runs until 2036 the need to protect and secure retail in the long term means the benefits of this are considered to outweigh this potential short term negative effect.</b></p> <p>Policy R1 could result in more visitor accommodation being permitted, which could reduce the availability of land to meet other development needs, and therefore it could potentially not effectively balance competing demands for land use. There are many identified needs that take priority above visitor accommodation in Islington, principally housing and offices. This is partially mitigated by the prescriptive approach taken in policy R12 which limits hotel development to specific sites or intensification of existing visitor accommodation in town centres and the CAZ. The policy also ensures that intensification of existing hotels has to demonstrate that additional business floorspace is not possible which allows other priorities to take precedent and optimise the use of previously developed land. Overall policy R1 is considered to have a significant positive effect even taking into account the assessment of the visitor accommodation element of the policy.</p> <p>Policy R3 will have a significant positive effect focusing appropriately scaled development in line with the retail hierarchy but also ensuring high quality development which ensures accessibility, amenity and sustainability are considered.</p>
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						<p>Policy R4 will have a minor positive effect through protecting existing retail and service function of uses in LSAs helping ensure needs are met. <b>New effects have been identified following review of the IIA as part of the examination process. There may be a minor short term temporary negative effect for LSAs where the change of use from A1 to other appropriate main town centre requires marketing and vacancy evidence which could potentially negatively impact on LSAs.. However, the 6 month marketing period is deliberately short enough to not facilitate an unduly long period of vacancy, whilst also helping to facilitate the protection and ongoing use of viable retail premises in the medium to long term to support the vitality and function of LSAs.</b></p> <p>Policy R5 will have a minor positive effect by protecting dispersed A1 and A3 premises which are often located in amongst residential areas and can provide an important local service.</p>
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	0	+	0	0	<p>No effect for policies R1, R2, R4, and R5.</p> <p>Policy R3 will have a minor positive effect in that Part F(iii) requires historic shopfronts to be retained therefore, preserving the historical environment that adds to the cultural environment of the borough.</p>
4. Promote liveable neighbourhoods which support good quality accessible	++	++	++	++	++	<p>Policies R1, R2 and R3 will have significant positive effects on enabling town centres and LSAs to continue to serve the needs and wellbeing of the local residents across different retail catchment areas by striking the right balance of retail, leisure and business uses. The PSA approach improves access and legibility to essential services through concentrating A1 uses in</p>

<p>services and sustainable lifestyles</p>					<p>the core of the town centre which enjoy the best transport links. The increased flexibility of uses in the rest of the town centre will support the expansion of cultural provision and encourage a vibrant environment for residents and visitors alike. Policy R1 will support and manage a thriving and safe cultural and night time economy, directing appropriate cultural and NTE development to town centres and CAZ locations and cultural quarter's and ensuring appropriate design which is safer and more inclusive. The agent of change principle is highlighted and applies in town centres and allows for vibrant town centre uses that attract visitors to be maintained.</p> <p>R1 could also have a positive effect by facilitating an increase in the number of visitors which could add to the vibrancy of an area and contribute to economic improvement; this would depend on the focus of the visitor accommodation (business or leisure visitors) as each group has different impacts. Leisure visitors especially could support the expansion and enhancement of cultural provision.</p> <p>Conversely, the visitor accommodation element of the policy could have negative effects, as it could also dilute the land available for meeting greater priority development needs, which could reduce access to essential services. <b>However, on balance the restriction of visitor accommodation to specific sites would not cumulatively obstruct the meeting of other development priorities.</b></p> <p>Policy R4 will have a significant positive effect, enabling LSAs to continue to serve the needs of local residents across local retail catchment areas.</p> <p>Policy R5 will have a significant positive effect through ensuring that essential dispersed convenience and café services are protected. These facilities are often the closest facilities to</p>
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						where people live so enabling their protection as a local neighbourhood service is particularly beneficial.
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	0	0	0	0	No overall effect for policies R1 to R5. There is potential for a minor negative effect as the policies affect the supply of housing in certain locations across the borough. Policies R2 and R3 may have a minor negative effect on access to housing because of the more restrictive approach in these locations. However, the assessment considers this to have no effect overall as other policies ensure housing is delivered outside the retail designations identified which will ensure housing targets are met. The protection of retail, services and leisure uses across town centres, LSAs and dispersed locations is vital for new housing to have access to these amenities. The policies set out circumstances where residential would be suitable in town centres and LSAs.
6. Promote social inclusion, equality, diversity and community cohesion	+	0	0	0	0	Minor positive effect for policies R1 to R5.  <b>New effects have been identified for Policy R1 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. The protection and enhancement of the retail hierarchy as set out in policy R1 could have a minor positive effect by ensuring main town centre uses remain accessible and abundant which in turn help foster community cohesion. Retail and cultural uses can act as informal spaces for communities to meet and strengthen local connections as well as selling a range of goods for the diverse population of Islington.</b>
7. Improve the health and wellbeing of the population and reduce health inequalities	+	+	+	+	+	<b>New effects have been identified for Policies R1-R4 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policies R1-R4 will provide a framework to support facilities which can meet the needs of communities and the benefits this can provide e.g. health, recreation and leisure. The policies also provide a framework for taking into account cumulative impacts to provide against the proliferation of activities which can have/or have the potential to have</b>

						<p><b>negative health impacts. Policy R3 part F in particular is clear that proposals must provide a good level of amenity for residents and businesses and ensure that adverse impacts from noise, odour, fumes, anti-social behaviour and other potential harms are fully mitigated.</b></p> <p>Policy R5 aims to protect local cafes and dispersed shops, these facilities are often the closest facilities to where people live so enabling their protection as a local neighbourhood service is particularly relevant and considered to have a positive effect against this objective.</p>
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	++	++	++	+	+	<p>Policies R1, R2, and R3 will have a significant positive effect. The policies aim to strike the right balance between retail, leisure and business uses to enable response to changing retail patterns. Town centre uses are key drivers in the local and London economy and also provide important local services. Town centres, LSAs and edge of centre locations are all promoted for varying degrees of flexibility of use based on their function and appropriateness for certain types of development. Town Centres provide the employment opportunities outside the CAZ and help provide job opportunities for local residents. An enhanced cultural NTE role will increase employment opportunities and contribute to the local economy.</p> <p>Policy R1 could provide opportunities for employment related to visitor accommodation, particularly for local people, albeit lower-skilled jobs at a relatively low employment density. Visitor accommodation can play a supporting role to other more economically important uses such as offices; this provides a more indirect economic benefit. Visitor accommodation may not be compatible with a range of other uses which may limit its ability to support a range of local business. <b>New effects have been identified following review of the IIA as part of the examination process. This includes the two year vacancy</b></p>

						<p>and marketing period for change of use away from A1 in the PSA potentially limiting a range of main town centre uses establishing here that would benefit from the high PTAL rating and ability for the area to absorb adverse amenity impacts. A short term minor negative economic effect could arise from a downturn in viability of A1 retailing resulting in a proliferation of vacant units in the PSA. However, on balance, as the plan period runs until 2036 the need to protect and secure retail in the long term outweighs this potential short term negative effect.</p> <p>Policy R4 and policy R5 will both have a minor positive impact as they are both aiming to strike the right balance between retail, leisure and business uses to enable response to changing retail patterns. Local centres are drivers in the local economy and ensuring space is protected will help meet the needs of small businesses.</p>
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	+	+	+	+	+	<p>No effect for policies R1 to R5.</p> <p><b>New effects have been identified for Policies R1-R5 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. A positive effect of enhancing and protecting the retail hierarchy is that retail and leisure development will be directed to town centres that enjoy the best transport connections. Additionally, protection of retail in LSAs ensures access to essential goods and services for local residents is retained, reducing the need for private vehicular and public transport to access these goods. Minor positive impacts have therefore been identified for policies R1-R4. Providing access to dispersed shops close to where people live can also help to reduce the need for vehicular travel, a minor positive is also identified for policy R5.</b></p>

10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	0	0	0	No effect for policies R1 to R5.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	0	0	0	No effect for policies R1 to R5.
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	0	0	0	0	No effect for policies R1 to R5.
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	0	0	0	No effect for policies R1 to R5.

14. Maximise protection and enhancement of natural resources including water, land and air	0	0	0	0	0	No effect for policies R1 to R5.
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### **R1: Retail, leisure and services, culture and visitor accommodation**

The Sustainability Appraisal considers Policy R1 will have significant positive effects against meeting needs and wellbeing of local residents through enabling town centres and LSAs to continue to serve the local residents across different retail catchment areas by striking the right balance of retail, leisure, culture and business uses to enable response to changing retail patterns. This provides a framework filtering through policies R1-R4 that meets the needs of residents benefiting health and ability to enjoy recreational activities. This is also positive for the wider economy with town centre uses key drivers in both the local service provision and the London economy. In addition the enhanced cultural NTE role will increase employment opportunities and contribute to the local economy focusing commercial, cultural and civic activity in town centres. The Sustainability Appraisal considers that Policy R1 will have a significant positive effect on the framework objective to optimise the use of developed land by focusing commercial, cultural and civic activity in town centres helping to balance land use needs through protection of existing venues and directing new venues to these locations. These locations are already the focus for cultural and night-time economy (NTE) uses and are appropriate given the commercial character which can better absorb the potential impacts.

Policy R1 could also could have a positive effect by facilitating an increase in the number of visitors which could add to the vibrancy of an area and contribute to economic improvement; this would depend on the focus of the visitor accommodation (business or leisure visitors) as each group has different impacts. Leisure visitors especially could support the expansion and enhancement of cultural provision.

Conversely, the visitor accommodation element of the policy could have negative effects, as it could also dilute the land available for meeting more priority development needs, which could reduce access to essential services. Therefore policy R1 could result in more visitor accommodation being permitted, which could reduce the availability of land to meet other more pressing development needs, and therefore it could potentially not effectively balance competing demands for land use. There are many identified needs that take priority above visitor accommodation in Islington, principally housing and offices. This is partially mitigated by the prescriptive approach taken in policy R12 which limits hotel development to specific sites or intensification of existing visitor accommodation in town centres and the CAZ. Overall policy R1 is considered to have a significant positive effect even taking into account the assessment of the visitor accommodation element of the policy.

## **R2: Primary Shopping Areas**

The Primary Shopping Area (PSA) approach is considered by the assessment to improve access and legibility to essential services through concentrating A1 uses in the core of the town centre which also enjoys the best transport links therefore supporting reduced numbers of journeys. The increased flexibility of uses in the secondary shopping area is considered by the Sustainability Appraisal to support the expansion of other TC uses helping encourage a vibrant environment for residents and visitors alike which allows town centres to accommodate evolving social and economic needs. This helps town centres respond to changing shopping behaviours as functions of town centres shift to more leisure and experience based activities. Minor negative effects of Policy R2 on housing supply could be argued to exist from a restrictive approach, however, this is considered to be neutralised by other policies that sufficiently address housing supply and sites. In addition, a viable and vibrant PSA benefits the access to goods of all existing and future residents. A two year vacancy and marketing period for change of use away from A1 in the PSA if below the strategic thresholds potentially limit a range of main town centre uses establishing here that would benefit from the high PTAL rating and ability for the area to absorb adverse amenity impacts. A short term minor negative economic effect could arise from a downturn in viability of A1 retailing resulting in a proliferation of vacant units in the PSA. However, on balance, as the plan period runs until 2036 the need to protect and secure retail in the long term outweighs this potential short term negative effect.

## **R3: Islington's Town Centres**

The Sustainability Appraisal considered the approach to have a significant positive effect focusing appropriately scaled development in line with the retail hierarchy which benefits from a public realm well suited to support commercial uses, but also ensuring high quality development which ensures accessibility, amenity and sustainability considered. Restricting residential uses at ground floor in town centres could be perceived to be a negative effect on housing supply but this is considered on balance to not be a negative when the protection of ground floor units provides access to goods and services for existing and future residents of the borough. The protection of historic shopfronts also ensures Islington's heritage can continue to contribute to its character and appeal. Policy R3 promotes a range of main town centre uses that benefit from a flexible approach to their change of use, providing significant areas of land to respond to changes to economic circumstances and the functions of town centres to more leisure based activities.

## **R4: Local Shopping Areas**

The Sustainability Appraisal identifies a significant positive effect against the framework objective relating to needs and wellbeing of the local residents across local retail catchment areas by striking the right balance of retail, leisure and business uses. Local centres are drivers in the local economy and ensuring space is protected will help meet the needs of small businesses. The six month marketing period for change of use

from A1 to non-A1 commercial uses on balance allows viability to be assessed without applying overly onerous periods of vacancy in an LSA that provides localised retail needs but is third in the retail hierarchy behind PSAs and Town Centres.

### **R5: Dispersed retail and leisure uses**

The approach will have a minor positive effect against the framework objective to create liveable neighbourhoods by ensuring that essential dispersed convenience and café services are protected. These facilities are often the closest facilities to where people live so enabling their protection as a local neighbourhood service is particularly beneficial and assessed as positive by the Sustainability Appraisal.

### Inclusive Economy, Local retail and specialist retail policies

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

- R6: Maintaining and enhancing Islington’s unique retail character - Policy R6 seeks to protect and promote the provision of small shops that contributes to the local character of Islington and maintain a retail environment with units which provide for local convenience, business and employment.
- R7: Markets and specialist shopping areas - Policy R7 protects and supports Islington’s two Specialist Shopping Areas in Angel (Camden Passage) and Finsbury Park (Fonthill Road) and an array of markets.
- R8: Location and concentration of uses - Policy R8 seeks to manage the detrimental concentrations of specific town centre uses that negatively impact public health and wellbeing, and cause harm to character and function, and vitality and viability of places.
- R9: Meanwhile/ temporary uses - Policy R9 sets out the approach that encourages making use of vacant buildings/sites for temporary (6 month) commercial use.

**Table 3.42: Assessment of policies R6 to R9**

IIA Objective	R6: Maintaining and enhancing Islington’s unique retail character	R7: Markets and SSAs	R8: Location and concentration of uses	R9: Meanwhile/	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	++	+	+	+	<p>Policy R6 will have a positive effect as it helps to protect and enhance the local character of Islington and maintain a retail environment where units provide active frontages and engagement with the street scene providing safety and convenience.</p> <p><b>New effects have been identified for Policies R7 following review of the IIA as part of the examination and changed the effects from</b></p>



					<p><b>neutral to minor positive. A minor positive has been identified for policy R7 as the protection and enhancement of markets and specialist shopping areas will help to maintain and enhance the local character of the borough. It will also help to ensure activity and natural surveillance within these locations which can help to create a safer and more inclusive environment.</b></p> <p>Policy R8 has a minor positive effect. It seeks to manage the detrimental concentrations of uses that hinder public health and wellbeing, amenity, character and function, and affect the vitality and viability of places. There is some evidence that increased numbers of betting shops can lead to increases in crime and anti-social behaviour (ASB), including fear/perceptions of crime and ASB therefore managing the concentration of such uses could have positive effects on the built environment.</p> <p>Policy R9 will have a minor positive effect by bringing back into use, albeit on a temporary basis, buildings and spaces. This could help reduce crime and fear of crime associated with vacant buildings/spaces. It will also help maintain and improve the quality of the built environment.</p>
2. Ensure efficient use of land, buildings and infrastructure	+	+	0	++	<p>Policy R6 will have a positive effect. It optimises the existing urban form of retail centres in the borough with flexibility to amalgamate units being carefully controlled.</p> <p>Policy R7 will have minor positive effect. It will help support the vitality and viability of the rest of town centre through protecting both markets and SSAs.</p> <p>Policy R8 has no effect.</p> <p>Policy R9 will have a significant positive effect by bringing back into use, albeit on a temporary basis, buildings and spaces.</p>
3. Conserve and enhance the	+	+	0	0	<p>Policies R7, R8 and R9 will have no effect</p>

significance of heritage assets and their settings, and the wider historic and cultural environment.					<p>Policy R6 will have a minor positive effect through the retention of small shops and resistance of amalgamation which will retain the unique retail character of Islington which is part of the boroughs heritage.</p> <p><b>New effects have been identified for Policies R7 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. A minor positive has been identified as the protection and enhancement of markets and specialist shopping areas will help to maintain and enhance the local character of the borough including in relation to Islington’s heritage assets.</b></p>
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	++	+	++	+	<p>Policy R6 will have a significant positive effect. It will protect small shops which often provide the essential services outside of supermarket chain developments and also provide requirement to provide small shops as part of larger developments.</p> <p>Policy R7 will have a minor positive effect, as it will help support the vitality and viability of the rest of town centre through protecting both markets and SSAs. Existing and new markets will contribute to the diversity of retail in town centres and the CAZ which provide access to a wide range of goods and services to some residents. SSAs provide a niche retail offer for residents and visitors. Together, the protection and enhancement of these assets can provide a vibrant social environment and a sense of place.</p> <p>There is a significant positive effect for Policy R8. There is no specific need for hot food takeaways, betting shops and adult gaming centres; and evidence suggests that they can undermine vitality, viability and vibrancy of town and local centres. A quantitative restriction within centres will help prevent a level of hot food takeaways, betting shops and adult gaming centres that would affect the ability of these centres to serve local needs, by virtue of both lack of available space for more priority uses which directly serve a local need; and through a</p>

					<p>cumulative undermining of the vitality and viability of these centres which could affect their medium to long term outlook.</p> <p>Policy R9 will have a minor positive effect as it will support a wide range of possible temporary uses increasing services available to residents.</p>
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	0	0	0	Policies R6 to R9 will have no effect.
6. Promote social inclusion, equality, diversity and community cohesion	0	+	0	0	<p>Policies R6, R8 and R9 will have no effect.</p> <p><b>New effects have been identified for Policies R7 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policy R7 will have a minor positive effect due to markets providing places for informal interaction, reduce social exclusion and increase social cohesion.</b> The provision of markets also provides the spaces to enable the establishment of local businesses from different demographics of Islington's population.</p>
7. Improve the health and wellbeing of the population and reduce health inequalities	0	0	+	0	<p>Policies R6, R7 and R9 will have no effect</p> <p>Policy R8 will have a minor positive effect. The policy working in tandem with other health initiatives should improve physical and mental health through restricting an overconcentration of HFT and BS which contribute to poor health and wellbeing. In particular reducing the proliferation of HFT fast food within 200m of a school which school children would be easily able to access will be particularly beneficial.</p>
8. Foster sustainable economic growth and increase employment	+	+	0	+	Policy R6 will have a minor positive effect. It will protect small shops which will help to maintain a supply of space for small business which is important as they form a large part of Islington's economy. <b>New effects have been identified following review of the IIA as part of the examination process. In theory, a protective approach to</b>

<p>opportunities across a range of sectors and business sizes</p>					<p><b>small shops could have a minor negative effect by limiting the economic expansion of individual retail and other main town centre uses. However, Policy R6 recognises that in order to maintain a strong local economy and support small and independent businesses, the unique character of Islington as a whole needs to be maintained and the benefits of this are recognised.</b></p> <p>Policy R7 will have a minor positive effect as SSA and markets make a contribution to the local economy of town centres and act as specific pull factors for visitors and residents to visit town centres. <b>New effects have been identified following review of the IIA as part of the examination. This includes the two year vacancy and marketing period for change of use away from A1 in the SSA potentially limiting a range of main town centre uses establishing here that would benefit from the high PTAL rating and ability for the area to absorb adverse amenity impacts. A short term minor negative economic effect could arise from a downturn in viability of A1 retailing potentially resulting in vacant units in the SSA. However, on balance, as the plan period runs until 2036 the need to protect and secure retail in the long term outweighs this potential short term negative effect.</b></p> <p>Policy R8 will have neutral effect by providing a quantitative restriction within centres which will help prevent a level of hot food takeaways, betting shops and adult gaming centres. On a purely economic basis the policy could have a <b>minor negative impact by limiting jobs in the betting and hot food takeaway industries, however from a sustainable economic development point of view the adverse economic impacts caused by obesity and personal debt is a far greater negative effect than the restrictions on these sectors growth. Controls on the location and concentration of uses can also have wider economic benefits by supporting a range of businesses by mitigating the cumulative adverse impacts some</b></p>
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					<p><b>uses can have on the viability and vitality of areas which can include impacts on character and rents.</b></p> <p>Policy R9 will have a minor positive effect through allowing space to be used for a wide range of potential uses helping contribute to the local economy.</p>
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	0	+	0	0	<p>Policies R6, R8 and R9 will have no effect</p> <p><b>New effects have been identified for Policies R1-R4 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policy R7 could see a minor positive effect by protecting markets and SSAs in accessible locations that help to promote local trips by sustainable and active travel transport modes.</b></p>
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	0	0	Policies R6 to R9 will have no effect
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	0	0	Policies R6 to R9 will have no effect
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	0	0	0	Policies R6 to R9 will have no effect

13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	0	0	Policies R6 to R9 will have no effect
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	0	0	Policies R6 to R9 will have no effect

### **R6: Maintaining and enhancing Islington’s unique retail character**

The Sustainability Appraisal considers that the policy has an overall positive effect against the sustainability objectives as it protects small shops which will help to protect and enhance the local character of Islington and maintain a retail environment with units which provide active frontages and engagement with the street scene providing safety and convenience for people. In character and heritage terms it protects against amalgamation of units into larger units. Small shops often provide the essential services outside of supermarket chain developments which maintains facilities for residents and also helps to maintain a supply of space for small business which is important as they form a large part of Islington’s economy. New effects have been identified following review of the IIA as part of the examination process. In theory, a protective approach to small shops could have a minor negative effect by limiting the economic expansion of individual retail and other main town centre uses. However, Policy R6 recognises that in order to maintain a strong local economy, the unique character of Islington as a whole needs to be maintained in order to retain perceptions and reality of a place that fosters independent businesses. This therefore does not change the overall positive effect the policy would have.

### **R7: Markets and Specialist Shopping Areas (SSA)**

The appraisal identified the approach in Policy R7 would have a positive effect against the framework objective for economic growth and increasing employment opportunities, as SSA and markets make a significant contribution to the local economy of town centres and act as specific pull factors for visitors and residents to visit town centres. They also contribute to the diversity of retail offer in town centres. Protecting SSA and markets also will also help support the character, vitality and viability of the rest of town centre. Other positive effects include: contributing to natural surveillance; conserving the setting heritage assets are within; facilitating access to goods and services, especially for lower income residents; contribute to a sense of place; encourage informal interactions, reducing social exclusion; and encouraging shopping trips to be made locally. A two year vacancy and marketing period for change of use away from A1 in SSAs if below the strategic thresholds potentially limit a range of main town centre uses establishing here that would benefit from the high PTAL rating and ability for the area to absorb adverse amenity impacts. A short term minor negative economic effect could arise from a downturn in viability of A1 retailing resulting in a proliferation of vacant units in the SSA. However, on balance, as the plan period runs until 2036 the need to protect and secure retail in the long term outweighs this potential short term negative effect.

### **R8: Location and Concentration of Uses**

The Sustainability Appraisal of the policy considered there is no specific need for hot food takeaways, betting shops and adult gaming centres; with evidence suggesting that they can undermine vitality, viability and vibrancy of town and local centres. A quantitative restriction within centres will help prevent a level of hot food takeaways, betting shops and adult gaming centres that would affect the ability of these centres to serve local needs, by virtue of both lack of available space for more priority uses which directly serve a local need; and through a cumulative undermining of the vitality and viability of these centres which could affect their medium to long term outlook. Although it is acknowledged that by restricting hot food takeaways and betting shops, a minor negative effect could be felt on the economic prosperity of those industries, it is considered on balance that the economic benefits from betterment of health outweighs this minor negative effect. The policy also supports businesses by mitigating the negative cumulative impacts brought about by the proliferation of certain uses.

The Sustainability Appraisal considered that policy R8 approach should work in tandem with other health initiatives and should improve physical and mental health through restricting an overconcentration of HFT and BS which contribute to poor health and wellbeing. In particular reducing the proliferation of HFT fast food within 200m of a school which school children would be easily able to access will be particularly beneficial.

### **R9: Meanwhile/temporary uses**

The Sustainability Appraisal considered that Policy R9 will have a minor positive effect against the framework objective to create a sustainable built environment by bringing back into use, albeit on a temporary basis the use of buildings and spaces which will help reduce crime and fear of crime associated with vacant buildings/spaces. It will also help maintain and improve the quality of the built environment if vacant buildings

are brought back into use. A wide range of possible temporary uses are supported increasing services available to residents which will also contribute to the local economy. The Sustainability Appraisal notes that this is a temporary effect.



### Inclusive Economy; Culture, Public Houses and Visitor Accommodation Policies

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

- R10: Culture and Night-Time Economy - Policy R10 focuses on the protection and enhancement of cultural and night time economy uses, directing new uses to Cultural Quarters, Town Centres, and the CAZ.
- R11: Public Houses - Policy R11 seeks to protect pubs and provides detail on subservient use as visitor accommodation
- R12: Visitor Accommodation - Policy R12 restricts visitor accommodation to site allocations and sets criteria for re-development of existing visitor accommodation and ensures appropriate design of any accommodation.

Table 3.43: Assessment of policies R10 to R12

IIA Objective	R10: Culture and NTE	R11: Public Houses	R12: Visitor accommodation	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	+	+	-	<p>Policy R10 will have a minor positive effect principally through seeking to support and manage a thriving and safe night time economy. Policy R10 provides detail on how the night time economy will respond with appropriate design which is high quality, safer and more inclusive potentially reducing crime and anti-social behaviour. In addition the agent of change principle is highlighted to ensure that the impact that other development has on culture and NTE is considered as well as the potential negative effect it can have on amenity. <b>New effects have been identified following review of the IIA as part of the examination process. The effect of Cultural Quarters could have a minor positive effect on the built environment by requiring development to enhance the cultural function whether that be through adaptable buildings or enhanced public realm for visitors.</b></p> <p><b>New effects have been identified for Policy R11 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policy R11 will have a minor positive effect by protecting pubs that contribute to the character and local distinctiveness of a variety of different areas including town centres, LSAs and areas of predominantly in residential use.</b></p> <p>There is a minor negative effect for policy R12 as it would likely increase the amount of visitor accommodation delivered; visitor accommodation is generally built to a unique specification which does not lend itself to be easily adapted for other uses, hence it is a less sustainable</p>

				built form. For example, visitor accommodation has smaller room sizes, less or no outdoor private amenity space and reduced accessibility requirements which all contributes to less flexible buildings. This is partially mitigated through the policy R12 requirement that the development or redevelopment/intensification of visitor accommodation must adhere to inclusive design requirement for 10% of rooms to be wheelchair accessible.
2. Ensure efficient use of land, buildings and infrastructure	++	+	0	<p>Policy R10 will have a significant positive effect through optimising the use of developed land which focuses commercial, cultural and civic activity in town centres helping to balance land use needs through protection of existing venues and directing new venues to these locations. These locations are already the focus for cultural and NTE uses and are appropriate given the commercial character which can better absorb the potential impacts.</p> <p>Policy R11 will have a minor positive effect as it will protect the use of pubs and potentially allow subservient visitor accommodation to help sustain the viability of public houses. This also allows development of pubs to be flexible and adapt to changing social and economic needs.</p> <p>There is a neutral effect for policy R12 as it would likely result in visitor accommodation being permitted, which could reduce the availability of land to meet other development needs, and therefore it could potentially not effectively balance competing demands for land use. This is partially mitigated by the prescriptive approach taken in policy R12 which limits hotel development to specific sites or intensification of existing visitor accommodation in town centres and the CAZ. The policy also ensures that intensification of existing hotels has to demonstrate that additional business floorspace is not possible which allows other priorities to take precedent and optimise the use of previously developed land.</p>
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	++	0	<p>No effect for policies R10 and R12.</p> <p>Policy R11 will have a significant positive effect as it aims to protect against redevelopment, demolition or change of use of a pub, especially with historical or heritage features which will help maintain the wider historic and cultural character of the borough.</p>
4. Promote liveable neighbourhoods	++	+	0	Policy R10 will have a significant positive effect principally through seeking to support and manage a thriving cultural and night time economy, directing appropriate cultural and NTE

<p>which support good quality accessible services and sustainable lifestyles</p>				<p>development to town centres and CAZ locations and cultural quarters, ensuring access to these cultural facilities that serve the needs and wellbeing of the population. The agent of change principle is highlighted and applies in town centres, allowing for vibrant town centre uses that attract visitors to be maintained.</p> <p>Policy R11 supports the protection of pubs which will contribute to diverse, vibrant and economically vibrant town centres and neighbourhoods.</p> <p>It is considered that on balance there is a neutral effect for policies R12. New visitor accommodation could have a positive effect by facilitating an increase in the number of visitors and footfall which could add to the vibrancy of an area and contribute to economic improvement; this would depend on the focus of the visitor accommodation (business or leisure visitors) as each group has different impacts. Leisure visitors especially could support the expansion and enhancement of cultural provision. Conversely, the policy could have negative effects.</p> <p><b>A more permissive approach to visitor accommodation would reduce the ability to provide land for other uses which support liveable neighbourhoods, including essential services and amenities within town centres which has the potential to impact on the vibrancy and vitality of town centres. Overall, the policy is considered to have no effect given the balance of potential positive and negative effects.</b></p>
<p>5. Ensure that all residents have access to good quality, well-located, affordable housing</p>	<p>0</p>	<p>0</p>	<p>0</p>	<p>No effect for policies R10, R11 and R12</p>
<p>6. Promote social inclusion, equality, diversity and community cohesion</p>	<p>+</p>	<p>+</p>	<p>0</p>	<p>No effect for policies and R12</p> <p><b>New effects have been identified following review of the IIA as part of the examination process. Policy R10 will have a minor positive effect in that supporting and protecting cultural uses allows spaces that act as informal meeting places to thrive, strengthening local connections and fostering skills/learning in the creative industries.</b></p>

				Policy R11 will have a minor positive effect. Pubs can promote social cohesion and integration, especially pubs with demonstrable community value. Such pubs can meet specific community needs, e.g. by acting as a focal point for events.
7. Improve the health and wellbeing of the population and reduce health inequalities	+	+	0	<p>No effect for policies R12</p> <p><b>New effects have been identified for Policies R10 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policy R10 will have a minor positive effect in terms of encouraging social interaction and providing facilities for the community. This has benefits of improving mental health and combatting loneliness and social isolation.</b></p> <p>Policy R11 will have a minor positive effect. See assessment against objective 6.</p>
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	++	++	+	<p>Policy R10 will have a significant positive effect through optimising the use of developed land which focuses commercial, cultural and civic activity in town centres helping to balance land use needs through protection of existing cultural and Night Time Economy (NTE) venues and directing new cultural and NTE venues to these locations. An enhanced cultural NTE especially will increase employment opportunities and increase the boroughs contribution to the local economy.</p> <p>Policy R11 will have a minor positive effect, as it will help to protect pubs which contribute to the NTE.</p> <p>There is a minor positive effect for policy R12. It could provide opportunities for employment, particularly for local people, in this industry, albeit lower-skilled jobs at a relatively low employment density. Visitor accommodation can play a supporting role to other more economically important uses such as office; this more indirect economic benefit therefore limits the scale of any positive effect. Visitor accommodation may not be compatible with a range of other uses which may limit its ability to support a range of local business and represents a loss of opportunity for other more appropriate main town centre uses.</p>
9. Minimise the need to travel and create accessible, safe and	+	0	0	No effect for policies R11 and R12

sustainable connections and networks by road, public transport, cycling and walking				<b>New effects have been identified following review of the IIA as part of the examination process. Policy R10 particularly would see a positive effect from requiring cultural uses to locate in the CAZ or Town Centres. This takes advantage of the most accessible parts of the borough, especially for public transport at night.</b>
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	0	No effect for policies R10, R11 and R12
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	0	No effect for policies R10, R11 and R12
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	0	-	No effect for policies R10 and R11  There is a minor negative effect for policy R12. Visitor accommodation, especially larger hotels, are very energy and water intensive. A proliferation of visitor accommodation would be likely to increase energy and water intensive uses, even if other Local Plan policies – for example sustainable design policies – had requirements to mitigate the impact of this increased intensity of use.
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that	0	0	-	No effect for policies R10 and R11  There is a minor negative effect for policy R12. Visitor accommodation, especially larger hotels, are very energy and water intensive. A proliferation of visitor accommodation would be likely to increase energy and water intensive uses, even if other Local Plan policies – for example sustainable design policies – had requirements to mitigate the impact of this increased intensity of use.

optimises resource use and minimises waste				
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	-	No effect for policies R10 and R11  There is a minor negative effect for policy R12. Visitor accommodation, especially larger hotels, are very energy and water intensive. A proliferation of visitor accommodation would be likely to increase energy and water intensive uses, even if other Local Plan policies – for example sustainable design policies – had requirements to mitigate the impact of this increased intensity of use.

### **R10: Culture and Night-Time Economy**

The Sustainability Appraisal considers that Policy R10 will have a significant positive effect on the framework objective to optimise the use of developed land by focusing commercial, cultural and civic activity in town centres helping to balance land use needs through protection of existing venues and directing new venues to these locations. These locations are already the focus for cultural and night-time economy (NTE) uses and are appropriate given the commercial character which can better absorb the potential impacts. Policy R10 also provides benefits in providing informal meeting spaces that can encourage social interaction which benefits mental health. Such spaces and uses also enable skills and education to be obtained in the creative and cultural industries. Policy R10 provides further detail on how the night time economy will respond with appropriate design which is safer and more inclusive potentially reducing crime and anti-social behaviour. An enhanced cultural and NTE especially will increase employment opportunities and increase the boroughs contribution to the local economy.

### **R11: Public Houses**

The Sustainability Appraisal of Policy R11 consider the policy will have a significant positive effect on various framework objectives through the protection of pubs which ensures their contribution to diverse, vibrant and economically vibrant town centres and also neighbourhoods outside town centres contributing to local distinctiveness and punctuating the urban form with pubs that add to a sense of place. They are also important as meeting places/community hubs; pubs can promote social cohesion and integration, especially pubs with demonstrable community value. This will also help maintain the wider historic and cultural character of the borough.

### **Policy R12: Visitor Accommodation**

The Sustainability Appraisal considered that the approach set out in Policy R12 would overall have a neutral impact – albeit with some minor negative environmental impacts recognised. Permitting more visitor accommodation reduces the availability of land to meet other more pressing development needs, therefore it would not effectively balance competing demands for land use. This is considered to outweigh potential benefits of increased footfall. There are many identified needs that take priority above visitor accommodation in Islington, principally housing and offices – it would also create additional pressure on land supply for other town centre uses. However, this effect is partially

mitigated by the restrictive approach taken in R12 which limits hotel development to specific sites or the intensification of existing visitor accommodation in town centres and the CAZ. This restrictive approach is considered to balance the need to consider competing land use as it also allows other priorities to take precedent on existing hotel sites and optimise the use of previously developed land.

In regards the impact against the framework objective to create a high quality built environment visitor accommodation is generally built to a unique specification which does not lend itself to be easily adapted for other uses, hence it is a less sustainable built form. For example, visitor accommodation has smaller room sizes, less or no outdoor private amenity space and reduced accessibility requirements which all contributes to less flexible buildings. This is partially mitigated through R12 requirement that the development or redevelopment/intensification of visitor accommodation must adhere to inclusive design requirement for 10% of rooms to be wheelchair accessible. As with land supply the reasonable alternative to policy R12 would increase the amount of less flexible accommodation.

The Sustainability Appraisal considered that new visitor accommodation could have a positive effect against the economic growth framework objective and supporting town centres by facilitating an increase in the number of visitors which could add to the vibrancy of an area and contribute to economic improvement; although the assessment considered this would depend on the focus of the visitor accommodation (business or leisure visitors) as each group has different impacts. Leisure visitors especially could support the expansion and enhancement of cultural provision. With the effect on land supply discussed above there could be a negative effect on the ability of town centres to meet the needs and wellbeing of the population affecting the wider vibrancy of the town centre. There is a minor positive effect for policy R12 in that it could provide opportunities for employment, particularly local people, in the hotel industry, albeit lower-skilled jobs at a relatively low employment density.

The Sustainability Appraisal identified a minor negative effect against the framework objectives for environment as visitor accommodation, especially larger hotels, are very energy and water intensive. A proliferation of visitor accommodation would be likely to increase energy and water intensive uses; therefore the reasonable alternative to policy R12 would increase the environmental impact from hotel accommodation.

## Green Infrastructure policy assessments

**Table 3.44: Assessment of Policies G1 to G3**

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

- G1: Green infrastructure - Policy G1 sets the strategic approach to the protection and enhancement of the network of green spaces, street trees, green roofs, and other assets such as natural drainage features and introduces Urban Greening Factor. For the purposes of the Local Plan, the term 'green infrastructure' is inclusive of 'blue infrastructure' too.
- G2 Protecting open space - Policy G2 seeks to protect public and significant private open space. Sets out the policy approach to protecting open space on housing estates.
- G3 New public open space - Policy G3 focuses on in what circumstances new public open space is required and criteria on the type of space provided.

IIA Objective	G1: Green Infrastructure	G2 Protecting open space	G3 New public open space	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	++	++	+	<p>Policies G1 and G2 will have a significant positive effect on promoting a high quality, inclusive, safe, and sustainable built environment by ensuring that open spaces are preserved. Open spaces in Islington are an essential and highly valued component of local character and distinctiveness. They also improve the appearance and functionality of the public realm.</p> <p><b>New effects have been identified following review of the IIA as part of the examination: Policy G1 will also result in more trees, plants, green walls and roofs being provided which will improve the appearance and thermal comfort of the built environment.</b></p> <p>Policy G3 will have a minor positive effect on promoting a high quality, inclusive, safe, and sustainable built environment by ensuring that large developments provide new open spaces. The new open spaces will help create neighbourhoods that are more attractive, functional, and sustainable.</p>



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)
2. Ensure efficient use of land, buildings and infrastructure	+	+	0	<p>Policies G1 and G2 will have a minor positive effect. They will ensure that much needed open space continues to be provided, balancing against the need for other development.</p> <p><b>New effects have been identified following review of the IIA as part of the examination process: Policy G1 will ensure that green infrastructure is provided making efficient use of the built environment – for example green roofs changing roof space from wasted space to a biodiversity asset.</b></p> <p><b>Effect changed from positive to neutral as part of the review of the IIA as part of the examination process: Policy G3 will have a neutral effect: Policy G3 will have neutral effect on the efficient use of land and buildings by reducing the amount of land that can be built to its highest economic use. However this effect is mitigated by the positive effects that open spaces bring in terms of appearance, character, biodiversity, and health and wellbeing.</b></p>
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	+	0	<p>No effects for policy G1 and G3</p> <p>Policy G2 will have minor positive effects on the historic environment by ensuring these spaces and their heritage value is protected. Many open spaces in Islington are heritage assets. The borough is home to two spaces listed on Historic England’s Register of Parks and Gardens (Bunhill Fields Burial Ground and part of the Barbican Estate), 42 squares are protected by the London Squares Preservation Act 1931, and 105 spaces are on the London Garden’s Trust Inventory of Historic Green Spaces. In addition, many open spaces form the setting for listed buildings, or are essential components of the value of Conservation Areas.</p>
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	++	++	+	<p>Policies G1 and G2 will have significant positive effects on liveable neighbourhoods by ensuring that existing open spaces are preserved. Open spaces are an essential and highly valued asset for local communities. They provide space for relaxation, exercise, and socialising. They are free and open to everyone.</p> <p><b>Effect changed from positive to minor positive as part of the review of the IIA as part of the examination process. G3 will have minor positive effects on liveable neighbourhoods by providing new open spaces. Open spaces are an essential and highly valued asset for local communities. They provide space for relaxation,</b></p>

IIA Objective	G1: Green Infrastructure	G2 Protecting open space	G3 New public open space	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
				<b>exercise, and socialising. They are free and open to everyone. Large areas of Islington are deficient in access to open space. With the population increasing there is a need to provide new open spaces to help meet this new demand. However only a few large developments will be able to provide additional open spaces so the effect is considered minor.</b>
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	0	0	No effects for policies G1 and G3  Policy G2 has a neutral effect. It will protect semi private amenity spaces on estate land from development. These spaces could be developed for additional affordable housing, as G2 does allow development on estates amenity spaces provided some higher quality space is retained/re-provided. The loss of amenity space could be considered minor negative as it does not meet peoples needs but would result in more affordable housing, a priority need for the plan therefore is considered on balance to be neutral.
6. Promote social inclusion, equality, diversity and community cohesion	0	+	+	No effects for policy G1.  <b>Effects have been changed from neutral to minor positive following review of the IIA as part of the examination process: Minor positive effects for Policies G2 and G3 as open spaces promote community cohesion by providing a space that is used by everyone and promotes interaction between people outside of their usual social groups and without cost.</b>
7. Improve the health and wellbeing of the population and reduce health inequalities	++	+	++	Policies G1 and G3 will have significant positive effects on the health and wellbeing of the population by protecting and increasing the amount of green open space, plants, trees, green walls and roofs in the urban environment. This will improve the air quality and encourage people to participate in more active travel, sport and recreation in the borough. Access to nature has been demonstrated to improve physical and emotional wellbeing, and plays an important role in the healthy development of children. Green infrastructure including trees, green roofs, and vegetation help reduce urban heat island effect by shading surfaces, deflecting the sun's radiation, and releasing moisture into the atmosphere. This will have benefits to comfort and wellbeing.

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)
				<p><b>Effects have been changed from significant positive to minor positive following review of the IIA as part of the examination process.</b> Policy G2 supports enhancements to open spaces on council estates providing a policy framework for redevelopment which ensures the enhancement of such spaces. The policy recognises the importance of these spaces on housing estates to residents and the benefit these spaces provide as a focal point for play, socialising and general relief from the mental pressures associated with higher density living within housing estates. However the policy permits loss of estate amenity spaces which can reduce the overall quantum which could affect access and opportunity for their use by all so the effect is considered minor positive overall.</p>
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	+	<p>No effects for policy G1 and G2.</p> <p><b>Effects have been changed from neutral to minor positive following review of the IIA as part of the examination process: G3 has a minor positive effect as it requires that new open space is designed to promote walking and cycling and to improve the appearance, amenity, and microclimate of the urban environment which increases the appeal of active transport.</b></p>
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	++	++	++	<p>Policy G1 will have a significant positive effect on open spaces by setting out a strategic approach to green infrastructure, encouraging development to provide green open space and also linking open spaces together with other green infrastructure for example planting, trees, green walls and roofs.</p> <p>Policy G2 is likely to have significant positive effects on open spaces by offering a very high level of protection and preserving open space in the borough. The policy not only protects designated open spaces but also contains protections for significant private open spaces</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)
				<p>and open space on housing estates. Whilst not formally designated open space the policy recognises the importance of these spaces on housing estates to residents and the benefit these spaces provide as a focal point for play, socialising and general relief from the mental pressures associated with higher density living within housing estates. A set of criteria are set out in policy providing a framework for decision making which allows redevelopment where there is re-provision and enhancement of these spaces.</p> <p>Policy G3 is likely to have significant positive effects on open spaces by ensuring that new large developments provide new open space in the borough. Islington is a densely developed urban area and large areas of Islington are deficient in open space. These small increases in open space provided by development are in demand and will likely be very well used.</p>
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	++	++	++	Policies G1 to G3 are likely to have significant positive effects on biodiversity by requiring developers to incorporate as much biodiversity habitat into development as is reasonably possible, by protecting existing open space and providing new open space. The preservation of existing open spaces is the most effective strategy for preserving and improving biodiversity value (which works in conjunction with other policies including policy G4).
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	++	++	+	<p>Policies G1 and G2 will have significant positive effects on reducing climate change and impact of climate change. The main positive effect of the green infrastructure policy is that it will contribute to mitigating the effects of climate change by protecting open spaces and vegetation in the urban environment, thus helping to reduce the urban heat island effect. Vegetation will also have a small effect of adsorbing some carbon dioxide in the atmosphere Green walls and roofs also will have a small effect in reducing heat reflected back in to the atmosphere. Green infrastructure also helps reduce peak water runoff, reducing the impact of flooding events which are likely to be more severe due to climate change.</p> <p>Policy G3 will have a minor positive effect on reducing climate change through provision of new open space.</p>

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)
				<p><b>New analysis has been added following review of the IIA as part of the examination process: Whilst in some instances, providing new open space may limit some opportunities for development in highly accessible locations - which can have carbon reduction benefits. The lost opportunity for development will be a small proportion of the overall proportion of development and the provision of open space will help to ensure new development can mitigate climate change impacts and other policies in the plan work to optimise development in accessible locations.</b></p>
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	0	No effects for policy G1, G2 and G3
14. Maximise protection and enhancement of natural resources including water, land and air	+	+	+	<p>Policies G1 and G2 will have significant positive effects on natural resources mainly by retaining open space and vegetation in the urban environment which will help clean the air. This will also have some positive effects on water and soil by reducing stormwater runoff, and retaining and increasing permeable surfaces.</p> <p>Policy G3 will have a minor positive effects on natural resources mainly by improving local air quality through the increased amount of vegetation in the urban environment which will help clean the air. New open space will also have some positive effects on water and soil by preserving permeable surfaces and therefore maintaining lower levels of stormwater runoff.</p>

### Policy G1: Green infrastructure

The Sustainability Appraisal considered Policy G1 is likely to have significant positive effects in particular against the framework objectives for open spaces, biodiversity, reducing climate change, and promoting a high quality, inclusive, safe, and sustainable built environment by setting out a strategic approach to green infrastructure which requires developers to incorporate as much green infrastructure into development as is reasonably possible providing new open spaces, new trees, plants, green roofs and walls. This

green infrastructure will improve the appearance of the built environment, improve the microclimate, reduce the urban heat island effects, store carbon, and provide habitat for biodiversity. This in turn will have significant positive effects on the health and wellbeing of the population by providing access to nature, improving the air quality, and encourage people to participate in more active travel, sport, and recreation. The policies will have positive effects on the efficient use of land and buildings by adding green infrastructure to already developed land.

### **Policy G2: Protecting open space and Policy G3: New public open space**

The Sustainability Appraisal considers Policy G2 and G3 are likely to have significant positive effects against the framework objectives for open spaces by offering a very high level of protection and preserving open space in the borough, and by providing new open spaces on larger developments. Policy G2 not only protects designated open spaces but also contains protections for significant private open spaces and open space on housing estates. Whilst not formally designated open space the policy recognises the importance of these spaces on housing estates to residents and the benefit these spaces provide as a focal point for play, socialising and general relief from the mental pressures associated with higher density living within housing estates. A set of criteria are set out in policy providing a framework for decision making which allows redevelopment where there is re-provision and enhancement of these spaces.

Policies G2 and G3 will have significant positive effects on the objective for biodiversity by protecting existing open space and providing new open spaces, therefore protecting and expanding the largest natural habitats in the borough. There are also minor positive effects on the objective for preserving natural resources for policies G2 and G3 by retaining open space which will help lower air pollution and slow stormwater runoff. There will be positive effects for reducing climate change by vegetation storing carbon and effects on mitigating the effects of climate change by reducing the urban heat island effect.

Policies G2 and G3 will likely have significant positive effects against the framework objectives for health and wellbeing, and promoting a high quality, inclusive, safe, and sustainable built environment by ensuring that open spaces are preserved and new spaces are created. Open spaces in Islington are an essential and highly valued component of local character. They provide space for relaxation, exercise, access to nature, and socialising. They improve the appearance and functionality of the public realm. For these reasons the assessment identified significant positive effects under Policy G2 and minor positive effects Policy G3 for liveable neighbourhoods. Policy G2 will have minor positive effects in protecting heritage value.

Policies G2 and G3 will have minor positive effects on social inclusion and community cohesion provided by the retention and provision of open space which provides opportunities for the community to interact.

The Sustainability Appraisal of G2 and G3 are likely to have significant positive effects against the framework objective for biodiversity by offering high levels of protection to open space in the borough. G3 will have significant positive effects on liveable neighbourhoods by providing new open spaces. Open spaces are an essential and highly valued asset for local communities. They provide space for relaxation, exercise, and socialising. They are free and open to everyone. Large areas of Islington are deficient in access to open

space. With the population increasing there is a need to provide new open spaces to help meet this new demand. This will also have a minor positive effect against the framework objective for reducing climate change and impact of climate change by increasing the vegetation in the urban environment and helping reduce the urban heat island effect. The retained vegetation will also have a small effect of adsorbing some carbon dioxide in the atmosphere. This will also benefit air quality.

**Table 3.45: Assessment of Policies G4 to G5**

The following policies have been assessed in the same assessment table.

- G4: Biodiversity, landscape design and trees - Policy G4 requires all development to protect and enhance site biodiversity and the surrounding area and demonstrate this through the submission of a Landscape Design Strategy.
- G5: Green roofs and vertical greening - Policy G5 sets out the requirements for the installation of green roofs and vertical greening.

IIA Objective	G4: Biodiversity, landscape design and trees	G5: Green roofs and vertical greening	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	++	+	<p>Policy G4 requires developments to submit a Landscape Design Strategy which maximises green infrastructure, biodiversity and sustainable drainage will promote a high quality and sustainable built environment. The Landscape Design Strategy should demonstrate a holistic approach including numerous requirements which will ensure an integrated approach to hard and soft landscaping design that contributes to high quality urban design and enhances local character and distinctiveness, and a functional, attractive and inclusive design. This will have significant positive effects in terms of promoting a high quality and sustainable built environment.</p> <p><b>Effects have been changed from neutral to minor positive following review of the IIA as part of the examination process. Policy G5 will have a minor positive effects in promoting a high quality and sustainable built environment by ensuring that buildings integrate green roofs and walls which will make buildings more attractive and improve the microclimate, reducing the urban heat island effect.</b></p>
2. Ensure efficient use of land, buildings and infrastructure	+	++	<p><b>New effects have been identified which change the effect from neutral to minor positive following review of the IIA as part of the examination process: Policy G4 will have a minor positive effect on the efficient use of land by using developed land and existing buildings to locate new green infrastructure.</b></p> <p>Policy G5 has a significant positive effect by maximising the use of often dead space to provide new green infrastructure.</p>



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)
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	0	Policies G4 and G5 have no effect. Policy G5 could, in some individual circumstances, have potential impacts on heritage assets or the setting of heritage assets, e.g. where a green roof is visible from the street or neighbouring properties, but this would be subject to other planning considerations, including balancing relevant design and heritage policies during the planning application process to ensure that the historic environment is not impacted significantly. Similar considerations for vertical greening. There is no 'in principle' effect on objective 3.
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	+	0	Policy G4 will have a minor positive effect. It will promote the creation of high quality green spaces and food growing spaces, and as a result will help to promote liveable neighbourhoods. This policy will result in some positive effects on objective 4 over the short and long term.  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

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)
6. Promote social inclusion, equality, diversity and community cohesion	+	0	<p><b>New effects have been identified which change the effect from neutral to minor positive following review of the IIA as part of the examination process: Policy G4 will have a minor positive effect on promoting social inclusion and community cohesion by providing food growing opportunities such as allotments which are places of social interaction.</b></p> <p>Policy G5 has no effect.</p>
7. Improve the health and wellbeing of the population and reduce health inequalities	+	+	<p>Policy G4 will have a minor positive effect. It will help to create high quality green spaces, and in turn, increase use and ease of access to green spaces, nature, and food growing, including for those with physical and mental and health concerns. This policy will result in some positive effects on objective 7. The green infrastructure provided will also help adapt to the impacts of climate change by reducing the urban heat island effect and improving the microclimate.</p> <p>Policy G5 will have a minor positive effect. It will provide cooling and sustainable drainage benefits, which will contribute to climate change adaptation. This may have a positive effect on wellbeing in terms of reducing the negative impacts of climate change of people's lives. Vertical greening has a visible greening effect which provides an attractive design feature and important visual amenity provision especially in built-up areas with a lack of green space, allowing people to experience biodiversity. This may have a positive impact on mental wellbeing.</p>
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	0	0	Policies G4 and G5 have no effect.

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)
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	+	+	<b>New effects have been added which change the effect from neutral to minor positive following review of the IIA as part of the examination process:</b> Provision of green infrastructure under policies G4 and G5 will improve the appearance, amenity, and microclimate of the urban environment which increases the appeal of active transport. Policy G4 requires that landscape design is integral to the design and functioning of the whole development and the wider area, which would include connectivity for walking and cycling.
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	++	0	<p>Policy G4 will have a significant positive effect. It requires that all developments must protect, enhance and contribute to the landscape, of the development site and surrounding area, and submit a Landscape Design Strategy which maximises green infrastructure, biodiversity and sustainable drainage. These requirements will help to meet the increasing need for open space and improve the quality of open space. The policy will also ensure that open space is considered within the wider context of green infrastructure and delivering multiple benefits, including sustainable drainage, biodiversity, urban cooling and air quality. Policy G4 works alongside Policy G2 and G3 (which relate to the quantum of open space) by directing the design, qualities, and features of the space. This policy will result in significant positive effects on objective 10.</p> <p>Policy G5 has no effect.</p>
11. Create, protect and enhance suitable wildlife habitats	++	++	Policy G4 will have a significant positive effect. It requires that all developments must protect and enhance site biodiversity, including wildlife habitats and trees, and take measures to reduce deficiencies in access to nature. This must be demonstrated through the submission of the Landscape Design Strategy. Biodiversity benefits and ecological connectivity must be maximised and support the council's Biodiversity Action Plan. As a result, this policy will have a direct impact on this objective, particularly increasing protection and improving opportunities for biodiversity, ensuring that

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)
wherever possible and protect species and diversity.			<p>development resulting in biodiversity net gain is given priority, improving access to nature, and improving connectivity. A key aim of the policy is to minimise impacts and damage to existing trees, hedges, shrubs and other significant vegetation, so this will also have direct impact on achieving this objective. The submission of the Landscape Design Strategy requires that appropriate maintenance arrangements will be put in place from the outset of the development, and this will help to support positive management of green infrastructure for biodiversity.</p> <p>Policy G5 will have a significant positive effect. It requires that developments maximise the incorporation of green roofs and vertical greening, primarily to enhance biodiversity and provide suitable wildlife habitats. Green roofs and green walls are required to promote ecological diversity through planting a range of appropriate species and incorporating micro habitats to support Islington's Biodiversity Action Plan. The maintenance of green roofs is required to ensure continuing biodiversity value. This policy will therefore create and enhance suitable wildlife habitats and protect species and diversity with strong positive effects on objective 11 over the short and long term.</p>
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	+	+	<p>Policy G4 will have a minor positive effect. It requires the submission of a Landscape Design Strategy which maximises green infrastructure, biodiversity and sustainable drainage will contribute to reducing the impacts of climate change, including flooding and urban heat island effect. The strategy is required to incorporate Sustainable Urban Drainage Systems (SUDS) into the landscape design which will help to reduce surface water flood risk, and to consider the impact of existing and proposed vegetation on sustainable drainage and urban cooling. The requirement to maximise green infrastructure will also help to reduce the urban heat island effect.</p> <p>Policy G5 will have a minor positive effect. Green roofs will be designed to maximise benefits for sustainable drainage and cooling. Green roofs will minimise flood risk by reducing surface water runoff, and improve thermal efficiency and cooling of buildings through the insulation they provide. They also provide urban cooling to mitigate the 'heat island effect'. Similarly, green walls provide benefits in terms of thermal efficiency and cooling, and they can have flood risk alleviation benefits where they are irrigated via rainwater runoff, reducing surface water run-off. This policy will contribute to enhancing community resilience to climate change impacts.</p>

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)
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

## Green Infrastructure policies

#### **Policy G4: Biodiversity, landscape design and trees**

The Sustainability Appraisal of Policy G4 considered it will have significant positive effects against the framework objectives for enhancing wildlife habitats as it requires all development to protect and enhance site biodiversity and demonstrate this through the submission of a Landscape Design Strategy. This assessment also highlighted the positive contribution to high quality urban design which enhances local character and distinctiveness, a functional, attractive and inclusive design which helps promote liveable neighbourhoods. The assessment also recognises the multiple benefits on reducing the impacts of climate change, creating positive benefits for health, sustainable drainage, biodiversity, urban cooling and air quality. Well-designed spaces and also food growing opportunities secured under Policy G4 promote social inclusion and cohesion. Both policies help active travel by creating more attracting and comfortable routes for walking and cycling.

#### **G5: Green roofs and vertical greening**

The Sustainability Appraisal identified that Policy G5 will create and enhance suitable wildlife habitats and protect species and diversity with strong positive effects against the framework objectives for wildlife and biodiversity creation over the short and long term. Development is required to maximise the incorporation of green roofs and vertical greening, primarily to enhance biodiversity and provide suitable wildlife habitats. Green roofs and green walls are required to promote ecological diversity through planting a range of appropriate species and incorporating micro habitats to support Islington's Biodiversity Action Plan. Green roofs will provide cooling and sustainable drainage benefits, which will contribute to climate change adaptation. Finally Policy G5 has a significant positive effect against the objective to use land efficiently by maximising the use of often dead space to provide new green infrastructure.

Policy G5 could, in some individual circumstances, have potential impacts on heritage assets or the setting of heritage assets, e.g. where a green roof is visible from the street or neighbouring properties, but this would be subject to other planning considerations, including balancing relevant design and heritage policies during the planning application process to ensure that the historic environment is not impacted significantly. Similar considerations for vertical greening. There is no 'in principle' effect on objective 3 in the Sustainability Appraisal framework.

## Sustainable Design policy assessment

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

- S1: Delivering Sustainable Design - Policy S1 strategically sets out the requirements for sustainable design to create energy and resource efficient development to tackle waste and climate change and take an integrated approach to water management.
- S2: Sustainable Design and Construction - Policy S2 requires all development proposals to submit a Sustainable Design and Construction Statement and policy sets out the details required for different scale of development
- S3: Sustainable Design Standards - Policy S3 sets out the various environmental standards that different development types should meet.
- S4: Minimising greenhouse gas emissions - Policy S4 focuses on the specific requirements of development to minimise greenhouse gas emissions to meet zero carbon targets including application of the Fabric Energy Efficiency Standards.
- S5: Energy Infrastructure - Policy S5 sets out the requirements for the implementation and connection of heat networks in development.

Table 3.46: 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	++	+	+	+	+	Policy S1 will have a significant positive effect in the short, medium and long term. It seeks to deliver sustainable design and ensure the borough develops in a way that maximises positive effects on the built environment whilst minimising negative impacts. Policy S1 promotes a circular economy approach to design and construction, and seeks to ensure that developments are designed to be flexible and

IIA Objective	S1: Delivering Sustainable Design	S2: Sustainable Design and Construction	S3: Sustainable Design Standards	S4: Minimising greenhouse gas emissions	S5: Energy Infrastructure	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
						<p>adaptable to changing requirements and circumstances over their lifetime.</p> <p>Policy S2 will have a minor positive effect. The requirement for developments to submit a Sustainable Design and Construction Statement will contribute to the promotion of a sustainable built environment</p> <p><b>New effects have been identified for Policy S3 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policy S3 is requires all developments to achieve the highest feasible level of the relevant sustainable design standard which will contribute towards a more sustainable built environment.</b></p> <p><b>New effects have been identified for Policies S4 and S5 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. The policies are likely to have a minor positive effect because they set out requirements for minimising greenhouse gas emissions and prioritising low and zero carbon heat sources for all development. This will contribute towards a more sustainable built environment and help to create buildings that are adaptable and can respond to change over their life.</b></p>
2. Ensure efficient use	+	+	0	0	+	Policies S1 and S5 will ensure that low-carbon energy infrastructure is provided in the right locations. In particular,



IIA Objective	S1: Delivering Sustainable Design	S2: Sustainable Design and Construction	S3: Sustainable Design Standards	S4: Minimising greenhouse gas emissions	S5: Energy Infrastructure	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
of land, buildings and infrastructure						<p>policy S5 promotes the development and extension of the borough's heat networks so that connection is possible for a greater number of developments. Policy S1 also seeks to ensure that developments are designed to be flexible and adaptable to changing requirements over their lifetime.</p> <p>Policy S2 will have a minor positive effect. The requirement for developments to submit an Adaptive Design Strategy will ensure that development is sufficiently flexible and adaptable to accommodate evolving social and economic needs.</p> <p>Policies S3 and S4 have no effect.</p>
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	0	0	0	0	<p>Policies S1 and S4 include the requirement for developments to maximise energy efficiency in accordance with the energy hierarchy, including consideration of building fabric energy efficiency as an integral part of the design. This may have an impact on heritage assets. Some developments may also seek to install air source heat pumps or solar panels which have the potential to impact upon heritage assets. However, alongside other policies in the plan, the effects will be considered and balanced so the effect on the conservation and enhancement of heritage assets is considered neutral overall.</p> <p><b>New effects have been identified following review of the IIA as part of the examination process. Policy S5 states that support for development of energy networks and energy centres is subject to meeting wider policy requirements including in relation to design. This will help to balance potential negative effects of developing</b></p>

IIA Objective	S1: Delivering Sustainable Design	S2: Sustainable Design and Construction	S3: Sustainable Design Standards	S4: Minimising greenhouse gas emissions	S5: Energy Infrastructure	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
						<p><b>heat networks on heritage assets and their settings, overall the effect is considered to be neutral.</b></p> <p>No effects have been identified for Policies S2 and S3.</p>
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	+	+	+	0	0	<p>Policy S1, S2 and S3 will contribute to the promotion of liveable neighbourhoods by ensuring that new developments limit their contribution to air pollution, improve air quality as far as possible, and reduce exposure to poor air quality.</p> <p>Policy S4 has no effect.</p> <p><b>New effects have been identified following review of the IIA as part of the examination process. Policy S5 adopts an integrated approach to energy supply to take into account that heat sources that use natural gas can impact on air pollution and so seeks to ensure that the selection of heat sources will result in low or zero emissions of carbon dioxide and NOx, with CHP and ultra-low NOx gas boiler communal or heat network systems designed to ensure they have no significant impact on local air quality. Overall a neutral effect has been identified.</b></p>
5. Ensure that all residents have access to good	++	++	++	++	++	<p>Policies S1, S2, S3, S4 and S5 will have a significant positive effect and help to ensure that all residents have access to good quality housing by requiring that all housing meets high standards of energy efficiency and relevant sustainable design standards. Policies S1, S2, S4 and S5</p>

IIA Objective	S1: Delivering Sustainable Design	S2: Sustainable Design and Construction	S3: Sustainable Design Standards	S4: Minimising greenhouse gas emissions	S5: Energy Infrastructure	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
quality, well-located, affordable housing						require all development proposals to maximise energy efficiency in accordance with the energy hierarchy, particularly by reducing energy demand through fabric energy efficiency, followed by supplying energy efficiently and cleanly, and incorporating renewable energy. <b>Text updated following review of the IIA as part of the examination process. Policy S3 requires residential developments to achieve high ratings under BREEAM Domestic Refurbishment 2014 and the BRE Home Quality Mark scheme, which both include credits relating to energy efficiency.</b>
6. Promote social inclusion, equality, diversity and community cohesion	+	+	+	+	+	Policies S1 to S5 have a minor positive effect. These policies will individually and cumulatively contribute to reducing fuel poverty in the borough, which has economic and health benefits for Islington residents.
7. Improve the health and wellbeing of the population and reduce health inequalities	++	++	++	++	++	Policies S1, S2, S3, S4 and S5 will have a significant positive effect on wellbeing and the reduction of fuel poverty by requiring that developments meet high standards of energy efficiency and relevant sustainable design standards. The policies require all development proposals to maximise energy efficiency in accordance with the energy hierarchy, particularly by reducing energy demand through fabric energy efficiency, followed by supplying energy efficiently and cleanly, and incorporating renewable energy.

IIA Objective	S1: Delivering Sustainable Design	S2: Sustainable Design and Construction	S3: Sustainable Design Standards	S4: Minimising greenhouse gas emissions	S5: Energy Infrastructure	<b>Commentary on assessment of likely significant effects of policies</b> (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
						<p><b>New text has been added following review of the IIA as part of the examination process.</b></p> <p><b>The requirement in Policy S5 to use low and zero carbon heating options, particularly heat networks and secondary heat sources has the potential to help to reduce fuel poverty and increase energy resilience.</b></p> <p><b>In addition, Policy S5 will have a significant positive effect because it will minimise fuel poverty linked to energy prices by requiring developments to assess energy supply prices at the planning stage to ensure the proposed low carbon heating system will not lead to high energy bills.</b></p> <p><b>Policies S1 and S2 will have a significant positive effect because they include requirements to ensure that new developments limit their contribution to air pollution and improve air quality as far as possible, as well as reducing exposure to poor air quality. Policy S3 will also have a significant positive effect by requiring developments to meet sustainable design standards relating to air quality.</b></p>
8. Foster sustainable economic growth and increase employment opportunities	+	0	0	+	+	<p>Policy S1 will support the development of green industries and a low-carbon economy through its promotion of zero carbon development and a circular economy approach to design and construction.</p> <p><b>Text updated following review of the IIA as part of the examination process: Policy S4 and S5 will also</b></p>

IIA Objective	S1: Delivering Sustainable Design	S2: Sustainable Design and Construction	S3: Sustainable Design Standards	S4: Minimising greenhouse gas emissions	S5: Energy Infrastructure	<b>Commentary on assessment of likely significant effects of policies</b> (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
across a range of sectors and business sizes						<p><b>support the development of green industries and a low-carbon economy by requiring on-site carbon emissions reductions in accordance with the energy hierarchy and the use of low and zero carbon heating options, including heat networks and secondary heat sources. The requirement to incorporate on-site renewable energy, such as air source heat pumps and solar panels, will also support this objective. A minor positive effect has therefore been identified.</b></p> <p>Policies S2 and S3 will have no effect.</p>
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	0	0	0	0	0	Policies S1 to S5 have no effect.
10. Protect and enhance open spaces that are high quality,	0	++	0	0	0	<p>Policy S1, S3, S4 and S5 have no effect.</p> <p>Policy S2 will deliver significant positive benefits to wider green infrastructure as it requires development to submit Landscape Design Strategy to demonstrate an integrated</p>

IIA Objective	S1: Delivering Sustainable Design	S2: Sustainable Design and Construction	S3: Sustainable Design Standards	S4: Minimising greenhouse gas emissions	S5: Energy Infrastructure	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
networked, accessible and multi-functional						approach to hard and soft landscape design which maximises urban greening, soft landscaping, biodiversity and sustainable drainage.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	++	+	0	0	<p>Policies S1, S4 and S5 has no effect.</p> <p>Policy S2 has a significant positive effect. It supports the protection and enhancement of suitable wildlife habitats and encourages development that implements strategic and connected green infrastructure through submission of a Landscape Design Strategy.</p> <p>Policy S3 has a minor positive effect. Developments are required to achieve the highest feasible level of the relevant sustainable design standard. This will contribute to the creation, protection and enhancement of suitable wildlife habitats, and the protection of particular species.</p>
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	++	++	++	++	++	<b>Text has been revised following review of the IIA as part of the examination process: Policy S1 will have a significant positive effect. This policy sets out the council's strategic approach to delivering sustainable design with the aim to reduce fuel poverty and enhance energy security, minimise contributions to climate change and ensure that developments are designed to mitigate the effects of climate change. This policy includes the target that all buildings in Islington will be zero carbon by 2050 (with a Council aim to achieve this earlier, by 2030). and seeks to develop and extend the borough's heat networks, The policy also promotes an integrated approach to water management, a circular economy approach and minimising the borough's</b>

IIA Objective	S1: Delivering Sustainable Design	S2: Sustainable Design and Construction	S3: Sustainable Design Standards	S4: Minimising greenhouse gas emissions	S5: Energy Infrastructure	<p>Commentary on assessment of likely significant effects of policies</p> <p>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</p>
						<p><b>contribution to air pollution, all of which will reduce the contribution of development in Islington to climate change and enhance community resilience to climate change impacts.</b></p> <p>Policies S2 and S3 will have a significant positive effect. Policy S2 requires developments to demonstrate how they directly contribute to reducing Islington’s contribution to climate change and promote climate change adaptation by submitting a Sustainable Design and Construction Statement and accompanying information. Policy S3 requires developments to achieve the highest feasible level of the relevant sustainable design standard, such as BREEAM, in order to ensure high standards of sustainable design.</p> <p>Policy S4 will have a significant positive effect. It will directly contribute to minimising Islington’s contribution to climate change by minimising greenhouse gas emissions from development, while also reducing fuel poverty and improving long term energy resilience. All development proposals are required to demonstrate how carbon emissions will be reduced in accordance with the energy hierarchy, with a focus on reducing energy demand through fabric energy efficiency in the first instance. The policy will apply to major developments and minor new-build residential developments of one unit or more. The assessment considers that Policy S4 has a minor positive short term impact which is more positive in the medium to long term, as the short term requirement for development is to comply with the less stringent interim Fabric Energy</p>

IIA Objective	S1: Delivering Sustainable Design	S2: Sustainable Design and Construction	S3: Sustainable Design Standards	S4: Minimising greenhouse gas emissions	S5: Energy Infrastructure	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
						<p>Efficiency Standard (FEES) until 2022 after which the full FEES standards will apply.</p> <p>Policy S5 will have a significant positive effect. It will directly contribute to minimising Islington’s contribution to climate change by ensuring that developments prioritise energy efficient low and zero carbon heating options. This will contribute to the decarbonisation of heat and the reduction of carbon emissions.</p>
<p>13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste</p>	<p>++</p>	<p>++</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>Policy S1 and S2 will have a significant positive effect. These policies contribute to the promotion of resource efficiency by enabling a circular economy approach that optimises resource use and minimises waste through requirement for developments to submit an Adaptive Design Strategy. New developments will reduce carbon emissions in accordance with the energy hierarchy, which includes a requirement to generate, store and use renewable energy on-site.</p> <p>Policy S3 will have a minor positive effect. The requirement for developments to achieve the highest feasible level of the relevant sustainable design standard includes standards relating to the sustainable procurement and use of materials, which will promote resource efficiency and a circular economy approach.</p> <p><b>Text has been revised following review of the IIA as part of the examination process: Policies S4 and S5 will have a minor positive effect. The policies will minimise the use of non-renewable energy sources by requiring developments to reduce carbon emissions in</b></p>



IIA Objective	S1: Delivering Sustainable Design	S2: Sustainable Design and Construction	S3: Sustainable Design Standards	S4: Minimising greenhouse gas emissions	S5: Energy Infrastructure	<b>Commentary on assessment of likely significant effects of policies</b> (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
						<b>accordance with the energy hierarchy. The policies will promote the use of renewable sustainable energy sources by supporting the use of low and zero carbon heating options, including heat networks and secondary heat sources. The policies will also encourage the use of renewable energy including air source heat pumps and solar panels.</b>
14. Maximise protection and enhancement of natural resources including water, land and air	+	+	+	0	0	<p>Policy S1, S2 and S3 will have a minor positive effect. Policy S1 will promote the sustainable use of water resources and the protection of water quality, minimise air pollution and reduce exposure to poor air quality, especially among vulnerable people. Policies S2 and S3 will ensure all developments demonstrates the relevant sustainable design policies and standards have been met.</p> <p><b>New effects have been identified following review of the IIA as part of the examination process. Policy S5 adopts an integrated approach to energy supply to take into account that heat sources that use natural gas can impact on air pollution and so seeks to ensure that the selection of heat sources will result in low or zero emissions of carbon dioxide and NOx, with CHP and ultra-low NOx gas boiler communal or heat network systems designed to ensure they have no significant impact on local air quality. Overall a neutral effect has been identified.</b></p> <p>Policies S4 will have no effect</p>

### **Policies S1: Delivering Sustainable Design**

Assumptions around the sustainability benefits of development have been made. Whilst policy to reduce energy demand and address climate change are precise in the level of carbon reductions expected the outcome of new policy such as that which deals with resource use has to be assumed.

Policy S1 will ensure that low-carbon energy infrastructure is provided in the right locations ensuring the efficient use of land. The policy will also have health benefits through promoting the sustainable use of water resources, the protection of water quality, minimising air pollution and reducing exposure to poor air quality, especially beneficial for more vulnerable people. Finally S1 will have positive effects against the built environment objective as it aims to deliver sustainable design, promote a circular economy approach to design and construction, and seek to ensure that developments are designed to be flexible and adaptable to changing requirements and circumstances over their lifetime.

### **S2: Sustainable Design and Construction, S3: Sustainable Design Standards**

Policies S2 and S3 will deliver benefits to sustainable buildings as it requires development to provide various information which helps demonstrate the achievement of the sustainable design policies. Policy S2 will have a positive impact on health through requiring development to demonstrate how it will limit its contribution to air pollution, improve local air quality and reduce exposure to poor air quality, Policy S3 requires high standards of sustainable design which can contribute towards a more sustainable built environment. It also requires demonstration of compliance with various environmental accreditation schemes ensuring a positive effect against the framework objectives to reduce the contribution to climate change and promote resource efficiency. Both policies will have a significant positive effect on delivering the council's strategic approach to delivering sustainable design with the aim that all buildings in Islington will be zero carbon by 2050 which will also have positive effects against the framework objective to provide high quality housing which minimises fuel poverty and enhancing energy security. The policies also promotes an integrated approach to water management, a circular economy approach and minimising the borough's contribution to air pollution, all of which ensure a positive effect against the framework objectives to reduce the contribution to climate change and enhance community resilience to climate change impacts.

### **S4: Minimising greenhouse gas emissions and S5: Energy infrastructure**

Policies S4 and S5 both have a significant positive effect against the objective to contribute to minimising Islington's contribution to climate change by minimising greenhouse gas emissions from development and Policy S5 will ensure that developments prioritise energy efficient low and zero carbon heating options. Policy S4 is considered by the Sustainability Assessment as a minor positive short term impact which is more positive in the medium to long term as the short term requirement for development is to comply with the less stringent interim Fabric Energy Efficiency Standard (FEES) until 2022 after which the full FEES standards will apply. Policies S4 and S5 are likely to have a minor positive effect on creating a more sustainable built environment through setting out requirements for minimising greenhouse gas emissions and sustainable energy infrastructure, this can also help to ensure buildings are adaptable over the lifetime. Policy S5 can also have a significant positive effect on health by minimising fuel poverty linked to energy prices by requiring

their assessment at planning stage to ensure low carbon heating systems will not lead to high energy bills. The **EqIA** identified the particularly positive impact of the S4 requirement for major residential development to achieve at least 10% of emissions reduction through Fabric Energy Efficiency measures 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.

## **Sustainable Design: Assessment of Policies S6 to S10**

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

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

Table 3.47: Assessment of policies S6 to S10

IIA Objective	S6: Managing heat risk	S7: Improving Air Quality	S8: Flood Risk Management	S9: Integrated Water Management and Sustainable Drainage	S10: Circular Economy and Adaptive Design	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	+	+	+	+	+	<p>Policies S6 to S9 have a minor positive effect. They work to make buildings more robust and create a sustainable public realm. They also ensure the built environment is safer by protecting from risk of increased heat and flooding, and poor air quality.</p> <p>Policy S10 will have a positive effect by requiring developments to be designed to be flexible and adaptable to changing requirements and circumstances over their lifetime; including changes to the physical environment, market demands and land use through provision of an Adaptive Design Strategy.</p>
2. Ensure efficient use of land, buildings and infrastructure	0	0	0	0	+	<p>Policies S6 to S9 have no effect.</p> <p>Policy S10 will have a minor positive effect by requiring developments to be designed to be flexible and adaptable to changing requirements and circumstances over their lifetime; including changes to the physical environment, market demands and land use through provision of an Adaptive Design Strategy. This will help to ensure efficient use is made of buildings over their lifetime.</p>

IIA Objective	S6: Managing heat risk	S7: Improving Air Quality	S8: Flood Risk Management	S9: Integrated Water Management and Sustainable Drainage	S10: Circular Economy and Adaptive Design	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	0	0	0	0	Policies S6 to S10 have no effect.
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	0	+	0	0	0	<p>Policy S6, S8, S9 and S10 have no effect.</p> <p>Policy S7 has a minor positive effect. It will require new developments to be designed, constructed and operated to limit their contribution to air pollution and improve local air quality as far as possible. All development should also seek to reduce the extent to which the public are exposed to poor air quality, especially vulnerable people.</p>

IIA Objective	S6: Managing heat risk	S7: Improving Air Quality	S8: Flood Risk Management	S9: Integrated Water Management and Sustainable Drainage	S10: Circular Economy and Adaptive Design	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
5. Ensure that all residents have access to good quality, well-located, affordable housing	+	0	0	0	+	<p>Policy S6 will have a minor positive effect, by requiring developments to reduce the potential for overheating and reliance on air conditioning systems accordance with a cooling hierarchy, which will therefore contribute to ensuring all housing meets a high standard of energy efficiency.</p> <p>Policies S7, S8 and S9 will have no effect.</p> <p>Policy S10 will have a minor positive effect. It requires developments to be flexible and adaptable to changing requirements over their lifetime which will contribute to ensuring the provision of housing that meets the diverse and changing needs of the population.</p>
6. Promote social inclusion, equality, diversity and community cohesion	0	0	0	0	0	Policies S6, S7, S8, S9 and S10 has no effect.

IIA Objective	S6: Managing heat risk	S7: Improving Air Quality	S8: Flood Risk Management	S9: Integrated Water Management and Sustainable Drainage	S10: Circular Economy and Adaptive Design	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
7. Improve the health and wellbeing of the population and reduce health inequalities	++	++	0	+	0	<p>Policy S6 will have a significant positive effect. It will help to improve the health and wellbeing of the population and reduce health inequalities through minimising the impacts of the urban heat island effect with high temperatures causing or worsen serious health conditions, particularly among vulnerable people including children and older people.</p> <p>Policy S7 will have a significant positive effect. It will require new developments to be designed, constructed and operated to limit their contribution to air pollution and improve local air quality as far as possible. All development will be required to reduce the extent to which the public are exposed to poor air quality, especially vulnerable people and people living in deprived areas where the risk of exposure to air pollution is often worse due to the fact that these areas are often located near to busy roads and lack green spaces.</p> <p>Policies S8 and S10 have no effect.</p> <p>Policy S9 will ensure that land affected by contamination will not create unacceptable risks to human health and the wider environment, protect water quality and demonstrate that there will be no negative impacts on the quality of local water resources as a result of the development.</p>



IIA Objective	S6: Managing heat risk	S7: Improving Air Quality	S8: Flood Risk Management	S9: Integrated Water Management and Sustainable Drainage	S10: Circular Economy and Adaptive Design	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	0	0	0	0	+	<p>Policies S6, S7, S8 and S9 have no effect.</p> <p>Policy 10 will have a minor positive effect. The adoption of a circular economy approach will support the development of local green industries that seek to save resources, improve resource efficiency and help to reduce carbon emissions.</p>
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	0	+	0	0	0	<p>Policies S6, S8, S9 and S10 have no effect.</p> <p>Policy S7 will have a minor positive effect, as it will help to reduce the impact of harmful emissions from transport, for example through the design of development proposals.</p>

IIA Objective	S6: Managing heat risk	S7: Improving Air Quality	S8: Flood Risk Management	S9: Integrated Water Management and Sustainable Drainage	S10: Circular Economy and Adaptive Design	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	0	+	0	<p>Policies S6, S7, S8 and S10 will have no effect.</p> <p>Policy S9 will require SUDS to be designed and implemented as a central part of the Landscape Design Strategy using an integrated approach which maximises biodiversity and water use efficiency alongside other benefits including, where appropriate and practical, amenity and recreation.</p>
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	+	0	+	0	<p>Policies S6, S8 and S10 will have no effect.</p> <p>Policy S7 will have a minor positive effect through reducing negative effects of air pollution on the quality of water, soil and ecosystem health, which can be very damaging for biodiversity and wildlife.</p> <p>Policy S9 will have a minor positive effect. It will ensure development adopts an integrated approach to water management which considers sustainable drainage, water efficiency, water quality and biodiversity holistically across a site will help to protect and enhance wildlife habitats and encourage a strategic approach to green infrastructure. In accordance with the drainage hierarchy, developments are required to manage surface water runoff through the use of green roofs and other green infrastructure where possible, both of which must maximise biodiversity in line with Policy G5.</p>

<p>12. Reduce contribution to climate change and enhance community resilience to climate change impacts.</p>	<p>++</p>	<p>0</p>	<p>++</p>	<p>++</p>	<p>++</p>	<p>Policy S6 will have a significant positive effect. It will enhance resilience to the impacts of climate change through measures to minimise internal heat gain and the impacts of the urban heat island through maximising the incorporation of passive design measures relating to design, layout, orientation and materials, in accordance with a cooling hierarchy which will reduce the potential for overheating and to avoid the need for energy intensive air conditioning which contributes to reducing carbon emissions. The policy also encourages developments to be designed to respond to changing conditions in the context of climate change.</p> <p>Policy S7 has no effect.</p> <p>Policy S8 will have a significant positive effect. It will directly reduce the impacts of climate change and enhance resilience to these impacts by requiring developments to be designed to manage and adapt to flood risk as a result of climate change.</p> <p>Policy S9 will have a significant positive effect. It will directly contribute to reducing the impacts of climate change and enhancing resilience to these impacts by requiring development to manage surface water runoff as close to its source as possible in accordance with a drainage hierarchy. Major developments must achieve particular standards and new development must also demonstrate that they have minimised the use of mains water and have been designed to be water efficient, which will also help to enhance resilience to climate change impacts.</p> <p>Policy S10 will have a significant positive effect. It will reduce the contribution of development in the borough to climate change by requiring developments to adopt a circular economy approach which will save resources, improve resource efficiency and help to reduce carbon emissions, including from the embodied energy of building materials and components. This policy will also require the flexible design of developments to enable them to respond to changing conditions in the context of climate change.</p>
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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)
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 have a significant positive effect by requiring developments to adopt a circular economy approach to building design and construction. It will ensure that development design is appropriate for the lifetime of a development by requiring developments to be designed to be flexible and adaptable to changing requirements and circumstances. The use of local, sustainable materials and resources will also be required, including the use of components and materials that can be reused or recycled. The volume of construction and deconstruction waste will be minimised by requiring materials to be re-used and/or recycled where demolition and remediation works are necessary.</p>

14. Maximise protection and enhancement of natural resources including water, land and air	0	++	0	++	+	<p>Policies S6, S8 and S10 have no effect.</p> <p>Policy S7 will have a significant positive effect. It will minimise air pollution and its negative impacts on human health, as well as improving air quality in line with national and international standards, including the Air Quality Standards Regulations 2010.</p> <p>Policy S9 have a significant positive effect. It will require all developments to adopt an integrated approach to water management which considers sustainable drainage, water efficiency, water quality and biodiversity holistically across a site and in the context of links with wider-than-site level plans. This will ensure the sustainable use of water resources. In addition, developments are required to ensure that land affected by contamination will not create unacceptable risks to the wider environment, and to demonstrate that there will be no negative impacts on the quality of local water resources as a result of the development.</p> <p><b>New effects have been identified for Policy S10 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policy S10 is likely to have a minor positive effect on the protection and enhancement of natural resources through keeping materials in use as long as possible and requiring buildings to be designed for materials to be re-used as well as made from recycled/reused content. Part F specifies development must minimise environmental impact of materials through the use of sustainable sourcing, low impact and recycled materials which will contribute to better use of natural resources.</b></p>
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**S6: Managing heat risk**

The assessment considered Policy S6 will have a positive effect against the framework objective to ensure all housing meets a high standard of energy efficiency and reduce contribution to carbon emissions by reducing the potential for overheating and reliance on air conditioning systems. This will also have a significant positive effect against the objective to improve the health and wellbeing of the population and reduce health inequalities through addressing the urban heat island effect with high temperatures causing or worsen serious health conditions, particularly among vulnerable people including children and older people.

**S7: Improving Air Quality**

The assessment considered Policy S7 will require new developments to be designed, constructed and operated to limit their contribution to air pollution and improve local air quality as far as possible therefore having a positive effect against these framework objectives. All development should also seek to reduce the extent to which the public are exposed to poor air quality, especially vulnerable people and therefore reduce negative impacts on human health.

**S8: Flood Risk Management**

The assessment considered Policy S8 will directly reduce the impacts of climate change and enhance resilience to these impacts by requiring developments to be designed to manage and adapt to flood risk as a result of climate change.

**S9: Integrated Water Management and Sustainable Drainage**

The assessment considered Policy S9 will ensure development adopts an integrated approach to water management which considers sustainable drainage, water efficiency, water quality and biodiversity holistically across a site and will maximise biodiversity and water use efficiency alongside other benefits including amenity and recreation. By managing surface water runoff as close to its source as possible this will directly contribute to a positive effect against the framework objectives to reduce the impacts of climate change and enhance resilience. In addition, developments are required to ensure that land affected by contamination will not create unacceptable risks to the wider environment, and to demonstrate that there will be no negative impacts on the quality of local water resources as a result of the development.

**S10: Circular Economy and Adaptive Design**

The assessment considered Policy S10 will reduce the contribution of development in the borough to climate change by requiring developments to adopt a circular economy approach which will have a positive effect against the framework objectives to reduce the contribution to climate change and promote resource efficiency save resources, including from the embodied energy of building materials and components. This will also help developments to be flexible and adaptable to changing requirements over their lifetime which will contribute to ensuring the provision of housing that meets the diverse and changing needs of the population. The policy may

also benefit the economy by supporting the development of local green industries. Policy S10 is also likely to have a minor positive effect on the protection and enhancement of natural resources through keeping materials in use as long as possible and requiring development to minimise environmental impact of materials.

## Transport and Public Realm policy assessment

The following transport and public realm policies have been considered in the same sustainability appraisal table:

- Policy T1: Enhancing the public realm and sustainable transport - Policy T1 sets out the strategic approach to public realm and transport which supports promotion of active travel over other transport modes, taking design led approach to transport with development to consider its impact between land use, building design, transport accessibility and connectivity.
- Policy T2: Sustainable transport choices - Policy T2 focuses on how development should incentivise walking and cycling, including cycle parking standards and minimise the impact of unsustainable transport modes. The policy also sets out how the Council will work with TfL and other stakeholders regarding public transport and associated infrastructure.
- Policy T3: Car free development - Policy T3 focuses on ensuring all new development is car free and the criteria related to ensuring accessible parking spaces are provided.
- Policy T4: Public Realm - Policy T4 focuses on how development should engage with and enhance the public realm.
- Policy T5: Delivery, servicing and construction - Policy T5 focuses on the requirements for new development to consider and manage delivery and servicing and mitigate the negative effects related to the construction of development.

Table 3.48: Assessment of policies T1 to T5

IIA Objective	T1: Enhancing the public realm and sustainable transport	T2: Sustainable Transport Choices	T3: Car free development	T4: Public realm	T5: Delivery, servicing & construction	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable	++	++	++	++	+	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, convenient and efficient access by sustainable modes of transport. This will put people at the heart of the design process with a coherent and



built environment						<p>cohesive public realm identified as one of the key elements in delivering the Local plan objectives which will ensure people make more sustainable transport choices.</p> <p>Policy T2 has a significant positive effect on safety because it resists the use of shared space which can be detrimental to those with mobility, sensory and or cognitive impairments as these people find can find “shared space” schemes dangerous and difficult to navigate. <b>Update following review of the IIA as part of the examination process: T2 also supports high quality cycle parking which will allow more people to use that sustainable active mode.</b></p> <p>Policy T3 will have a significant positive effect. Car parking has negative impacts on the the built environment, particularly at street level where it reduces the ability to design multi-functional spaces which promote walking and cycling and other activities. T3 aims at reducing the number of vehicles in Islington, which is also likely to reduce accidents and hence lead to a safer built environment.</p> <p>Policy T5 will have a minor positive effect. It requires Delivery and Servicing Plans where there may be an impact on amenity from likely vehicle movements which will have a minor positive effect; and promotes off-street delivery and servicing which is likely to improve the safety of the built environment. <b>Update following review of the IIA as part of the examination process: T5 also requires developments to explore more efficient and sustainable freight, delivery and servicing movements.</b></p>
2. Ensure efficient use of land, buildings and infrastructure	+	+	++	0	+	<p>Policy T1 and T2 will have a minor positive effect as they encourage more sustainable modes of transport which require less land than private vehicle use so in that respect are encouraging a more optimal land use in relation to transport and the movement of people and goods. Although given the land constraints in Islington there is no possibility of further land being use for vehicles.</p> <p>Policy T3 will have a significant positive effect on the use of land for parking which is considered an unnecessary and inefficient use of land in the Islington context where other more sustainable transport options are available.</p>

						<p>Policy T4 has no effect.</p> <p><b>New effects have been identified for Policy T5 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policy T5 has a minor positive effect as developments must investigate more efficient, sustainable and non-motorised freight, servicing and delivery movements, which could reduce the amount of space required on-site and off-site to accommodate these vehicular movements. Optimised and efficient vehicular movements for freight, delivery, servicing can also lead to positive impacts in terms of improving congestion on the road network.</b></p>
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	0	0	0	0	<p>Policies T1 to T5 have no effect.</p>
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	++	++	+	++	+	<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. 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.</p> <p>Policy T3 will have a minor positive effect. It will discourage car use through restricting car parking and therefore will reduce the impacts of pollution from vehicles.</p>

						<b>New effects have been identified for Policy T5 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policy T5 has a minor positive effect as developments must investigate more efficient, sustainable and non-motorised freight, servicing and delivery movements, which supports a reduction in vehicular movements, promotes non motorised modes, which can support better access to services and sustainable lifestyles.</b>
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	0	0	0	0	Policies T1 to T5 have no effect.
6. Promote social inclusion, equality, diversity and community cohesion	+	+	+	+	0	<p><b>New effects have been identified for Policies T1, T2 and T4 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policies T1, T2 and T4 ensure that active travel and public transport users benefit from improved travel conditions. This supports equality as almost 70% of households in Islington do not have access to a private car. The policies aim at mitigating the negative impacts of private motorised transport on other transport modes. Together they have a minor positive impact on social inclusion, equality, diversity and community cohesion, by encouraging active, connected, strong and cohesive communities.</b></p> <p><b>New effects have been identified for Policy T3 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policy T3 ensures that wheelchair accessible parking is delivered for those blue badge holders who rely on private cars, which has a minor positive impact on inclusion, by promoting equity between different population groups and those with protected characteristics.</b></p> <p>T5 has no effect.</p>
7. Improve the health and wellbeing of the	++	++	+	++	0	Policies T1, T2 and T4 will have a significant positive effect through enabling and prioritising active travel and use of more sustainable transport modes, to help promote healthier lifestyles which will reduce health inequality among the

population and reduce health inequalities						<p>residents. Policies T2 and T4 in particular will positively enhance the liveability of neighbourhoods and improve access through an improved public realm with permeability and legibility opening up new access routes and connections to existing facilities and services.</p> <p>Policy T3 will have a minor positive effect. It will discourage car usage and may therefore lead to an increase in the use of sustainable modes of travel.</p> <p>Policy T5 has no effect.</p>
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	0	0	0	0	+	<p>Policies T1 to T4 will have no effect.</p> <p>Policy T5 has minor positive effect as it will ensure that new development considers and mitigates where necessary through relevant modelling its impact on the wider transport system which will ensure that new development does not restrict or affect the economic function of a wider area. In particular, logistics in relation to LSIS industrial areas are identified.</p>
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	++	++	+	++	+	<p>Policies T1, T2 and T4 will have a significant positive effect in that they encourage a shift to more sustainable modes of transport through improvements to the public realm which improve permeability and legibility and opening up new access routes and connections. In particular, policy T4 will ensure context is considered through appraisal to inform how a development 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, and investigate non-motorised modes. In addition, the use of low-emission vehicles and efficient and sustainable delivery systems</p>

						which minimise motorised vehicle trips is encouraged which will have a positive effect.
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	0	+	0	<p>Policies T1 to T5 have no effect.</p> <p>Policy T4 will have a minor positive effect as they will require that where public realm is created as part of a development it contributes to the quality and quantity of green infrastructure and is based on a contextual appraisal.</p>
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	0	0	0	Policies T1 to T5 have no effect.
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	++	++	++	++	+	<p>Policies T1, T2, T3 and T4 will have a significant positive effect. They encourage active travel, including through improvements to the public realm which reduce the need to use fuel-based transport, reduce carbon emissions and improve energy efficiency. Policy T3 requires car free development which will help to reduce the amount of travel by car, which, coupled with other policies to promote improved cycle parking and deliver improvements to the public realm, will encourage travel by more sustainable modes of transport which will reduce carbon emissions.</p> <p>Policy T5 will have a minor positive effect. It requires Delivery and Servicing Plans which will assess the ongoing freight impact of the development and minimise and mitigate the impacts of this on the transport system. In addition, the use of low-emission vehicles and efficient and sustainable delivery systems which minimise motorised vehicle trips is encouraged, which could have a positive effect on reducing carbon emissions.</p>
13. Promote resource efficiency by	+	+	+	0	+	<b>New effects have been identified for Policies T1, T2, T3 and T5 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policies T1, T2, T3 and T5 could have a minor</b>

<p>decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste</p>						<p><b>positive effect. This can help promote resource efficiency through reducing motor vehicle use and promote sustainable transport options, minimising the use of non-renewable resources such as petroleum-based fuels.</b></p> <p>Policy T4 has no effect.</p>
<p>14. Maximise protection and enhancement of natural resources including water, land and air</p>	<p>++</p>	<p>++</p>	<p>++</p>	<p>++</p>	<p>+</p>	<p><b>New effects have been identified for Policies T1, T2, T3 and T4 following review of the IIA as part of the examination and changed the effects from neutral to significant positive. Policies T1, T2, T3 and T4 will have a positive effect. They encourage active travel, including through improvements to the public realm which reduce transport related emissions which contribute to air pollution. Policy T3 requires car free development which will help to reduce the amount of travel by car, which, coupled with other policies to promote improved cycle parking and deliver improvements to the public realm, will encourage travel by more sustainable modes of transport which will improve air quality.</b></p> <p><b>New effects have been identified for Policy T5 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policy T5 will have a minor positive effect. It requires Delivery and Servicing Plans which will assess the ongoing freight impact of the development and minimise and mitigate the impacts of this on the transport system. In addition, the use of low-emission vehicles and efficient and sustainable delivery systems which minimise motorised vehicle trips is encouraged, which could have a positive effect on air quality.</b></p>

## **Policy T1: Enhancing the public realm and sustainable transport, Policy T2: Sustainable transport choices and Policy T4: Public Realm**

The assessment considered Policy T1, T2 and T4 will have significant positive effects against the framework objective for the built environment – the public realm between the buildings -as they seek to integrate development into the existing built environment in a way which ensures safe, practical and convenient access by sustainable modes of transport. This will put people at the heart of the design process with a coherent and cohesive public realm identified as one of the key elements in delivering the Local plan objectives which will ensure people make more sustainable transport choices. Increasing active transport and minimising the private vehicle use will have a positive effect against the liveability of neighbourhoods by improving access through an improved public realm with permeability and legibility adding benefits of opening up new access routes and connections to existing facilities and services. Through enabling and prioritising active travel and use of more sustainable transport modes helps promote a healthier lifestyle which will reduce health inequality among the residents and reduce carbon emission and improve energy efficiency.

As part of the assessment assumptions around modes of travel are made, whilst the approach seeks to encourage use of more sustainable modes it is not a given that people will respond to this. Many other factors may also affect future travel patterns such as ways of working, the cost of transport, new modes of transport and changing trends. Both T1 and T2 and T4 will have a positive effect on inclusion from improved travel conditions which supports equality as almost 70% of households in Islington do not have access to a private car. The policies aim at mitigating the negative impacts of private motorised transport on other transport modes. Together they have a minor positive impact on social inclusion, equality, diversity and community cohesion, by encouraging active, connected, strong and cohesive community. Both T1 and T2 also help promote resource efficiency through reducing motor vehicle use and promote sustainable transport options, minimising the use of non-renewable resources such as petroleum-based fuels which also helps have a positive effect on objective 14 in relation to air quality.

### **Policy T2: Sustainable transport choices**

The Sustainability Appraisal considered Policy T2 has a particular positive effect against the framework objective for the built environment which considers safety because it resists the use of shared space which can be detrimental to those with mobility, sensory and or cognitive impairments as these people find “shared space” schemes dangerous and difficult to navigate. It is also positive as it supports high quality cycle parking which will allow more people to use that sustainable active mode.

### **Policy T3: Car free development**

The assessment considered Policy T3 will have a significant positive effect against the framework objective for the use of land as it will continue to reduce the use of land for parking cars in new development. Use of land for parking is considered an unnecessary and inefficient use of land in the Islington context where other more sustainable transport options are available as well as other priority land uses. Car parking can have a negative effect on the built environment, particularly at street level where it reduces the ability to design multi-functional spaces which promote walking and cycling and other activities. T3 will have positive impacts against the environmental framework

objectives by reducing the amount of travel by private cars which will reduce the impact that cars have on air pollution and carbon emissions. Restricting car parking will also make neighbourhoods more liveable through reduced pollution impacts from vehicles. Policy T3 will also have a positive effect against the objective for inclusion as it ensures that wheelchair accessible parking is delivered for those blue badge holders who rely on private cars, which has a minor positive impact on inclusion, by promoting equity between different population groups and those with protected characteristics.

#### **Policy T5: Delivery, servicing and construction**

The assessment considered Policy T5 will have a minor positive effect against the objective for travel as it will ensure that new development considers and mitigates where necessary through relevant modelling its impact on the wider transport system which will ensure that new development does not restrict or affect the function of a wider area. In particular logistics in relation to LSIS industrial areas are identified with developments required to explore more efficient and sustainable freight, delivery and servicing movements which is positive against safety in the built environment objective and may also lead to more efficient use of space and therefore positive against the use of land objective. The requirement for Delivery and Servicing Plans also encourages the use of low-emission vehicles, non-motorised transport modes and efficient and sustainable delivery systems which minimise motorised vehicle trips which will contribute to reducing carbon emissions and improving air quality. T5 also help promote resource efficiency through reducing motor vehicle use and promote sustainable transport options, minimising the use of non-renewable resources such as petroleum-based fuels which also helps have a positive effect on objective 14 in relation to air quality.



## Design and Heritage policy assessment

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

- Policy DH1: Fostering innovation and conserving and enhancing the historic environment - Policy DH1 sets out the strategic approach to design and heritage supporting innovative approaches to development as a means to increasing development capacity to meet identified needs, while simultaneously addressing any adverse heritage impacts and protecting and enhancing the unique character of the borough.
- Policy DH2: Heritage assets - Policy DH2 sets out the requirements for protecting heritage assets and their setting including – Conservation Areas, Listed Buildings; Historic Green Spaces, Archaeology, Views, Non-designated Heritage Assets.
- Policy DH3: Building heights - Policy DH3 defines tall buildings, identifies where tall buildings will be permitted and how the design of tall buildings will take account of visual, functional and environmental impacts.
- Policy DH4: Basement development - Policy DH4 sets the approach to basement development restricting basements that are disproportionately large, out of character with the site and host building. Sets criteria where basement development is permissible.

Table 3.49: Assessment of policies DH1 to DH4

IIA Objective	Policy DH1: Fostering innovation ...	Policy DH2: Heritage assets	Policy DH3: Building heights	Policy DH4: Basement developmen t	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	++	++	++	+	<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 as it will ensure that architecture and urban design conserves heritage assets and the</p>

IIA Objective	Policy DH1: Fostering innovation ...	Policy DH2: Heritage assets	Policy DH3: Building heights	Policy DH4: Basement developmen t	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
					<p>historic environment, which helps protect character and distinctiveness. It provides detailed policies which seek the conservation and enhancement of the historic environment, in part through protection of a range of heritage assets.</p> <p>Policy DH3 will have a significant positive effect on the built environment because it takes a plan led approach to tall buildings. It restricts tall buildings across the vast majority of the borough, and directs them to potentially suitable locations (subject to a range of additional detailed assessments). The locations have been identified in principle based on a co-ordinated and holistic approach which considers local character and distinctiveness, taking into account heritage assets as well as considering transport accessibility, infrastructure and land use. The policy seeks to promote exceptional design with high quality design details in terms of tall buildings visual impact and considering any local design principles.</p> <p>Policy DH4 will have a minor positive effect by promoting a high quality, inclusive, safe, and sustainable built environment. The policy will prevent basements that are disproportionately large, out of character with the site and host building.</p>
2. Ensure efficient use of land, buildings and infrastructure	++	+	++	-	Policy DH1 will have a significant positive effect. This policy makes efficient use of land by encouraging innovative ways to meet local plan objectives while preserving heritage, by requiring site density levels to be optimised in order to make the best use of the land, by directing tall buildings to appropriate locations, by introducing the agent of change principal which in turn leads to more compatible and therefore efficient locations for uses.

IIA Objective	Policy DH1: Fostering innovation ...	Policy DH2: Heritage assets	Policy DH3: Building heights	Policy DH4: Basement developmen t	<p>Commentary on assessment of likely significant effects of policies</p> <p>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</p>
					<p><b>New effects have been identified which changes the effects from significant to minor positive following review of the IIA as part of the examination process. Policy DH2 will have a minor positive effect. Heritage has value in terms of cultural and historical interest but also economically, and in terms of aesthetics and function, with period buildings often commanding high values. DH2 ensures this value is retained over the long term, instead of being lost due to more short term pressures.</b></p> <p>Policy DH3 will have a significant positive effect. The suitable locations for tall buildings have been identified in principle based on a co-ordinated and holistic approach which considers local character and distinctiveness. The approach also focuses development in the most appropriate locations considering transport accessibility, infrastructure and land use. By their very nature a tall building will optimise the use of land.</p> <p><b>New effects have been identified which changes the effect from minor positive to minor negative following review of the IIA as part of the examination process: Policy DH4 will have a minor negative effect. The policy will restrict very large basements which are not proportionate to the host building and site. However the additional space which may be added in these large basements to existing dwellings and commercial buildings would add value, albeit at considerable cost to achieving other objectives.</b></p>

IIA Objective	Policy DH1: Fostering innovation ...	Policy DH2: Heritage assets	Policy DH3: Building heights	Policy DH4: Basement developmen t	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	+	++	++	+	<p>Policy DH1 will have a minor positive effect. It protects a range of heritage assets in the borough, but recognises that Islington's character may need to evolve in order to accommodate the identified development needs, and ultimately deliver the Local Plan objectives holistically.</p> <p>Policy DH2 will have a significant positive effect. It ensures that heritage assets will be strongly protected while recognising the need to accommodate new development.</p> <p>Policy DH3 will have a significant positive effect. The suitable locations for tall buildings have been identified in principle based on a co-ordinated and holistic approach which considers local character and distinctiveness. The approach included excluding areas of heritage value – conservation areas, and the suitable locations identified have considered proximate heritage assets therefore ensuring heritage assets are conserved and enhanced. Part F of the policy ensures that the design is of a high quality and does not adversely impact the surrounding context including heritage assets.</p> <p>Policy DH4 will have a minor positive effect on conserving the historic environment. The policy will ensure that basement development does not harm the historic environment for example by introducing lightwells that harm the appearance of the building or conservation areas.</p>
4. Promote liveable neighbourhoods	+	0	0	0	Policy DH1 will have a minor positive effect through ensuring site potential for development and site density levels must be fully optimised and encouraging innovative approaches which will help the

IIA Objective	Policy DH1: Fostering innovation ...	Policy DH2: Heritage assets	Policy DH3: Building heights	Policy DH4: Basement developmen t	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
which support good quality accessible services and sustainable lifestyles					<p>opportunity to provide various services, facilities and amenities which may be necessary to support development and meet needs.</p> <p>There is no effect for policies DH2, DH3 and DH4.</p>
5. Ensure that all residents have access to good quality, well-located, affordable housing	+	0	0	0	<p>Policy DH1 will have a minor positive effect. Site density levels must be fully optimised which increases the delivery potential of the site and hence could lead to more affordable housing. The policy recognises that Islington's character may need to evolve in order to accommodate the identified development needs, and ultimately deliver the Local Plan objectives holistically.</p> <p><b>New assessment detail has been added following review of the IIA as part of the examination process: Policy DH3 may limit opportunities for tall buildings which can provide housing on specific sites which could impact to some degree on housing delivery. However research has shown that high densities of housing can be achieved in lower rise development, which also offer a better range of unit types and sizes. High densities will be secured through policy DH1 which requires that development optimises density. The total effect on housing delivery in the borough is not likely to be sufficiently to justify a negative scoring and housing targets are being achieved. In addition under DH3 some sites identified as potentially appropriate for tall buildings are allocated to include residential development, therefore also delivering affordable housing.</b></p> <p>There is no effect for policies DH2, and DH4.</p>

IIA Objective	Policy DH1: Fostering innovation ...	Policy DH2: Heritage assets	Policy DH3: Building heights	Policy DH4: Basement developmen t	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
					<b>New assessment detail has been added following review of the IIA as part of the examination process: With regard to DH4 while basement development can extend space in homes it generally does not result in creation of new dwellings.</b>
6. Promote social inclusion, equality, diversity and community cohesion	+	0	0	0	<p>Policy DH1 will have a minor positive effect. The policy supports innovative approaches to development as a means to increasing development capacity to meet needs, while simultaneously addressing any adverse heritage impacts and protecting and enhancing the unique character of the borough. Innovation goes beyond mere aesthetics; it is fundamentally about how we can accommodate new development – particularly delivery of affordable housing and other priorities - through intensification, achieving versatility and injecting life into an area. This balanced approach to design will assist with the creation of strong and cohesive communities.</p> <p>There is no effect for policies DH2, DH3 and DH4.</p>
7. Improve the health and wellbeing of the population and reduce health inequalities	+	0	0	+	<p>Policy DH1 will have a minor positive effect. It applies the agent of change principle which ensures that the individual/organisation proposing change is responsible for ensuring that existing uses in the area are not adversely impacted, including through noise and vibration impacts.</p> <p>There is no effect for policies DH2 and DH3.</p>

IIA Objective	Policy DH1: Fostering innovation ...	Policy DH2: Heritage assets	Policy DH3: Building heights	Policy DH4: Basement developmen t	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
					<p>Policy DH4 will likely have minor positive effects on the health and wellbeing of the population in the short term by reducing the impact of construction. Basement development generally requires excavation works which create significant noise and vibration. These works can take years to complete. Some neighbourhoods may experience a number of basement excavations in succession leading to the effect of a continuous inappropriate disturbance in a residential area. This policy seeks to limit the effects of basement construction by limiting the size of basement developments and also by managing the construction impacts through Construction Management Plan.</p>
<p>8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes</p>	<p>+</p>	<p>0</p>	<p>-</p>	<p>0</p>	<p>Policy DH1 will have a minor positive effect. The policy supports innovative approaches to development as a means to increasing development capacity to meet needs, while simultaneously addressing any adverse heritage impacts and protecting and enhancing the unique character of the borough.</p> <p><b>New effects have been identified which changes the effects from neutral to minor negative following review of the IIA as part of the examination process. Policy DH3 may have a minor negative effects on economic development as the development of tall buildings will be directed to key locations where they are most appropriate, which may result in a lower overall quantum of floorspace delivery than an approach where tall buildings could be developed in more locations across the borough. These effects are minor as lower rise buildings will meet the vast majority of this need, and on many sites lower rise buildings can rival tall buildings for floorspace delivery.</b></p>

IIA Objective	Policy DH1: Fostering innovation ...	Policy DH2: Heritage assets	Policy DH3: Building heights	Policy DH4: Basement developmen t	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
					There is no effect for policies DH2 and DH4.
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	0	0	+	0	<p>There are no effects for policies DH1, DH2 and DH4.</p> <p>Policy DH3 will have a minor positive effect. The suitable locations for tall buildings have been identified in principle based on a co-ordinated and holistic approach which focuses development in the most appropriate locations considering transport accessibility, infrastructure and land use. The policy criteria ensure that tall buildings do not prejudice the ongoing functionality of sites in the local area including the functionality of the existing transport network.</p>
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	+	0	++	<p>There is no effect for policy DH1.</p> <p>Policy DH2 will have a minor positive effect. The policy protects heritage assets including historic open spaces.</p> <p><b>New effects have been identified which changes the effects from positive to neutral effect following review of the IIA as part of the examination process. New analysis has been added following review of the IIA as part of the examination process: Policy DH3 will have no significant effect on open spaces. Policy DH3 ensures that where tall buildings are developed they do not harm nearby open spaces including through overshadowing and microclimate. This will ensure no negative impacts are caused as the impacts are addressed by policy but will not be scored as a positive impact.</b></p>



IIA Objective	Policy DH1: Fostering innovation ...	Policy DH2: Heritage assets	Policy DH3: Building heights	Policy DH4: Basement developmen t	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
					<p>Policy DH4 is likely to have significant positive effects on private open spaces by limiting the extent to which basements will be developed under private gardens, and preventing gardens being replaced by lightwells or sunken paved areas.</p>
<p>11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.</p>	<p>0</p>	<p>+</p>	<p>+</p>	<p>++</p>	<p>There are no effects for policy DH1.</p> <p><b>New effects have been identified which changes the effects from neutral to minor positive following review of the IIA as part of the examination process. Policy DH2 will have a minor positive effect. The policy protects heritage assets including historic open spaces.</b></p> <p><b>New effects have been identified which changes the effects from neutral to minor positive following review of the IIA as part of the examination process. New effect has been added following review of the IIA as part of the examination process: Policy DH3 requires that development of tall buildings does not adverse impact biodiversity. This will have a minor positive effect on protecting habitats and species diversity.</b></p> <p>Policy DH4 is likely to have significant positive effects on biodiversity by limiting the extent to which basements will be developed under private gardens and requiring minima soil depth. Basement development generally requires removal of the existing garden and any trees. The replacement garden often has less soil depth and less ability to support large trees. Replacement gardens also often have</p>

IIA Objective	Policy DH1: Fostering innovation ...	Policy DH2: Heritage assets	Policy DH3: Building heights	Policy DH4: Basement developmen t	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
					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	+	+	<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> <p><b>New effects have been identified which changes the effects from neutral to minor positive following review of the IIA as part of the examination process. Policy DH3 will have a minor positive effect on reducing climate change by requiring new tall buildings to be of exceptional design standards.</b></p> <p><b>New effects have been identified which changes the effects from neutral to minor positive following review of the IIA as part of the examination process. Policy DH4 ensures that basement development does not harm the ground and water conditions of the area, reducing the likelihood and impact of surface water flooding cause by more extreme weather events which are the result of climate change. The policy also preserves gardens from being entirely built beneath allowing more established and biodiverse gardens which will benefit the microclimate and reduce the urban heat island effect as well as storing some carbon through large trees.</b></p>

IIA Objective	Policy DH1: Fostering innovation ...	Policy DH2: Heritage assets	Policy DH3: Building heights	Policy DH4: Basement developmen t	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	+	+	<p>There are no effects for policies DH1 and DH2.</p> <p><b>New effects have been identified which changes the effects from neutral to minor positive following review of the IIA as part of the examination process. Policy DH3 will have minor positive effects by limiting the overall number of tall buildings, which are more resource intensive and less adaptable than low rise buildings with longer lifespans. The complex engineering and use specific design of tall buildings make repair and adaptation over time challenging or uneconomic, often resulting in demolition, and associated construction waste impacts.</b></p> <p><b>New effects have been identified which changes the effects from neutral to minor positive following review of the IIA as part of the examination process. Policy DH4 will have minor positive effects by reducing the overall size of some basement developments. Basement development, through the extensive excavation and structural engineering required are more wasteful than comparably size above ground developments.</b></p>
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	+	+	<p>There is no effect for policies DH1 and DH2.</p> <p><b>New effects have been identified which changes the effects from neutral to minor positive following review of the IIA as part of the examination process. Policy DH3 will have a minor positive effect by ensuring that development of tall buildings does not impact impacts on the wider environmental including watercourses and water bodies and their hydrology.</b></p>

IIA Objective	Policy DH1: Fostering innovation ...	Policy DH2: Heritage assets	Policy DH3: Building heights	Policy DH4: Basement developmen t	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
					Policy DH4 will have minor positive effects on natural resources by ensuring basement development does not harm the ground and groundwater conditions of the area. Basement development will only be permitted where it has been demonstrated by appropriately qualified engineers that no harm will be caused to the ground or water conditions of the area evidenced through a structural method statement.

### Policy DH1: Fostering innovation and conserving and enhancing the historic environment

The Sustainability Appraisal considered that Policy DH1 has a significant positive effect against the framework objectives for the built environment and for the efficient use of land by ensuring development is optimised, which helps to meet development needs in the borough. The policy sets out that high density development should be accommodated throughout the borough, but that the scale of development is dependent on a number of considerations, including design and heritage. The policy protects heritage value but allows evolving character where appropriate.

The policy will also have a minor positive effects against promoting liveable neighbourhoods, providing affordable housing, promoting social inclusion, improving health and wellbeing, economic development, and reducing and climate change.

### Policy DH2: Heritage assets

The Sustainability Appraisal considered that Policy DH2 will have a significant positive effects against the framework objectives for the built environment, efficient use of land and heritage through detailed policies which seek the conservation and enhancement of the historic environment. The assessment recognises that heritage has value in terms of cultural and historical interest but also economically, and in terms of aesthetics and function, with period buildings often commanding high values. DH2 sets out that other Local Plan policy requirements including affordable housing, affordable workspace, inclusive design and sustainability standards, are relevant considerations when

determining whether significant harm to an asset is acceptable. DH2 will also have minor positive effects on protecting open space, including historic open spaces and biodiversity.

### **Policy DH3: Building heights**

The Sustainability Appraisal considered Policy DH3 will have a positive effect against the framework objective for the built environment, efficient use of land, and protecting heritage through the plan led approach to development of tall buildings. The policy restricts tall buildings across the vast majority of the borough, and directs them to potentially suitable locations (subject to a range of additional detailed assessments). The locations have been identified in principle based on a co-ordinated and holistic approach which considers local character and distinctiveness, taking into account heritage assets as well as considering transport accessibility, infrastructure and land use. Whilst Policy DH3 may limit opportunities for tall buildings which can provide housing or employment floorspace on specific sites which could impact to some degree on housing delivery or meeting economic needs. However research has shown that high densities of housing can be achieved in lower rise development, which also offer a better range of unit types and sizes. High densities will be secured through policy DH1 which requires that development optimises density. The total effect on housing delivery in the borough is not likely to be sufficiently to justify a negative scoring and housing targets are being achieved. The policy seeks to promote exceptional design with high quality design details in terms of tall buildings visual impact and considering any local design principles. The policy will also have minor positive effects on biodiversity, reducing climate change, reducing waste, and preserving natural resources. The effect on climate change is considered to be limited by the policy which seeks to reduce the overall number of tall buildings; the assessment recognises that tall buildings are more resource intensive and less adaptable than lower rise counterparts.

### **Policy DH4: Basement development**

The Sustainability Appraisal considered that Policy DH4 is likely to have significant positive effects on open space and biodiversity by limiting the extent to which basements will be developed under private gardens. The policy is also likely to have minor positive effects on the health and wellbeing of the population by reducing the impact of construction by limiting the size of basements. The assessment also showed minor positive effects against the framework objective to promote a high quality, inclusive, safe, and sustainable built environment by preventing basements that are disproportionately large, out of character with the site and host building. The policy has been shown to have some minor negative effects on the efficient use of land objective by reducing some developable floorspace for basements which are not proportionate to the host building and site however basements do not generally add additional homes so the objective for affordable housing has been marked as no effect. The policy also have minor positive effects on reducing waste (from construction) and preserving natural resources (impacts on ground conditions and water). The assessment also considers Policy DH4 has a positive effect on climate change and ensures that basement development does not harm the ground and water conditions of the area, reducing the likelihood and impact of surface water flooding cause by more extreme weather events which are the result of climate change.

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

- Policy DH5: Agent of change, noise and vibration Policy DH5 aims to protect existing uses such as cultural use or night time economy use from proposals for new noise sensitive development which are in proximity through requirement to follow the 'agent-of-change' principle and ensure that suitable mitigation is applied. The policy also sets out how all development should reduce the impacts of noise and vibration from new noise generating uses.
- Policy DH6: Advertisements - Policy DH6 sets ensures that advertisements should contribute to a safe and attractive environment.
- Policy DH7: Shopfronts - Policy DH7 focuses on ensuring shopfronts are accessible and contribute positively to the character of an area.
- Policy DH8: Public art - Public art: Policy DH8 encourages new public art and the requirements of this.

Table 3.50: Assessment of policies DH5 to DH8

IIA Objective	DH5: Agent of change, noise and vibration	DH6: Advertisements	DH7: Shopfronts	DH8: Public art	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	+	+	++	+	<p>Policy DH5 will have a minor positive effect and will help create robust buildings which are designed to mitigate the noise impacts of an existing use rather than affect that use. Equally all new development which generates noise should ensure it considers and mitigates the impact on sensitive uses promoting an inclusive built environment through reducing amenity impacts.</p> <p>Policy DH6 will have minor positive effects on the built environment by ensuring that advertisements are high quality in terms of appearance, do not contribute to visual clutter, do not harm amenity with flashing elements, and respect the local context.</p> <p>Policy DH7 will have a significant positive effect as it will ensure that shops which are subject to redevelopment install accessible and inclusive shopfronts which ensure access for those less able and which will also benefit residents generally. Reference is also made to enhancing natural surveillance which is also important to creating a safer built environment.</p> <p>Policy DH8 will have a minor positive effect. It makes clear that new public art should not compromise inclusive design policy objectives and should consider impact on the local area and its character.</p>

IIA Objective	DH5: Agent of change, noise and vibration	DH6: Advertisements	DH7: Shopfronts	DH8: Public art	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
2. Ensure efficient use of land, buildings and infrastructure	0	0	0	+	<p>Policy DH5 has no effect</p> <p><b>Effects have been amended which changes the effects from positive to neutral following review of the IIA as part of the examination process. Policy DH6 has no effect.</b></p> <p>Policy DH7 has no effect</p> <p>Policy DH8 has a minor positive effect in respect that the policy identifies that provision of public arts should not come at the cost of meeting other more important Local Plan objectives ensuring an efficient use of land and balance in terms of resources.</p>
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	+	++	+	<p>Policy DH5 has no effect</p> <p>Policy DH6 will have a minor positive effect. It makes clear advertisements should respect local context, including listed buildings and conservation areas so is considered minor positive.</p> <p><b>New effects have been identified which changes the effects from minor positive to significant positive following review of the IIA as part of the examination process. Policy DH7 will have a significant positive effect on protection of heritage assets and the historic environment, by ensuring the sensitive design of shopfronts which are an important component of the historic environment. Reference to Islington Urban Design Guide is made.</b></p> <p>Policy DH8 will have a minor positive effect. It makes clear that new public art should protect and enhance local character and demonstrate the relationship between the public art and the site.</p>



IIA Objective	DH5: Agent of change, noise and vibration	DH6: Advertisements	DH7: Shopfronts	DH8: Public art	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	++	0	0	0	<p>Policy DH5 will have a significant positive effect as it aims to protect existing uses such as cultural use or night time economy use from proposals for new noise sensitive development which are in proximity to follow the 'agent-of-change' principle and ensure that suitable mitigation is applied. In addition, the policy will reduce the impacts of noise and vibration from new noise generating development which will help contribute to maintaining amenity of neighbourhoods. This will support enhancement of existing cultural and night time economy uses in particular where there are concentrations in town centres and cultural quarters.</p> <p>Policies DH6, DH7 and DH8 will have no effect</p>
5. Ensure that all residents have access to good quality, well-located, affordable housing	++	0	0	0	<p>Policy DH5 will have a significant positive effect. It will ensure that new housing mitigates noise impacts from both within a development and also from external sources such as cultural uses or other sources.</p> <p>Policies DH6, DH7 and DH8 will have no effect</p>
6. Promote social inclusion, equality, diversity and community cohesion	0	0	+	+	<p>Policies DH5 and DH6 will have no effect.</p> <p><b>New effects have been identified which changes the effects from neutral to minor positive following review of the IIA as part of the examination process. Policy DH7 requires new or refurbished shopfronts to be accessible and inclusive, which will remove barriers to employment and use of public spaces.</b></p> <p><b>New effects have been identified which changes the effects from neutral to minor positive following review of the IIA as part of the examination process. Policy DH8 will help support active engagement of the wider community in decisions that affect their area by requiring consultation with the community on public art.</b></p>

IIA Objective	DH5: Agent of change, noise and vibration	DH6: Advertisements	DH7: Shopfronts	DH8: Public art	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
7. Improve the health and wellbeing of the population and reduce health inequalities	++	+	0	+	<p>Policy DH5 will have a significant positive effect as it will ensure the health impacts of noise and vibration are mitigated. Both through the 'agent-of-change' principle ensuring suitable mitigation is applied and ensuring impacts of noise and vibration from new noise generating development are mitigated will help contribute to managing noise effects and the impact on individual health.</p> <p><b>New effects have been identified which changes the effects from neutral to minor positive following review of the IIA as part of the examination process. Policy DH6 will improve health and wellbeing by ensuring that advertisements do not cause light pollution into adjoining sensitive land uses, including residential.</b></p> <p>Policies DH7 and DH8 will have no effect.</p>
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	+	0	0	0	<p>Policy DH5 will have a minor positive effect. It will support the enhancement of existing cultural and night time economy uses in particular where there are concentrations in town centres and cultural quarters through the application of the agent of change principle potentially helping these business to grow.</p> <p>Policies DH6, DH7 and DH8 will have no effect.</p>

IIA Objective	DH5: Agent of change, noise and vibration	DH6: Advertisements	DH7: Shopfronts	DH8: Public art	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
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.

IIA Objective	DH5: Agent of change, noise and vibration	DH6: Advertisements	DH7: Shopfronts	DH8: Public art	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	0	0	0	Policies DH5, DH6, DH7 and DH8 will have no effect.
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	0	0	Policies DH5, DH6, DH7 and DH8 will have no effect.
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.

### **Policy DH5: Agent of change, noise and vibration**

The Sustainability Appraisal considered Policy DH5 will have a significant positive effects against the framework objectives for liveable neighbourhoods, affordable housing, health and wellbeing, and minor positive effects on economic development and the built environment. The policy aims to protect existing uses such as cultural use or night time economy use from proposals for new noise sensitive development which are in proximity through requirement to follow the 'agent-of-change' principle and ensure that suitable mitigation is applied. In addition, the policy will reduce the impacts of noise and vibration from new noise generating development which will help contribute to maintaining amenity of neighbourhoods as well as the internal amenity of dwellings. Protecting existing cultural uses from change will also help support enhancement of existing cultural and night time economy uses in particular where there are concentrations in town centres and cultural quarters.

### **Policy DH6: Advertisements**

The Sustainability Appraisal considered Policy DH6 will have minor positive effects on the objectives for promoting a high quality built environment, protecting heritage, promoting social inclusion, and health and wellbeing. The policy achieves this by ensuring that advertisements are high quality in terms of appearance, do not contribute to visual clutter, do not harm amenity and health with flashing elements, and respect the local context, including the historic environment. The policy helps achieve the health and wellbeing objective by not allowing advertisements to create light pollution into homes.

### **Policy DH7: Shopfronts**

The Sustainability Appraisal considered Policy DH7 will have a significant positive effect against the framework objective for built environment and inclusive accessibility as it will ensure that shops which are subject to redevelopment install accessible and inclusive shopfronts which will also benefit residents generally and remove barriers to employment and use of public spaces. Reference is also made to enhancing natural surveillance which is also important to creating a safer built environment. Policy DH7 will also have a significant positive effect on protection of heritage assets and the historic environment, by ensuring the sensitive design of shopfronts which are an important component of the historic environment.

### **Policy DH8: Public art**

The Sustainability Appraisal considered Policy DH8 to have minor positive effect against the framework objective for efficient use of land as it makes clear that provision of public arts should not come at the cost of meeting other more important Local Plan priorities. In addition DH8 makes clear that new public art should not compromise inclusive design policy objectives and should consider impact on the local character. Finally Policy DH8 will have a positive effect against objective 6 and help support active engagement of the wider community in decisions that affect their area by requiring consultation with the community on public art.

## **Strategic Infrastructure**

The following strategic infrastructure policies have been considered in the same sustainability appraisal table:

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

Table 3.51: Assessment of Policies ST1 to ST4

IIA Objective	ST1: Infrastructure Planning and Smarter City Approach	ST2: Waste	ST3: Telecommunications, communications and utilities equipment	ST4: Water and Wastewater infrastructure	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	+	++	+	+	<p>New effects have been identified following review of the IIA as part of the examination process. A minor positive effect has been identified for ST1 through the support provided for robust and adaptable buildings by supporting in-building infrastructure capable of exceeding building regulation standards for digital connectivity.</p> <p>Policy ST2 has a significant positive effect. It requires development to provide waste and recycling facilities which are accessible and designed to provide convenient access for all people in order to help people to recycle <b>which is positive and creates adaptable buildings which are more inclusive and contributes to a more long term sustainable built environment.</b> The policy cross references the housing policy H4 which provides more detailed guidance.</p> <p>Policy ST3 has a minor positive effect. It deals with the visual impact of telecommunications equipment. Both visual impact and impact on character and appearance, with the general approach to restrict siting equipment in locations which are visible from the public realm. This will help contribute to creating a high quality built environment and help to protect amenity.</p> <p><b>New effects have been identified for Policy ST4 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. The policy will ensure adequate water and wastewater infrastructure is provided which will help providing long term robust and adaptable buildings.</b></p>

IIA Objective	ST1: Infrastructure Planning and Smarter City Approach	ST2: Waste	ST3: Telecommunications, communications and utilities equipment	ST4: Water and Wastewater infrastructure	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
2. Ensure efficient use of land, buildings and infrastructure	++	++	0	++	<p>Policy ST1 will have a significant positive effect as it makes clear the Council will update the Infrastructure Delivery Plan and work with relevant providers to deliver the infrastructure necessary to support development. The policy lists the various potential infrastructure needs and the potential funding routes for them. This is considered to have a significant positive effect as it is balancing development needs of the borough and ensuring the full range of development needs are met.</p> <p>Policy ST2 will have a significant positive effect. The policy protects the only waste management facility in the borough at Hornsey Street – the Hornsey Street reuse and recycling centre. It also makes clear in the policy that the borough will continue to work with the seven neighbouring boroughs on the North London Waste Plan to provide sufficient land to meet waste management needs across the seven North London boroughs. Therefore, the long term waste management needs of Islington will be met through delivery of a Joint Waste Plan.</p> <p>Policy ST3 has no effect.</p> <p>Policy ST4 will have a significant positive effect as it states it will ensure adequate water supply, surface water, foul drainage and sewerage treatment capacity exists to serve all new developments. Thames Water has engaged in the Local Plan review and provided policy comments and comments on site allocations stating where there are capacity issues. These will be referenced in the Site Allocations, therefore the policy is considered to have a significant positive effect as it is balancing development needs of the borough and ensuring that water related infrastructure needs are met.</p>



IIA Objective	ST1: Infrastructure Planning and Smarter City Approach	ST2: Waste	ST3: Telecommunications, communications and utilities equipment	ST4: Water and Wastewater infrastructure	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	0	++	0	<p>Policies ST1, ST2 and ST4 have no effect</p> <p>Policy ST3 will have a significant positive effect as it deals with the visual impact of telecommunications equipment; both visual impact and impact on character and appearance, therefore impact on heritage assets will be considered where relevant.</p>
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	++	+	0	0	<p>Policy ST1 will have a significant positive effect as it seeks to balance the development needs of the borough ensuring the full range of residents development needs are met. This will help ensure residents have access to the various essential services, facilities and amenities necessary and the policy will be supported by an evidence base; the updated Infrastructure Delivery Plan.</p> <p><b>New effects have been identified for Policy ST4 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Protecting the Hornsey Street Re-use and Recycling centre will help to ensure access to this important facility/service within the borough for residents.</b></p> <p>Policies ST3 to ST4 will have no effect.</p>
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	0	0	0	Policies ST1 to ST4 will have no effect

IIA Objective	ST1: Infrastructure Planning and Smarter City Approach	ST2: Waste	ST3: Telecommunications, communications and utilities equipment	ST4: Water and Wastewater infrastructure	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
6. Promote social inclusion, equality, diversity and community cohesion	++	0	0	0	<p>Policy ST1 will have a significant positive effect as it seeks to balance the development needs of the borough ensuring the full range of residents development needs are met. This should help ensure residents have equal opportunities to facilities and services across the borough. New effects have been identified following review of the IIA as part of the examination process for policy ST1 which supports in-building infrastructure capable of exceeding building regulation standards for digital connectivity which will help community cohesion by supporting a more connected community.</p> <p>Policies ST2 to ST4 will have no effect.</p>
7. Improve the health and wellbeing of the population and reduce health inequalities	++	+	0	0	<p>Policy ST1 will have a significant positive effect as it seeks to balance the development needs of the borough ensuring the full range of residents development needs are met. This should help fund where necessary improvements to access open spaces and health facilities which will help to support residents needs.</p> <p><b>New effects have been identified following review of the IIA as part of the examination process for policy ST2 which will have a minor positive effect as it reduces the need for household waste to be transported further afield by safeguarding the Hornsey Street Re-use and Recycling Centre which will contribute to improving air quality.</b></p> <p>Policies ST3 and ST4 will have no effect.</p>

IIA Objective	ST1: Infrastructure Planning and Smarter City Approach	ST2: Waste	ST3: Telecommunications, communications and utilities equipment	ST4: Water and Wastewater infrastructure	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	+	0	0	0	<p><b>New effects have been identified following review of the IIA as part of the examination process for policy ST1 which identify a minor positive effect through the support ST1 provides for in-building digital infrastructure capable of exceeding building regulation standards for digital connectivity which will help widen the opportunities for residents to work from home, access employment and support local businesses.</b></p> <p>Policies ST2 to ST4 will have no effect</p>
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	++	+	0	0	<p>Policy ST1 will have a significant positive effect as it seeks to balance the development needs of the borough ensuring the full range of residents development needs are met. This should help fund where necessary improvements to the transport network. <b>In addition new effects have been identified following review of the IIA as part of the examination process for policy ST1 which identify a minor positive effect through the support ST1 provides for in-building digital infrastructure capable of exceeding building regulation standards for digital connectivity which will help widen the opportunities for residents to work from home, access employment and support local businesses.</b></p> <p><b>New effects have been identified following review of the IIA as part of the examination process for policy ST2 which will have a minor positive effect as it reduces the need for household waste to be transported further afield by safeguarding the Hornsey Street Re-use and Recycling Centre.</b></p> <p>Policies ST3 to ST4 will have no effect.</p>

IIA Objective	ST1: Infrastructure Planning and Smarter City Approach	ST2: Waste	ST3: Telecommunications, communications and utilities equipment	ST4: Water and Wastewater infrastructure	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	++	0	0	0	<p>Policy ST1 will have a significant positive effect as it seeks to balance the development needs of the borough ensuring the full range of residents development needs are met. This should help fund where necessary improvements to the open space network and access to it.</p> <p>Policies ST2 to ST4 will have no effect.</p>
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	0	0	Policies ST1 to ST4 will have no effect
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	++	+	0	0	<p>Policy ST1 will have a significant positive effect as it seeks to balance the development needs of the borough ensuring the full range of residents development needs are met. This should help fund where necessary improvements to climate change resilience and energy infrastructure.</p> <p><b>New effects have been identified following review of the IIA as part of the examination process for policy ST2 which will have a minor positive effect as it reduces the need for household waste to be transported further afield by safeguarding the Hornsey Street Re-use and Recycling Centre.</b></p> <p>Policies ST3 to ST4 will have no effect.</p>

IIA Objective	ST1: Infrastructure Planning and Smarter City Approach	ST2: Waste	ST3: Telecommunications, communications and utilities equipment	ST4: Water and Wastewater infrastructure	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	++	0	0	<p>Policies ST1, ST3 and ST4 have no effect.</p> <p>Policy ST2 will have a significant positive effect. It requires development to provide waste and recycling facilities which are accessible and designed to provide convenient access for all people in order to help people to recycle. The policy highlights the need to refer to the Councils guidance and cross references to policy H4 which also provides further detail.</p> <p>The policy also requires that the long term waste management needs of Islington will be met through delivery of a Joint Waste Plan and protects the existing waste transfer station in the borough at Hornsey Street. The Joint Waste Plan will deal with ensuring that waste infrastructure needs are met across the seven north London boroughs. The North London Waste Plan is subject to a separate Integrated Impact Assessment.</p>
14. Maximise protection and enhancement of natural resources including water, land and air	0	+	0	++	<p>Policies ST1 and ST3 have no effect.</p> <p><b>New effects have been identified following review of the IIA as part of the examination process for policy ST2 which will have a minor positive effect as it reduces the need for household waste to be transported further afield by safeguarding the Hornsey Street Re-use and Recycling Centre which will contribute to improving air quality.</b></p> <p>Policy ST4 will have a significant positive effect as it states it will ensure adequate water supply, surface water, foul drainage and sewerage treatment capacity exists to serve all new developments. Thames Water has engaged in the Local Plan review and provided policy comments and comments on site allocations stating where there are capacity issues. These will be referenced in the Site Allocations, therefore the policy is considered to have a significant positive effect as it is balancing development needs of the borough and ensuring that water related infrastructure needs are met.</p>

The **Sustainability Appraisal** considered **Policy ST1** will have a positive effect as it seeks to balance the development needs of the borough ensuring the full range of residents development needs are met. This will help ensure residents have access to the various essential services, facilities and amenities necessary. The policy will be supported by an evidence base; the updated Infrastructure Delivery Plan. The policy will help provide equality of access to facilities and services and fund improvements to various infrastructure across the borough. New positive effects have been identified following review of the IIA as part of the examination process for policy ST1 which supports in-building infrastructure capable of exceeding building regulation standards for digital connectivity. This helps community cohesion by supporting a more connected community, provides a positive effect for the built environment by providing robust and adaptable buildings and support economic growth by widening the opportunities for residents to access employment and support local businesses.

The **Sustainability Appraisal** considered **Policy ST2** positive against the framework objective for built environment as it requires development to provide waste and recycling facilities which are accessible and designed to provide convenient access for all people in order to help people to recycle. This will help residents contribute towards increasing the proportion of waste recycled. The policy also protects the only waste management facility in the borough – the Hornsey Street reuse and recycling centre and makes clear that the borough will continue to work with the seven neighbouring boroughs on the North London Waste Plan. This joint Waste Plan aims to provide sufficient land to meet waste management needs across the seven North London boroughs, satisfying the long term waste management needs of Islington. New effects have been identified following review of the IIA as part of the examination process for policy ST2 which will have a minor positive effect as it reduces the need for household waste to be transported further afield by safeguarding the Hornsey Street Re-use and Recycling Centre which reduces peoples need to travel and associated emissions and should help improve air quality.

The **Sustainability Appraisal** considered Policy ST3 positive against the framework objective for built environment as it will ensure the visual impact and impact on character and appearance, of telecommunications equipment is minimised which will help contribute to creating a high quality built environment and help to protect amenity.

The **Sustainability Appraisal** considered Policy ST4 will have a positive effect against the framework objective for natural resources as it states it will ensure adequate water supply, surface water, foul drainage and sewerage treatment capacity exists to serve all new developments. Thames Water has engaged in the Local Plan review and provided policy comments and comments on site allocations stating where there are capacity issues. These will be referenced in the Site Allocations, therefore the policy is considered to have a significant positive effect as it is balancing development needs of the borough and ensuring that water related infrastructure needs are met. New effects have been identified for Policy ST4 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. The policy will ensure adequate water and wastewater infrastructure is provided which will help providing robust and adaptable buildings.

## Bunhill and Clerkenwell AAP Policy Assessments

The following policies for Bunhill and Clerkenwell AAP have been considered by the sustainability appraisal:

- Policy BC1: Prioritising office use
- Policy BC2: Culture, retail and leisure uses

Table 3.52: Assessment of Policies BC1 and BC2

IIA Objective	Policy BC1: Prioritising office use	Policy BC2: Culture, retail and leisure uses	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	0	0	<p><b>New effects have been identified for Policy BC1 following review of the IIA as part of the examination and changed the effects from minor positive to neutral. The policy will likely have a neutral effect on promoting a high quality, inclusive, safe, and sustainable built environment. Given the limited number of development sites, combined with policies to protect certain uses (e.g. housing, business, cultural uses) any mix of land uses proposed in new developments is unlikely to change the overall mixed use character of the AAP area during the plan period.</b></p> <p>Policy BC2 will have no effect.</p>
2. Ensure efficient use of land, buildings and infrastructure	++	+	<p>Policy BC1 will have a significant positive effect on the efficient use of land. The policy will focus development of employment uses (which generate a large number of trips) in an area highly accessible by sustainable means of transport. Development will be located in areas with excellent public transport accessibility including to the underground and Crossrail. The Islington Employment Study states that the Central Activities Zone is the location with the most demand for Grade A office space and this will be the priority. Maximisation of business floorspace will be required in the CAZ, given this is the area which will see the most demand for business floorspace. Local evidence currently indicates that there is a significant shortfall in supply of employment land. This policy will maximise development of floorspace in this most appropriate location ensuring the efficient use of the land. The policy also acts, in combination with other plan policies, to balance demand for uses across the borough in accordance with identified needs, with housing prioritised in other locations.</p> <p>Policy BC2 will have a minor positive effect on the efficient use of land, buildings, and infrastructure by ensuring that cultural, retail, and leisure uses are developed in the most appropriate locations, improving positive agglomeration</p>

IIA Objective	Policy BC1: Prioritising office use	Policy BC2: Culture, retail and leisure uses	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
			effects and the cultural, retail, and leisure offer of the area, while reducing harmful impacts between uses in particular the effects of noise, litter, and anti-social behaviour on residential uses.
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	0	Policies BC1 and BC2 will have no effect.
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	0	+	<p>Policy BC1 will likely have a neutral effect. While this policy requires that the majority proportion of new development is office, it does allow smaller proportions of other uses on site. In addition, there are number of sites are allocated for other (non-office) uses. These factors combined with the existing mixed use character of the area means the mix of uses which support liveable neighbourhoods will not be significantly affected.</p> <p>Policy BC2 will likely have a minor positive effect. It helps to ensure that retail, cultural, entertainment and food and drink uses are located in areas where they do not harm the amenity of the area. The policy also sets out that development cannot create harmful concentrations of night time economy uses, which would include impacts from noise, litter, and anti-social behaviour. The policy also directs cultural uses to the Clerkenwell / Farringdon Cultural Quarter helping expand the cultural role of this area and of London as a whole.</p>
5. Ensure that all residents have access to good quality, well-located, affordable housing	-	0	<p>Policy BC1 will likely have a minor negative effect on the provision of affordable housing. The policy requires that most new development in Bunhill and Clerkenwell is office-led. This will lead development of less housing as it will prevent some residential-led schemes coming forward. In addition, it also means that less affordable housing will be developed, as it is required to be provided as a proportion of new residential developments. However the Council has assessed future housing delivery and considers that it can meet its housing target with this policy in place.</p> <p>Policy BC2 will have no effect.</p>



IIA Objective	Policy BC1: Prioritising office use	Policy BC2: Culture, retail and leisure uses	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
6. Promote social inclusion, equality, diversity and community cohesion	+	0	<p>Policy BC1 will have a minor positive effect, in terms of social inclusion, equality, diversity, and community cohesion. The policy will strengthen the local economy and provide new jobs by encouraging development of employment floorspace which will meet demand and unlock potential economic growth. The Council has policies whereby new office developments must provide a proportion of affordable workspace. These policies will result in more office development and therefore more affordable workspace. The increase in businesses and employment in the area will also lead to a greater number of training and apprenticeships opportunities for local residents.</p> <p>Policy BC2 will have no effect.</p>
7. Improve the health and wellbeing of the population and reduce health inequalities	0	+	<p>Policy BC1 will have no effect.</p> <p>Policy BC2 will have a minor positive effect on the health and wellbeing of the population by directing uses with potential for negative effects on amenity to the most appropriate locations to minimise harmful effects. In particular, the policy ensures that retail, cultural, entertainment, and food and drink uses are located in predominately commercial areas and that they do not harm the amenity of the area. The policy also sets out that development cannot create harmful concentrations of night time economy uses, which would include impacts from noise, litter, and anti-social behaviour.</p>
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	++	++	<p>Policy BC1 will have significant positive effects on economic growth and providing employment opportunities. The policy will provide much needed floorspace for employment uses, in particular office uses. There is high demand in Islington for office floorspace, which is projected to exceed supply, restricting economic growth and employment in the borough. The biggest threat to the supply of employment land is likely to be from restricted supply caused by a lack of sites as they are outbid by residential developments. In addition, the loss of office stock within the CAZ to residential development has the potential to undermine the strategic functions of the CAZ and East London Tech City. As part of office development, other Local Plan policies will ensure that these developments also provide affordable workspace and space suitable for small and medium enterprises, helping to diversify the employment opportunities in the borough.</p> <p>Policy BC2 will have a significant positive effect. It will prevent some development of cultural, retail, and entertainment uses in locations that are deemed inappropriate. However, the policy will have overall positive effects on economic growth by directing growth of cultural, retail, and leisure uses to the most appropriate locations, and supporting the important economic role these uses play in Bunhill and Clerkenwell, and London as a whole.</p>
9. Minimise the need to travel and create	+	+	<p>Policies BC1 and BC2 will have a minor positive effect. Both policies promote development in areas with excellent public transport accessibility, including to the underground and Crossrail, as well as excellent conditions for walking and cycling.</p>

IIA Objective	Policy BC1:Prioritising office use	Policy BC2: Culture, retail and leisure uses	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
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	0	Policies BC1 and BC2 will have no effect.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	Policies BC1 and BC2 will have no effect.
12. Reduce contribution to climate change and enhance community resilience to	0	0	Policies BC1 and BC2 will have no effect.

IIA Objective	Policy BC1: Prioritising office use	Policy BC2: Culture, retail and leisure uses	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
climate change impacts.			
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	Policies BC1 and BC2 will have no effect.
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	Policies BC1 and BC2 will have no effect.

**Policy BC1: Prioritising office use**

The Sustainability Appraisal of BC1 considered that the policy approach will have a significant positive effect against the framework objective for the efficient use of land. The approach will focus development of employment uses (which generate a large number of trips) in an area which is highly accessible by sustainable means of transport and which has a mixed use character with specific concentrations of employment use. The approach delivers maximisation of employment floorspace in the CAZ which the Islington Employment Study states is the location with the most demand for Grade A office space.

In terms of balancing the competing demands between land uses, policy BC1 provides a specific percentage minimum of 90% in office use in the City Fringe area, or 80% in the remainder of the Bunhill and Clerkenwell AAP area which clearly prioritises the majority of floorspace must be in business use. Given the limited number of development sites, combined with policies to protect certain uses (e.g. housing, business, cultural uses) any mix of land uses proposed in new developments is unlikely to change the overall mixed use character of the AAP area during the plan period. The policy approach still allows a small amount of alternative floorspace too therefore overall its effect on the sustainability objective to ensure efficient use of land was considered to be significantly positive.

With regards economic growth local evidence currently suggests a significant shortfall in supply of employment land which BC1 will address by maximising employment land delivery. Demand for employment floorspace is projected to far exceed supply which could restrict economic growth and employment in the borough. BC1 will strengthen the local economy and provide new jobs by encouraging development of employment floorspace which will meet demand and unlock potential economic growth as well as providing affordable workspace and training and apprenticeships opportunities for local residents.

The assessment considered the effect of the BC1 policy approach to have a positive effect against the framework objective for liveable neighbourhoods providing a mix of uses with maximisation of office space also allowing sufficient flexibility to provide some floorspace for different uses on ground floor level at least if not a number of floors.

## **Policy BC2: Culture, retail and leisure uses**

The Sustainability Appraisal of Policy BC2 considered it will have positive effects against the framework objective for the efficient use of land by ensuring that cultural, retail, and leisure uses are developed in the most appropriate locations, improving positive agglomeration effects and the cultural, retail, and leisure offer of the area, while reducing harmful impacts between uses in particular the effects of noise, litter, and anti social behaviour on residential uses. The policy will likely have a neutral effect on promoting a high quality, inclusive, safe, and sustainable built environment. Given the limited number of development sites, combined with policies to protect certain uses (e.g. housing, business, cultural uses) any mix of land uses proposed in new developments is unlikely to change the overall mixed use character of the AAP area during the plan period. The policy will have positive effects on health and wellbeing by directing uses with potential for negative effects on amenity to the most appropriate locations – more commercial areas - to minimise harmful effects. Directing cultural uses to these locations will also help support the existing cultural economic function of these areas.

The Sustainability Appraisal of the Spatial Strategy Area policies (BC3 to BC8) found minor positive effects across most spatial strategy areas against the objectives for the built environment, efficient use of land and buildings, conserving heritage, liveable neighbourhoods, health and wellbeing, economic growth, sustainable transport, open spaces, biodiversity. These positive effects are achieved through area specific policies including policies for the development of key sites, proposals for public realm schemes, improvements to open spaces, new links, and protection of specific historic assets. The detail is set out in the table above.

Table 3.53: Assessment of Policies BC3 to BC8

IIA Objective	Policy BC3: City Fringe Opportunity Area	Policy BC4: City Road	Policy BC5: Farringdon	Policy BC6: Mount Pleasant and Exmouth Market	Policy BC7: Central Finsbury	Policy BC8: Historic Clerkenwell	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	+	+	+	+	+	+	<p><b>New effects have been identified for Policies BC4, BC5, BC6, BC7 and BC8 following review of the IIA as part of the examination and changed the effects from neutral to minor positive.</b></p> <p><b>The spatial policies in the BCAAP contain area specific policies to improve the built environment, which all are likely to have minor positive effects. These include:</b></p> <p><b>BC3: Public realm improvements identified at Old Street roundabout., development in character with scale and massing, and protection of views.</b></p> <p><b>BC4: Improved public realm, improved links across City Road, improved City Road corridor.</b></p> <p><b>BC5: Improved environment around Farringdon Station, improved public realm, links to spaces including Clerkenwell Green, retail and leisure uses on Cowcross Street.</b></p> <p><b>BC6: Public realm improvements to Exmouth Market, improved routes to Spa Green.</b></p> <p><b>BC7: Development to protect character including of the Spa Green Estate, provision of high quality and</b></p>

IIA Objective	Policy BC3: City Fringe Opportunity Area	Policy BC4: City Road	Policy BC5: Farringdon	Policy BC6: Mount Pleasant and Exmouth Market	Policy BC7: Central Finsbury	Policy BC8: Historic Clerkenwell	<p>Commentary on assessment of likely significant effects of policies</p> <p>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</p>
							<p>connected public realm, better pedestrian and cycle access.</p> <p>BC8: Preservation of the fine grained historic character, active ground floor uses.</p>
2. Ensure efficient use of land, buildings and infrastructure	+	+	+	+	+	+	<p><b>New positive effects have been identified following review of the IIA as part of the examination for these policies which does not change the overall effect. There is a minor positive effect for policies BC3 to BC8. The spatial policies set out the locations which are considered to be the most appropriate locations for larger scale development such as some areas within the City Fringe Opportunity Area as well as guiding more moderate development in sensitive areas such as Historic Clerkenwell. These policies will ensure development makes the best use of the qualities of different areas across the AAP area, making efficient use of the land.</b></p>
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	+	+	+	+	+	++	<p>All spatial strategy areas include area specific policies which protect the historic environment in that area. The effects are likely to be minor in scale for all areas except for BC8 where development is to be heritage led, and this area has been recorded as a significant positive effect for this objective. They key policy points for these areas are set out below:</p> <p><b>New positive effects have been identified following review of the IIA as part of the examination for</b></p>

IIA Objective	Policy BC3: City Fringe Opportunity Area	Policy BC4: City Road	Policy BC5: Farringdon	Policy BC6: Mount Pleasant and Exmouth Market	Policy BC7: Central Finsbury	Policy BC8: Historic Clerkenwell	<p>Commentary on assessment of likely significant effects of policies</p> <p>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</p>
							<p>Policy BC3 to BC7 which does not change the overall effect.</p> <p><b>BC3: Development proposals must preserve or enhance heritage assets, Bunhill Fields, Wesley’s Chapel, the Honourable Artillery Company grounds and the area’s three protected local landmarks.</b></p> <p><b>BC4: Preservation of the waterway and Graham Street Gardens.</b></p> <p><b>BC5: Preservation of the history and heritage of the wider area (including the Smithfield Market in the City of London), preservation of the open character across the railway lines.</b></p> <p><b>BC6: Preservation of the listed Clerkenwell Fire Station, the Rosebery Avenue Conservation Area, the Church of the Holy Redeemer, various shopfronts on Exmouth Market and Rosebery Avenue, and the listed Finsbury Health Centre.</b></p> <p><b>BC7: Design to respond to local context, to be human in scale, following predominant building heights, re-establish traditional building lines. Preservation of the Grade II* listed Spa Green Estate.</b></p> <p>BC8. Preserving heritage assets is the starting point for development in this area, reflecting character and historic value. The area has a rich historic townscape pattern of development and includes Conservation</p>



IIA Objective	Policy BC3: City Fringe Opportunity Area	Policy BC4: City Road	Policy BC5: Farringdon	Policy BC6: Mount Pleasant and Exmouth Market	Policy BC7: Central Finsbury	Policy BC8: Historic Clerkenwell	<p>Commentary on assessment of likely significant effects of policies</p> <p>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</p>
							<p>Areas, a scheduled ancient monument, listed buildings, historic shopfronts, and strategic and local views to St. Paul's Cathedral.</p>
<p>4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles</p>	+	+	0	+	+	0	<p><b>New positive effects have been identified following review of the IIA as part of the examination for Spatial strategy areas BC3, BC4, BC6, and BC7 which changes the effect from neutral to minor positive. Spatial strategy areas BC3, BC4, BC6, and BC7 include area specific policies to promote liveable neighbourhoods in that area. They key policy points for these areas are set out below. The effects for these policies are considered likely to have minor positive effects against this objective.</b></p> <p><b>BC3: Provision of the Moorfields Eye Hospital and Institute of Ophthalmology legacy eye clinic facility, GP or community health hub, or all of these uses.</b></p> <p><b>BC4: Retention of the Islington Boat Club.</b></p> <p>BC5: No specific policies related to this objective.</p> <p><b>BC6: Retention of the Finsbury Health Centre.</b></p> <p><b>BC7: Retention of the Ironmonger Row Baths. Retention and improvement of the Finsbury Leisure Centre to include a new leisure centre, healthcare, childcare, and energy facilities into one new civic development.</b></p> <p>BC8: No specific policies related to this objective.</p>

IIA Objective	Policy BC3: City Fringe Opportunity Area	Policy BC4: City Road	Policy BC5: Farringdon	Policy BC6: Mount Pleasant and Exmouth Market	Policy BC7: Central Finsbury	Policy BC8: Historic Clerkenwell	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	+	0	+	+	0	<p>There is no effect for policy BC3. See response to IIA Objective 3.</p> <p>There is a minor positive effect for policy BC4. The policy sets out criteria for residential moorings, which will help address the housing need for boat dwellers identified in Local Plan evidence.</p> <p><b>New effects have been identified for Policy BC6 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. BC6 will have minor positive effects through development of affordable housing at site allocation site BC24 the Clerkenwell Fire Station.</b></p> <p>Policy BC7 will have minor positive effects. The redevelopment of Finsbury Leisure Centre referenced in the policy will deliver a significant amount of affordable housing. Finsbury Leisure Centre is also assessed as site allocation BC4.</p> <p>There is no effect for policies BC5, and BC8. See response to IIA Objective 1.</p>
6. Promote social inclusion, equality, diversity and community cohesion	0	0	0	0	0	0	<p>There is no effect for policy BC3. See response to IIA Objective 3.</p> <p>There is no effect for policies BC4 to BC8. See response to IIA Objective 1. There are opportunities for cross boundary working exist with the City of London and the Cultural Mile for BC5.</p>

IIA Objective	Policy BC3: City Fringe Opportunity Area	Policy BC4: City Road	Policy BC5: Farringdon	Policy BC6: Mount Pleasant and Exmouth Market	Policy BC7: Central Finsbury	Policy BC8: Historic Clerkenwell	<p>Commentary on assessment of likely significant effects of policies</p> <p>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</p>
7. Improve the health and wellbeing of the population and reduce health inequalities	+	+	+	+	+	+	<p><b>New positive effects have been identified following review of the IIA as part of the examination for Spatial strategy areas which changes the effect from neutral to minor positive. The Spatial Strategy areas contribute minor positive effects for health and wellbeing through improvements to open space and also through improvements to the public realm to improve opportunities for walking and cycling. Refer to objectives 9 and 10 for the summaries of these policies.</b></p> <p>In addition Policy BC7 will have minor positive effects. The redevelopment of Finsbury Leisure Centre referenced in the policy will deliver improved sporting facilities which will benefit local people and encourage more sporting activity. Finsbury Leisure Centre is also assessed as site allocation BC4.</p>
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	++	+	+	+	+	+	<p>There is a significant positive effect for policy BC3. This area is the most significant location for new office floorspace in the borough and correlates with the London Plan Opportunity Area. There is specific reference to the Moorfields site which will deliver a significant quantum of office space and which reinforces the policy position set out in policy B2 and helps contribute to economic growth. The Opportunity Area reflects the importance of cross boundary working with neighbouring London Borough of Hackney and the City of London.</p>

IIA Objective	Policy BC3: City Fringe Opportunity Area	Policy BC4: City Road	Policy BC5: Farringdon	Policy BC6: Mount Pleasant and Exmouth Market	Policy BC7: Central Finsbury	Policy BC8: Historic Clerkenwell	<p>Commentary on assessment of likely significant effects of policies</p> <p>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</p>
							<p>There is a minor positive effect for policies BC4 to BC8. There is specific reference to the economic/commercial importance of these areas which reinforces the policy position set out in other Local Plan policies including policy B2, and helps contribute to economic growth.</p>
<p>9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking</p>	+	+	+	+	+	+	<p><b>New positive effects have been identified following review of the IIA as part of the examination for Spatial strategy areas which changes the effect from neutral to minor positive.</b></p> <p><b>All Spatial Strategy Areas include policies to improve the public realm to create a safe and convenient network for walking and cycling. The key policies for each area are:</b></p> <p><b>BC3: Major public realm scheme at Old Street Roundabout to remove the gyratory and improve conditions for walking and cycling. All development to improve permeability.</b></p> <p><b>BC4: Improve City Road corridor with active frontages, enhanced public realm, new pedestrian crossings, and tree planting.</b></p> <p><b>BC5: Improved interchange between modes at Farringdon Station and surrounding area, a single station environment, improved public realm in surrounding streets linking to Smithfield Market and Clerkenwell Green.</b></p>

IIA Objective	Policy BC3: City Fringe Opportunity Area	Policy BC4: City Road	Policy BC5: Farringdon	Policy BC6: Mount Pleasant and Exmouth Market	Policy BC7: Central Finsbury	Policy BC8: Historic Clerkenwell	<p>Commentary on assessment of likely significant effects of policies</p> <p>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</p>
							<p><b>BC6:</b> Public realm improvements at Exmouth Market improving the pedestrian priority, improvements to Farringdon Road and Rosebury Avenue to make walking and cycling easier and safer, provision of green infrastructure. Improved routes to Spa Fields.</p> <p><b>BC7:</b> Public realm improvements to facilitate easy pedestrian and cyclist access through and within the area, in line with pedestrian and cycle desire lines.</p> <p><b>BC8:</b> Development to positively reinforce the street space, increased permeability, active uses at ground floor.</p> <p>These improvements are likely to have significant positive effects on this objective however they have been marked as minor positive under this assessment as these policies will also rely on other mechanisms including action through the Council's Local Implementation Plan (including funding) for implementation.</p>
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	+	+	0	+	+	+	<p>New positive effects have been identified following review of the IIA as part of the examination for Spatial strategy areas BC3, BC6, BC7 and BC8 which changes the effect from neutral to minor positive. All Spatial Strategy Areas apart from BC5 include policies to improve the open spaces. The key policies for each area are set out below. Each of these have been marked as minor positive.</p>

IIA Objective	Policy BC3: City Fringe Opportunity Area	Policy BC4: City Road	Policy BC5: Farringdon	Policy BC6: Mount Pleasant and Exmouth Market	Policy BC7: Central Finsbury	Policy BC8: Historic Clerkenwell	<p>Commentary on assessment of likely significant effects of policies</p> <p>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</p>
							<p><b>BC3: Enhancement of the public open space at Finsbury Square. Creation of a new public space at Old Street Roundabout.</b></p> <p>BC4: The policy sets out criteria for residential moorings on Regent's Canal, a designated open space. The criteria ensure that moorings do not harm the open space. Protection of the City Road Basin as a place of relaxation and recreation.</p> <p>BC5: No policies specific to improving open spaces.</p> <p><b>BC6: Proposals in proximity to Spa Fields must ensure avoid adverse impacts and maximise opportunities to enhance its multifunctional role, improvement to routes leading to Spa Fields.</b></p> <p><b>BC7: The area includes Radnor Street Gardens, King Square Gardens and Fortune Street Gardens, as well as other informal green spaces on housing estates. Development to improve and better connect these green spaces. New green spaces should be provided including pocket parks.</b></p> <p><b>BC8: Encourages creating additional public space by transferring underused roads and parking areas into pedestrian use. Proposal to create a green space at Clerkenwell Green in place of car parking.</b></p>
11. Create, protect and	+	+	+	+	+	+	<p><b>New positive effects have been identified following review of the IIA as part of the examination for Spatial strategy areas BC3, BC5, BC6, BC7 and BC8</b></p>

IIA Objective	Policy BC3: City Fringe Opportunity Area	Policy BC4: City Road	Policy BC5: Farringdon	Policy BC6: Mount Pleasant and Exmouth Market	Policy BC7: Central Finsbury	Policy BC8: Historic Clerkenwell	<p>Commentary on assessment of likely significant effects of policies</p> <p>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</p>
<p>enhance suitable wildlife habitats wherever possible and protect species and diversity.</p>							<p>which changes the effect from neutral to minor positive. All Spatial Strategy Areas include policies which will improve biodiversity and introduce more green infrastructure and habitat for wildlife. The key policies for each area are set out below. Each of these have been marked as minor positive.</p> <p><b>BC3: Improvements to the quality of Finsbury Square, particularly in terms of green infrastructure. New green infrastructure along Old Street and at Old Street Roundabout.</b></p> <p>BC4: Protection of the Regent’s Canal, a designated open space, to protect use and function of this space. Protection of the biodiversity value of Graham Street Gardens.</p> <p><b>BC5: Greening of public spaces.</b></p> <p><b>BC6: Greening of Farringdon Road and Rosebery Avenue. Protection of Spa Fields and links to the space.</b></p> <p><b>BC7: Preservation of existing green spaces including parks and the grounds of housing estates, improved connections between these spaces from new developments. Provision of new open spaces including pocket parks. Incorporation of new tree planting to reinforce the street hierarchy.</b></p> <p><b>BC8: Increased biodiversity and green infrastructure in the public realm. Conversion of carriageway</b></p>

IIA Objective	Policy BC3: City Fringe Opportunity Area	Policy BC4: City Road	Policy BC5: Farringdon	Policy BC6: Mount Pleasant and Exmouth Market	Policy BC7: Central Finsbury	Policy BC8: Historic Clerkenwell	<p>Commentary on assessment of likely significant effects of policies</p> <p>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</p>
							<p>space and car parking to green space. Conversion of the car parking at Clerkenwell Green to green space.</p>
<p>12. Reduce contribution to climate change and enhance community resilience to climate change impacts.</p>	0	+	0	0	0	0	<p>There is no effect for policy BC3. See response to IIA Objective 3.</p> <p><b>New positive effects have been identified following review of the IIA as part of the examination for BC4. There is a minor positive effect for policy BC4. The spatial strategy sets out that the City Road Basin is a potential location for the expansion of Islington’s Heat Network, and supports delivery of the Bunhill Phase 2 energy centre at the Junction of City Road and Central Street, and the delivery of Bunhill Phase 3 at the City Road Basin. These actions will help to reduce carbon emissions and assist with the transition to zero carbon.</b></p> <p>There is no effect for policies BC5 to BC8. See response to IIA Objective 1.</p>
<p>13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste</p>	0	0	0	0	0	0	<p>There is no effect for policy BC3. See response to IIA Objective 3.</p> <p>There is no effect for policies BC4 to BC8. See response to IIA Objective 1.</p>



IIA Objective	Policy BC3: City Fringe Opportunity Area	Policy BC4: City Road	Policy BC5: Farringdon	Policy BC6: Mount Pleasant and Exmouth Market	Policy BC7: Central Finsbury	Policy BC8: Historic Clerkenwell	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
14. Maximise protection and enhancement of natural resources including water, land and air	0	+	0	0	0	0	<p>There is no effect for policy BC3. See response to IIA Objective 3.</p> <p>There is a minor positive effect for policy BC4 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 policies BC5 to BC8. See response to IIA Objective 1.</p>

## **Bunhill and Clerkenwell AAP**

The submission IIA assessed Policy AAP1. The purpose of Policy AAP1 is to ensure the delivery of plan objectives by ensuring that sites allocated for particular uses deliver those types of development in line with the allocations. The assessment in the submission IIA recognised that because there are no explicit requirements attached to the policy it was considered to not have any effect for the purposes of the Sustainability Appraisal therefore the assessment has not been repeated here.

### **Policy BC3: City Fringe Opportunity Area**

The SA highlighted the specific minor positive effect against the framework objective for the built environment from the environmental improvements identified at Old Street roundabout and related public realm work and development in character with scale and massing, and protection of views. The assessment recognises a minor positive effect against the built environment and heritage as the policy will ensure development makes the best use of the qualities of different areas across the spatial area, making efficient use of the land and references the areas heritage assets. Policy BC3 also has a specific positive effect against the economic growth objective because of specific reference to the Moorfields site and the significant quantum of office which will be delivered – this helps reinforce the policy position set out in policy B2. There is also a positive effect against liveable objective identified with reference to legacy community health provision as part of the Moorfields Eye Hospital site. The area is the most significant location for new office floorspace in the borough which correlates with the London Plan Opportunity Area. The Opportunity Area reflects the importance of cross boundary working with neighbouring London Borough of Hackney and the City of London. The assessment identifies the positive effect on the objectives for health, need to travel and open space with BC3 seeking permeability improvements, improvements to the public realm to create a safe and convenient network for walking and cycling, the Old Street roundabout scheme and improvement and the enhancement of the public open space at Finsbury Square. Green infrastructure improvements of Finsbury Square will also have positive effect on biodiversity objective.

### **Policy BC4: City Road**

The SA highlighted the specific minor positive effect against the framework objective for the built environment from policy requirement for improved public realm, improved links across City Road, improved City Road corridor. The assessment recognises a minor positive effect against the built environment and heritage as the policy will ensure development makes the best use of the qualities of different areas across the spatial area, making efficient use of the land and references the areas heritage assets. There is also a positive effect against liveable objective identified with reference to retention of the Islington boat club. The SA of identified positive effect against objectives for housing, open space and enhancement of natural resources because it sets out criteria for residential moorings, which will help address the housing need for boat dwellers, protect the function of the open space and consider the effect of air pollution. Finally BC4 has minor positive effect against the objective for climate change as City Road Basin is identified as an important location for the expansion of Islington's Decentralised Energy Network, which will help to reduce carbon emissions and assist with the transition to zero carbon. The assessment identifies the positive effect on the objectives for health, need to travel and open space with BC4 seeking to improve City Road corridor with active frontages, enhanced public realm, new pedestrian crossings, and tree planting.

### **Policy BC5: Farringdon**

The has a specific positive effect against the objective related to the built environment and heritage assets with specific references to integration and linking of high quality neighbouring public space, improved environment around Farringdon Station, improved public realm, links to spaces including Clerkenwell Green, retail and leisure uses on Cowcross Street. There are also references to the history and heritage of the wider area. The assessment recognises a minor positive effect against the built environment as the policy will ensure development makes the best use of the qualities of different areas across the spatial area, making efficient use of the land. There was also a positive effect against liveable neighbourhoods as the policy includes requirements related access to services, through preservation and enhancement of Exmouth market Local Shopping Area. The opportunities for cross boundary working exist with the City of London and the Cultural Mile. The assessment identifies the positive effect on the objectives for health, need to travel and open space with BC5 recognising the improved interchange between modes at Farringdon Station and surrounding area, a single station environment, improved public realm in surrounding streets linking to Smithfield Market and Clerkenwell Green as well as the greening of public spaces. Green infrastructure improvements of the public realm will also have positive effect on biodiversity objective.

### **Policy BC6: Mount Pleasant and Exmouth Market**

The has a specific positive effect against the objective related to the built environment and heritage with specific references to Public realm improvements to Exmouth Market, improved routes to Spa Green and references the areas heritage assets. The assessment recognises a minor positive effect against the built environment as the policy will ensure development makes the best use of the qualities of different areas across the spatial area, making efficient use of the land. There is also a positive effect against liveable objective identified with reference to retention of the Finsbury Health Centre. BC6 will have minor positive effects against the objective for affordable housing through development of affordable housing at site allocation site BC24 the Clerkenwell Fire Station. The assessment identifies the positive effect on the objectives for health, need to travel and open space with BC6 recognising public realm improvements at Exmouth Market and Farringdon Road / Rosebury Avenue to make walking and cycling easier and safer, as well as provision of green infrastructure. The importance of Spa Fields is also recognised by the assessment. Cross boundary working opportunities are noted with London Borough of Camden. Green infrastructure improvements of the public realm will also have positive effect on biodiversity objective.

### **Policy BC7: Central Finsbury**

The has a specific positive effect against the objective related to the built environment with specific references to protect character including of the Spa Green Estate, provision of high quality and connected public realm, better pedestrian and cycle access. The assessment recognises a minor positive effect against the built environment and heritage as the policy will ensure development makes the best use of the qualities of different areas across the spatial area, making efficient use of the land and designing to respond to local context. Reference to the preservation of the Grade II\* listed Spa Green Estate is also identified in the assessment. The SA of identified the positive effect against the objective for liveable neighbourhoods through the redevelopment of Finsbury Leisure Centre referenced in BC7 which will deliver improved sporting facilities which will benefit local people and encourage more sporting activity which will have a minor positive effect. Finsbury Leisure Centre is also assessed as site allocation BC4. The retention of Ironmonger Road baths is also positive. The assessment identifies the positive effect on the objectives for health, need to travel and open space

with BC7 recognising in the assessment the benefits of and need for informal green spaces on housing estates and how development should improve and better connect these green spaces as well as provide new green spaces. Green infrastructure improvements of these informal spaces will also have positive effect on biodiversity objective.

### **Policy BC8: Historic Clerkenwell**

The has a specific positive effect against the objective related to the built environment with specific references to preservation of the fine grained historic character, active ground floor uses. The assessment recognises a minor positive effect against the built environment as the policy will ensure development makes the best use of the qualities of different areas across the spatial area, making efficient use of the land. The SA of identified a positive effect against the heritage objective through the approach which identifies preserving heritage assets as the starting point for development in this area, reflecting its uniqueness. There are also specific heritage assets identified for this area. The assessment identifies the positive effect on the objectives for health, need to travel and open space with BC8 encouraging the creation additional public space by transferring underused roads and parking areas into pedestrian use and the proposal to create a green space at Clerkenwell Green in place of car parking. Such changes are likely to reinforce the street space and increase permeability as well have positive effect on biodiversity objective with increased biodiversity and green infrastructure in the public realm.

**c. Assessment of Local Plan: Site Allocations and alternatives**

## **Introduction**

This section sets out the assessment of site allocations and where relevant the alternatives to those site allocations. The presentation of the site assessment has been revised and includes assessment against the full set of appraisal objectives as requested by the Inspectors. Reasonable alternatives are considered alongside site assessments where relevant or explanations of where there are no alternatives. The assessment of site allocations has been revised and the text updated where relevant. This section replaces the assessment of site allocations in appendix 7 of the submission IIA.

All modifications to the site allocations made since the submission IIA are addressed in part 2 of the examination IIA. There are several sites where updates have been made which are assessed in part 2 – these are:

- AUS8: 161-169 Essex Road, N1 2SN -
- FP5: Conservative Club, 1 Prah Road
- NH1: Morrison's supermarket and adjacent car park, 10 Hertslet Road, and 8-32 Seven Sisters Road, N7 6AG
- OIS10: Hornsey Road and Grenville Works, 2A Grenville Road
- ARCH1: Vorley Road/Archway Bus Station, N19
- ARCH5: Archway Campus, Highgate Hill, N19
- BC13: Car park at 11 Shire House, Whitbread Centre, Lamb's Passage

The submission IIA assessed Policy SA1. The purpose of Policy SA1 is to ensure the delivery of plan objectives by ensuring that sites allocated for particular uses deliver those types of development in line with the allocations. The assessment in the submission IIA recognised that because there are no explicit requirements attached to the policy it was considered to not have any effect for the purposes of the Sustainability Appraisal therefore the assessment has not been repeated here.

Table 3.54: Site Assessment KC1: King's Cross Triangle Site

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
KC1: King's Cross Triangle Site, bounded by York Way, East Coast Main Line & Channel Tunnel Rail Link, N1	+	++	0	+	+	+	+	+	0	+	-	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>KC1 is allocated for mixed use development including residential, business, retail, leisure and community uses. The intensification/provision of business floorspace is a priority in this location but the site has extant planning permission for a residential-led, mixed use scheme providing leisure, community and retail uses as well as open space. The allocation also identifies that the northern part of the site overlaps with land deemed suitable for a district landmark building of up to 20 storeys, although the land is currently operational railway land and unlikely to come forward for development in the foreseeable future.</p> <p>The development considerations identify that the site is surrounded by major road and rail infrastructure, which could expose future occupants to the negative effects of noise and vibration if not adequately addressed. The larger scale of development proposed by the allocation would have positive or significant positive effects on economic growth by providing a large quantum of employment floorspace, and would have positive effects on housing by providing additional homes. Also, the larger size of this site lends support to the practicality of a designing a mixed use scheme. In turn this could have a positive effect on social inclusion through the provision of good quality housing and a diverse range of employment opportunities at the site. Similarly, the provision of affordable housing, leisure and community facilities and new open space could have a positive effect on health and wellbeing. The allocation could have a significant positive effect on the efficient use of land by proposing a significant uplift in floorspace on a site most recently used for storage (B8) and car parking (Sui Generis). New development on the disused former railway lands can help to enhance the local character of the area and promote a high quality built environment.</p> <p>There is potential for development to have a negative impact on biodiversity as the site is partially within a SINC. Impacts should be carefully considered and managed.</p>													
<b>Reasonable alternative summary</b>	<p>No reasonable alternative was identified. The site is allocated for mixed use development and has planning permission that accords with the uses proposed in the draft allocation.</p>													

Table 3.55: Site Assessment KC2: 176-178 York Way

IJA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
KC2: 176-178 York Way, N1 0AZ	+	++	0	0	+	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>KC2 is allocated for business-led, mixed use development. The intensification of business uses is the priority on this site, with an element of residential development also likely to be acceptable.</p> <p>The Islington Tall Building Study suggests the north-western part of 176-178 York Way would be an appropriate location for a local landmark building of up to 12 storeys (37m). Specific permeability improvements are identified which will help create a safer and more inclusive built environment opening the area up to new pedestrian routes. The larger scale of development proposed on this site would have positive or significant positive effects on economic growth by providing a large quantum of employment floorspace in an area well connected to public transport.</p> <p>The site is located above railway land and the London Underground, which could expose future occupants to the negative effects of noise and vibration if not adequately addressed. Delivery of quality housing which addresses the challenging environment would be an important consideration to ensure a good standard of living. If this could be satisfactorily achieved, the allocation would have a positive effect on housing by providing additional homes including affordable housing which would also have positive effects in relation to social inclusion. The allocation makes efficient use of land by proposing a significant uplift in floorspace in an accessible location. Development of the site can help to enhance the local character of the area and promote a high quality built environment. The permeability improvements could help to promote walking and cycling however the specific effects are uncertain and so have been assessed as neutral.</p>													
IJA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES



Reasonable Alternative 1: Mixed-use commercial and residential development	+	+	0	+	+	0	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>This alternative is for mixed-use commercial and residential development. The other provisions of policy KC2 remain unchanged, for example, for a local landmark building of up to 12 storeys and permeability improvements.</p> <p>Allocating this site for mixed-use commercial and residential development could have a limited positive effect in terms of the efficient use of land and buildings, as the site could accommodate a wider range of uses.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access for residents to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>Alternative1 should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p> <p>The flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. Alternative 1 has the potential to have a negative effect on the borough's economic growth as certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace needed to support Islington's projected economic growth.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													
<b>IIA Objective / Site</b>	<b>1. HIGH QUALITY ENVIRON</b>	<b>2. EFFICIENT USE OF LAND</b>	<b>3. HERITAGE</b>	<b>4. LIVEABLE NEIGHBOURHOODS</b>	<b>5. HOUSING QUALITY</b>	<b>6. SOCIAL INCLUSION</b>	<b>7. HEALTH AND WELLBEING</b>	<b>8. ECONOMIC GROWTH</b>	<b>9. NEED TO TRAVEL</b>	<b>10. OPEN SPACE</b>	<b>11. BIODIVERSITY</b>	<b>12. CLIMATE CHANGE</b>	<b>13. RESOURCE EFFICIENCY</b>	<b>14. NATURAL RESOURCES</b>
Reasonable Alternative 2: residential-led development	+	0	0	+	++	+	+	-	0	0	0	0	0	0

**Commentary on assessment of likely significant effects of Alternative 2**

This alternative is for residential-led development. The other provisions of policy KC2 remain unchanged, for example, for a local landmark building of up to 12 storeys and permeability improvements.

Allocating this site for residential-led development could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations. Although the site has been identified as suitable for development, the site falls partly within the CAZ, a key employment location. A residential-led allocations is unlikely to adequately balance the competing demands for land in the borough and provide for the full range of development needs. The intensification of the site could help to make more efficient use of the land. Therefore overall a neutral effect has been identified for objective 2.

A residential-led allocation for this site could have a positive effect on the promotion of liveable neighbourhoods, as it would bring more housing close to facilities such as shops and other leisure activities.

The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. Improved housing options would also have a positive effect in terms of social inclusion and on health and wellbeing by helping people out of overcrowded or poor quality housing, combatting some of the negative consequences of relative poverty.

Whilst residential-led development could bring residents into town centres, potentially improving footfall for local businesses, it is considered that alternative 2 is likely to have a significant negative effect on economic growth. If developed for residential purposes, the site – which is in existing business and employment use – will no longer be contributing towards the borough’s economy or supporting a range of jobs.

It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.

**Conclusion**

The proposed allocation allows for an element of housing, whilst recognising the need to adequately address noise and vibration impacts given the proximity to railway infrastructure, , with a strong emphasis on business use given its location. Two reasonable alternatives to the business-led allocation for KC2 were identified: mixed-use residential and commercial development and residential-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough’s identified development needs, and residential-led development would have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business-led development was most appropriate for this site given its proximity to King’s Cross and the CAZ and the borough’s need for additional employment floorspace.

Table 3.56: Site Assessment KC3: Regents Wharf

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
KC3: Regents Wharf, 10, 12, 14, 16 and 18 All Saints Street, N1	0	+	0	0	0	0	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>KC3 is allocated for retention and re-provision of business floorspace, with potential for limited intensification of business use, and small scale commercial uses at ground floor level. The site has planning permission for additional business floorspace with flexible A1/A3/B1/D1/D2 ground floor uses.</p> <p>It is considered the provision of business and other commercial uses on site will have minor positive effects in relation to economic development and the efficient use of land.</p>													
<b>Reasonable alternative summary</b>	<p>No reasonable alternative was identified. The site is allocated for retention, re-provision and limited intensification of business floorspace and has planning permission that accords with the uses proposed in the draft allocation.</p>													

Table 3.57: Site Assessment KC4: Former York Road Station

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
KC4: Former York Road Station, 172-174 York Way, N1	+	+	+	+	+	+	+	+	0	+	0	+	+	0

<p><b>Commentary on assessment of likely significant effects of site allocations</b></p>	<p>KC4 is allocated for business-led development with an element of residential use.</p> <p>The allocation states that the locally listed former underground station should be retained on site, which will likely have positive effects on the historic environment and built environment. There will also be potential for creation of a safer and more inclusive built environment with creation of new public open space, which could also be positive for health and wellbeing. The allocation for business led use will have positive effects on economic growth, and positive effects on housing quality and social inclusion if it includes an element of residential use which will also deliver affordable housing. The allocation should have positive effects on the efficient use of land by bringing a vacant building back into use and the development considerations recognise the opportunity for site assembly with the neighbouring site. This site may also have a positive effect in terms of reducing the effects of climate change and increasing resource efficiency as there is potential for the site to support the expansion of the council's decentralised energy network.</p>													
<p><b>IIA Objective / Site</b></p>	<p><b>1. HIGH QUALITY ENVIRON</b></p>	<p><b>2. EFFICIENT USE OF LAND</b></p>	<p><b>3. HERITAGE</b></p>	<p><b>4. LIVEABLE NEIGHBOURHOODS</b></p>	<p><b>5. HOUSING QUALITY</b></p>	<p><b>6. SOCIAL INCLUSION</b></p>	<p><b>7. HEALTH AND WELLBEING</b></p>	<p><b>8. ECONOMIC GROWTH</b></p>	<p><b>9. NEED TO TRAVEL</b></p>	<p><b>10. OPEN SPACE</b></p>	<p><b>11. BIODIVERSITY</b></p>	<p><b>12. CLIMATE CHANGE</b></p>	<p><b>13. RESOURCE EFFICIENCY</b></p>	<p><b>14. NATURAL RESOURCES</b></p>
<p><b>Reasonable Alternative 1: Mixed-use commercial and residential development</b></p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>0</p>	<p>0</p>	<p>+</p>	<p>0</p>	<p>+</p>	<p>0</p>	<p>+</p>	<p>+</p>	<p>0</p>
<p><b>Commentary on assessment of likely significant effects of Alternative 1</b></p>	<p>This alternative is for mixed use commercial and residential development. The other provisions of policy KC4 remain unchanged, for example, the retention of the existing locally listed station, potential for connection to a decentralised energy network and incorporation of public open space.</p> <p>The alternative could have a limited positive effect in terms of the efficient use of land and buildings, as the site could accommodate a wider range of uses.</p> <p>The flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace needed to support Islington's projected economic growth. However, given there would likely be some commercial use on the site a minor positive effect has been identified overall.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p>													

	<p>Allocating this site for mixed-use development should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses. The provision of affordable housing is also likely to have positive effects on social inclusion.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 2: residential-led development	+	0	+	+	++	+	0	-	0	+	0	+	+	0
Commentary on assessment of likely significant effects of Alternative 2	<p>This alternative is for residential-led development.</p> <p>The other provisions of policy KC4 remain unchanged, for example, the retention of the existing locally listed station, potential for connection to a decentralised energy network and incorporation of public open space.</p> <p>The intensification of the site for residential could help to make more efficient use of the site, however the site is partially within the CAZ where employment uses are prioritised and there are existing employment uses on the site and so residential development may not help to focus development in the most appropriate locations. On balance a neutral effect on the efficient use of land has been identified.</p> <p>A residential-led allocation for this site could have a positive effect on the promotion of liveable neighbourhoods, as it would bring more housing close to facilities such as shops and other leisure activities. However, having no commercial uses it could also have a minor negative effect on economic growth.</p> <p>The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>													
Conclusion	<p>Two reasonable alternatives to the business-led allocation for KC4 were identified: mixed-use residential and commercial development and residential-led development. Whilst mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development would have positive effects in terms of the delivery of good-quality housing, on balance it</p>													

was considered that business-led development was most appropriate for this site given its proximity to King’s Cross and the CAZ and the borough’s need for additional employment floorspace.

Table 3.58: Site Assessment KC5: Belle Isle Frontage

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
KC5: Belle Isle Frontage, land on the east side of York Way	+	+	0	0	0	+	0	++	0	0	-	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>The allocation for KC5 states that the rear of the site accommodates a UKPNS feeder station providing power to HS1, but the frontage of the site is under-utilised and does not create a positive street frontage. It is considered that the front portion of the site could accommodate office uses linking to King's Cross. The development of offices in this location would mark the end of the King's Cross office cluster, and signal the start of the Vale Royal / Brewery Road industrial area.</p> <p>The Islington Tall Building Study suggests this site would be an appropriate location for a local landmark building of up to 15 storeys (46m). 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 support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion. This will make more efficient use of land compared to the current low density infrastructure use. A new quality building will also improve the local environment, provide an active frontage and ground floor uses which will create a safer and more inclusive environment creating a more sustainable neighbourhood. The site falls partially within the Copenhagen Junction SINC, there is potential for development to have a negative impact on biodiversity as the site is partially within a SINC. Impacts should be carefully considered and managed.</p>													
<b>Reasonable Alternative 1: Mixed-use commercial and residential development</b>	+	+	0	+	+	0	0	+	+	0	-	0	0	0

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<p><b>Commentary on assessment of likely significant effects of Alternative 1</b></p>	<p>This alternative is for mixed-use commercial and residential development. The other provisions of policy KC4 remain unchanged, for example, the opportunity for a local landmark building of up to 15 storeys and the impact a new building could make on improving the local built environment.</p> <p>Allocating this site for mixed-use commercial and residential development could have a minor positive effect in terms of the efficient use of land. However, the flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. The site is within the CAZ which prioritises employment uses. It is considered alternative 1 has the potential to have a negative effect on the borough's economic growth as certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace needed to support Islington's projected economic growth. However, given the mixed use development would lead to the provision of some employment use on the site, overall a minor positive effect is identified.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>Allocating the sites for mixed-use development should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 2: residential-led development	+	-	0	+	++	+	0	-	0	0	-	0	0	0

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>This alternative is for residential-led development. The other provisions of policy KC4 remain unchanged, for example, the opportunity for a local landmark building of up to 15 storeys and the impact a new building could make on improving the local built environment.</p> <p>Allocating the site for residential-led development could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations because the site is within the CAZ which prioritises employment uses.</p> <p>Given the location of the site in the CAZ where employment uses are prioritised, a residential-led allocation is likely to have a significant negative effect on economic growth by not contributing towards the boroughs need for additional employment floorspace and jobs associated with that.</p> <p>A residential-led allocation for this site could have a positive effect on the promotion of liveable neighbourhoods, as it would bring more housing close to facilities such as shops and other leisure activities. Development for residential would need to adequately address noise and vibration impacts given the proximity to railway infrastructure.</p> <p>The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>													
<b>Conclusion</b>	<p>Two reasonable alternatives to the business-led allocation for KC5 were identified: mixed-use residential and commercial development and residential-led development. Whilst mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development would have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business-led development was most appropriate for this site given its location in the CAZ, its proximity to King's Cross and the borough's need for additional employment floorspace.</p>													



Table 3.59: Site Assessment KC6: 8 All Saints Street

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
KC6: 8 All Saints Street, N1 9RJ	0	+	0	0	0	0	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>KC6 is allocated for retention and reprovision of business floorspace, and potential for limited intensification of business use. Small scale commercial uses at ground floor level.</p> <p>The existing building is an acceptable context building. The allocation will likely have positive effects on economic development by providing additional employment floorspace. Through protecting and potentially intensifying the use of the site for employment use, the allocation can contribute to the more efficient use of land and the wider economic growth of the King's Cross Priority Employment Location in which it sits.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Mixed-use commercial and residential development	0	+	0	+	+	0	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>Allocating this site for mixed-use commercial and residential development could have a minor positive effect in terms of the efficient use of land. However, the flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. It is considered alternative 1 has the potential to have a negative effect on the borough's economic growth as certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace needed to support Islington's projected economic growth. Given the site is already wholly in use as offices, a mix of uses on the site would lead to a reduction in employment use on the site which could also be damaging to the wider King's Cross Priority Employment Location within which the site sits and where employment uses are prioritised.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	<p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>Allocating this site for mixed-use development should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 2: residential-led development	0	-	0	0	++	+	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>Allocating the site for residential-led development could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations. The site is located within the King's Cross Priority Employment Location (PEL) which prioritises employment uses. It is considered that alternative 2 is likely to have a significant negative effect on economic growth. If developed for residential purposes, the site – which is in existing business use – will no longer be contributing towards the borough's economy or supporting a range of jobs.</p> <p>The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>													
<b>Conclusion</b>	<p>Two reasonable alternatives to the business-led allocation for KC6 were identified: mixed-use residential and commercial development and residential-led development. Whilst mixed-use development could have positive effects by supporting a range of the borough's identified</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	development needs, and residential-led development would have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business-led development was the most appropriate use for this site given its proximity to King's Cross and the CAZ and the borough's need for additional employment floorspace and the small site size.													

Table 3.60: Site Assessment KC7: All Saints Triangle

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
KC7: All Saints Triangle, Caledonian Road, N1 9RR	+	+	0	+	0	0	0	+	0	+	+	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>KC7 is allocated for redevelopment for business use.</p> <p>The existing building has large blank frontages and does not positively contribute to the character of the area. The allocation requires that a small pocket park on the corner of the site is retained and improved, which could have a minor positive effect on biodiversity. An improved building with an improved open space will have positive effects on the local environment and liveable neighbourhoods helping create a safer and more inclusive environment. The current use is quite low density and additional floorspace could be created on site making a more efficient use of land.</p> <p>A new larger building would have positive effects on economic development by providing more employment floorspace; this will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Mixed-use commercial and residential development	+	+	0	+	+	0	0	0	0	+	+	0	0	0
Commentary on assessment of likely significant effects of Alternative 1	<p>This alternative is for mixed commercial and residential development. The other provisions of policy KC7 remain unchanged, for example, improvements to the designated open space to the southern corner of the site.</p> <p>Allocating this site for mixed-use commercial and residential development could have a limited positive effect in terms of the efficient use of land and buildings, as the site could accommodate a wider range of uses. However, the flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. It is considered alternative 1 has the potential to have a negative effect on the borough's economic growth as certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace needed to support Islington's projected economic growth. The However the provision of some commercial use is likely to provide some employment benefits and so on balance a neutral effect has been identified in relation to objective 8.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>Allocating the site for mixed-use development should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 2: residential-led development	+	-	0	0	++	+	+	-	0	+	+	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>This alternative is for residential-led development. The other provisions of policy KC7 remain unchanged, for example, improvements to the designated open space to the southern corner of the site.</p> <p>The current use is quite low density and additional development could be accommodated on site making a more efficient use of land. Allocating the sites for residential-led development could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations. The site is located within the King's Cross Priority Employment Location which prioritises employment uses. If developed for residential purposes, the site – which is in existing business use – will no longer be contributing towards the borough's economy or supporting a range of jobs. Given its potential for intensification, it will also not contribute towards future economic or jobs growth. A significant negative effect has therefore been identified in relation to economic growth.</p> <p>The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. Improved housing options would also have a positive effect in terms of social inclusion and on health and wellbeing by helping people out of overcrowded or poor quality housing, combatting some of the negative consequences of relative poverty.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.													
<b>Conclusion</b>	Two reasonable alternatives to the business-led allocation for KC7 were identified: mixed-use residential and commercial development and residential-led development. Whilst mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development would have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business-led development was most appropriate for this site given its location within the King's Cross Priority Employment Location, the existing business use of the site and the borough's need for additional employment floorspace.													

### Site Allocations: Vale Royal and Brewery Road Locally Significant Industrial Sites

Table 3.61: Site Assessment VR1: Fayers Site, 202-228 York Way

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>VR1: Fayers Site, 202-228 York Way, Former Venus Printers, 22-23 Tileyard Road, adjacent 196-200 York Way, N7 9AX</b>	+	++	+	0	0	+	0	++	0	0	0	0	0	0

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>The site is allocated for retention and intensification for industrial uses (B1c, B2 and B8). The allocation also sets out that office floorspace will only be acceptable as part of a hybrid workspace scheme.</p> <p>The allocation states that the site's prominent corner location warrants a high quality, well designed building. The design of any building will be of high quality and will be in keeping with the site's industrial character. Industrial development will consider the spaces between buildings and incorporate adequate servicing to serve the site's industrial function. The development of new industrial space will be designed to ensure that it is adaptable to meet the needs of a range of users.</p> <p>Development of the site will optimise the use of previously developed land. The Local Plan directs industrial development to Locally Significant Industrial Sites (LSIS). The site is located in an LSIS, therefore, this is an appropriate location for such development. The development of industrial floorspace balances the competing demands between land uses as sites such as this are under pressure for the development of other uses (not just residential, but office too). By prioritising industrial development the allocation ensures that much needed industrial space is also delivered.</p> <p>The site is partially within a protected viewing corridor. The allocation sets out that building height will be limited to 5 storeys, this will ensure that views towards heritage assets are maintained.</p> <p>The development of the site will support economic growth in the borough. The delivery of additional industrial floorspace is much needed as a significant amount of industrial floorspace has been lost in recent years. Such space, in such a central location, will play a key role in supporting the Central London economy and support a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion. It is recognised that the intensification of industrial uses may have negative effects on traffic congestion and air quality, but it is considered this would be counteracted to some extent by keeping industrial suppliers in the borough thereby enabling shorter journeys and supply chains than if they had to travel into their central London clients from further afield. It is noted that Policy S7 provides strong criteria to mitigate any potential negative effects on air quality and the overall effect on the need to travel, climate change and natural resources has therefore been scored as neutral.</p>													
<b>Reasonable alternative summary</b>	<p>No reasonable alternative was identified. The site is allocated for retention and intensification for industrial uses and has planning permission that accords with the uses proposed in the draft allocation.</p>													

Table 3.62: Site Assessment VR2: 230-238 York Way

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
VR2: 230-238 York Way, N7 9AG	+	++	+	0	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>The site is allocated for retention and intensification for industrial uses (B1c, B2 and B8). The allocation also sets out that office floorspace will only be acceptable as part of a hybrid workspace scheme.</p> <p>The allocation states that the site's prominent corner location warrants a high quality, well designed building which would have a positive effect on the quality of the built environment. The design of any building will be of high quality and will be in keeping with the site's industrial character. Industrial development will consider the spaces between buildings and incorporate adequate servicing to serve the site's industrial function. The development of new industrial space will be designed to ensure that it is adaptable to meet the needs of a range of users.</p> <p>Development of the site will optimise the use of previously developed land. The Local Plan directs industrial development to Locally Significant Industrial Sites (LSIS). The site is located in an LSIS, therefore, this is an appropriate location for such development. The development of industrial floorspace balances the competing demands between land uses as sites such as this are under pressure for the development of other uses (not just residential, but office too). By prioritising industrial development the allocation ensures that much needed industrial space is also delivered.</p> <p>The site is partially within a protected viewing corridor. The allocation sets out that building height will be limited to 5 storeys, this will ensure that views towards heritage assets are maintained.</p> <p>The development of the site will support economic growth in the borough. The delivery of additional industrial floorspace is much needed as a significant amount of industrial floorspace has been lost in recent years. Such space, in such a central location, will play a key role in supporting the Central London economy and support a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion. It is recognised that the intensification of industrial uses may have negative effects on traffic congestion and air quality, but it is considered this would be counteracted to some extent by keeping industrial suppliers in the borough thereby enabling shorter journeys and supply chains than if they had to travel into their central London clients from further afield. It is noted that Policy S7 provides strong criteria to mitigate any potential negative effects on air quality and the overall effect on the need to travel, climate change and natural resources has therefore been scored as neutral.</p>													



IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Housing co-location	+	-	+	-	+	0	0	-	-	0	0	-	0	-
Commentary on assessment of likely significant effects of Alternative 1	<p>This alternative is for housing to be co-located alongside industrial use. The other provisions of policy VR2 remain unchanged, for example, that building height will be limited to 5 storeys and that site's location warrants a high quality, well designed building which would have a positive effect on the quality of the built environment.</p> <p>The provision of new housing, contributing to the borough's significant evidenced need for new homes, would be a minor positive effect of widening the allocation to include residential use and should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses.</p> <p>Although residential uses can be accommodated elsewhere in the borough to meet the borough's housing targets, locations suitable for industrial uses are significantly more constrained given land values in the borough and the potential for such uses to be viewed as 'bad neighbours'. For alternative 1 co-location of industrial space with residential uses would help to achieve an effective use of land. Whilst this intensification of uses could bring some additional industrial floorspace to the LSIS, there needs to be a balance with protecting the full range of industrial functions that make the LSIS a successful industrial cluster. The co-location of industrial floorspace with housing would lead to the exclusion of more traditional industrial uses in the LSIS in favour of light industrial activities which can coexist with residential development. This will have a minor negative effect on the balance of uses and industrial activities in the LSIS particularly in terms of focusing development in the most appropriate locations. Opening the LSIS up to residential development increases opportunities for conflict between industrial occupiers, who may operate long hours, generating noise and frequent vehicle movements, and new residential occupiers. As such alternative 1 is assessed as having a minor negative effect on the promotion of liveable neighbourhoods, as set out in objective 4.</p> <p>Whilst a minor positive effect in relation to the provision of housing that would contribute towards the borough's evidenced need for housing is recognised, the effect of alternative 1 on social inclusion is considered to be neutral given that residential reduces floorspace which would deliver potential job opportunities for local residents.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	<p>With regards to the impact of alternative 1 on health and wellbeing, the co-location of residential uses with industrial uses within the LSIS could have an effect on the wellbeing of future residents relating to aspects of industrial operations such as noise that it may not be possible to mitigate against, however the effects of this are uncertain in relation to scheme design and site location and so a neutral effect has been identified overall. Alternative 1 would have a minor negative effect on economic growth. Whilst this alternative could bring some intensification of industrial floorspace, the extent to which industrial uses could be intensified would be more limited than if it is focused on industrial intensification. It is also likely to reduce the range of businesses because some types of industrial would be prioritised as being compatible for residential uses, therefore having an impact on range of business and jobs. The intensification of residential uses would not provide long-term employment opportunities and would likely limit the capacity for the existing business sectors to expand rea. This could have negative effects on the wider economy and Central London services which rely on the support of production activities in the LSIS.</p> <p>Connected to this, although residential use within the LSIS could reduce travel in some ways – for example if future residents live close to their places of work – whilst it could lead to the intensification of industrial uses, the scope for intensification of industrial operations in the LSIS is lessened and the range of industrial uses could lead to the displacement of industrial businesses to Outer London industrial locations while still needing to travel to central London to access their markets. This could increase vehicle mileage through Islington, which risks increased congestion and emissions, and have negative impacts on climate change and air quality. The alternative would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expanding in the longer term . In this way alternative 1 is considered to also have a minor negative effect in terms of reducing contributions to climate change (objective 12) and in relation to objective 14 (maximising protection of natural resources including water, land and air).</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 2 Office co-location	+	0	+	0	0	+	0	+	-	0	0	-	0	-
Commentary on assessment of likely significant	<p>This alternative is for the co-location of industrial uses with office use. The other provisions of policy VR2 remain unchanged, for example, that building height will be limited to 5 storeys and that site’s location warrants a high quality, well designed building which would have a positive effect on the quality of the built environment.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
effects of Alternative 2	<p>For alternative 2, there will be a neutral effect on optimisation of land use and balancing economic needs. As a higher density employment use, offices could result in an optimisation of existing employment floorspace and some intensification of industrial floorspace. However, there is already a significant proportion of office buildings integrated within parts of the LSIS and if new development is likely to introduce significant quantum of office, the land use balance could quickly shift to offices. Otherwise it would have the same effect as alternative 1. The LSIS has a strategic position in relation to the CAZ. It is one of the last remaining industrial clusters within close proximity to the CAZ and supports Central London's economy through the provision of 'last mile' distribution/logistics and 'just in time' servicing. Without policy protection industrial businesses are likely to be displaced to Outer London locations. Whilst there are land use benefits from the co-location of offices with industrial, depending on the extent to which offices are intensified, there are potential negative impacts that could arise from the displacement of industrial activities given that office needs can be demonstrated to be met elsewhere in the borough. On balance, this alternative is considered to have neutral effects for objective 2.</p> <p>For Alternative 2 there would be a minor positive effect on economic growth. Whilst on the one hand the intensification of new business floorspace as office space co-located with industrial will strengthen the local economy and provide a higher density of jobs by encouraging development of employment floorspace, there could be negative effects in the longer term sustainability of the LSIS. The function of the industrial area would change as land values from office uses out-compete new industrial floorspace. As part of the balance, whilst there are other locations for offices to be promoted in the borough, industrial uses are only sought in LSISs and therefore the scope for intensification of offices is particularly important in this context. The scale of this effect would be dependent on the degree of the impact on the industrial function caused by office development over time, and the scale of industrial activities lost, displaced and /or prevented from being expanded. The alternative would have a positive effect on social inclusion by providing opportunities for residents to access employment in the borough in line with the social inclusion objective. Industrial sectors provide job opportunities for resident population. Opportunities within these sectors may offer more diverse ways of accessing employment through learning skills on the job for those who have low qualification levels or no qualifications, who often face more barriers to access work. If these sectors are lost in the local area, residents dependent on these jobs may be at risk of unemployment. Alternative 2 could lead to the intensification of industrial uses, the scope for intensification of industrial operations in the LSIS is lessened and the range of industrial uses could lead to the displacement of industrial businesses to Outer London industrial locations while still needing to travel to central London to access their markets. This could increase vehicle mileage through Islington, which risks increased congestion and emissions, and have negative impacts on climate change and air quality. The alternatives would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expanded in this location in the longer term. In this way alternative 2 is considered to also have a minor negative effect in terms of reducing contributions to climate change (objective 12) and in relation to objective 14 (maximising protection of natural resources including air).</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 3 Office and housing co-location	+	-	+	-	+	0	0	-/0	-	0	0	-	0	-
Commentary on assessment of likely significant effects of Alternative 3	<p>Alternative 3 is for the co-location of industrial uses with mixed residential and office uses. The other provisions of policy VR2 remain unchanged, for example, that building height will be limited to 5 storeys and that site's location warrants a high quality, well designed building which would have a positive effect on the quality of the built environment.</p> <p>The co-location of mixed office and residential uses could optimise the use of sites and bring more efficient uses which are adaptable to future economic needs. However, there could be negative effects on the primary economic function of the area because the range of industrial uses or size of resulting facilities may not be suitable for all the range of existing and future operations in the LSIS (i.e. yard space), which would have a negative impact on balancing competing demand for development needs in the area. A minor negative effect has therefore been identified in relation to objective 2.</p> <p>Opening the LSIS up to residential development increases opportunities for conflict between industrial occupiers, who may operate long hours, generating noise and frequent vehicle movements, and new residential occupiers. As such alternative 1 is assessed as having a minor negative effect on the promotion of liveable neighbourhoods, as set out in objective 4.</p> <p>Alternative 3 would lead to a smaller amount of affordable housing than alternative 1 as development would need to accommodate offices and industrial uses. Overall, this alternative will also have minor positive effects for housing.</p> <p>The co-location of residential uses with industrial uses within the LSIS could have an effect on the wellbeing of future residents relating to aspects of industrial operations such as noise that it may not be possible to mitigate against, however the effects of this are uncertain in relation to scheme design and site location and so a neutral effect has been identified overall.</p> <p>Alternative 3 could have a minor negative effect on economic growth. Whilst this alternative could bring some intensification of industrial floorspace, the extent to which industrial uses could be intensified would be more limited than if it is focused on industrial intensification. It is also likely to reduce the range of businesses because some types of industrial would be prioritised as being compatible for residential uses, therefore having an impact on range of business and jobs. The intensification of residential uses would not create long-term employment opportunities and</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	<p>would likely limit the capacity for the existing business sectors to expand in the longer term. This could have negative effects on the wider economy and Central London services which rely on the support of production activities in the LSIS. However, the the intensification of some business floorspace as office space co-located with industrial will strengthen the local economy and provide a higher density of jobs albeit this could create negative effects on the longer term sustainability of the LSIS as a functional industrial area because the capacity to which industrial floorspace can be intensified will compete with offices. As part of the balance, whilst there are other locations for housing and offices promoted in the borough, industrial uses are only sought in LSISs and therefore the scope for intensification of industrial is particularly important in this context. The scale of this effect would be dependent on the degree of the impact on the industrial function caused by office development over time, and the scale of industrial activities lost, displaced and /or prevented from being expanded. Given this a neutral/minor negative effect has been identified overall.</p> <p>Residential development would pose limitations to on-site loading and parking requirements of industrial uses. This could lead to increased traffic congestion and further pressures on road networks. Office uses are likely to create more journeys to work than many industrial uses, and for this reason are usually supported in locations which are more accessible than the LSIS ( which has low PTAL ratings along the western edge along York Way), such as town centres and CAZ where transport infrastructure better supports the intensity of journeys created. Considering these effects, The alternative 3 would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expanded in this location. In this way alternative 2 is considered to also have a minor negative effect in terms of reducing contributions to climate change (objective 12) and in relation to objective 14 (maximising protection of natural resources including air).</p>													
<b>Conclusion</b>	<p>Three reasonable alternatives to the allocated use (industrial consolidation and intensification) were identified for site VR2: the co-location of industrial uses with housing, the co-location of industrial uses with offices and the co-location of industrial uses with both housing and offices. Although each of these alternative uses would have some positive effects - such as the provision of additional housing or the provision of additional business floorspace to support the borough's economic growth – on balance it was considered that the consolidation and intensification of industrial uses was most appropriate for this site given its location within the LSIS and the contribution this could make to its industrial function. Related to this site allocation assessment is the assessment of reasonable alternatives to policy SP3: Vale Royal/Brewery Road Locally Significant Industrial Site.</p>													

Table 3.63: Site Assessment VR3: Tileyard Studios

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
VR3: Tileyard Studios, Tileyard Road, N7 9AH	+	++	+	0	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>The site is allocated for retention and intensification for industrial uses (B1c, B2 and B8). The allocation also sets out that office floorspace will only be acceptable as part of a hybrid workspace scheme.</p> <p>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 and promote development that can promote location sensitive design and enhance local character, leading to a high quality built environment.</p> <p>The development of the site will support economic growth in the borough. The delivery of additional industrial floorspace is much needed as a significant amount of industrial floorspace has been lost in recent years. Such space, in such a central location, will play a key role in supporting the Central London economy and support a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion. It is recognised that the intensification of industrial uses may have negative effects on traffic congestion and air quality, but it is considered this would be counteracted to some extent by keeping industrial suppliers in the borough thereby enabling shorter journeys and supply chains than if they had to travel into their central London clients from further afield. It is noted that Policy S7 provides strong criteria to mitigate any potential negative effects on air quality and the overall effect on the need to travel, climate change and natural resources has therefore been scored as neutral.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Housing co-location	0	-	+	-	+	0	0	-	-	0	0	-	0	-
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>This alternative is for housing to be co-located alongside industrial use. The other provisions of policy VR3 remain unchanged, for example, that building height will be limited to 5 storeys.</p> <p>Although it is recognised that high quality architecture could be introduced as part of a mix of uses alongside industrial, this is also likely to be more challenging given the nature of the LSIS and this could also undermine the industrial character of the LSIS. The effect on the quality of the built environment will come down to scheme design and is therefore uncertain – a neutral effect has therefore been identified in relation to objective 1.</p> <p>The provision of new housing, contributing to the borough’s significant evidenced need for new homes, would be a minor positive effect of widening the allocations to include residential use and should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses.</p> <p>Although residential uses can be accommodated elsewhere in the borough to meet the borough’s housing targets, locations suitable for industrial uses are significantly more constrained given land values in the borough and the potential for such uses to be viewed as ‘bad neighbours’. For alternative 1 co-location of industrial space with residential uses would help to achieve an effective use of land. Whilst this intensification of uses could bring some additional industrial floorspace to the LSIS, there needs to be a balance with protecting the full range of industrial functions that make the LSIS a successful industrial cluster. The co-location of industrial floorspace with housing would lead to the exclusion of more traditional industrial uses in the LSIS in favour of light industrial activities which can coexist with residential development. This will have a minor negative effect on the balance of uses and industrial activities in the LSIS particularly in terms of focusing development in the most appropriate locations. Opening the LSIS up to residential development increases opportunities for conflict between industrial occupiers, who may operate long hours, generating noise and frequent vehicle movements, and new residential occupiers. As such alternative 1 is assessed as having a minor negative effect on the promotion of liveable neighbourhoods, as set out in objective 4.</p> <p>Whilst a minor positive effect in relation to the provision of housing that would contribute towards the borough’s evidenced need for housing is recognised, the effect of alternative 1 on social inclusion is considered to be neutral given that residential reduces floorspace which would deliver potential job opportunities for local residents.</p>													

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	<p>With regards to the impact of alternative 1 on health and wellbeing, the co-location of residential uses with industrial uses within the LSIS could have an effect on the wellbeing of future residents relating to aspects of industrial operations such as noise that it may not be possible to mitigate against, however the effects of this are uncertain in relation to scheme design and site location and so a neutral effect has been identified overall. Alternative 1 would have a minor negative effect on economic growth. Whilst this alternative could bring some intensification of industrial floorspace, the extent to which industrial uses could be intensified would be more limited than if it is focused on industrial intensification. It is also likely to reduce the range of businesses because some types of industrial would be prioritised as being compatible for residential uses, therefore having an impact on range of business and jobs. The intensification of residential uses would not provide long-term employment opportunities and would likely limit the capacity for the existing business sectors to expand in the longer term. This could have negative effects on the wider economy and Central London services which rely on the support of production activities in the LSIS.</p> <p>Connected to this, although residential use within the LSIS could reduce travel in some ways – for example if future residents live close to their places of work – whilst it could lead to the intensification of industrial uses, the scope for intensification of industrial operations in the LSIS is lessened and the range of industrial uses could lead to the displacement of industrial businesses to Outer London industrial locations while still needing to travel to central London to access their markets. This could increase vehicle mileage through Islington, which risks increased congestion and emissions, and have negative impacts on climate change and air quality. The alternatives would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expanded in this location in the longer term. In this way alternative 1 is considered to also have a minor negative effect in terms of reducing contributions to climate change (objective 12) and in relation to objective 14 (maximising protection of natural resources including water, land and air).</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 2 Office co-location	0	0	+	0	0	+	0	+	-	0	0	-	0	-
Commentary on assessment of	This alternative is for the co-location of industrial uses with office use. The other provisions of policy VR3 remain unchanged, for example, that building height will be limited to 5 storeys.													



IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
likely significant effects of Alternative 2	<p>Incorporating office uses into the LSIS allocations could undermine the industrial character of the built environment. Office occupiers have different demands to industrial operators in terms of floorspace requirements. Although it is recognised that high quality architecture could be introduced as part of a mix of uses alongside industrial, this is also likely to be more challenging given the nature of the LSIS and this could also undermine the industrial character of the LSIS. The effect on the quality of the built environment will come down to scheme design and is therefore uncertain – a neutral effect has therefore been identified in relation to objective 1.</p> <p>For alternative 2, there will be a neutral effect on optimisation of land use and balancing economic needs. As a higher density employment use, offices could result in an optimisation of existing employment floorspace and some intensification of industrial floorspace. However, there is already a significant proportion of office buildings integrated within parts of the LSIS and if new development is likely to introduce significant quantum of office, the land use balance could quickly shift to offices. The site specific characteristics of the current use by the creative sector, in particular the music industry is noted for this site. Otherwise it would have the same effect as alternative 1. The LSIS has a strategic position in relation to the CAZ. It is one of the last remaining industrial clusters within close proximity to the CAZ and supports Central London's economy through the provision of 'last mile' distribution/logistics and 'just in time' servicing. Without the policy protection industrial businesses are likely to be displaced to Outer London locations. Whilst there are land use benefits from the co-location of offices with industrial, depending on the extent to which offices are intensified, there are potential negative impacts that could arise from the displacement of industrial activities given that office needs can be demonstrated to be met elsewhere in the borough. On balance, this alternative is considered to have neutral effects for the objective.</p> <p>For alternative 2 there would be a minor positive effect on economic growth. Whilst on the one hand the intensification of new business floorspace as office space co-located with industrial will strengthen the local economy and provide a higher density of jobs by encouraging development of employment floorspace, there could be negative effects in the longer term sustainability of the LSIS. The function of the industrial area would change as land values from office uses out-compete new industrial floorspace. As part of the balance, whilst there are other locations for housing and offices to be promoted in the borough, industrial uses are only sought in LSISs and therefore the scope for intensification of offices is particularly important in this context. The scale of this effect would be dependent on the degree of the impact on the industrial function caused by office development over time, and the scale of industrial activities lost, displaced and /or prevented from being expanded. The alternative would have a positive effect on social inclusion by providing opportunities for residents to access employment in the borough in line with the social inclusion objective. Industrial sectors provide job opportunities for resident population. Opportunities within these sectors may offer more diverse ways of accessing employment through learning skills on the job for those who have low qualification levels or no qualifications, who often face more barriers to access work. If these sectors are lost in the local area, residents dependent on these jobs may be at risk of unemployment. Alternative 2 could lead to the intensification of industrial uses, the scope for intensification of industrial operations in the LSIS is lessened and the range of industrial uses could lead to the displacement of industrial businesses to Outer London industrial locations while still needing to travel to central London to access their markets. This could increase vehicle mileage through Islington, which risks increased congestion and emissions, and have negative impacts on climate change and air quality. The alternatives would therefore have a minor to significant negative effect,</p>													

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	dependent on the level of industrial activities lost, displaced and /or prevented from expanded in this location in the longer term. In this way alternative 2 is considered to also have a minor negative effect in terms of reducing contributions to climate change (objective 12) and in relation to objective 14 (maximising protection of natural resources including air).													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 3 Office and housing co-location	0	-	+	-	+	0	0	-/0	-	0	0	-	0	-
Commentary on assessment of likely significant effects of Alternative 3	<p>This alternative is for the co-location of industrial uses with office use. The other provisions of policy VR3 remain unchanged, for example, that building height will be limited to 5 storeys.</p> <p>Incorporating office and housing uses into the LSIS allocations could undermine the industrial character of the built environment. Although it is recognised that high quality architecture could be introduced as part of a mix of uses alongside industrial, this is also likely to be challenging given the nature of the LSIS. However, the effect on the quality of the built environment will come down to scheme design and is therefore uncertain – a neutral effect has therefore been identified in relation to objective 1.</p> <p>The co-location of mixed office and residential uses could optimise the use of sites and bring more efficient uses which are adaptable to future economic needs. The large size of this site also lends support to the practicality of a designing a mixed use scheme. However, there could be negative effects on the primary economic function of the area because the range of industrial uses or size of resulting facilities may not be suitable for all the range of existing and future operations in the LSIS (i.e. yard space), which would have a negative impact on balancing competing demand for development needs in the area. A minor negative effect has therefore been identified in relation to objective 2.</p> <p>Opening the LSIS up to residential development increases opportunities for conflict between industrial occupiers, who may operate long hours, generating noise and frequent vehicle movements, and new residential occupiers. As such alternative 1 is assessed as having a minor negative effect on the promotion of liveable neighbourhoods, as set out in objective 4.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	<p>Alternative 3 would lead to a smaller amount of affordable housing than alternative 1 as development would need to accommodate offices and industrial uses. Overall, this alternative will also have minor positive effects for housing.</p> <p>The co-location of residential uses with industrial uses within the LSIS could have an effect on the wellbeing of future residents relating to aspects of industrial operations such as noise that it may not be possible to mitigate against, however the effects of this are uncertain in relation to scheme design and site location and so a neutral effect has been identified overall.</p> <p>Alternative 3 could have a minor negative effect on economic growth. Whilst this alternative could bring some intensification of industrial floorspace, the extent to which industrial uses could be intensified would be more limited. It is also likely to reduce the range of businesses because some types of industrial would be prioritised as being compatible for residential uses, therefore having an impact on range of business and jobs. The intensification of residential uses would not create long-term employment opportunities and would likely limit the capacity for the existing business sectors to expand. This could have negative effects on the wider economy and Central London services which rely on the support of production activities in the LSIS. However, the intensification of some business floorspace as office space co-located with industrial will strengthen the local economy and provide a higher density of jobs albeit this could create negative effects on the longer term sustainability of the LSIS as a functional industrial area because the capacity to which industrial floorspace can be intensified will compete with offices. As part of the balance, whilst there are other locations for housing and offices promoted in the borough, industrial uses are only sought in LSISs and therefore the scope for intensification of industrial is particularly important in this context. The scale of this effect would be dependent on the degree of the impact on the industrial function caused by office development over time, and the scale of industrial activities lost, displaced and /or prevented from being expanded. Given this a neutral/minor negative effect has been identified overall.</p> <p>Residential development would pose limitations to on-site loading and parking requirements of industrial uses. This could lead to increased traffic congestion and further pressures on road networks. Office uses are likely to create more journeys to work than many industrial uses, and for this reason are usually supported in locations which are more accessible than the LSIS ( which has low PTAL ratings along the western edge along York Way), such as town centres and CAZ where transport infrastructure better supports the intensity of journeys created. Considering these effects, Alternative 3 would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expanded in this location in the longer term. In this way alternative 2 is considered to also have a minor negative effect in terms of reducing contributions to climate change (objective 12) and in relation to objective 14 (maximising protection of natural resources including air).</p>													
<b>Conclusion</b>	<p>Three reasonable alternatives to the allocated use (industrial consolidation and intensification) were identified for site VR3: the co-location of industrial uses with housing, the co-location of industrial uses with offices and the co-location of industrial uses with both housing and offices. Although each of these alternative uses would have some positive effects - such as the provision of additional housing or the provision of</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	additional business floorspace to support the borough's economic growth – on balance it was considered that the consolidation and intensification of industrial uses was most appropriate for this site given its location within the LSIS and the contribution this could make to its industrial function whilst noting site specific characteristics (current use by the creative sector, in particular the music industry. Related to this site allocation assessment is the assessment of reasonable alternatives to policy SP3: Vale Royal/Brewery Road Locally Significant Industrial Site.													

Table 3.64: Site Assessment VR4: 20 Tileyard Road

IIA Objective / Site	1. HIGH QUALITY ENVIRONME	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHO	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
VR4: 20 Tileyard Road, N7 9AH	+	++	+	0	0	+	0	++	0	0	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	<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 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 and promote development that can promote location sensitive design and enhance local character, leading to a high quality built environment.</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>													

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	<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 and support a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion. It is recognised that the intensification of industrial uses may have negative effects on traffic congestion and air quality, but it is considered this would be counteracted to some extent by keeping industrial suppliers in the borough thereby enabling shorter journeys and supply chains than if they had to travel into their central London clients from further afield. It is noted that Policy S7 provides strong criteria to mitigate any potential negative effects on air quality and the overall effect on the need to travel, climate change and natural resources has therefore been scored as neutral</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Housing co-location	0	-	+	-	+	0	0	-	-	0	0	-	0	-
Commentary on assessment of likely significant effects of Alternative 1	<p>This alternative is for housing to be co-located alongside industrial use. The other provisions of policy VR4 remain unchanged, for example, that building height will be limited to 5 storeys.</p> <p>Although it is recognised that high quality architecture could be introduced as part of a mix of uses alongside industrial, this is also likely to be more challenging given the nature of the LSIS and this could also undermine the industrial character of the LSIS. The effect on the quality of the built environment will come down to scheme design and is therefore uncertain – a neutral effect has therefore been identified in relation to objective 1</p> <p>The provision of new housing, contributing to the borough’s significant evidenced need for new homes, would be a minor positive effect of widening the allocations to include residential use and should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	<p>Although residential uses can be accommodated elsewhere in the borough to meet the borough’s housing targets, locations suitable for industrial uses are significantly more constrained given land values in the borough and the potential for such uses to be viewed as ‘bad neighbours’. For alternative 1 co-location of industrial space with residential uses would help to achieve an effective use of land. Whilst this intensification of uses could bring some additional industrial floorspace to the LSIS, there needs to be a balance with protecting the full range of industrial functions that make the LSIS a successful industrial cluster. The co-location of industrial floorspace with housing would lead to the exclusion of more traditional industrial uses in the LSIS in favour of light industrial activities which can coexist with residential development. This will have a minor negative effect on the balance of uses and industrial activities in the LSIS particularly in terms of focusing development in the most appropriate locations.</p> <p>Opening the LSIS up to residential development increases opportunities for conflict between industrial occupiers, who may operate long hours, generating noise and frequent vehicle movements, and new residential occupiers. As such alternative 1 is assessed as having a minor negative effect on the promotion of liveable neighbourhoods, as set out in objective 4.</p> <p>Whilst a minor positive effect in relation to the provision of housing that would contribute towards the borough’s evidenced need for housing is recognised, the effect of alternative 1 on social inclusion is considered to be neutral given that residential reduces floorspace which would deliver potential job opportunities for local residents.</p> <p>With regards to the impact of alternative 1 on health and wellbeing, the co-location of residential uses with industrial uses within the LSIS could have an effect on the wellbeing of future residents relating to aspects of industrial operations such as noise that it may not be possible to mitigate against, however the effects of this are uncertain in relation to scheme design and site location and so a neutral effect has been identified overall.</p> <p>Alternative 1 would have a minor negative effect on economic growth. Whilst this alternative could bring some intensification of industrial floorspace, the extent to which industrial uses could be intensified would be more limited than if it is focused on industrial intensification. It is also likely to reduce the range of businesses because some types of industrial would be prioritised as being compatible for residential uses, therefore having an impact on range of business and jobs. The intensification of residential uses would not provide long-term employment opportunities and would likely limit the capacity for the existing business sectors to expand in the longer term. This could have negative effects on the wider economy and Central London services which rely on the support of production activities in the LSIS.</p> <p>Connected to this, although residential use within the LSIS could reduce travel in some ways – for example if future residents live close to their places of work – whilst it could lead to the intensification of industrial uses, the scope for intensification of industrial operations in the LSIS is lessened and the range of industrial uses could lead to the displacement of industrial businesses to Outer London industrial locations while still needing to travel to central London to</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRONME	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHO ODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	access their markets. This could increase vehicle mileage through Islington, which risks increased congestion and emissions, and have negative impacts on climate change and air quality. The alternatives would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expanded in this location. In this way alternative 1 is considered to also have a minor negative effect in terms of reducing contributions to climate change (objective 12) and in relation to objective 14 (maximising protection of natural resources including water, land and air).													
IIA Objective / Site	1. HIGH QUALITY ENVIRONME	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHO ODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 2 Office co-location	0	0	+	0	0	+	0	+	-	0	0	-	0	-
Commentary on assessment of likely significant effects of Alternative 2	<p>This alternative is for the co-location of industrial uses with office use. The other provisions of policy VR4 remain unchanged, for example, that building height will be limited to 5 storeys.</p> <p>Incorporating office uses into the LSIS allocations could undermine the industrial character of the built environment. Office occupiers have different demands to industrial operators in terms of floorspace requirements. Although it is recognised that high quality architecture could be introduced as part of a mix of uses alongside industrial, this is also likely to be more challenging given the nature of the LSIS and this could also undermine the industrial character of the LSIS. The effect on the quality of the built environment will come down to scheme design and is therefore uncertain – a neutral effect has therefore been identified in relation to objective 1.</p> <p>For alternative 2, there will be a neutral effect on optimisation of land use and balancing economic needs. As a higher density employment use, offices could result in an optimisation of existing employment floorspace and some intensification of industrial floorspace. However, there is already a significant proportion of office buildings integrated within parts of the LSIS and if new development is likely to introduce significant quantum of office, the land use balance could quickly shift to offices. Otherwise it would have the same effect as alternative 1. The LSIS has a strategic position in relation to the CAZ. It is one of the last remaining industrial clusters within close proximity to the CAZ and supports Central London’s economy through the provision of ‘last mile’</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	<p>distribution/logistics and 'just in time' servicing. Without the policy protection industrial businesses are likely to be displaced to Outer London locations. Whilst there are land use benefits from the co-location of offices with industrial, depending on the extent to which offices are intensified, there are potential negative impacts that could arise from the displacement of industrial activities (given that office needs can be demonstrated to be met elsewhere in the borough. On balance, this alternative is considered to have neutral effects for the objective.</p> <p>For alternative 2 there would be a minor positive effect on economic growth. Whilst on the one hand the intensification of new business floorspace as office space co-located with industrial will strengthen the local economy and provide a higher density of jobs by encouraging development of employment floorspace, there could be negative effects in the longer term sustainability of the LSIS. The function of the industrial area would change as land values from office uses out-compete new industrial floorspace. As part of the balance, whilst there are other locations for housing and offices be promoted in the borough, industrial uses are only sought in LSISs and therefore the scope for intensification of offices is particularly important in this context. The scale of this effect would be dependent on the degree of the impact on the industrial function caused by office development over time, and the scale of industrial activities lost, displaced and/or prevented from being expanded in the longer term. The alternative would have a positive effect on social inclusion by providing opportunities for residents to access employment in the borough in line with the social inclusion objective. Industrial sectors provide job opportunities for resident population. Opportunities within these sectors may offer more diverse ways of accessing employment through learning skills on the job for those who have low qualification levels or no qualifications, who often face more barriers to access work. If these sectors are lost in the local area, residents dependent on these jobs may be at risk of unemployment.</p> <p>Alternative 2 could lead to the intensification of industrial uses, the scope for intensification of industrial operations in the LSIS is lessened and the range of industrial uses could lead to the displacement of industrial businesses to Outer London industrial locations while still needing to travel to central London to access their markets. This could increase vehicle mileage through Islington, which risks increased congestion and emissions, and have negative impacts on climate change and air quality. The alternatives would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expanded in this locations in the longer term. In this way alternative 2 is considered to also have a minor negative effect in terms of reducing contributions to climate change (objective 12) and in relation to objective 14 (maximising protection of natural resources including air).</p>													



IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 3 Office and housing co-location	0	-	+	-	+	0	0	-/0	-	0	0	-	0	-
<b>Commentary on assessment of likely significant effects of Alternative 3</b>	<p>This alternative is for the co-location of industrial uses with office use. The other provisions of policy VR4 remain unchanged, for example, that building height will be limited to 5 storeys.</p> <p>Incorporating office and housing uses into the LSIS allocations could undermine the industrial character of the built environment. Although it is recognised that high quality architecture could be introduced as part of a mix of uses alongside industrial, this is also likely to be challenging given the nature of the LSIS. However, the effect on the quality of the built environment will come down to scheme design and is therefore uncertain – a neutral effect has therefore been identified in relation to objective 1.</p> <p>The co-location of mixed office and residential uses could optimise the use of sites and bring more efficient uses which are adaptable to future economic needs. However, there could be negative effects on the primary economic function of the area because the range of industrial uses or size of resulting facilities may not be suitable for all the range of existing and future operations in the LSIS (i.e. yard space), which would have a negative impact on balancing competing demand for development needs in the area. A minor negative effect has therefore been identified in relation to objective 2.</p> <p>Opening the LSIS up to residential development increases opportunities for conflict between industrial occupiers, who may operate long hours, generating noise and frequent vehicle movements, and new residential occupiers. As such alternative 1 is assessed as having a minor negative effect on the promotion of liveable neighbourhoods, as set out in objective 4.</p> <p>Alternative 3 would lead to a smaller amount of affordable housing than alternative 1 as development would need to accommodate offices and industrial uses. Overall, this alternative will also have minor positive effects for housing.</p> <p>The co-location of residential uses with industrial uses within the LSIS could have an effect on the wellbeing of future residents relating to aspects of industrial operations such as noise that it may not be possible to mitigate against, however the effects of this are uncertain in relation to scheme design and site location and so a neutral effect has been identified overall.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	<p>Alternative three could have a minor negative effect on economic growth. Whilst this alternative could bring some intensification of industrial floorspace, the extent to which industrial uses could be intensified would be more limited. It is also likely to reduce the range of businesses because some types of industrial would be prioritised as being compatible for residential uses, therefore having an impact on range of business and jobs. The intensification of residential uses would not create long-term employment opportunities and would likely limit the capacity for the existing business sectors to expand. This could have negative effects on the wider economy and Central London services which rely on the support of production activities in the LSIS. However, the intensification of some business floorspace as office space co-located with industrial will strengthen the local economy and provide a higher density of jobs albeit this could create negative effects on the longer term sustainability of the LSIS as a functional industrial area because the capacity to which industrial floorspace can be intensified will compete with offices. As part of the balance, whilst there are other locations for housing and offices promoted in the borough, industrial uses are only sought in LSISs and therefore the scope for intensification of industrial is particularly important in this context. The scale of this effect would be dependent on the degree of the impact on the industrial function caused by office development over time, and the scale of industrial activities lost, displaced and /or prevented from being expanded. Given this a neutral/minor negative effect has been identified overall.</p> <p>Residential development would pose limitations to on-site loading and parking requirements of industrial uses. This could lead to increased traffic congestion and further pressures on road networks. Office uses are likely to create more journeys to work than many industrial uses, and for this reason are usually supported in locations which are more accessible than the LSIS ( which has low PTAL ratings along the western edge along York Way), such as town centres and CAZ where transport infrastructure better supports the intensity of journeys created. Considering these effects, The alternative 3 would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expanded in this location in the longer term. In this way alternative 2 is considered to also have a minor negative effect in terms of reducing contributions to climate change (objective 12) and in relation to objective 14 (maximising protection of natural resources including air).</p>													
Conclusion	<p>Three reasonable alternatives to the allocated use (industrial consolidation and intensification) were identified for site VR4: the co-location of industrial uses with housing, the co-location of industrial uses with offices and the co-location of industrial uses with both housing and offices. Although each of these alternative uses would have some positive effects - such as the provision of additional housing or the provision of additional business floorspace to support the borough's economic growth – on balance it was considered that the consolidation and intensification of industrial uses was most appropriate for this site given its location within the LSIS and the contribution this could make to its industrial function. Related to this site allocation assessment is the assessment of reasonable alternatives to policy SP3: Vale Royal/Brewery Road Locally Significant Industrial Site.</p>													

Table 3.65: Site Assessment VR5: 4 Brandon Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
VR5: 4 Brandon Road, N7 9AA	+	++	+	0	0	+	0	++	+	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<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 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 and promote development that can promote location sensitive design and enhance local character, leading to a high quality built environment.</p> <p>Development of the site will optimise the use of previously developed land. The Local Plan directs industrial development to Locally Significant Industrial Sites (LSIS). The site is located in an LSIS, therefore, this is an appropriate location for such development. The development of industrial floorspace balances the competing demands between land uses as sites such as this are under pressure for the development of other uses (not just residential, but office too). By prioritising industrial development the allocation ensures that much needed industrial space is also delivered.</p> <p>The development of the site will support economic growth in the borough. The delivery of additional industrial floorspace is much needed as a significant amount of industrial floorspace has been lost in recent years. Such space, in such a central location, will play a key role in supporting the Central London economy and support a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion. It is recognised that the intensification of industrial uses may have negative effects on traffic congestion and air quality, but it is considered this would be counteracted to some extent by keeping industrial suppliers in the borough thereby enabling shorter journeys and supply chains than if they had to travel into their central London clients from further afield. It is noted that Policy S7 provides strong criteria to mitigate any potential negative effects on air quality and the overall effect on the need to travel, climate change and natural resources has therefore been scored as neutral</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Housing co-location	0	-	+	-	+	0	0	-	-	0	0	-	0	-
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>This alternative is for housing to be co-located alongside industrial use. The other provisions of policy VR5 remain unchanged, for example, that building height will be limited to 5 storeys.</p> <p>Although it is recognised that high quality architecture could be introduced as part of a mix of uses alongside industrial, this is also likely to be more challenging given the nature of the LSIS and this could also undermine the industrial character of the LSIS. The effect on the quality of the built environment will come down to scheme design and is therefore uncertain – a neutral effect has therefore been identified in relation to objective 1.</p> <p>The provision of new housing, contributing to the borough’s significant evidenced need for new homes, would be a minor positive effect of widening the allocations to include residential use and should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses.</p> <p>Although residential uses can be accommodated elsewhere in the borough to meet the borough’s housing targets, locations suitable for industrial uses are significantly more constrained given land values in the borough and the potential for such uses to be viewed as ‘bad neighbours’. For alternative 1 co-location of industrial space with residential uses would help to achieve an effective use of land. Whilst this intensification of uses could bring some additional industrial floorspace to the LSIS, there needs to be a balance with protecting the full range of industrial functions that make the LSIS a successful industrial cluster. The co-location of industrial floorspace with housing would lead to the exclusion of more traditional industrial uses in the LSIS in favour of light industrial activities which can coexist with residential development. This will have a minor negative effect on the balance of uses and industrial activities in the LSIS particularly in terms of focusing development in the most appropriate locations. Opening the LSIS up to residential development increases opportunities for conflict between industrial occupiers, who may operate long hours, generating noise and frequent vehicle movements, and new residential occupiers. As such alternative 1 is assessed as having a minor negative effect on the promotion of liveable neighbourhoods, as set out in objective 4.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	<p>Whilst a minor positive effect in relation to the provision of housing that would contribute towards the borough's evidenced need for housing is recognised, the effect of alternative 1 on social inclusion is considered to be neutral given that residential reduces floorspace which would deliver potential job opportunities for local residents.</p> <p>With regards to the impact of alternative 1 on health and wellbeing, the co-location of residential uses with industrial uses within the LSIS could have an effect on the wellbeing of future residents relating to aspects of industrial operations such as noise that it may not be possible to mitigate against, however the effects of this are uncertain in relation to scheme design and site location and so a neutral effect has been identified overall. Alternative 1 would have a minor negative effect on economic growth. Whilst this alternative could bring some intensification of industrial floorspace, the extent to which industrial uses could be intensified would be more limited than if it is focused on industrial intensification. It is also likely to reduce the range of businesses because some types of industrial would be prioritised as being compatible for residential uses, therefore having an impact on range of business and jobs. The intensification of residential uses would not provide long-term employment opportunities and would likely limit the capacity for the existing business sectors to expand in the longer term. This could have negative effects on the wider economy and Central London services which rely on the support of production activities in the LSIS.</p> <p>Connected to this, although residential use within the LSIS could reduce travel in some ways – for example if future residents live close to their places of work – whilst it could lead to the intensification of industrial uses, the scope for intensification of industrial operations in the LSIS is lessened and the range of industrial uses could lead to the displacement of industrial businesses to Outer London industrial locations while still needing to travel to central London to access their markets. This could increase vehicle mileage through Islington, which risks increased congestion and emissions, and have negative impacts on climate change and air quality. The alternatives would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expanded in this location in the longer term. In this way alternative 1 is considered to also have a minor negative effect in terms of reducing contributions to climate change (objective 12) and in relation to objective 14 (maximising protection of natural resources including water, land and air).</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 2 Office co-location	0	0	+	0	0	+	0	+	-	0	0	-	0	-
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>This alternative is for the co-location of industrial uses with office use. The other provisions of policy VR5 remain unchanged, for example, that building height will be limited to 5 storeys.</p> <p>Incorporating office uses into the LSIS allocations could undermine the industrial character of the built environment. Office occupiers have different demands to industrial operators in terms of floorspace requirements. Although it is recognised that high quality architecture could be introduced as part of a mix of uses alongside industrial, this is also likely to be more challenging given the nature of the LSIS and this could also undermine the industrial character of the LSIS. The effect on the quality of the built environment will come down to scheme design and is therefore uncertain – a neutral effect has therefore been identified in relation to objective 1.</p> <p>For alternative 2, there will be a neutral effect on optimisation of land use and balancing economic needs. As a higher density employment use, offices could result in an optimisation of existing employment floorspace and some intensification of industrial floorspace. However, there is already a significant proportion of office buildings integrated within parts of the LSIS and if new development is likely to introduce significant quantum of office, the land use balance could quickly shift to offices. Otherwise it would have the same effect as alternative 1. The LSIS has a strategic position in relation to the CAZ. It is one of the last remaining industrial clusters within close proximity to the CAZ and supports Central London's economy through the provision of 'last mile' distribution/logistics and 'just in time' servicing. Without the policy protection industrial businesses are likely to be displaced to Outer London locations. Whilst there are land use benefits from the co-location of offices with industrial, depending on the extent to which offices are intensified, there are potential negative impacts that could arise from the displacement of industrial activities given that office needs can be demonstrated to be met elsewhere in the borough. On balance, this alternative is considered to have neutral effects for the objective.</p> <p>For alternative 2 there would be a minor positive effect on economic growth. Whilst on the one hand the intensification of new business floorspace as office space co-located with industrial will strengthen the local economy and provide a higher density of jobs by encouraging development of employment floorspace, there could be negative effects in the longer term sustainability of the LSIS. The function of the industrial area would change as land values from office uses out-compete new industrial floorspace. As part of the balance, whilst there are other locations for housing and offices be promoted in the borough, industrial uses are only sought in LSISs and therefore the scope for intensification of offices is particularly important in this context. The scale of this effect would be dependent on the degree of the impact on the industrial function caused by office development over time, and the scale of industrial activities lost, displaced and /or prevented from being expanded in the longer term. The alternative would have a positive effect on social inclusion by providing opportunities for residents to access employment in the borough in line with the social inclusion objective. Industrial sectors provide job opportunities for resident population. Opportunities within these sectors may offer</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	<p>more diverse ways of accessing employment through learning skills on the job for those who have low qualification levels or no qualifications, who often face more barriers to access work. If these sectors are lost in the local area, residents dependent on these jobs may be at risk of unemployment.</p> <p>Alternative 2 could lead to the intensification of industrial uses, however the scope for intensification of industrial operations in the LSIS is lessened and the range of industrial uses could lead to the displacement of industrial businesses to Outer London industrial locations while still needing to travel to central London to access their markets. This could increase vehicle mileage through Islington, which risks increased congestion and emissions, and have negative impacts on climate change and air quality. The alternatives would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expanded in this location in the longer term . In this way alternative 2 is considered to also have a minor negative effect in terms of reducing contributions to climate change (objective 12) and in relation to objective 14 (maximising protection of natural resources including air).</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 3 Office and housing co-location	0	-	+	-	+	0	0	-/0	-	0	0	-	0	-
Commentary on assessment of likely significant effects of Alternative 3	<p>This alternative is for the co-location of industrial uses with office uses on the allocated sites. The other provisions of policy VR5 remain unchanged, for example, that building height will be limited to 5 storeys.</p> <p>Incorporating office and housing uses into the LSIS allocations could undermine the industrial character of the built environment. Although it is recognised that high quality architecture could be introduced as part of a mix of uses alongside industrial, this is also likely to be challenging given the nature of the LSIS. However, the effect on the quality of the built environment will come down to scheme design and is therefore uncertain – a neutral effect has therefore been identified in relation to objective 1.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	<p>The co-location of mixed office and residential uses could optimise the use of sites and bring more efficient uses which are adaptable to future economic needs. However, there could be negative effects on the primary economic function of the area because the range of industrial uses or size of resulting facilities may not be suitable for all the range of existing and future operations in the LSIS (i.e. yard space), which would have a negative impact on balancing competing demand for development needs in the area. A minor negative effect has therefore been identified in relation to objective 2.</p> <p>Opening the LSIS up to residential development increases opportunities for conflict between industrial occupiers, who may operate long hours, generating noise and frequent vehicle movements, and new residential occupiers. As such alternative 1 is assessed as having a minor negative effect on the promotion of liveable neighbourhoods, as set out in objective 4.</p> <p>Alternative 3 would lead to a smaller amount of affordable housing than alternative 1 as development would need to accommodate offices and industrial uses. Overall, this alternative will also have minor positive effects for housing.</p> <p>The co-location of residential uses with industrial uses within the LSIS could have an effect on the wellbeing of future residents relating to aspects of industrial operations such as noise that it may not be possible to mitigate against, however the effects of this are uncertain in relation to scheme design and site location and so a neutral effect has been identified overall.</p> <p>Alternative three could have a minor negative effect on economic growth. Whilst this alternative could bring some intensification of industrial floorspace, the extent to which industrial uses could be intensified would be more limited. It is also likely to reduce the range of businesses because some types of industrial would be prioritised as being compatible for residential uses, therefore having an impact on range of business and jobs. The intensification of residential uses would not create long-term employment opportunities and would likely limit the capacity for the existing business sectors to expand. This could have negative effects on the wider economy and Central London services which rely on the support of production activities in the LSIS. However, the intensification of some business floorspace as office space co-located with industrial will strengthen the local economy and provide a higher density of jobs albeit this could create negative effects on the longer term sustainability of the LSIS as a functional industrial area because the capacity to which industrial floorspace can be intensified will compete with offices. As part of the balance, whilst there are other locations for housing and offices promoted in the borough, industrial uses are only sought in LSISs and therefore the scope for intensification of industrial is particularly important in this context. The scale of this effect would be dependent on the degree of the impact on the industrial function caused by office development over time, and the scale of industrial activities lost, displaced and /or prevented from being expanded in the longer term. Given this a neutral/minor negative effect has been identified overall.</p> <p>Residential development would pose limitations to on-site loading and parking requirements of industrial uses. This could lead to increased traffic congestion and further pressures on road networks. Office uses are likely to create more journeys to work than many industrial uses, and for this</p>													



IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	reason are usually supported in locations which are more accessible than the LSIS ( which has low PTAL ratings along the western edge along York Way), such as town centres and CAZ where transport infrastructure better supports the intensity of journeys created. Considering these effects, The alternative 3 would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expanded in this location. In this way alternative 2 is considered to also have a minor negative effect in terms of reducing contributions to climate change (objective 12) and in relation to objective 14 (maximising protection of natural resources including air).													
<b>Conclusion</b>	Three reasonable alternatives to the allocated use (industrial consolidation and intensification) were identified for site VR5: the co-location of industrial uses with housing, the co-location of industrial uses with offices and the co-location of industrial uses with both housing and offices. Although each of these alternative uses would have some positive effects - such as the provision of additional housing or the provision of additional business floorspace to support the borough's economic growth – on balance it was considered that the consolidation and intensification of industrial uses was most appropriate for this site given its location within the LSIS and the contribution this could make to its industrial function. Related to this site allocation assessment is the assessment of reasonable alternatives to policy SP3: Vale Royal/Brewery Road Locally Significant Industrial Site.													

Table 3.66: Site Assessment VR6: The Fitzpatrick Building

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>VR6: The Fitzpatrick Building, 188 York Way, N7 9AD</b>	+	++	+	0	0	+	0	++	0	0	0	0	0	0

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>The site has planning permission for a mix of B1a and flexible B1 floorspace. Should the site be subject to further amendments or new planning applications, any proposal should seek to retain and intensify industrial uses (B1c, B2 and B8) with office floorspace only be acceptable as part of a hybrid workspace scheme.</p> <p>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. Business space provided could be occupied by local businesses, which would therefore have a positive impact on the local economy, reducing barriers to employment and supporting social inclusion objectives. It is recognised that the intensification of industrial uses may have negative effects on traffic congestion and air quality, but it is considered this would be counteracted to some extent by keeping industrial suppliers in the borough thereby enabling shorter journeys and supply chains than if they had to travel into their central London clients from further afield. It is noted that Policy S7 provides strong criteria to mitigate any potential negative effects on air quality and the overall effect on the need to travel, climate change and natural resources has therefore been scored as neutral</p>													
<b>Reasonable alternative summary</b>	<p>No reasonable alternative was identified. The site has an extant, implemented planning permission for a mix of B1(a) and flexible B1 floorspace. The allocation seeks to retain and intensify industrial uses should the permitted scheme be subject to amendment.</p>													

Table 3.67: Site Assessment VR7: 43-53 Brewery Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
VR7: 43-53 Brewery Road, N7 9QH	+	++	+	0	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>The site is allocated for retention and intensification for industrial uses (B1c, B2 and B8). The allocation also sets out that office floorspace will only be acceptable as part of a hybrid workspace scheme.</p> <p>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 and that the design enhances local character and distinctiveness. There is a locally listed building nearby, as such, Local Plan policies will apply; any development will be required to respect the heritage asset.</p> <p>The development of the site will support economic growth in the borough. The delivery of additional industrial floorspace is much needed as a significant amount of industrial floorspace has been lost in recent years. Such space, in such a central location, will play a key role in supporting the Central London economy and support a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion. It is recognised that the intensification of industrial uses may have negative effects on traffic congestion and air quality, but it is considered this would be counteracted to some extent by keeping industrial suppliers in the borough thereby enabling shorter journeys and supply chains than if they had to travel into their central London clients from further afield. The effect on the need to travel, climate change and natural resources has therefore been scored as neutral.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Housing co-location	0	-	+	-	+	0	0	-	-	0	0	-	0	-
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>This alternative is for housing to be co-located alongside industrial use. The other provisions of policy VR7 remain unchanged, for example, that building height will be limited to 5 storeys.</p> <p>Although it is recognised that high quality architecture could be introduced as part of a mix of uses alongside industrial, this is also likely to be more challenging given the nature of the LSIS and this could also undermine the industrial character of the LSIS. The effect on the quality of the built environment will come down to scheme design and is therefore uncertain – a neutral effect has therefore been identified in relation to objective 1</p> <p>The provision of new housing, contributing to the borough’s significant evidenced need for new homes, would be a minor positive effect of widening the allocations to include residential use and should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses.</p> <p>Although residential uses can be accommodated elsewhere in the borough to meet the borough’s housing targets, locations suitable for industrial uses are significantly more constrained given land values in the borough and the potential for such uses to be viewed as ‘bad neighbours’. For alternative 1 co-location of industrial space with residential uses would help to achieve an effective use of land. Whilst this intensification of uses could bring some additional industrial floorspace to the LSIS, there needs to be a balance with protecting the full range of industrial functions that make the LSIS a successful industrial cluster. The co-location of industrial floorspace with housing would lead to the exclusion of more traditional industrial uses in the LSIS in favour of light industrial activities which can coexist with residential development. This will have a minor negative effect on the balance of uses and industrial activities in the LSIS particularly in terms of focusing development in the most appropriate locations. Opening the LSIS up to residential development increases opportunities for conflict between industrial occupiers, who may operate long hours, generating noise and frequent vehicle movements, and new residential occupiers. As such alternative 1 is assessed as having a minor negative effect on the promotion of liveable neighbourhoods, as set out in objective 4.</p> <p>Whilst a minor positive effect in relation to the provision of housing that would contribute towards the borough’s evidenced need for housing is recognised, the effect of alternative 1 on social inclusion is considered to be neutral given that residential reduces floorspace which would deliver potential job opportunities for local residents.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	<p>With regards to the impact of alternative 1 on health and wellbeing, the co-location of residential uses with industrial uses within the LSIS could have an effect on the wellbeing of future residents relating to aspects of industrial operations such as noise that it may not be possible to mitigate against, however the effects of this are uncertain in relation to scheme design and site location and so a neutral effect has been identified overall. Alternative 1 would have a minor negative effect on economic growth. Whilst this alternative could bring some intensification of industrial floorspace, the extent to which industrial uses could be intensified would be more limited than if it is focused on industrial intensification. It is also likely to reduce the range of business in the area because some types of industrial would be prioritised as being compatible for residential uses, therefore having an impact on range of business and jobs. The intensification of residential uses would not provide long-term employment opportunities and would likely limit the capacity for the existing business sectors to expand in the longer term. This could have negative effects on the wider economy and Central London services which rely on the support of production activities in the LSIS.</p> <p>Connected to this, although residential use within the LSIS could reduce travel in some ways – for example if future residents live close to their places of work – whilst it could lead to the intensification of industrial uses, the scope for intensification of industrial operations in the LSIS is lessened and the range of industrial uses could lead to the displacement of industrial businesses to Outer London industrial locations while still needing to travel to central London to access their markets. This could increase vehicle mileage through Islington, which risks increased congestion and emissions, and have negative impacts on climate change and air quality. The alternatives would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expanded in this location in the longer term. In this way alternative 1 is considered to also have a minor negative effect in terms of reducing contributions to climate change (objective 12) and in relation to objective 14 (maximising protection of natural resources including water, land and air).</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 2 Office co-location	0	0	+	0	0	+	0	+	-	0	0	-	0	-
Commentary on assessment of	This alternative is for the co-location of industrial uses with office uses on the allocated sites. The other provisions of policy VR7 remain unchanged, for example, that building height will be limited to 5 storeys.													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
likely significant effects of Alternative 2	<p>Incorporating office uses into the LSIS allocations could undermine the industrial character of the built environment. Office occupiers have different demands to industrial operators in terms of floorspace requirements. Although it is recognised that high quality architecture could be introduced as part of a mix of uses alongside industrial, this is also likely to be more challenging given the nature of the LSIS and this could also undermine the industrial character of the LSIS. The effect on the quality of the built environment will come down to scheme design and is therefore uncertain – a neutral effect has therefore been identified in relation to objective 1.</p> <p>For alternative 2, there will be a neutral effect on optimisation of land use and balancing economic needs. As a higher density employment use, offices could result in an optimisation of existing employment floorspace and some intensification of industrial floorspace. However, there is already a significant proportion of office buildings integrated within parts of the LSIS and if new development is likely to introduce significant quantum of office, the land use balance could quickly shift to offices. Otherwise it would have the same effect as alternative 1. The LSIS has a strategic position in relation to the CAZ. It is one of the last remaining industrial clusters within close proximity to the CAZ and supports Central London's economy through the provision of 'last mile' distribution/logistics and 'just in time' servicing. Without the policy protection industrial businesses are likely to be displaced to Outer London locations. Whilst there are land use benefits from the co-location of offices with industrial, depending on the extent to which offices are intensified, there are potential negative impacts that could arise from the displacement of industrial activities given that office needs can be demonstrated to be met elsewhere in the borough. On balance, this alternative is considered to have neutral effects for the objective.</p> <p>For alternative 2 there would be a minor positive effect on economic growth. Whilst on the one hand the intensification of new business floorspace as office space co-located with industrial will strengthen the local economy and provide a higher density of jobs by encouraging development of employment floorspace, there could be negative effects in the longer term sustainability of the LSIS. The function of the industrial area would change as land values from office uses out-compete new industrial floorspace. As part of the balance, whilst there are other locations for housing and offices be promoted in the borough, industrial uses are only sought in LSISs and therefore the scope for intensification of offices is particularly important in this context. The scale of this effect would be dependent on the degree of the impact on the industrial function caused by office development over time, and the scale of industrial activities lost, displaced and /or prevented from expanding in the longer term. The alternative would have a positive effect on social inclusion by providing opportunities for residents to access employment in the borough in line with the social inclusion objective. Industrial sectors provide job opportunities for resident population. Opportunities within these sectors may offer more diverse ways of accessing employment through learning skills on the job for those who have low qualification levels or no qualifications, who often face more barriers to access work. If these sectors are lost in the local area, residents dependent on these jobs may be at risk of unemployment.</p> <p>Alternative 2 could lead to the intensification of industrial uses, the scope for intensification of industrial operations in the LSIS is lessened and the range of industrial uses could lead to the displacement of industrial businesses to Outer London industrial locations while still needing to travel to central London to access their markets. This could increase vehicle mileage through Islington, which risks increased congestion and emissions,</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	and have negative impacts on climate change and air quality. The alternatives would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expanding in the longer term. In this way alternative 2 is considered to also have a minor negative effect in terms of reducing contributions to climate change (objective 12) and in relation to objective 14 (maximising protection of natural resources including air).													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 3 Office and housing co-location	0	-	+	-	+	0	0	-/0	-	0	0	-	0	-
Commentary on assessment of likely significant effects of Alternative 3	<p>This alternative is for the co-location of industrial uses with office uses on the allocated sites. The other provisions of policy VR7 remain unchanged, for example, that building height will be limited to 5 storeys.</p> <p>Incorporating office and housing uses into the LSIS allocations could undermine the industrial character of the built environment. Although it is recognised that high quality architecture could be introduced as part of a mix of uses alongside industrial, this is also likely to be challenging given the nature of the LSIS. However, the effect on the quality of the built environment will come down to scheme design and is therefore uncertain – a neutral effect has therefore been identified in relation to objective 1.</p> <p>The co-location of mixed office and residential uses could optimise the use of sites and bring more efficient uses which are adaptable to future economic needs. However, there could be negative effects on the primary economic function of the area because the range of industrial uses or size of resulting facilities may not be suitable for all the range of existing and future operations in the LSIS (i.e. yard space), which would have a negative impact on balancing competing demand for development needs in the area. A minor negative effect has therefore been identified in relation to objective 2.</p> <p>Opening the LSIS up to residential development increases opportunities for conflict between industrial occupiers, who may operate long hours, generating noise and frequent vehicle movements, and new residential occupiers. As such alternative 1 is assessed as having a minor negative effect on the promotion of liveable neighbourhoods, as set out in objective 4.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	<p>Alternative 3 would lead to a smaller amount of affordable housing than alternative 1 as development would need to accommodate offices and industrial uses. Overall, this alternative will also have minor positive effects for housing.</p> <p>The co-location of residential uses with industrial uses within the LSIS could have an effect on the wellbeing of future residents relating to aspects of industrial operations such as noise that it may not be possible to mitigate against, however the effects of this are uncertain in relation to scheme design and site location and so a neutral effect has been identified overall.</p> <p>Alternative three could have a minor negative effect on economic growth. Whilst this alternative could bring some intensification of industrial floorspace, the extent to which industrial uses could be intensified would be more limited. It is also likely to reduce the range of business because some types of industrial would be prioritised as being compatible for residential uses, therefore having an impact on range of business and jobs. The intensification of residential uses would not create long-term employment opportunities and would likely limit the capacity for the existing business sectors to expand. This could have negative effects on the wider economy and Central London services which rely on the support of production activities in the LSIS. However, the intensification of some business floorspace as office space co-located with industrial will strengthen the local economy and provide a higher density of jobs albeit this could create negative effects on the longer term sustainability of the LSIS as a functional industrial area because the capacity to which industrial floorspace can be intensified will compete with offices. As part of the balance, whilst there are other locations for housing and offices promoted in the borough, industrial uses are only sought in LSISs and therefore the scope for intensification of industrial is particularly important in this context. The scale of this effect would be dependent on the degree of the impact on the industrial function caused by office development over time, and the scale of industrial activities lost, displaced and /or prevented from expanding in the longer term. Given this a neutral/minor negative effect has been identified overall.</p> <p>Whilst alternative 3 could lead to the intensification of industrial uses, the scope for intensification of industrial operations in the LSIS is reduced and the range of industrial uses could lead to the displacement of industrial businesses to Outer London industrial locations while still needing to travel to central London to access their markets. This could increase vehicle mileage through Islington, which risks increased congestion and emissions, and have negative impacts on climate change and air quality.</p> <p>Residential development would pose limitations to on-site loading and parking requirements of industrial uses. This could lead to increased traffic congestion and further pressures on road networks. Office uses are likely to create more journeys to work than many industrial uses, and for this reason are usually supported in locations which are more accessible than the LSIS ( which has low PTAL ratings along the western edge along York Way), such as town centres and CAZ where transport infrastructure better supports the intensity of journeys created. Considering these effects, the alternative 3 would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced</p>													



IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	and /or prevented from expanding in the longer term. In this way alternative 2 is considered to also have a minor negative effect in terms of reducing contributions to climate change (objective 12) and in relation to objective 14 (maximising protection of natural resources including air).													
<b>Conclusion</b>	Three reasonable alternatives to the allocated use (industrial consolidation and intensification) were identified for site VR7: the co-location of industrial uses with housing, the co-location of industrial uses with offices and the co-location of industrial uses with both housing and offices. Although each of these alternative uses would have some positive effects - such as the provision of additional housing or the provision of additional business floorspace to support the borough's economic growth – on balance it was considered that the consolidation and intensification of industrial uses was most appropriate for this site given its location within the LSIS and the contribution this could make to its industrial function. Related to this site allocation assessment is the assessment of reasonable alternatives to policy SP3: Vale Royal/Brewery Road Locally Significant Industrial Site.													

Table 3.68: Site Assessment VR8: 55-61 Brewery Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>VR8: 55-61 Brewery Road, N7 9QH</b>	+	++	+	0	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant</b>	The site has planning permission for the provision of additional B1 floorspace, including B1c. Should the site be subject to further amendments or new applications, any proposal should seek to retain and intensify industrial uses (B1c, B2 and B8). Office floorspace will only be acceptable as part of a hybrid workspace scheme.													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>effects of site allocations</b>	<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 and that the design enhances local character and distinctiveness.</p> <p>The development of the site will support economic growth in the Borough. The delivery of additional industrial floorspace is much needed as a significant amount of industrial floorspace has been lost in recent years. Such space, in such a central location, will play a key role in supporting the Central London economy and support a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion. It is recognised that the intensification of industrial uses may have negative effects on traffic congestion and air quality, but it is considered this would be counteracted to some extent by keeping industrial suppliers in the borough thereby enabling shorter journeys and supply chains than if they had to travel into their central London clients from further afield. It is noted that Policy S7 provides strong criteria to mitigate any potential negative effects on air quality and the overall effect on the need to travel, climate change and natural resources has therefore been scored as neutral</p>													
<b>Reasonable alternative summary</b>	<p>No reasonable alternative was identified. The site is allocated for retention and intensification for industrial uses and has planning permission that accords with the uses proposed in the draft allocation.</p>													

Table 3.69: Site Assessment VR9: Rebond House

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
VR9: Rebond House, 98-124 Brewery Road, N7 9BG	+	++	0	0	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>The site is allocated for retention and intensification for industrial uses (B1c, B2 and B8). The allocation also sets out that office floorspace will only be acceptable as part of a hybrid workspace scheme.</p> <p>The design of any building will be of high quality and will be in keeping with the site's industrial character and the allocation sets out that the building height will be limited to 5 storeys, this will help to ensure that the design enhances local character and distinctiveness. 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 and the effect considered neutral against heritage.</p> <p>The development of the site will support economic growth in the borough. The delivery of additional industrial floorspace is much needed as a significant amount of industrial floorspace has been lost in recent years. Such space, in such a central location, will play a key role in supporting the Central London economy and support a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion. It is recognised that the intensification of industrial uses may have negative effects on traffic congestion and air quality, but it is considered this would be counteracted to some extent by keeping industrial suppliers in the borough thereby enabling shorter journeys and supply chains than if they had to travel into their central London clients from further afield. It is noted that Policy S7 provides strong criteria to mitigate any potential negative effects on air quality and the overall effect on the need to travel, climate change and natural resources has therefore been scored as neutral</p>													
<b>Reasonable alternative summary</b>	<p>No reasonable alternative was identified. The site is allocated for retention and intensification for industrial uses and has planning permission that accords with the uses proposed in the draft allocation.</p>													

Table 3.70: Site Assessment VR10: 34 Brandon Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
VR10: 34 Brandon Road, N7 9AA	+	++	0	0	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>The site is allocated for retention and intensification for industrial uses (B1c, B2 and B8). The allocation also sets out that office floorspace will only be acceptable as part of a hybrid workspace scheme.</p> <p>The allocation sets out that the building height will be limited to 5 storeys this will help to ensure 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 development. The development of industrial floorspace balances the competing demands between land uses as sites such as this are under pressure for the development of other uses (not just residential, but office too). By prioritising industrial development the allocation ensures that much needed industrial space is also delivered.</p> <p>The development of the site will support economic growth in the borough. The delivery of additional industrial floorspace is much needed as a significant amount of industrial floorspace has been lost in recent years. Such space, in such a central location, will play a key role in supporting the Central London economy and support a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion. It is recognised that the intensification of industrial uses may have negative effects on traffic congestion and air quality, but it is considered this would be counteracted to some extent by keeping industrial suppliers in the borough thereby enabling shorter journeys and supply chains than if they had to travel into their central London clients from further afield. It is noted that Policy S7 provides strong criteria to mitigate any potential negative effects on air quality and the overall effect on the need to travel, climate change and natural resources has therefore been scored as neutral</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Housing co-location	0	-	+	-	+	0	0	-	-	0	0	-	0	-
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>This alternative is for housing to be co-located alongside industrial use. The other provisions of policy VR10 remain unchanged, for example, that building height will be limited to 5 storeys.</p> <p>Although it is recognised that high quality architecture could be introduced as part of a mix of uses alongside industrial, this is also likely to be more challenging given the nature of the LSIS and this could also undermine the industrial character of the LSIS. The effect on the quality of the built environment will come down to scheme design and is therefore uncertain – a neutral effect has therefore been identified in relation to objective 1.</p> <p>The provision of new housing, contributing to the borough’s significant evidenced need for new homes, would be a minor positive effect of widening the allocations to include residential use and should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses.</p> <p>Although residential uses can be accommodated elsewhere in the borough to meet the borough’s housing targets, locations suitable for industrial uses are significantly more constrained given land values in the borough and the potential for such uses to be viewed as ‘bad neighbours’. For alternative 1 co-location of industrial space with residential uses would help to achieve an effective use of land. Whilst this intensification of uses could bring some additional industrial floorspace to the LSIS, there needs to be a balance with protecting the full range of industrial functions that make the LSIS a successful industrial cluster. The co-location of industrial floorspace with housing would lead to the exclusion of more traditional industrial uses in the LSIS in favour of light industrial activities which can coexist with residential development. This will have a minor negative effect on the balance of uses and industrial activities in the LSIS particularly in terms of focusing development in the most appropriate locations. Opening the LSIS up to residential development increases opportunities for conflict between industrial occupiers, who may operate long hours, generating noise and frequent vehicle movements, and new residential occupiers. As such alternative 1 is assessed as having a minor negative effect on the promotion of liveable neighbourhoods, as set out in objective 4.</p> <p>Whilst a minor positive effect in relation to the provision of housing that would contribute towards the borough’s evidenced need for housing is recognised, the effect of alternative 1 on social inclusion is considered to be neutral given that residential reduces employment floorspace which would deliver potential job opportunities for local residents. With regards to the impact of alternative 1 on health and wellbeing, the co-location of residential uses with industrial uses within the LSIS could have an effect on the wellbeing of future residents relating to aspects of industrial</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	<p>operations such as noise that it may not be possible to mitigate against, however the effects of this are uncertain in relation to scheme design and site location and so a neutral effect has been identified overall.</p> <p>Alternative 1 would have a minor negative effect on economic growth. Whilst this alternative could bring some intensification of industrial floorspace, the extent to which industrial uses could be intensified would be more limited than if it is focused on industrial intensification. It is also likely to reduce the range of business in the area because some types of industrial would be prioritised as being compatible for residential uses, therefore having an impact on range of business and jobs. The intensification of residential uses would not provide long-term employment opportunities and would likely limit the capacity for the existing business sectors to expand and the economic activity of the area. This could have negative effects on the wider economy and Central London services which rely on the support of production activities in the LSIS.</p> <p>Connected to this, although residential use within the LSIS could reduce travel in some ways – for example if future residents live close to their places of work – whilst it could lead to the intensification of industrial uses, the scope for intensification of industrial operations in the LSIS is lessened and the range of industrial uses could lead to the displacement of industrial businesses to Outer London industrial locations while still needing to travel to central London to access their markets. This could increase vehicle mileage through Islington, which risks increased congestion and emissions, and have negative impacts on climate change and air quality. The alternatives would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expansion in the longer term. In this way alternative 1 is considered to also have a minor negative effect in terms of reducing contributions to climate change (objective 12) and in relation to objective 14 (maximising protection of natural resources including water, land and air).</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 2 Office co-location	0	0	+	0	0	+	0	+	-	0	0	-	0	-
Commentary on assessment of likely significant	<p>This alternative is for the co-location of industrial uses with office use. The other provisions of policy VR10 remain unchanged, for example, that building height will be limited to 5 storeys.</p> <p>Incorporating office uses into the LSIS allocations could undermine the industrial character of the built environment. Office occupiers have different demands to industrial operators in terms of floorspace requirements. Although it is recognised that high quality architecture could be</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
effects of Alternative 2	<p>introduced as part of a mix of uses alongside industrial, this is also likely to be more challenging given the nature of the LSIS and this could also undermine the industrial character of the LSIS. The effect on the quality of the built environment will come down to scheme design and is therefore uncertain – a neutral effect has therefore been identified in relation to objective 1.</p> <p>For alternative 2, there will be a neutral effect on optimisation of land use and balancing economic needs. As a higher density employment use, offices could result in an optimisation of existing employment floorspace and some intensification of industrial floorspace. However, there is already a significant proportion of office buildings integrated within parts of the LSIS and if new development is likely to introduce significant quantum of office, the land use balance could quickly shift to offices. Otherwise it would have the same effect as alternative 1. The LSIS has a strategic position in relation to the CAZ. It is one of the last remaining industrial clusters within close proximity to the CAZ and supports Central London's economy through the provision of 'last mile' distribution/logistics and 'just in time' servicing. Without the policy protection industrial businesses are likely to be displaced to Outer London locations. Whilst there are land use benefits from the co-location of offices with industrial, depending on the extent to which offices are intensified, there are potential negative impacts that could arise from the displacement of industrial activities given that office needs can be demonstrated to be met elsewhere in the borough. On balance, this alternative is considered to have neutral effects for the objective.</p> <p>For alternative 2 there would be a minor positive effect on economic growth. Whilst on the one hand the intensification of new business floorspace as office space co-located with industrial will strengthen the local economy and provide a higher density of jobs by encouraging development of employment floorspace, there could be negative effects in the longer term sustainability of the LSIS. The function of the industrial area would change as land values from office uses out-compete new industrial floorspace. As part of the balance, whilst there are other locations for housing and offices be promoted in the borough, industrial uses are only sought in LSISs and therefore the scope for intensification of offices is particularly important in this context. The scale of this effect would be dependent on the degree of the impact on the industrial function caused by office development over time, and the scale of industrial activities lost, displaced and /or prevented from being expanded. The alternative would have a positive effect on social inclusion by providing opportunities for residents to access employment in the borough in line with the social inclusion objective. Industrial sectors provide job opportunities for resident population. Opportunities within these sectors may offer more diverse ways of accessing employment through learning skills on the job for those who have low qualification levels or no qualifications, who often face more barriers to access work. If these sectors are lost in the local area, residents dependent on these jobs may be at risk of unemployment. Alternative 2 could lead to the intensification of industrial uses, the scope for intensification of industrial operations in the LSIS is lessened and the range of industrial uses could lead to the displacement of industrial businesses to Outer London industrial locations while still needing to travel to central London to access their markets. This could increase vehicle mileage through Islington, which risks increased congestion and emissions, and have negative impacts on climate change and air quality. The alternatives would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expansion in the longer term. In this way alternative 2 is considered to also have a minor negative effect in terms of reducing contributions to climate change (objective 12) and in relation to objective 14 (maximising protection of natural resources including air).</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 3 Office and housing co-location	0	-	+	-	+	0	0	-/0	-	0	0	-	0	-
<b>Commentary on assessment of likely significant effects of Alternative 3</b>	<p>This alternative is for the co-location of industrial uses with office uses on the allocated sites. The other provisions of policy VR10 remain unchanged, for example, that building height will be limited to 5 storeys.</p> <p>Incorporating office and housing uses into the LSIS allocations could undermine the industrial character of the built environment. Although it is recognised that high quality architecture could be introduced as part of a mix of uses alongside industrial, this is also likely to be challenging given the nature of the LSIS. However, the effect on the quality of the built environment will come down to scheme design and is therefore uncertain – a neutral effect has therefore been identified in relation to objective 1.</p> <p>The co-location of mixed office and residential uses could optimise the use of sites and bring more efficient uses which are adaptable to future economic needs. However, there could be negative effects on the primary economic function of the area because the range of industrial uses or size of resulting facilities may not be suitable for all the range of existing and future operations in the LSIS (i.e. yard space), which would have a negative impact on balancing competing demand for development needs in the area. A minor negative effect has therefore been identified in relation to objective 2.</p> <p>Opening the LSIS up to residential development increases opportunities for conflict between industrial occupiers, who may operate long hours, generating noise and frequent vehicle movements, and new residential occupiers. As such alternative 1 is assessed as having a minor negative effect on the promotion of liveable neighbourhoods, as set out in objective 4.</p> <p>Alternative 3 would lead to a smaller amount of affordable housing than alternative 1 as development would need to accommodate offices and industrial uses. Overall, this alternative will also have minor positive effects for housing.</p> <p>The co-location of residential uses with industrial uses within the LSIS could have an effect on the wellbeing of future residents relating to aspects of industrial operations such as noise that it may not be possible to mitigate against, however the effects of this are uncertain in relation to scheme design and site location and so a neutral effect has been identified overall.</p> <p>Alternative 3 could have a minor negative effect on economic growth. Whilst this alternative could bring some intensification of industrial floorspace, the extent to which industrial uses could be intensified would be more limited. It is also likely to reduce the range of businesses</p>													



IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	<p>because some types of industrial would be prioritised as being compatible for residential uses, therefore having an impact on range of business and jobs. The intensification of residential uses would not create long-term employment opportunities and would likely limit the capacity for the existing business sectors to expand. This could have negative effects on the wider economy and Central London services which rely on the support of production activities in the LSIS. However, the intensification of some business floorspace as office space co-located with industrial will strengthen the local economy and provide a higher density of jobs albeit this could create negative effects on the longer term sustainability of the LSIS as a functional industrial area because the capacity to which industrial floorspace can be intensified will compete with offices. As part of the balance, whilst there are other locations for housing and offices promoted in the borough, industrial uses are only sought in LSISs and therefore the scope for intensification of industrial is particularly important in this context. The scale of this effect would be dependent on the degree of the impact on the industrial function caused by office development over time, and the scale of industrial activities lost, displaced and /or prevented from being expanded in the longer term. Given this a neutral/minor negative effect has been identified overall.</p> <p>Residential development would pose limitations to on-site loading and parking requirements of industrial uses. This could lead to increased traffic congestion and further pressures on road networks. Office uses are likely to create more journeys to work than many industrial uses, and for this reason are usually supported in locations which are more accessible than the LSIS ( which has low PTAL ratings along the western edge along York Way), such as town centres and CAZ where transport infrastructure better supports the intensity of journeys created. Considering these effects, the alternative 3 would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expansion in the longer term. In this way alternative 2 is considered to also have a minor negative effect in terms of reducing contributions to climate change (objective 12) and in relation to objective 14 (maximising protection of natural resources including air).</p>													
<b>Conclusion</b>	<p>Three reasonable alternatives to the allocated use (industrial consolidation and intensification) were identified for site VR10: the co-location of industrial uses with housing, the co-location of industrial uses with offices and the co-location of industrial uses with both housing and offices. Although each of these alternative uses would have some positive effects - such as the provision of additional housing or the provision of additional business floorspace to support the borough's economic growth – on balance it was considered that the consolidation and intensification of industrial uses was most appropriate for this site given its location within the LSIS and the contribution this could make to its industrial function. Related to this site allocation assessment is the assessment of reasonable alternatives to policy SP3: Vale Royal/Brewery Road Locally Significant Industrial Site.</p>													

## Angel and Upper Street

Table 3.71: Site Assessment AUS1: Royal Bank of Scotland

I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
AUS1: Royal Bank of Scotland, 42 Islington High Street, N1 8EQ	+	+	0	+	0	0	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>AUS1 is allocated for intensification of office use with active retail use on the ground floor.</p> <p>The allocation protects business use although the site has limited capacity for intensification. The net increase in business floorspace following development may be limited, but is considered to have a positive effect on the overall provision of business floorspace in the borough therefore having a positive effect in relation to economic growth as well as in relation to the efficient use of land. In addition, the allocation seeks improvements to the public realm in the Town Centre, public access to the building's currently private courtyards (if the current building is retained) and improved permeability between Islington High Street and Torrens Street. This will improve the quality of the town centre environment making it safer and more inclusive for people leading to positive effects in relation to objectives 1 and 4. An improved public realm and permeability could help to promote walking and cycling however the specific effects are uncertain and so have been assessed as neutral.</p>													
I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Mixed-use commercial and residential development	+	+	0	+	+	+	0	-	0	0	0	0	0	0

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<p><b>Commentary on assessment of likely significant effects of Alternative 1</b></p>	<p>This alternative is for mixed-use commercial and residential development. The other provisions of AUS1 remain the same, for example the public realm and permeability improvements.</p> <p>Allocating this site for mixed-use commercial and residential development could have a limited positive effect in terms of the efficient use of land and buildings.</p> <p>The co-location of commercial and residential uses could have a minor positive effect on promoting liveable neighbourhoods by improving access to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>Allocating this site for mixed-use development should have a minor positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>The flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. It has the potential to have a minor negative effect on the borough's economic growth as certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace needed to support Islington's projected economic growth. Furthermore, given the current employment nature of the site and limited scope for intensification a mix of uses would reduce the employment use that is currently on the site.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 2: Residential-led development	+	-	0	+	++	+	0	+	0	0	0	0	0	0

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>This alternative is for residential-led development. The other provisions of AUS1 remain the same, for example the public realm and permeability improvements.</p> <p>Allocating the site for residential-led development could have a significant negative effect with regards to the efficient use of land as it may not focus development in the most appropriate location. The site is within Angel Town Centre and CAZ where employment uses are prioritised and the site is in existing employment use. Whilst residential-led development on this site could bring more residents into the town centres, potentially improving footfall for local businesses, it is considered that alternative 2 is likely to have a significant negative effect on economic growth. If developed for residential purposes, the site will lead to a loss of employment floorspace and not contribute towards economic growth.</p> <p>A residential-led allocation could have a positive effect on the promotion of liveable neighbourhoods, as it would bring more housing in to Angel Town Centre where residents can be close to facilities such as shops and other leisure activities.</p> <p>The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments There would also be positive effects addressing objectives relating to social inclusion.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>													
<b>Conclusion</b>	<p>Two reasonable alternatives to the business-led allocation for AUS1 were identified: mixed-use residential and commercial development and residential-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development could have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business-led development was most appropriate for this site given its location within Angel Town Centre and the CAZ, the existing employment use of the site and the borough's need for a significant amount of additional employment floorspace.</p>													

Table 3.72: Site Assessment AUS2: Pride Court, 80-82 White Lion Street

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
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<b>AUS2: Pride Court, 80-82 White Lion Street, N1 9PF</b>	+	+	0	0	0	0	0	0	+	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>AUS2 is allocated for intensification of business floor space.</p> <p>The allocation is intended to positively contribute to the provision of floorspace needed to meet Islington's projected employment growth. Although the net increase of business floor space achievable at the site might be limited, it is considered that it will have a minor positive effect on the overall provision of business floorspace in the borough and contribute towards the efficient use of land. Development of the site, including the provision of active frontages along White Lion Street, could help to enhance the local character of the area and promote a high quality built environment.</p>													
<b>Reasonable Alternative 1: Mixed-use commercial and residential development</b>	0	+	0	+	+	+	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>Allocating this site for mixed-use commercial and residential development could have a limited positive effect in terms of the efficient use of land and buildings and the practicality of intensifying a small site is noted.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>Allocating this site for mixed-use development should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses. There would also be positive effects addressing objectives relating to social inclusion.</p> <p>The flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. This has the potential to have a minor negative effect on the borough's economic growth as certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace needed to support Islington's projected economic growth.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													
<b>IIA Objective / Site</b>	<b>1. HIGH QUALITY ENVIRON</b>	<b>2. EFFICIENT USE OF LAND</b>	<b>3. HERITAGE</b>	<b>4. LIVEABLE NEIGHBOURHOODS</b>	<b>5. HOUSING QUALITY</b>	<b>6. SOCIAL INCLUSION</b>	<b>7. HEALTH AND WELLBEING</b>	<b>8. ECONOMIC GROWTH</b>	<b>9. NEED TO TRAVEL</b>	<b>10. OPEN SPACE</b>	<b>11. BIODIVERSITY</b>	<b>12. CLIMATE CHANGE</b>	<b>13. RESOURCE EFFICIENCY</b>	<b>14. NATURAL RESOURCES</b>

<b>Reasonable Alternative 2: Residential-led development</b>	0	-	0	+	++	+	+	--	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>Alternative 2 is for residential-led development. Although there is scope for the intensification of the site, allocating the site for residential-led development could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. The site is within Angel Town Centre and CAZ where employment uses are prioritised. Whilst residential-led development on this site could bring more residents into the town centre, potentially improving footfall for local businesses, it is considered that this is likely to have a significant negative effect on economic growth. If developed for residential purposes, this site will no longer be contributing towards the borough's economy or supporting a range of jobs.</p> <p>A residential-led allocations could have a positive effect on the promotion of liveable neighbourhoods, as it would bring more housing in to Angel Town Centre where residents can be close to facilities such as shops and other leisure activities.</p> <p>The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. There would also be positive effects addressing objectives relating to social inclusion.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>													
<b>Conclusion</b>	<p>Two reasonable alternatives to the allocation for AUS2 were identified: mixed-use residential and commercial development and residential-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development could have positive effects in terms of the delivery of good-quality housing, on balance it was considered that intensification for business use development was most appropriate for this site given its location within Angel Town Centre and the CAZ and the borough's need for a significant amount of additional employment floorspace.</p>													

Table 3.73: Site Assessment AUS3: Electricity substation, 84-89 White Lion Street

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>AUS3: Electricity substation, 84-89 White Lion Street, N1 9PF</b>	+	++	0	0	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>AUS3 is allocated for further intensification of business floorspace.</p> <p>The development will have a positive effect in optimising use of an underutilised site, which was previously used as an electricity substation. Allocating the site for business use will contribute to the provision of floorspace needed to support projected employment growth in the borough.; this will support the economy and a range of employment types and opportunities that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.</p> <p>Development of this underutilised site can help to enhance the local character of the area and promote a high quality built environment.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>Reasonable Alternative 1: Mixed-use commercial and residential development</b>	+	+	0	+	+	+	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>Allocating this site for mixed-use commercial and residential development could have a minor positive effect in terms of the efficient use of land and buildings on this underutilised site. Development of this underutilised site can help to enhance the local character of the area and promote a high quality built environment.</p> <p>The flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. The small size of this site also detracts from an efficient use of land with the potential difficulties around designing a mixed use scheme. This has the potential to have a minor negative effect on the borough's economic growth as certain uses,</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	<p>particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace needed to support Islington's projected economic growth on a site that is located within the CAZ where employment uses are prioritised.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access for residents to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>Allocating this site for mixed-use development should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses. There would be positive effects in terms of social inclusion.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 2: Residential-led development	+	-	0	+	++	+	0	-	+	0	0	0	0	0
Commentary on assessment of likely significant effects of Alternative 2	<p>Alternative 2 is residential-led development.</p> <p>Development of this underutilised site can help to enhance the local character of the area and promote a high quality built environment. Although development of this underutilised site for housing would help to make more efficient use of the site, this could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. The site is located within Angel Town Centre and the CAZ where employment uses are prioritised. Whilst residential-led development on this site could bring more residents into the town centre, potentially improving footfall for local businesses, it is considered that alternative 2 is likely to have a significant negative effect on economic growth. If developed for residential purposes, this site will no longer be contributing towards the borough's economy or supporting a range of jobs.</p>													



IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	<p>A residential-led allocation could have a positive effect on the promotion of liveable neighbourhoods, as it would bring more housing in to Angel Town Centre where residents can be close to facilities such as shops and other leisure activities.</p> <p>The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. There would be positive effects in terms of social inclusion.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>													
<b>Conclusion</b>	<p>Two reasonable alternatives to the business-led allocation for AUS3 were identified: mixed-use residential and commercial development and residential-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development could have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business-led development was most appropriate for this site given its location within Angel Town Centre and the CAZ and the borough's need for a significant amount of additional employment floorspace.</p>													

Table 3.74: Site Assessment AUS4: Land at 90-92 White Lion Street

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>AUS4: Land at 90-92 White Lion Street, N1 9PF</b>	+	++	0	0	0	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>AUS4 has extant planning permission for mixed-use development. Should the planning permission be subject to further amendments, or new applications submitted, the priority use of the site should be intensification of office uses on upper floors with some active ground floor town centre uses.</p> <p>The development of the site will have a positive effect in optimising use of previously vacant land located in a central part of the town centre with good public transport connections. The allocation would contribute to the provision of business floorspace needed for economic growth and</p>													

	provide more opportunity for residents to access employment in the borough, which could have a minor positive effect in terms of social inclusion objectives. Also, it should have a positive effect on the quality of the environment given it is currently a vacant and cleared plot and through the provision of active frontages it will make the town centre a safer and more inclusive place to visit.													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Residential-led development	+	-	0	0	+	+	0	-	0	0	0	0	0	0
Commentary on assessment of likely significant effects of Alternative 1	<p>Alternative 1 is residential-led development.</p> <p>Residential-led development could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. The site is within Angel Town Centre and CAZ where employment uses are prioritised.</p> <p>A residential-led allocation for the site could have a positive effect on the promotion of liveable neighbourhoods, as it would bring housing in to a town centre location where residents could be close to facilities such as shops, libraries and other leisure activities. However, if the site was developed for residential uses at the expense of commercial uses it could also have a negative impact on the diversity, vibrancy and economic sustainability of the area. As such the effect of the allocation on liveable neighbourhoods is assessed as neutral.</p> <p>Allocating the site for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs: the provision of additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion. Development should also have a positive effect on the quality of the environment given the site is currently a vacant and cleared plot, making the town centre a safer and more inclusive place to visit.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES

<b>Reasonable Alternative 2: Mixed-use commercial and residential development</b>	+	+	0	+	+	+	0	+	0	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>The alternative of mixed-use commercial and residential development is broadly reflective of the planning permission for the site. Development should also have a positive effect on the quality of the environment given the site is currently a vacant and cleared plot, making the town centre a safer and more inclusive place to visit.</p> <p>A mix of commercial and residential uses positive effect in terms of the efficient use of land and buildings.</p> <p>The flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. High-value residential uses, may be chosen at the expense of delivering the employment floorspace needed to support Islington's projected economic growth on a site that is located within the CAZ where employment uses are prioritised. However, a mix use development on this currently vacant site would deliver some employment floorspace which would contribute towards economic growth and therefore on balance a minor positive effect for economic growth is identified.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access for residents to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>Allocating this site for mixed-use development should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses. There would also be positive effects in terms of social inclusion.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>														
<b>Conclusion</b>	<p>Two reasonable alternatives to the business-led allocation for AUS4 were identified: mixed-use residential and commercial development and residential-led development. Whilst mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development could have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business-led development was most appropriate for this site given its location within Angel Town Centre and the CAZ and the borough's need for a significant amount of additional employment floorspace.</p>														

Table 3.75: Site Assessment AUS5: 94 White Lion Street

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
AUS5: 94 White Lion Street (BSG House), N1 9PF	+	+	0	0	0	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>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; this will support the economy and a range of employment types and opportunities that will reduce barriers to employment and have a minor positive effect in relation to social inclusion</p> <p>The allocation also aims to optimise the use of land by adding extra floorspace on site. Development of the site can help to enhance the local character of the area and promote a high quality built environment.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Mixed-use commercial and residential development	+	+	0	+	+	+	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant</b>	<p>Allocating this site for mixed-use commercial and residential development could have a minor positive effect in terms of the efficient use of land and buildings. Development of the site can help to enhance the local character of the area and promote a high quality built environment.</p> <p>The flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. This has the potential to have a minor negative effect on the borough's economic growth as certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace needed to support</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
effects of Alternative 1	<p>Islington's projected economic growth. The site is located within Angel Town Centre and the CAZ where employment uses are prioritised. Given the current business use of the site and depending on intensification, mixed use development could see the loss of employment floorspace.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access for residents to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>Allocating this site for mixed-use development should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 2: Residential-led development	+	-	0	+	++	+	0	-	0	0	0	0	0	0
Commentary on assessment of likely significant effects of Alternative 2	<p>Development of this site for housing could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. The site is located within Angel Town Centre and the CAZ where employment uses are prioritised. Whilst residential-led development on this site could bring more residents into the town centre, potentially improving footfall for local businesses, it is considered that Alternative 2 is likely to have a significant negative effect on economic growth. If developed for residential purposes, the site will lead to a loss of employment floorspace and not contribute towards economic growth.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	<p>A residential-led allocation could have a positive effect on the promotion of liveable neighbourhoods, as it would bring more housing in to Angel Town Centre where residents can be close to facilities such as shops and other leisure activities.</p> <p>The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. There would also be positive effects addressing objectives relating to social inclusion.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>													
<b>Conclusion</b>	<p>Two reasonable alternatives to the business-led allocation for AUS5 were identified: mixed-use residential and commercial development and residential-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development would have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business-led development was most appropriate for this site given its location within Angel Town Centre and the CAZ and the borough's need for a significant amount of additional employment floorspace.</p>													

Table 3.76: Site Assessment AUS6: Sainsbury's, 31-41 Liverpool Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>AUS6: Sainsbury's, 31-41 Liverpool Road, N1 0RW</b>	++	++	0	+	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>AUS6 is allocated for re-providing/ improving retail uses alongside provision of a significant amount of business floorspace which could contribute to meeting strategic office needs. The car park could be utilised for additional development of retail and business floorspace.</p> <p>The development of the site could have a significant positive effect in optimising use of a previously developed building and the adjacent underutilised land, currently used for car parking and storage units. The site would make a significant contribution to the provision of business and retail floorspace needed to support the borough's projected economic growth. Prioritising delivery of employment space in this town centre location within the CAZ is considered appropriate and helps meet wider needs for employment growth in the borough; this will support the</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	<p>economy and a range of employment types and opportunities that will reduce barriers to employment and have a minor positive effect in relation to social inclusion. Policy B2 identifies that office use is an important land use in Angel Town Centre. The allocation for commercial uses balances competing demands between land uses and ensures that much needed business and retail floorspace should be delivered in an appropriate location within the CAZ and Angel Primary Shopping Area.</p> <p>The allocation should have a positive effect on the built environment by promoting a more inclusive and safer environment through its mix of uses and requiring maintained/improved permeability between White Conduit Street and Tolpuddle Street. The permeability improvements could help to promote walking and cycling however the specific effects are uncertain and so have been assessed as neutral. The site represents an opportunity for a more efficient use of land, and if the amount of car parking is reduced development could help to meet objectives to reduce dependence on cars which could also be positive in relation to reducing contributions to climate change and air quality however the extent of the effects will depend on the detail of the scheme that comes forward and so have been assessed as neutral.</p> <p>Development at the site has the potential to disrupt the operation of Chapel Market, as stallholders use storage units located on the site. The allocation is clear that storage units must be provided to ensure the continued operation of the market, which contributes to the variety and diversity of products and services available in the town centre to serve the needs of both residents and visitors to the area. Proposals for the site must also demonstrate that adverse impacts on the surrounding groundwater Source Protection Zone will be avoided to protect groundwater quality which will have a positive effect in relation to natural resources.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Residential-led development	++	-	0	-	++	+	0	-	0	0	0	0	0	0

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<p><b>Commentary on assessment of likely significant effects of Alternative 1</b></p>	<p>This alternative is for residential-led development. The other provisions of policy AUS6 remain unchanged for example in relation to permeability and re-provision of storage units for Chapel Market stallholders.</p> <p>Development of this site for housing could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. The site is located within Angel Town Centre and the CAZ where employment uses are prioritised.</p> <p>The site is located within the CAZ and Angel Town Centre (including Primary Shopping Area) where competing demands for land have to be carefully balanced, and non-residential uses are likely to be necessary to meet the needs of residents for services and facilities and promote diverse, vibrant and economically thriving town centres as well as provide for employment needs. As such this alternative has been assessed as having a minor negative effect on the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services as the provision of a residential-led development could lead to a reduction in key town centre services.</p> <p>The site is located within Angel Town Centre and the CAZ where employment uses are prioritised. Whilst residential-led development on this site could bring more residents into the town centre, potentially improving footfall for local businesses, it is considered that alternative 2 is likely to have a significant negative effect on economic growth.</p> <p>Allocating this site for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 2: Business-led development	++	+	0	-	0	+	0	++	0	0	0	0	0	0



IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>This alternative is for business-led development. The other provisions of policy AUS6 remain unchanged for example in relation to permeability and re-provision of storage units for Chapel Market stallholders.</p> <p>There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. The site is located within the CAZ, where the delivery of business floorspace is a priority. Allocating this site for business-led development could help the towards meeting identified needs for business floorspace, and foster sustainable economic growth in the borough. This would help create employment opportunities that would support the council's social inclusion objectives.</p> <p>The site is located within the CAZ and Angel Town Centre (including Primary Shopping Area) where competing demands for land have to be carefully balanced, and non-residential uses are likely to be necessary to meet the needs of residents for services and facilities. If no retail use is re-provided on the site this could have a minor negative effect on the promotion of liveable neighbourhoods</p>													
<b>Conclusion</b>	<p>Two reasonable alternatives to the mixed retail and business use allocation for AUS6 were identified: residential-led and business-led development. Whilst business-led development could have positive effects by supporting a specific identified development need, and residential-led development could have positive effects in terms of the delivery of good-quality housing, on balance it was considered that a mix of business and retail development was most appropriate for this site given its location within Angel Town Centre and the CAZ and the borough's need for a significant amount of additional employment floorspace.</p>													

Table 3.77: Site Assessment AUS7: 1-7 Torrens Street

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>AUS7: 1-7 Torrens Street, EC1V 1NQ</b>	+	+	0	++	0	+	+	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>AUS7 is allocated for refurbishment for town centre uses such as retail, offices, cultural and community uses. The existing arts space should be retained. The refurbishment of the buildings can help to retain and enhance the local character of the area and promote a high quality built environment.</p> <p>Development of the site should have a positive effect in optimising use of a previously developed building. It will positively contribute to the provision of business floorspace needed for economic growth. The most significant positive effect will be on liveable neighbourhoods and the quality of the environment by protecting the existing community and cultural uses and promoting other town centre uses with active ground floor</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	frontages encouraged. Cultural and community uses can have a positive impact on social inclusion, and support the mental and physical health and wellbeing of their patrons.													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Residential-led development	+	-	0	-	++	0	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>This alternative is for business-led development. The other provisions of policy AUS6 remain unchanged for example in relation the refurbishment of the site.</p> <p>The site is located within Angel town centre where competing demands for land have to be carefully balanced, and non-residential uses are likely to be necessary to meet the needs of residents for services and facilities and promote diverse, vibrant and economically thriving town centres. As such this alternative has been assessed as having a minor negative effect on the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services.</p> <p>The site is located within Angel Town Centre and the CAZ where employment uses are prioritised. There are also employment uses on the site currently. Whilst residential-led development on this site could bring more residents into the town centre, potentially improving footfall for local businesses, it is considered that alternative 1 is likely to have a minor negative effect on economic growth.</p> <p>Allocating this sites for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. There would also be positive effects addressing objectives relating to social inclusion.. However because of there would be no cultural and community uses provided, on balance a neutral effect has been identified in relation to social inclusion.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	The development of this site for housing could have a minor negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs.													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 2: Business-led development	+	+	0	-	0	0	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>This alternative is for business-led development. The other provisions of policy AUS6 remain unchanged for example in relation the refurbishment of the site.</p> <p>If there was a loss of community and cultural uses as part of a business-led development then this is likely to have a minor negative effect on liveable neighbourhoods.</p> <p>Business led development would have a positive effect on economic growth and optimise use of the site for employment use in a town centre location. There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. The site is located within the CAZ, where the delivery of business floorspace is a priority. Allocating this site for business-led development could help towards meeting identified needs for business floorspace, and foster sustainable economic growth in the borough. This would help create employment opportunities that would support the council's social inclusion objectives – although on balance this would be neutral given the loss of cultural and community uses.</p>													
<b>Conclusion</b>	Two reasonable alternatives to the mixed-use allocation for AUS7 were identified: residential-led development and business-led development. Although positive effects could be realised through both residential-led and business-led development.. The assessment of the site is finely balanced in particular between business-led development and the preferred allocation however it is considered that the additional flexibility offered by a mixed-use allocation is appropriate for this site which currently already comprises a range of uses.													

Table 3.78: Site Assessment AUS8: 161-169 Essex Road

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
AUS8: 161-169 Essex Road, N1 2SN	+	+	++	++	0	+	0	+	+	0	0	+	0	+
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>AUS8 is allocated for a mix of retail, culture and leisure uses. There is an opportunity to develop the car park to the rear of the site; any development on this portion of the site should prioritise business floorspace, particularly offices.</p> <p>The most significant positive effect of the allocation will be on liveable neighbourhoods. The allocation protects the existing cultural uses which will attract people to the area and help sustain a vibrant and viable town centre in Angel. The building is Grade II* listed and this is identified in the site constraints; bringing the building back into appropriate use could have a significant positive heritage impact. The allocation also positively contributes to creating a high quality environment and optimising the use of land by supporting the development of the car park to meet need for other priority uses in the area in particular employment which will help meet wider needs for employment growth in the borough. This also contributes to the council's strategic objective to encourage active modes of transport and reduce dependency on cars, which should have a minor positive effect in relation to the council's objectives to reduce contributions to climate change and improve air quality.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Residential-led development	+	+	++	-	++	+	0	-	+	0	0	+	0	+

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>This alternative is for residential-led development. The other provisions of policy AUS8 remain unchanged for example bringing the building back into use and optimising use of land by supporting the development of the car park.</p> <p>The site is located within Angel Town Centre where competing demands for land have to be carefully balanced, and non-residential uses are likely to be necessary to meet the needs of residents for services and facilities and promote diverse, vibrant and economically thriving town centres. As such this alternative has been assessed as having a minor negative effect on the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services, and in relation to economic growth.</p> <p>Allocating this for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>Reasonable Alternative 2: Business-led development</b>	+	+	++	-	0	+	0	++	+	0	0	+	0	+
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>Business led development would have a positive effect on economic growth and optimise use of the site for employment use in a town centre location. There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. Allocating this site for business-led development could help towards meeting identified needs for business floorspace, and foster sustainable economic growth in the borough. This would help create employment opportunities that would support the council's social inclusion objectives. Although this option would meet a clearly defined need, it would be at the expense of other priority development needs and would not be the most advantageous way of balancing competing demands for land. The loss of cultural use on the site could have a minor negative effect on the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>Conclusion</b>	<p>Two reasonable alternatives to the mixed-use allocation for AUS8 were identified: residential-led development and business-led development. Although positive effects could be realised through both residential-led and business-led development, it is considered that a mixed-use allocation including retail, leisure and culture uses is appropriate for this site given the current and historical use of the site and its location within Angel Town Centre.</p> <p><b>This allocation is subject to a modification which has been assessed separately in part 2.</b></p>													

Table 3.79: Site Assessment AUS9: 10-14 White Lion Street

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>AUS9: 10-14 White Lion Street, N1 9PD</b>	0	+	0	0	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>AUS9 is allocated for, and has planning permission for, the intensification of business use.</p> <p>The allocation should have a positive effect in optimising the use of previously developed land and buildings. The intensification of business uses on site supports the economic growth of the Angel Town Centre and wider borough and a range of employment types and opportunities will reduce barriers to employment and have a minor positive effect in relation to social inclusion.</p>													
<b>Conclusion</b>	No reasonable alternative was identified, the allocation reflects the extant planning permission for the site.													

Table 3.80: Site Assessment AUS10: 1-9 White Lion Street

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
AUS10: 1-9 White Lion Street, N1 9PD	0	+	0	0	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>AUS10 is allocated for intensification of business use.</p> <p>The allocation should have a positive effect in optimising the use of previously developed land and buildings. The intensification of business uses on site supports the economic growth of the Angel Town Centre and wider borough and a range of employment types and opportunities that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Mixed-use commercial and residential development	0	+	0	+	+	0	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>Allocating this site for mixed-use commercial and residential development could have a minor positive effect in terms of the efficient use of land and buildings.</p> <p>The flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. This has the potential to have a minor negative effect on the borough's economic growth as certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace needed to support Islington's projected economic growth. The site is located within Angel Town Centre and the CAZ where employment uses are prioritised. Given the current business use of the site and depending on intensification, mixed use development could see the loss of employment floorspace.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	<p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access for residents to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>Residential development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 2: Residential-led development	0	-	0	+	++	+	0	-	0	0	0	0	0	0
Commentary on assessment of likely significant effects of Alternative 2	<p>Although development of this site for housing and the potential for intensification could help to make more efficient use of the site, this could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. The site is located within the CAZ where employment uses are prioritised. Whilst residential-led development on this site could bring more residents into the town centre, potentially improving footfall for local businesses, it is considered that the alternative is likely to have a significant negative effect on economic growth. If developed for residential purposes, this site will no longer be contributing towards the borough's economy or supporting a range of jobs.</p> <p>A residential-led allocation could have a positive effect on the promotion of liveable neighbourhoods, as it would bring more housing in to Angel Town Centre where residents can be close to facilities such as shops and other leisure activities.</p>													



IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. There would also be positive effects addressing objectives relating to social inclusion..													
	It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.													
<b>Conclusion</b>	Two reasonable alternatives to the business-led allocation for AUS10 were identified: mixed-use residential and commercial development and residential-led development. Whilst mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development could have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business-led development was most appropriate for this site given its location within Angel Town Centre and the CAZ and the borough's need for a significant amount of additional employment floorspace.													

Table 3.81: Site Assessment AUS11: Collins Theatre

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>AUS11: Collins Theatre, 13-17 Islington Green, N1 2XN</b>	+	+	+	++	0	0	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	AUS11 is allocated for protection of the site's cultural role and bringing the theatre back into use. The allocation should help to maintain an attractive, successful and vibrant centre which draws in visitors and contributes to the area's economic growth. The allocation details a number of heritage designations relevant to the site which should be considered as part of any development proposals.													

I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable alternative summary	No reasonable alternative was identified. The allocation supports the permitted theatre use of the site with the intention of securing and protecting a cultural use for the benefit of the borough in accordance with Local Plan policy.													

Table 3.82: Site Assessment AUS12: Public Carriage Office, 15 Penton Street

I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
AUS12: Public Carriage Office, 15 Penton Street, N1 9PU	+	++	0	+	+	+	0	++	0	0	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	AUS12 is allocated for mixed-use development for re-provision and intensification of business floorspace with an element of residential use. The development of the site will have a positive impact in optimising the use of previously developed land and buildings. Increasing the density of business floorspace at the site will contribute to economic growth. An element of housing would contribute towards housing needs in the borough whilst also contributing towards liveable neighbourhoods, where people can work and live. The site would provide affordable housing as part of any residential element which may have positive effects in terms of social inclusion. Development of the site can help to enhance the local character of the area and promote a high quality built environment.													
I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>Reasonable Alternative 1: Mixed-use commercial and residential development</b>	+	+	0	+	+	0	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>Allocating this site for mixed-use commercial and residential development could have a minor positive effect in terms of the efficient use of land and buildings. Development of the site can help to enhance the local character of the area and promote a high quality built environment.</p> <p>The flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. This has the potential to have a minor negative effect on the borough's economic growth as certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace needed to support Islington's projected economic growth. The site is located within the CAZ where employment uses are prioritised. Given the current business use of the site and depending on intensification, mixed use development could see the loss of employment floorspace.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access for residents to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>Allocating this site for mixed-use development should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses. The provision of additional housing, particularly affordable housing. There would also be positive effects addressing objectives relating to social inclusion.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 2: Residential-led development	+	-	0	+	++	+	0	--	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>Development of the site can help to enhance the local character of the area and promote a high quality built environment. Although development of this site for housing and the potential for intensification could help to make more efficient use of the site, this could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. The site is located within the CAZ and the Northdown Street Priority Employment Location where employment uses are prioritised. Whilst residential-led development on this site could bring more residents into the town centre, potentially improving footfall for local businesses, it is considered that the alternative is likely to have a significant negative effect on economic growth.</p> <p>A residential-led allocation could have a positive effect on the promotion of liveable neighbourhoods, as it would bring more housing in to Angel Town Centre where residents can be close to facilities such as shops and other leisure activities.</p> <p>The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. There would also be positive effects addressing objectives relating to social inclusion.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>													
<b>Conclusion</b>	<p>Two reasonable alternatives to the business-led allocation for AUS12 were identified: mixed-use residential and commercial development and residential-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development could have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business-led development was most appropriate for this site given its location within Angel Town Centre and the CAZ and the borough's need for a significant amount of additional employment floorspace.</p>													

Table 3.83: Site Assessment AUS13: N1 Centre, Parkfield Street

I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
AUS13: N1 Centre, Parkfield Street, N1	+	+	0	+	0	0	0	+	0	+	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	AUS13 is allocated, and has planning permission, for the protection and enhancement of the open space with some intensification of retail. The allocation should have a positive impact on the viability of the town centre by increasing the provision of retail floorspace. The protection and enhancement of the open space will contribute to liveable neighbourhoods since it provides a publicly accessible space for people in the centre and if access were improved then there could also be health and wellbeing benefits.													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified, the allocation reflects the extant planning permission for the site.													

Table 3.84: Site Assessment AUS14: 46-52 Pentonville Road

I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
AUS14: 46-52 Pentonville Road, N1 9HF	0	+	0	0	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant</b>	AUS14 has extant permission for intensification of business and business related education uses. Should the permission be subject to amendment or a new application submitted, business floorspace should be prioritised. The provision of B1a uses should have a positive impact													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
effects of site allocations	on the economic growth of the Angel Town Centre and Baron Street PEL as well as the wider borough and a range of employment types and opportunities that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Education use	0	+	0	+	0	+	0	+	0	0	0	0	0	0
Commentary on assessment of likely significant effects of Alternative 1	The alternative reflects the extant planning permission for the site which allows intensification of business and business-related education uses. The site is in an accessible location so education use could be viewed as an efficient use of the land, and as promoting liveable neighbourhoods by providing an essential service for residents. Education uses can support economic growth and social inclusion by offering opportunities for people to learn and develop new skills.													
Conclusion	The site has planning permission for intensification of business and business-related education uses. The allocation states that if the planning permission is subject to further amendment, or new proposals are submitted for the site, business floorspace should be prioritised. The reasonable alternative to the allocation for business-led development is considered to be an allocation for education use of the site. The site is within the CAZ, Angel town centre and the Baron Street Priority Employment Location, where the priority land use is employment floorspace. Supporting education use in this location means forgoing employment floorspace necessary to meet the borough's requirements and therefore on balance the business-led allocation is deemed more appropriate albeit it is noted that this judgement is finely balanced.													

Table 3.85: Site Assessment AUS15: Windsor Street Car Park

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
AUS15: Windsor Street Car Park, N1 8QF	+	+	0	+	++	+	+	0	+	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	AUS15 is allocated for residential development. The site has planning permission for the development of an 11-bedroom supported living scheme for people with learning disabilities. The most significant positive effect of the allocation would be the provision of good quality housing, designed to meet an identified need in the borough for supported living accommodation. The allocation will also have a positive impact in optimising the use of land previously used for car parking. The removal of car parking from the area would help to create a higher quality environment and contribute to the council's strategic objective to achieve sustainable modes of transport and reduce dependency on private car travel. The supported living scheme will positively contribute to the inclusivity and liveability of the area by providing a facility that residents may previously have had to leave the borough to access.													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified. The site is owned by LBI and has extant planning permission for the delivery of a supported-living scheme. The draft allocation reflects the permission.													

Table 3.86: Site Assessment AUS16: Angel Square

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
AUS16: Angel Square, EC1V 1NY	+	+	0	+	0	+	0	+	0	0	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	<p>AUS16 is allocated for intensification of office use.</p> <p>The allocation protects the business use of the site which positively contributes to economic growth; this will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion. It seeks improvements to the building façade and relationship to the High Street in the town centre which would make it a more pleasant place to visit. The improved connectivity sought by the allocation, could help to promote walking and cycling however the specific effects are uncertain and so have been assessed as neutral. The allocation details a number of heritage designations relevant to the site which should be considered as part of any development proposals.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Mixed-use commercial and residential development	+	+	+	+	+	0	0	-	0	0	0	0	0	0



IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<p><b>Commentary on assessment of likely significant effects of Alternative 1</b></p>	<p>This alternative is for mixed-use commercial and residential development. The other provisions of policy AUS16 remain unchanged, for example, improvements to the façade and improved connectivity.</p> <p>Allocating this site for mixed-use commercial and residential development could have a minor positive effect in terms of the efficient use of land and buildings.</p> <p>The flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough’s identified development needs. This has the potential to have a minor negative effect on the borough’s economic growth as certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace needed to support Islington’s projected economic growth. Flexibility is appropriate for some sites in the borough but in order to meet identified development needs it is necessary for some allocations to be more specific in their requirements. The site is located within the CAZ where employment uses are prioritised. Given the current business use of the site and depending on intensification, mixed use development could see the loss of employment floorspace.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access for residents to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>Residential development would have a positive effect in terms of meeting one of the borough’s priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 2: Residential-led development	+	-	+	+	++	+	0	--	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>This alternative is for residential-led development. The other provisions of policy AUS16 remain unchanged, for example, improvements to the façade and improved connectivity.</p> <p>Although development of this site for housing and the potential for intensification could help to make more efficient use of the site, this could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. The site is located within the CAZ where employment uses are prioritised. Whilst residential-led development on this site could bring more residents into the town centre, potentially improving footfall for local businesses, it is considered that the alternative is likely to have a significant negative effect on economic growth. If developed for residential purposes, the site will lead to a loss of employment floorspace and lead to a negative effect economic growth.</p> <p>A residential-led allocation could have a positive effect on the promotion of liveable neighbourhoods, as it would bring more housing in to Angel Town Centre where residents can be close to facilities such as shops and other leisure activities.</p> <p>The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. There would also be positive effects addressing objectives relating to social inclusion..</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>													
<b>Conclusion</b>	<p>Two reasonable alternatives to the business-led allocation for AUS16 were identified: mixed-use residential and commercial development and residential-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough’s identified development needs, and residential-led development would have positive effects in terms of the delivery of good-quality housing, on</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	balance it was considered that business-led development was most appropriate for this site given its location within Angel Town Centre and the CAZ, the existing office use of the site and the borough's need for a significant amount of additional employment floorspace.													

### Nag's Head and Upper Holloway

Table 3.87: Site Assessment NH1: Morrison's supermarket and adjacent car park

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
NH1: Morrison's supermarket and adjacent car park, 10 Hertslet Road, and 8-32 Seven Sisters Road, N7 6AG	++	++	0	++	+	+	+	++	0	+	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	NH1 is allocated for mixed-use development, with residential use, retention of and improvements to existing retail floorspace and a significant amount of new office floorspace. Existing site permeability through to Seven Sisters Road and the market should be maintained. Retention and enhancement of the covered market will be supported. The allocation also identifies that the site offers the opportunity for the development of a local landmark building up to 15 storeys.													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	<p>The allocation offers an opportunity to improve retail provision and add business and residential floorspace in a central location in the town centre. This should help meet resident's needs and improve access to town centre uses, foster economic growth through providing additional opportunity for employment as well as increase the supply of residential floorspace all of which result in positive effects. The site would provide affordable housing as part of any residential element which alongside the provision of employment opportunities can have a minor positive effect in relation to social inclusion. Delivery of quality housing which addresses amenity issues 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 and also contribute to creating a high quality environment. New development presents the opportunity for new high quality architecture that can enhance the town centre in particular along Hertslett Road. The large size of this site also lends support to the practicality of a designing a mixed use scheme. The potential delivery of new public open space would improve accessibility to public open space as well as have wider health benefits. Improvements to the public realm and open space could help to promote walking and cycling however the specific effects are uncertain and so have been assessed as neutral.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Residential-led development	++	-	0	-	++	+	+	-	0	+	0	0	0	0
Commentary on assessment of likely significant effects of Alternative 1	<p>This alternative is for residential-led development. The other provisions of policy NH1 remain unchanged, for example, the opportunity for the development of a local landmark building up to 15 storeys, permeability and open space improvements.</p> <p>The site is located within Nag's Head Town Centre where competing demands for land have to be carefully balanced, and non-residential uses are likely to be necessary to meet the needs of residents for services and facilities and promote diverse, vibrant and economically thriving town centres. The site is currently made up of predominantly retail uses and forms part of the Primary Shopping Area in the town centre where retail uses are prioritised. Although development of this site for housing and the potential for intensification could help to make more efficient use of the site, this could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. A residential led development on the site has also been assessed as having a minor negative effect on economic growth and the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	Allocating this site for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 2: Business-led development	++	+	0	-	0	+	0	++	0	+	0	0	0	0
Commentary on assessment of likely significant effects of Alternative 2	There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. Allocating this site for business-led development could help towards meeting identified needs for business floorspace, and foster sustainable economic growth in the borough. This would help create employment opportunities that would support social inclusion objectives. A business-led development on the site has been assessed as having a minor negative effect on the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services as it would lead to the loss of retail provision.													
Conclusion	Two reasonable alternatives to the mixed-use allocation for NH1 were identified: residential-led development and business-led development. Although positive effects could be realised through both residential-led and business-led development, it is considered that a mixed-use allocation including retail, office and residential uses is appropriate for this prominent site in the Nag's Head Town Centre.  <b>This allocation is subject to a modification which has been assessed separately in part 2.</b>													

Table 3.88: Site Assessment NH2: 368-376 Holloway Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
NH2: 368-376 Holloway Road (Argos and adjoining shops), N7 6PN	++	+	0	++	+	+	+	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>NH2 is allocated for retail use at ground floor with business and residential uses above. The allocation also identifies that the site offers the opportunity for the development of a local landmark building up to 15 storeys.</p> <p>The allocation is an opportunity to increase retail floorspace and add business and residential floorspace in a central location in the town centre. This should help meet resident's needs and improve access to town centre uses, foster economic growth and social inclusion through providing additional opportunity for employment, and increase the supply of residential floorspace all of which result in positive effects. It is however noted that there is potential with mixed use allocations that higher-value residential uses may be chosen at the expense of delivering the employment floorspace needed to support Islington's projected economic growth. The corner location is prominent and offers a design opportunity for a landmark tall building design response which creates a more appealing frontage than currently exists. Public realm improvements are also identified which could further contribute towards a high quality environment. The site would provide affordable housing as part of any residential element. Delivery of quality housing would be an important consideration in this location.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Residential-led development	++	-	0	-	++	+	0	-	0	0	0	0	0	0

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<p><b>Commentary on assessment of likely significant effects of Alternative 1</b></p>	<p>This alternative is for residential-led development. The other provisions of policy NH2 remain unchanged, for example, the opportunity for the development of a local landmark building up to 15 storeys and public realm improvements.</p> <p>The site is located within Nag's Head Town Centre where competing demands for land have to be carefully balanced, and non-residential uses are likely to be necessary to meet the needs of residents for services and facilities and promote diverse, vibrant and economically thriving town centres. The site is currently made up of predominantly retail uses and forms part of the Primary Shopping Area in the town centre where retail uses are prioritised. The development of this site for housing could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. A residential led development on the site has also been assessed as having a minor negative effect on economic growth and the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services.</p> <p>Allocating this site for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<p><b>Reasonable Alternative 2: Business-led development</b></p>	++	+	0	-	0	+	0	++	0	0	0	0	0	0
<p><b>Commentary on assessment of likely significant effects of Alternative 2</b></p>	<p>This alternative is for business-led development. The other provisions of policy NH2 remain unchanged, for example, the opportunity for the development of a local landmark building up to 15 storeys and public realm improvements. There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. Allocating this site for business-led development could help towards meeting identified needs for business floorspace, and foster sustainable economic growth in the borough in a town centre location. This would help create employment opportunities that would support the council's social inclusion objectives. A business-led development on the site</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	has also been assessed as having a minor negative effect on the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services as it would lead to the loss of retail provision.													
<b>Conclusion</b>	Two reasonable alternatives to the mixed-use allocation for NH2 were identified: residential-led development and business-led development. Although positive effects could be realised through both residential-led and business-led development, it is considered that a mixed-use allocation including retail, business and residential uses is appropriate in this instance for this prominent town centre site to support its delivery.													

Table 3.89: Site Assessment NH3: 443-453 Holloway Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>NH3: 443-453 Holloway Road, N7 6LJ</b>	+	+	+	+	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	NH3 is allocated for intensification of business uses and commercial uses along Holloway Road with retention of existing arts/cultural uses. The allocation is an opportunity to intensify business floorspace in the Holloway Road North Priority Employment Location. Both office and warehouse space is expected to be provided and will help support economic growth and provide more opportunity for residents to access employment in the borough. Intensification of the site will optimise use of previously developed land. The introduction of commercial uses along Holloway Road and public realm improvements will help create a safer and more sustainable environment where there is currently no active frontage. Retention of the locally listed buildings is highlighted as a development consideration. The retention of existing arts/cultural uses is identified as having a positive effect in relation to liveable neighbourhoods.													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES



IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Residential-led development	+	-	+	-	++	+	0	-	0	0	0	0	0	0
Commentary on assessment of likely significant effects of Alternative 1	<p>This alternative is for residential-led development. The other provisions of policy NH3 remain unchanged, for example, public realm improvements.</p> <p>The site is located within the Holloway Road North Priority Employment Location where competing demands for land have to be carefully balanced. Although development of this site for housing and the potential for intensification could help to make more efficient use of the site, this could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs A residential led development would not contribute towards the provision of employment or other arts/cultural uses and this is likely to have a minor negative effect on economic growth and the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services.</p> <p>Allocating this site for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 2: Business-led development	+	+	+	-	0	+	0	++	0	0	0	0	0	0
Commentary on assessment of	<p>This alternative is for business-led development. The other provisions of policy NH3 remain unchanged, for example, public realm improvements. There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. Allocating</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
likely significant effects of Alternative 2	this site for business-led development could help towards meeting identified needs for business floorspace, and foster sustainable economic growth in the borough. This would help create employment opportunities which are prioritised in this location that would also support social inclusion objectives. However, the loss of existing arts/cultural uses is likely to have a minor negative impact in relation to liveable neighbourhoods.													
Conclusion	Two reasonable alternatives to the mixed-use allocation for NH3 were identified: residential-led development and business-led development. Although positive effects could be realised through the provision of additional residential accommodation and business-led development would contribute to the Priority Employment Location, it is considered that a mixed-use allocation including business, commercial and arts/cultural uses provide an appropriate balance for this site given the current uses on the site and its location with a PEL.													

Table 3.90: Site Assessment NH4: Territorial Army Centre, 65-69 Parkhurst Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
NH4: Territorial Army Centre, 65-69 Parkhurst Road, N7 0LP	++	++	0	+	+	+	0	0	0	0	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	NH4 is allocated, and has planning permission, for residential development. Any proposal should ensure continued Ministry of Defence use on part of the site (for cadets). The allocation is for redevelopment of a redundant territorial army centre. The most significant positive effect will be to optimise use of previously developed land and buildings providing residential use in an appropriate location, and depending on the final design this should have a positive effect on enhancing local character and distinctiveness. There will be a positive effect on both liveable neighbourhoods and inclusion/equality through re-provision of the cadet facility on the site. The site would provide affordable housing as part of any residential element which is considered likely to have positive effects on social inclusion.													

I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable alternative summary	No reasonable alternative was identified. The draft allocation reflects the extant planning permission for residential development of the site.													

Table 3.91: Site Assessment NH5: 392A Camden Road and 1 Hillmarton Road

I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
NH5: 392A Camden Road and 1 Hillmarton Road, N7 and 394 Camden Road, N7	++	+	0	0	+	+	0	+	0	0	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	<p>NH5 is allocated for mixed use residential and business use.</p> <p>The allocation is for redevelopment of a vehicle repair depot and warehouse and represents an intensification of use of the site. This would have a positive effect in terms of optimising use of previously developed land and buildings and will enhance local character and distinctiveness, as would a consistent design approach between sites, depending on the final scheme. This is a location which suffers from traffic related pollution – although given the nature of the borough this is a common issue for many site allocations. The site allocation has a positive effect on economic growth in the borough through retaining existing employment uses. The site would provide affordable housing as part of any residential element which is considered to have a positive effect with regards to social inclusion. It is noted that there is potential with mixed use allocations that higher-value residential uses may be chosen at the expense of delivering the employment floorspace needed to support Islington’s projected economic growth.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Residential-led development	++	+	0	0	++	+	0	-	0	0	0	0	0	0
Commentary on assessment of likely significant effects of Alternative 1	<p>The development of previously developed land and buildings and a consistent design approach between sites will enhance local character and distinctiveness.</p> <p>The site is located within a Priority Employment Location where competing demands for land have to be carefully balanced, and employment uses are prioritised. Although development of this site for housing and the potential for intensification could help to make more efficient use of the site, this could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. Given the site's location within the Camden Road/Parkhurst Road Priority Employment Location and the existing employment uses on the site, a residential led development is likely to have a negative effect on employment floorspace and job creation.</p> <p>Allocating this site for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 2: Business-led development	++	+	0	0	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	The intensification of use of the site for business-led development would have a positive effect in terms of optimising use of previously developed land and buildings and will enhance local character and distinctiveness. There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. Allocating this site for business-led development could help towards meeting identified needs for business floorspace within a location where this is prioritised. This would help to foster sustainable economic growth in the borough. This would help create employment opportunities that would support the council's social inclusion objectives.													
<b>Conclusion</b>	Two reasonable alternatives to the mixed-use allocation for NH5 were identified: residential-led development and business-led development. Although positive effects could be realised through both residential-led and business-led development, it is considered that in this case a mixed-use allocation allowing more flexibility over the balance of residential and business uses to be provided is appropriate in helping to balance competing demands for land and to support delivery of the site.													

Table 3.92: Site Assessment NH6: 11-13 Benwell Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
NH6: 11-13 Benwell Road	0	+	0	0	+	0	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant</b>	NH6 is allocated for retention and re-provision of business floorspace. An element of residential use may be acceptable. Intensification of the former warehouse for office use will have a positive effect in optimising the use of previously developed land and buildings, and on economic growth, through increasing density of business floorspace on the site. Residential development on the site could contribute													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
effects of site allocations	towards meeting housing need in the borough. Given the small scale of the site it is unlikely the allocation will affect other objectives. The site has constrained access from Benwell Road.													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Residential-led development	0	+	0	0	++	+	0	-	0	0	0	0	0	0
Commentary on assessment of likely significant effects of Alternative 1	Intensification of the site will have a positive effect in optimising the use of previously developed land and buildings. Allocating this site for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion. Given the existing employment uses on the site, a residential led development is likely to have a negative effect on employment floorspace/job creation and therefore economic growth.													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 2: Business-led development	0	+	0	0	0	+	0	++	0	0	0	0	0	0
Commentary on assessment of	The intensification of use of the site for business-led development would have a positive effect in terms of optimising use of previously developed land and buildings and will enhance local character and distinctiveness. There is a significant development need for additional business													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
likely significant effects of Alternative 2	floorspace in the borough to meet projected economic growth to 2036. Allocating this site for business-led development could help towards meeting identified needs for business floorspace, and foster sustainable economic growth in the borough. This would help create employment opportunities that would support the council's social inclusion objectives.													
Conclusion	Two reasonable alternatives to the mixed-use allocation for NH6 were identified: residential-led development and business-led development. Although positive effects could be realised through both residential-led and business-led development, it is considered that in this case a mixed-use allocation allowing more flexibility over the balance of residential and business uses to be provided is appropriate although it is noted that it is quite a finely balanced assessment between the alternatives and the preferred approach.													

Table 3.93: Site Assessment NH7: Holloway Prison

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
NH7: Holloway Prison, Parkhurst Road, N7 0NU	++	++	0	++	++	++	+	+	0	+	0	+	+	0
Commentary on assessment of likely significant effects of site allocations	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 significant positive effect in optimising the use of previously developed land and buildings, providing a significant amount of residential and community uses in an appropriate location. A significant amount of affordable housing will be required as part of any residential development to help meet need in the borough. Depending on the final design, development of this currently closed site will enhance local character and distinctiveness. Protected views cross the site, but impact on these can be avoided through careful design of the scheme, hence the impact will be neutral. The allocation promotes liveable neighbourhoods by requiring the provision of new facilities and amenities including publicly accessible open space, and development will open connections through the site for residents which will have wider health benefits. The allocation requires that consideration is given to the heritage of the site, formerly a women's prison, through the provision of community facilities including a women's centre. The scheme will also have significant environmental benefits by reducing resource use and reducing the borough's contribution to climate change with A new energy centre.													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>Reasonable alternative summary</b>	No reasonable alternative was identified. Supplementary planning guidance produced for this site supports a significant residential development with complementary community and business uses, which is reflected in the draft allocation. The site has been bought by a housing association committed to the residential development of the site, and has received financial support from the GLA to facilitate housing delivery and particularly the delivery of genuinely affordable housing. This is a key strategic site for the borough, with the potential to deliver approximately 880 new homes, therefore alternative uses are not considered reasonable in this case.													

Table 3.94: Site Assessment NH8: 457-463 Holloway Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>NH8: 457-463 Holloway Road, N7 6LJ</b>	+	+	++	0	+	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>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 the existing buildings’ contribution to the conservation area so there would be a significant positive effect if sympathetic development were implemented. The allocation will have a positive effect on economic growth in the borough through retaining existing employment uses. The site would provide affordable housing as part of any residential element which could also have a positive effect in relation to social inclusion. Delivery of quality housing would be an important consideration in this location. It is noted that there is potential with mixed use allocations that higher-value residential uses may be chosen at the expense of delivering the employment floorspace needed to support Islington’s projected economic growth.</p>													



IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Residential-led development	+	-	++	0	++	+	0	-	0	0	0	0	0	0
Commentary on assessment of likely significant effects of Alternative 1	<p>This is for residential-led use. The other provisions of policy NH8 remain unchanged, for example the retention and sensitive refurbishment of the locally listed building, which could also have a positive effect on local character and distinctiveness.</p> <p>The site is located within a Priority Employment Location where competing demands for land have to be carefully balanced, and employment uses are prioritised. Although development of this site for housing and the potential for intensification could help to make more efficient use of the site, this could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. Given the sites location within a Priority Employment Location and the existing employment use on the site, a residential led development is likely to have a negative effect on economic growth.</p> <p>Allocating this site for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>Reasonable Alternative 2: Business-led development</b>	+	+	++	0	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>This alternative is for business-led use. The other provisions of policy NH8 remain unchanged, for example the retention and sensitive refurbishment of the locally listed building, which could also have a positive effect on local character and distinctiveness. The alternative is considered to have a positive effect on optimising use of previously development land given the site's location within a Priority Employment Location.</p> <p>There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. Allocating this site for business-led development could help towards meeting identified needs for business floorspace, and foster sustainable economic growth in the borough and contribute to the Priority Employment Location in which the site sits. This would help create employment opportunities that would support the council's social inclusion objectives.</p>													
<b>Conclusion</b>	<p>Two reasonable alternatives to the mixed-use allocation for NH8 were identified: residential-led development and business-led development. Although positive effects could be realised through both residential-led and business-led development, it is considered that in this case a mixed-use allocation allowing more flexibility over the balance of residential and business uses to be provided is appropriate in this instance to support delivery of the site.</p>													

Table 3.95: Site Assessment NH9: Islington Arts Factory

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
NH9: Islington Arts Factory, 2 and 2a Parkhurst Road, N7	+	+	+	++	+	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>NH9 is allocated for provision of replacement community floorspace, residential use and an element of office floorspace. The allocation is for redevelopment of community space and storage. The allocation will have a positive effect on optimising use of previously developed land and buildings, providing a significant new mix of land uses and improving the quality of the built environment. The allocation should also enhance local character and the distinctiveness of the conservation area. The re-provision of the Islington Arts Factory community facility will have a significant positive effect on liveable neighbourhoods, as well as benefits for social inclusion. The provision of employment floorspace will have a positive effect on economic growth providing some new employment floorspace. The site would provide affordable housing as part of any residential element, delivery of quality housing which addresses the context of the road/traffic junction and provides mitigation would be an important consideration in this location. It is noted that there is potential with mixed use allocations that higher-value residential uses may be chosen at the expense of delivering the employment floorspace needed to support Islington's projected economic growth.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Residential-led development	+	+	0	-	++	0	0	-	0	0	0	0	0	0

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<p><b>Commentary on assessment of likely significant effects of Alternative 1</b></p>	<p>The alternative for residential-led could help to optimise use of the land and buildings on the site and enhance the local character of the area. However a residential-led development is likely to lead to the loss of community floorspace on the site which would have a negative impact on liveable neighbourhoods and social inclusion.</p> <p>The site is located within the Camden Road/Parkhurst Road Priority Employment Location. Given this context and the existing employment uses on the site, a residential led development is likely to have a negative effect on economic growth.</p> <p>Allocating this site for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion. However given the effect of the loss of the community use this is likely to result in a neutral score for social inclusion overall.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 2: Business-led development	+	+	0	-	0	0	0	++	0	0	0	0	0	0
Reasonable Alternative 2: Residential-led development	<p>The alternative for business-led development could help to optimise use of the land and buildings on the site and enhance the local character of the area.. However a business-led development is likely to lead to the loss of community floorspace on the site which would have a negative impact on liveable neighbourhoods and social inclusion.</p> <p>There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. Allocating this site for business-led development could help towards meeting identified needs for business floorspace, and foster sustainable economic growth in the borough and contribute to the Camden Road/Parkhurst Road Priority Employment Location in which the site sits. This would help create employment opportunities that would support social inclusion objectives. However given the effect of the loss of the community use this is likely to result in a neutral score for social inclusion overall.</p>													

I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>Conclusion</b>	Two reasonable alternatives to the mixed-use allocation for NH9 were identified: residential-led development and business-led development. Although positive effects could be realised through both residential-led and business-led development, it is considered that a mixed-use allocation including community, residential and office uses in this instance is appropriate for this site given the current uses and to support its delivery.													

Table 3.96: Site Assessment NH10: 45 Hornsey Road and 252 Holloway Road

I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>NH10: 45 Hornsey Road and 252 Holloway Road</b>	+	++	0	+	0	0	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>NH10 is allocated for redevelopment for conventional housing, however, given its location adjacent to London Metropolitan University, 45 Hornsey Road may also be considered as a site suitable for student accommodation. Commercial uses, particularly light industrial uses, should be maintained under the railway arches. The north eastern corner portion of the site is considered appropriate to develop a local landmark building of up to 12 storeys.</p> <p>The allocation will have a significant positive effect on optimising use of previously developed land and buildings and is currently used for storage and warehousing so would represent an intensification of the site, although it would have a negative effect on the delivery of affordable housing if student accommodation was delivered. If student accommodation was delivered this would also have an effect on the efficient use of land as this form of housing is not a priority in the borough. Conversely if the site is delivered for conventional housing there will be a positive effect on the delivery of housing to meet the borough's significant identified need. Given this uncertainty, the effect on objective 5 is considered to be neutral. There would be a minor positive effect to liveable neighbourhoods. Reference to impact on the local viewing corridor is identified in the development considerations. Maintaining the commercial industrial uses under the railway arches will help contribute to the boroughs economy.</p>													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified. The draft allocation is flexible and supports a mix of uses, suggesting the site could be suitable for conventional housing or student accommodation with the retention of commercial uses under the railway arches. Given this flexibility it is considered there would be limited benefit in assessing alternative uses. Related to this site allocation assessment is the assessment of a more permissive approach to Policy H6: Purpose-built student accommodation.													

Table 3.97: Site Assessment NH11: Mamma Roma, 377 Holloway Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
NH11: Mamma Roma, 377 Holloway Road, N7 0RN	0	+	0	+	0	0	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>NH11 is allocated for the intensification of business use with replacement warehouse space and other business use above. The allocation is for redevelopment of an existing single storey warehouse and will have a minor positive effect on optimising use of previously developed land and buildings, and economic growth, through increasing density of business floorspace on the site. Given the small scale of the site it is unlikely the allocation will affect other objectives. The site has constrained access from Holloway Road and adjacent site allocation NH12 identifies the possibility of improving this access as part of comprehensive development which could potentially lead to a positive impact on improving neighbourhood connectivity depending on both sites being delivery as part of a comprehensive proposal. The development considerations highlight the adjacent conservation area designation.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Mixed-use commercial and residential development	0	+	0	0	+	+	0	-	0	0	0	0	0	0

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<p><b>Commentary on assessment of likely significant effects of Alternative 1</b></p>	<p>Allocating this site for mixed-use commercial and residential development could have a minor positive effect in terms of the efficient use of land and buildings.</p> <p>The flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. This has the potential to have a minor negative effect on the borough's economic growth as certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace needed to support Islington's projected economic growth. Given the current business use of the site and depending on intensification, mixed use development could see the loss of employment floorspace.</p> <p>Allocating this site for mixed-use development should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 2: Residential-led development	0	0	0	+	++	+	0	-	0	0	0	0	0	0
<p><b>Commentary on assessment of likely significant effects of Alternative 2</b></p>	<p>Redevelopment of an existing single storey warehouse will have a minor positive effect on optimising use of previously developed land. However, this could also have a negative effect as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. The site is located within Nag's Head Town Centre. Whilst residential-led development on this site could bring more residents into the town centre, potentially improving footfall for local businesses, it is considered that the alternative is likely to have a significant negative effect on economic growth. If developed for residential purposes, this site will no longer be contributing towards the borough's economy or supporting a range of jobs.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	A residential-led allocation could have a positive effect on the promotion of liveable neighbourhoods, as it would bring more housing in to Nag's Head Town Centre where residents can be close to facilities such as shops and other leisure activities. The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. Improved housing options would also have a positive effect in terms of social inclusion.													
	It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives													
<b>Conclusion</b>	Two reasonable alternatives to the business-led allocation for NH11 were identified: mixed-use residential and commercial development and residential-led development. Whilst mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development would have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business-led development was most appropriate for this site given its existing use and limited scope for expansion, alongside the borough's need for a significant amount of additional employment floorspace although it is recognised that the assessment is quite finely balanced between the mixed use alternative and the preferred approach.													

Table 3.98: Site Assessment NH12: 379-391 Camden Road and 341-345 Holloway Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>NH12: 379-391 Camden Road and 341-345 Holloway Road</b>	++	+	0	++	+	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>NH12 is allocated for re-provision and intensification of commercial and residential uses including no net loss of retail floorspace with some intensification of business floorspace. The allocation also identifies that the site offers the opportunity for the development of a local landmark building up to 12 storeys.</p> <p>The allocation is an opportunity to increase retail floorspace and add business and residential floorspace in a central location in the town centre. This should help meet resident's needs and improve access to town centre uses, foster economic growth through providing additional opportunities for employment and increase the supply of residential floorspace, all of which result in positive effects. It is however noted that there</p>													



IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	is potential with mixed use allocations that higher-value residential uses may be chosen at the expense of delivering the employment floorspace needed to support Islington's projected economic growth. The corner location is prominent and offers a design opportunity for a landmark tall building design response which creates a more appealing frontage than currently exists. The development considerations highlight the adjacent conservation area designation. The site would provide affordable housing as part of any residential element, delivery of quality housing which addresses the challenging environment would be an important consideration in this location and could help to address issues surrounding social exclusion.													
<b>Reasonable Alternative 1: Residential-led development</b>	++	-	0	-	++	+	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>This alternative is where this site would be amended so that the allocation is for residential-led use. The other provisions of policy NH12 remain unchanged, for example the opportunity for a landmark tall building design response which creates a more appealing frontage than currently exists.</p> <p>The site is located within Nag's Head Town Centre where competing demands for land have to be carefully balanced, and non-residential uses are likely to be necessary to meet the needs of residents for services and facilities and promote diverse, vibrant and economically thriving town centres. Development of this site for housing could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. A residential led development would not contribute towards the provision of retail, employment or other uses which contribute towards the town centre and this is likely to have a minor negative effect on economic growth and the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services.</p> <p>Allocating this site for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 2: Business-led development	++	+	0	-	0	+	0	++	0	0	0	0	0	0
Commentary on assessment of likely significant effects of Alternative 2	<p>This alternative is where this site would be amended so that the allocation is for business-led use. The other provisions of policy NH12 remain unchanged, for example the opportunity for a landmark tall building design response which creates a more appealing frontage than currently exists.</p> <p>Business-led development would have a positive effect on economic growth and optimise use of the site for employment use in a town centre location. There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. Allocating this site for business-led development could help towards meeting targets for business floorspace, and foster sustainable economic growth in the borough. This would help create employment opportunities that would support social inclusion objectives. If other town centre uses are not provided such as retail however, this could have a negative effect on liveable neighbourhoods which seeks to improve access for all residents to essential services.</p>													
Conclusion	<p>Two reasonable alternatives to the mixed-use allocation for NH12 were identified: residential-led development and business-led development. Although positive effects could be realised through both residential-led and business-led development, it is considered that a mixed-use allocation including business, residential and retail uses is appropriate for this site in this instance given it's location in the Nag's Head Town Centre and the current uses on the site.</p>													

Table 3.99: Site Assessment NH13: 166-220 Holloway Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
NH13: 166-220 Holloway Road	+	++	0	++	0	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>NH13 is allocated for improvements to the internal layout of the London Metropolitan University (LMU) site with existing education uses to be consolidated and improved. Student accommodation is not considered to be an acceptable use. The allocation also identifies that the site offers the opportunity to increase the height of the LMU tower by approximately 20m to create a district landmark building.</p> <p>The allocation will have a positive effect in optimising the use of previously developed land and buildings. The site will have a significant positive effect by creating more liveable sustainable neighbourhoods which are inclusive and safer and help attract students into the borough through the improvement of the university campus buildings and public realm. There may also be benefits to residents through further training and education opportunities increasing skills levels. In addition there may be positive benefits to wider economic growth in London and Islington.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Education use including student accommodation	+	0	0	+	0	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>Allocating this sites for education use including student accommodation could make efficient use of previously developed land and buildings, but it could be challenging to effectively balance competing demands between land uses to provide for the borough's full range of development needs. These sites were part of a larger London Metropolitan University site allocation in the 2013 Site Allocations DPD, which was partially developed as student accommodation. The remaining undeveloped sites, NH13 and NH14, are considered necessary for meeting the borough's need for education floorspace and allowing additional student accommodation could make this less achievable. As such alternative 1 has been assessed as having a neutral effect on the efficient use of land.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	Alternative 1 would have similarities to the preferred approach in terms of promoting an inclusive and safe built environment as it would still require improvements to the layout of the site. There would also be the opportunity to increase the height of the LMU tower by approximately 20m to create a district landmark building. The alternative should also promote liveable neighbourhoods by improving access for residents to education facilities, although as some of the sites would be given over to student accommodation this has been assessed as a minor positive effect. The alternative may also have a limited positive effect with regards to the social inclusion objective by providing access to training and education opportunities which could increase skills levels and reduce barriers to employment. The alternative could have a limited positive effect on economic growth as it would bring new students and residents to the site who would spend money in the local area.													
<b>Conclusion</b>	One reasonable alternative to the proposed allocation for NH13 (consolidation and improvement of existing education uses) was identified: education use including student accommodation. Whilst the alternative provides some positives in relation to economic growth social inclusion and liveable neighbourhoods, the provision of additional student accommodation would lead to potential less efficient provision of education floorspace, and in addition this is not considered a priority need given the borough's previous high delivery of student accommodation. On balance the allocation for education use is appropriate on this site. Related to this site allocation assessment is the assessment of a more permissive approach to Policy H6: Purpose-built student accommodation.													

Table 3.100: Site Assessment NH14: 236-250 Holloway Road and 29 Hornsey Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>NH14: 236-250 Holloway Road and 29 Hornsey Road</b>	+	+	0	++	0	+	0	+	0	0	0	0	0	0

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>NH14 is allocated for improvements to the internal layout of the London Metropolitan University site with existing education uses to be consolidated and improved. Student accommodation is not considered to be an acceptable use.</p> <p>The allocation will have a positive effect in optimising the use of previously developed land and buildings. The most significant positive effects will be the benefit to liveable neighbourhoods and attracting students into the borough through the improvement of the university campus buildings and public realm, and benefits to inclusivity for residents through further training and education opportunities increasing skills levels. In addition there may be positive benefits to wider economic growth for London and the borough. The development considerations highlight the potential impact on the local viewing corridor.</p>													
<b>Reasonable Alternative 1: Education use including student accommodation</b>	+	0	0	+	0	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>Allocating this site for education use including student accommodation could make efficient use of previously developed land and buildings, but it could be challenging to effectively balance competing demands between land uses to provide for the borough's full range of development needs. These sites were part of a larger London Metropolitan University site allocation in the 2013 Site Allocations DPD, which was partially developed as student accommodation. The remaining undeveloped sites, NH13 and NH14, are considered necessary for meeting the borough's need for education floorspace and allowing additional student accommodation could make this less achievable. As such alternative 1 has been assessed as having a neutral effect on the efficient use of land.</p> <p>Alternative 1 would have similarities to the preferred approach in terms of promoting an inclusive and safe built environment as it would still require improvements to the layout of the site. There would also be the opportunity to increase the height of the LMU tower by approximately 20m to create a district landmark building. The alternative should also promote liveable neighbourhoods by improving access for residents to education facilities, although as some of the sites would be given over to student accommodation this has been assessed as a minor positive effect. The alternative may also have a limited positive effect with regards to the social inclusion objective by providing access to training and education opportunities which could increase skills levels and reduce barriers to employment.</p> <p>The alternative could have a limited positive effect on economic growth as it would bring new students and residents to the site who would spend money in the local area.</p>													
<b>Conclusion</b>	<p>One reasonable alternative to the proposed allocation for NH14 (consolidation and improvement of existing education uses) was identified: education use including student accommodation. Whilst the alternative provides some positives in relation to economic growth social inclusion and liveable neighbourhoods, the provision of additional student accommodation would lead to potential less efficient provision of education</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	floorspace, and in addition this is not considered a priority need given the borough's previous high delivery of student accommodation. On balance the allocation for education use is appropriate on this site. Related to this site allocation assessment is the assessment of a more permissive approach to Policy H6: Purpose-built student accommodation.													

## Finsbury Park

Table 3.101: Site Assessment FP1: City North Islington Trading Estate

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>FP1: City North Islington Trading Estate, Fonthill Road and 8-10 Goodwin Street</b>	+	++	0	+	+	+	+	++	+	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	The site allocation for FP1 aligns with the extant planning permission for two 21-storey towers and 3 and 10 storey buildings containing 355 residential dwellings, offices, restaurant and café floorspace and flexible (A1-A4/D2/B1 use) floorspace. A new western entrance to Finsbury Park station will be created along with step-free access to the platforms. Should the site be subject to further amendments or new applications suitable uses should be provided aligning with the adjacent Fonthill Road Specialist Shopping Area and Finsbury Park Spatial Strategy and should seek to protect and enhance the public realm.													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	<p>The allocation is an opportunity to increase retail and business floorspace and add residential floorspace in a central and highly accessible location in the town centre. This should help meet resident's needs, improve access to town centre uses, foster economic growth through providing additional opportunity for employment and increase the supply of residential floorspace, all of which result in positive effects. As well as providing B1 floorspace which is a main driver of economic growth, modern retail floor space will create a new attraction to Finsbury Park. The modernised public realm should also benefit the Specialist Shopping Area of Fonthill Road, further boosting economic growth. The site will provide affordable housing as part of the residential element. Permeability improvements and the provision of step-free access to the station promote more sustainable neighbourhoods which are more inclusive and safer and improve residents' connection to facilities and amenities. An enhanced public realm will make this part of Finsbury Park less dominated by the transport interchange, which, alongside improvements to the station should have a positive effect in relation to promoting sustainable travel.</p>													
<b>Reasonable alternative summary</b>	<p>No reasonable alternative was identified. The site has planning permission that accords with the uses proposed in the draft allocation, and has reached an advanced stage of development.</p>													

Table 3.102: Site Assessment FP2: Morris Place/Wells Terrace

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>FP2: Morris Place/Wells Terrace (including Clifton House)</b>	++	++	0	+	+	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant</b>	<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>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>effects of site allocations</b>	The allocation provides an opportunity to increase retail floorspace and add business and residential floorspace in a central location in the town centre. This should help meet residents needs and improve access to town centre uses, foster economic growth through providing additional opportunities for employment as well as increase the supply of residential floorspace, all of which result in positive effects, including in relation to social inclusion. The site would provide affordable housing as part of any residential element. It is noted that there is potential with mixed use allocations that higher-value residential uses may be chosen at the expense of delivering the employment floorspace needed to support Islington's projected economic growth. 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.													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>Reasonable Alternative 1: Residential-led development</b>	++	-	0	-	++	+	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>This alternative is where this site would be amended so that the allocation is for residential-led use. The other provisions of policy FP2 remain unchanged, for example the opportunity for a landmark tall building of up to 15 storeys.</p> <p>The site is located in Finsbury Park Town Centre and a Primary Shopping Area where competing demands for land have to be carefully balanced, and non-residential uses are likely to be necessary to meet the needs of residents for services and facilities and promote diverse, vibrant and economically thriving town centres. Development of this site for housing could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. A residential led development would not contribute towards the provision of retail, employment or other uses which contribute towards the town centre and this is likely to have a minor negative effect on economic growth and the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services.</p>													



IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	Allocating this site for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 2: Business-led development	++	+	0	-	0	+	0	++	0	0	0	0	0	0
Commentary on assessment of likely significant effects of Alternative 2	This alternative is for business-led use. The other provisions of policy FP2 remain unchanged, for example the opportunity for a landmark tall building design response which creates a more appealing frontage than currently exists. There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. Allocating this site for business-led development could help the council work towards meeting its targets for business floorspace, and foster sustainable economic growth in the borough. The site is located within Finsbury Park Town Centre, which has the potential to develop as a satellite location for business uses. This would help create employment opportunities that would support social inclusion objectives. The focus on business-led development however may not help to balance other competing demands for uses within town centres, including the provision of retail and leisure space, a minor negative for liveable neighbourhoods has therefore been identified.													
Conclusion	Two reasonable alternatives to the mixed-use allocation for FP2 were identified: residential-led development and business-led development. Although positive effects could be realised through both residential-led and business-led development, it is considered that a mixed-use allocation including business, residential and retail uses is appropriate in this instance for this well-located site close to Finsbury Park Station although it is recognised that it is finely balanced with the alternative for business-led development.													

Table 3.103: Site Assessment FP3: Finsbury Park Station and Island

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
FP3: Finsbury Park Station and Island, Seven Sisters Road	++	+	0	+	0	0	0	+	++	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>FP3 is allocated for improvements to the existing underground and railway station and related infrastructure and public realm improvements. Provision of a high quality public space adjacent to the station is required. Retention and potential expansion of ground floor retail. Retention of units in retail use on the Island part of the site, with a mix of commercial and residential uses provided above ground floor.</p> <p>The allocation provides an opportunity to increase retail floorspace and add business and residential floorspace in a central location in the town centre. This should help meet residents’ needs and improve access to town centre uses, foster economic growth through providing additional opportunities for employment, as well as increasing the supply of residential floorspace, all of which result in positive effects. It is noted that there is potential with mixed use allocations that higher-value residential uses may be chosen at the expense of delivering the employment floorspace needed to support Islington’s projected economic growth. Permeability improvements at the site would promote liveable neighbourhoods by improving residents connection to facilities and amenities. Development of the site would improve the public realm making the relationship between pedestrian, bus, taxi and cyclist movements safer. Improvements to the station including access improvements will make the transport hub more inclusive and have a significant positive effect in relation to the need to travel and the creation of accessible, safe and sustainable transport connections. The permeability and transport improvements could help to promote walking, cycling and sustainable transport. The development would optimise the use of previously developed land.</p> <p>Development above the railway station is a long term ambition. If overstation development comes forward, the council would expect a mixed use, commercial led scheme with significant amounts of office floorspace, and the possibility of some residential floorspace. The allocation identifies that the site offers the opportunity for the development of a district landmark building of up to 25 storeys.</p> <p>The allocation is primarily concerned with public realm improvements and limited commercial expansion and has been scored as such. If comprehensive over-station development came forward, there would likely be significant positive effects for a number of objectives, namely economic growth, efficient use of land and affordable housing, although there would be potential negative impacts on health and housing quality</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	due to the close proximity to the rail line, which would need to be managed through design. Given the need to weigh the benefits of housing delivery against the constraints and potential negative effects presented by this location, a neutral effect has been identified in relation to housing quality.													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Residential-led development	++	-	0	-	++	+	0	-	++	0	0	0	0	0
Commentary on assessment of likely significant effects of Alternative 1	<p>This alternative is where this site would be amended so that the allocation is for residential-led use. The other provisions of policy FP3 remain unchanged, for example improvements to the existing underground and railway station and related infrastructure and public realm improvements.</p> <p>The site is located in Finsbury Park Town Centre and a Primary Shopping Area where competing demands for land have to be carefully balanced, and non-residential uses are likely to be necessary to meet the needs of residents for services and facilities and promote diverse, vibrant and economically thriving town centres. Development of this site for housing could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. There are a range of town centre uses currently on the site. A residential led development would not contribute towards the provision of retail, employment or other uses which contribute towards the town centre and this is likely to have a minor negative effect on economic growth and the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services.</p> <p>Allocating this site for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 2: Business-led development	++	+	0	-	0	+	0	++	0	0	0	0	0	0
Commentary on assessment of likely significant effects of Alternative 2	<p>This alternative is for business-led use. The other provisions of policy FP3 remain unchanged, for example improvements to the existing underground and railway station and related infrastructure and public realm improvements.</p> <p>There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. The site is located within Finsbury Park Town Centre, which has the potential to develop as a satellite location for business uses. Allocating this site for business-led development could towards meeting its targets for business floorspace, and foster sustainable economic growth in a town centre location. This would help create employment opportunities that would support social inclusion objectives. The focus on business-led development however may not help to balance other competing demands for uses within town centres, including the provision of retail and leisure space, a minor negative for liveable neighbourhoods has therefore been identified.</p>													
Conclusion	<p>Two reasonable alternatives to the mixed-use allocation for FP2 were identified: residential-led development and business-led development. Although positive effects could be realised through both residential-led and business-led development, it is considered that a mixed-use allocation including business, residential and retail uses is appropriate in this instance for this well-located that includes Finsbury Park Station.</p>													

Table 3.104: Site Assessment FP4: 129-131 & 133 Fonthill Road and 13 Goodwin Street

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
FP4: 129-131 & 133 Fonthill Road and 13 Goodwin Street	+	+	0	+	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>Site FP4 is allocated for retail-led mixed use development to complement the specialist shopping function of Fonthill Road (as a fashion corridor) and contribute to the vitality of Finsbury Park Town Centre. Active retail should be provided on the ground floor. Upper floors should provide office floorspace and, where appropriate, workshop space related to ground floor specialist retail functions including appropriate well designed SME workspace.</p> <p>The allocation is an opportunity to increase retail floorspace and add business floorspace, including workshop space related to ground floor specialist retail functions including SME workspace, in a central location in the town centre. This should help meet residents' needs by improving access to town centre uses, and foster economic growth and social inclusion through providing additional opportunities for employment. The allocation requires improvements to the public realm and transport and pedestrian links which promotes more sustainable neighbourhoods by improving residents connection to facilities and amenities. Improvements to the public realm would act to make the connection between Fonthill Road and Goodwin Street leading to City North more harmonious. Improvements to the public realm and transport and pedestrian could help to promote walking and cycling however the specific effects are uncertain and so have been assessed as neutral. The allocation seeks to focus development of retail, office, workshop and SME workspace in the most appropriate location because Fonthill Road is a fashion hub and specialist shopping area (SSA). Development of the site can help to enhance the local character of the area and promote a high quality built environment.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Residential-led development	+	-	0	-	++	+	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>This alternative is where this site would be amended so that the allocation is for residential-led use. The other provisions of policy FP4 remain unchanged, for example improvements to the public realm and transport and pedestrian links.</p> <p>The site is located in Finsbury Park Town Centre, a Primary Shopping Area and the Fonthill Road Specialist Shopping Area where competing demands for land have to be carefully balanced, and non-residential uses are likely to be necessary to meet the needs of residents for services and facilities and promote diverse, vibrant and economically thriving town centres. Development of this site could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. There are town centre uses currently on the site. A residential led development would not contribute towards the provision of retail, employment or other uses which contribute towards the town centre and this is likely to have a minor negative effect on economic growth and the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services.</p> <p>Allocating this site for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 2: Business-led development	+	+	0	0	0	+	0	++	0	0	0	0	0	0

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	This alternative is for business-led use. The other provisions of policy FP3 remain unchanged, for example the opportunity for a landmark tall building design response which creates a more appealing frontage than currently exists. Business led development would have a positive effect on economic growth and optimise use of the site for employment use in a town centre location. There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. The site is located within Finsbury Park Town Centre, which has the potential to develop as a satellite location for business uses. Allocating this site for business-led development could help towards meeting targets for business floorspace, and foster sustainable economic growth in the borough. This would help create employment opportunities that would support social inclusion objectives. The focus on business-led development however may not help to balance other competing demands for uses within town centres, including the provision of retail and leisure space, a minor negative for liveable neighbourhoods and the efficient use of land has therefore been identified.													
<b>Conclusion</b>	Two reasonable alternatives to the mixed-use allocation for FP4 were identified: residential-led development and business-led development. Although positive effects could be realised through both residential-led and business-led development, it is considered that a mixed-use allocation providing retail and office floorspace including workshop space designed to support the specialist retail functions on the ground floor of the site is appropriate given its location within the designated Fonthill Road Specialist Shopping Area.													

Table 3.105: Site Assessment FP5: Conservative Club, 1 Prah Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>FP5: Conservative Club, 1 Prah Road</b>	++	+	0	0	0	+	0	++	0	0	0	0	0	0
<b>-Commentary on assessment of likely significant</b>	FP5 is allocated for business floorspace, particularly workspace suitable for SMEs  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													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
effects of site allocations	provides floor space for an expanding business function of Finsbury Park. Development of the site will bring land back into use that can be utilised for uses that will benefit the town centre and support potentially local SME businesses. It could also help to promote social inclusion through providing additional opportunities for employment. Delivery of employment space in this town centre location is would help to meet wider needs for employment growth in the borough. More affordable workspaces can support SMEs and its close proximity to City and Islington College has potential for this link to be positively exploited.													
Reasonable Alternative 1: Mixed-use commercial and residential development	++	+	0	+	+	0	0	+	0	0	0	0	0	0
Commentary on assessment of likely significant effects of Alternative 1	<p>A mixed-use commercial and residential development of the site provides an opportunity to bring an unused site back into use, making more efficient use of the site and improving natural surveillance in an area with high crime levels.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access for residents to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>The flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. This has the potential to have a minor negative effect on the borough's economic growth as certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace needed to support Islington's projected economic growth. However, given the current use of the site it is likely that some commercial use as part of a mixed use development would have a minor positive effect on economic growth. The small size of this site also detracts from an efficient use of land with the potential difficulties around designing a mixed use scheme.</p> <p>Allocating this site for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p>													



IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 2: Residential-led development	++	+	0	+	++	+	0	0/-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>The residential-led development of the site provides an opportunity to bring an unused site back into use, making more efficient use of the site and improving natural surveillance in an area with high crime levels.</p> <p>The site is located within Finsbury Park Town Centre. Whilst residential-led development on this site could bring more residents into the town centre, potentially improving footfall for local businesses, it could have a negative effect on economic growth, albeit this is reduced because the site was not previously in employment use. On balance this is considered to have a neutral/negative effect.</p> <p>A residential-led allocation could have a positive effect on the promotion of liveable neighbourhoods, as it would bring more housing in to Finsbury Park Town Centre where residents can be close to facilities such as shops and other leisure activities.</p> <p>The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>													
<b>Conclusion</b>	<p>Two reasonable alternatives to the business-led allocation for FP5 were identified: mixed-use residential and commercial development and residential-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development could have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business-led development was most appropriate for this site given its town centre location and the borough's need for additional employment floorspace, although the assessment is considered to be quite finely balanced with both alternatives.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
This allocation is subject to a modification which has been assessed separately in part 2.														

Table 3.106: Site Assessment FP6: Cyma Service Station, 201A Seven Sisters Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
FP6: Cyma Service Station, 201A Seven Sisters Road	++	++	0	0	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>FP6 site is allocated for redevelopment to provide office floor space across the whole site.</p> <p>This allocation will have positive effects on economic development by providing employment (office) floorspace in the town centre, and will make more efficient use of the site than the former petrol station use. The site is located within Finsbury Park Town Centre, which has the potential to develop as a satellite location for business uses. Bringing this vacant site back into use will also have a positive effect on promoting a high quality built environment, providing surveillance to make the environment safer as well as enhancing the local character of the area. The site is of no heritage significance however its setting is, with the Grade II* listed Rainbow Theatre in close proximity which the development would need to respect and enhance the setting of it. Prioritising delivery of employment space in this town centre location is considered appropriate and helps meet wider needs for employment growth in the borough, reducing barriers to employment in accordance with the social inclusion objective.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Mixed-use commercial and residential development	++	++	0	+	+	0	0	+	0	0	0	0	0	0
Commentary on assessment of likely significant effects of Alternative 1	<p>This alternative is for mixed-use and commercial development and will make more efficient use of the site than the former petrol station use. Bringing this vacant site back into use will also have a positive effect on promoting a high quality built environment, providing surveillance to make the environment safer as well as enhancing the local character of the area.</p> <p>The flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. The alternative has the potential to have a negative effect on economic growth because certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace on site. However, it is likely that the provision of some commercial floorspace as part of the mix of uses will have a minor positive effect in relation to economic growth. The practicality of mixing uses on this small site is also noted.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access for residents to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>Allocating this site for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 2: Residential-led development	++	-	0	+	++	+	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>This alternative is for residential-led development of the site. Bringing this vacant site back into use will also have a positive effect on promoting a high quality built environment, providing surveillance to make the environment safer as well as enhancing the local character of the area.</p> <p>The site is located in Finsbury Park Town Centre, and Primary Shopping Area where competing demands for land have to be carefully balanced, and non-residential uses are likely to be necessary to meet the needs of residents for services and facilities and promote diverse, vibrant and economically thriving town centres. Although development of this site for housing and the potential for intensification could help to make more efficient use of this vacant site, this could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs – on balance a neutral effect has therefore been identified in relation to the efficient use of land. There are town centre uses currently on the site. The site is located within Finsbury Park Town Centre, which has the potential to develop as a satellite location for business uses. A residential led development would not contribute towards the provision of retail, employment or other uses which contribute towards the town centre and this is likely to have a minor negative effect on economic growth and the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services.</p> <p>A residential-led allocation could have a positive effect on the promotion of liveable neighbourhoods, as it would bring more housing in to Finsbury Park Town Centre where residents can be close to facilities such as shops and other leisure activities. The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>													
<b>Conclusion</b>	<p>Two reasonable alternatives to the business-led allocation for FP6 were identified: mixed-use residential and commercial development and residential-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development could have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business-led development was most appropriate for this site given its town centre location and the borough's need for additional employment floorspace and its promotion in Finsbury Park SP6 area spatial strategy.</p>													

Table 3.107: Site Assessment FP7: Holloway Police Station

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
FP7: Holloway Police Station, 284 Hornsey Road	++	+	0	+	++	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>FP7 is allocated for redevelopment of the police station (subject to justifying the loss of social infrastructure) for residential-led mixed use development, with office/workspace uses on the ground floor.</p> <p>A mixed use scheme involving residential and office/workspace is appropriate given the location is outside the town centre. The wide pavements bordering the site present an opportunity for enhancements to the public realm with the potential for urban greening. The development will be residential led and provide affordable housing. This could have positive effects in helping to address issues surrounding social exclusion - the close relationship of the site with the adjacent Andover Estate is noted. Ground floor office and workspace will contribute to the economy and provide more affordable rents for business as well as creating a more active frontage than currently exists. The redevelopment of the site would help to optimise use of previously development land and can help to enhance the local character of the area and promote a high quality built environment.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Business-led mixed use development	0	-	0	+	+	+	0	+	+	0	0	0	0	0

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	Alternative 1: The Holloway Police Station site is outside of the town centre and therefore is not considered to be the most appropriate location for business-led mixed use redevelopment. As this option allows for a mix of uses it would still provide an opportunity to deliver some housing, which would have positive effects in relation to affordable housing and social inclusion. A mix of uses on the site could also be beneficial for Islington's economic growth, particularly if affordable workspace is offered. The co-location of commercial and residential uses could help to promote liveable neighbourhoods. It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>Reasonable Alternative 2: Retention of social and community infrastructure</b>	0	0	0	+	0	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	Alternative 2: An allocation requiring retention of social and community infrastructure on site could help to secure uses that find it difficult to compete against more financially viable land uses in Islington, therefore making efficient use of the site and the borough's limited resources. Social and community infrastructure supports liveable neighbourhoods by providing access to essential services, although in this case the Police Station has closed and is sitting vacant. If an alternative social and community infrastructure use could be found for the site it could promote social inclusion, and potentially economic growth by improving opportunities for learning and skills development. However, if there is no demand for an alternative social and community infrastructure use the allocation could prove detrimental by restricting other uses and failing to make efficient use of land. It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.													
<b>Conclusion</b>	Two reasonable alternatives to the residential-led allocation for FP7 were identified: business-led mixed use development and the retention of social and community infrastructure at the site. Whilst both these alternatives have their merits it is considered that as the site is outside of the town centre it is not in the most appropriate location for a business-led mixed use redevelopment. , whilst a failure to secure an alternative social and community infrastructure use for the site would not make the most efficient use of the land. Subject to justifying the loss of social and community infrastructure at the site, a residential-led development would contribute towards meeting the borough's significant housing need.													

Table 3.108: Site Assessment FP8: 113-119 Fonthill Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
FP8: 113-119 Fonthill Road	++	++	0	+	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>FP8 is allocated for retention of retail floorspace and provision of a significant amount of business floorspace on upper floors. The allocation also identifies that the site offers an opportunity for the development of a local landmark building of up to 12 storeys. The site is identified as having potential for a tall building which would help to visually mediate between the City North development and lower surrounding context heights as well as helping to optimise use of the site and make the most efficient use of land.</p> <p>Retention of retail on the ground floor will help support the town centre’s vibrancy and provide good quality trading space for many of the local businesses on Fonthill Road. Significant amounts of business floor space will be provided, supporting the approach set out in policy SP6 which identifies the positive contribution to employment growth and the economy Finsbury Park can make, given its potential to develop as a satellite location for business uses. Retention of retail on the ground floor will support Fonthill Road’s retail character, securing services for residents and space for business use. There will be no effects on heritage from redeveloping the site but the design should be sympathetic to the adjoining locally listed Edwardian former postal sorting office. The redevelopment of the site would help to optimise use of previously development land and can help to enhance the local character of the area and promote a high quality built environment.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Mixed-use commercial and residential development	++	+	0	+	+	0	0	-	0	0	0	0	0	0

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<p><b>Commentary on assessment of likely significant effects of Alternative 1</b></p>	<p>This alternative is where this site would be amended so that the allocation is for mixed use commercial and residential development. The other provisions of policy FP8 remain unchanged, for example the opportunity for a tall building which would help to visually mediate between the City North development and lower surrounding context heights.</p> <p>Whilst allocating this site for mixed-use commercial and residential development could have a positive effect in terms of the efficient use of land and buildings, the flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. The alternative has the potential to have a negative effect on economic growth because certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace within Finsbury Park Town Centre. Given the current employment use of the site and depending on intensification, mixed use development could see the loss of employment floorspace.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access for residents to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>Allocating this site for mixed-use development should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses. Improved housing options would also have a positive effect in terms of social inclusion. It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													
<p><b>Reasonable Alternative 2: Residential-led development</b></p>	++	-	0	+	++	+	0	--	0	0	0	0	0	0



IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>This alternative is for residential-led use. The other provisions of policy FP8 remain unchanged, for example the opportunity for a tall building which would help to visually mediate between the City North development and lower surrounding context heights.</p> <p>The site is located in Finsbury Park Town Centre, and Primary Shopping Area where competing demands for land have to be carefully balanced, and non-residential uses are likely to be necessary to meet the needs of residents for services and facilities and promote diverse, vibrant and economically thriving town centres. Although development of this site for housing and the potential for intensification could help to make more efficient use of the site, this could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. Whilst residential-led development on this site could bring more residents into the town centre, potentially improving footfall for local businesses, it is considered that the alternative is likely to have a significant negative effect on economic growth. The site is located within Finsbury Park Town Centre, which has the potential to develop as a satellite location for business uses. If developed for residential purposes, this site will no longer be contributing towards the borough's economy or supporting a range of jobs.</p> <p>A residential-led allocation could have a positive effect on the promotion of liveable neighbourhoods, as it would bring more housing in to Finsbury Park Town Centre where residents can be close to facilities such as shops and other leisure activities.</p> <p>The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>													
<b>Conclusion</b>	<p>Two reasonable alternatives to the business-led allocation for FP8 were identified: mixed-use residential and commercial development and residential-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development could have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business-led development was most appropriate for this site given its town centre location and the borough's need for additional employment floorspace.</p>													

Table 3.109: Site Assessment FP9: 221-233 Seven Sisters Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
FP9: 221-233 Seven Sisters Road	++	++	0	++	+	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>FP9 is allocated for the re-provision of community use, intensification of main town centre uses with a significant amount of business floorspace and an element of residential use. The allocation identifies the site as offering an opportunity for the development of a local landmark building of up to 15 storeys.</p> <p>Increased density in the form of a tall building is appropriate in this location as it is highly accessible and would form part of a Finsbury Park tall buildings cluster. Development could also provide an enhanced active frontage and accessibility improvements through a new potential pedestrian link. The site could provide a wide mix of town centre uses which will have a positive effect on provision of services. Significant amounts of business floor space will be provided, supporting employment growth in the borough. The site is located within Finsbury Park Town Centre, which has the potential to develop as a satellite location for business uses. 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 and social inclusion by re-providing upgraded community space that will interact more positively with the street scene. A small element of residential use is allocated for the site which will make a small contribution to housing supply and affordable housing in a mixed use development. Delivery of quality housing which addresses amenity impacts in relation to the sites proximity to the railway line would be an important consideration in this location. The redevelopment of the site would help to optimise use of previously development land and can help to enhance the local character of the area and promote a high quality built environment.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Residential-led development	++	+	0	+	++	+	0	+	0	0	0	0	0	0

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<p><b>Commentary on assessment of likely significant effects of Alternative 1</b></p>	<p>This alternative is for residential-led use. The other provisions of policy FP9 remain unchanged, for example the development of a local landmark building of up to 15 storeys.</p> <p>The site is located in Finsbury Park Town Centre, and Primary Shopping Area where competing demands for land have to be carefully balanced, and non-residential uses are likely to be necessary to meet the needs of residents for services and facilities and promote diverse, vibrant and economically thriving town centres. Although development of this site for housing and the potential for intensification could help to make more efficient use of the site, this could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. Whilst residential-led development on this site could bring more residents into the town centre, potentially improving footfall for local businesses, it is considered that the alternative is likely to have a significant negative effect on economic growth. If developed for residential purposes, this site will no longer be contributing towards the borough's economy or supporting a range of jobs. The site is located within Finsbury Park Town Centre, which has the potential to develop as a satellite location for business uses. The alternative could have a minor negative effect on the promotion of liveable neighbourhoods, including through the loss of existing community uses on the site – this objective seeks improved access for all residents to essential services.</p> <p>Allocating this site for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 2: Business-led development	++	++	0	-	0	+	0	++	0	0	0	0	0	0

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	This alternative is where this site would be amended so that the allocation is for business-led use. The other provisions of policy FP9 remain unchanged, for example for example the re-provision of community opportunity for the development of a local landmark building of up to 15 storeys. Business led development would have a positive effect on economic growth and optimise use of the site for employment use in a town centre location. There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. The site is located within Finsbury Park Town Centre, which has the potential to develop as a satellite location for business uses. Allocating this site for business-led development could help towards meeting targets for business floorspace, and foster sustainable economic growth in the borough within Finsbury Park Town Centre. This would help create employment opportunities that would support social inclusion objectives. The alternative could have a minor negative effect on the promotion of liveable neighbourhoods, including through the loss of existing community uses on the site – this objective seeks improved access for all residents to essential services.													
<b>Conclusion</b>	Two reasonable alternatives to the mixed-use allocation for FP9 were identified: residential-led development and business-led development. Although positive effects could be realised through both residential-led and business-led development, it is considered that a mixed-use allocation providing main town centre uses with business floorspace and an element of residential use, alongside the re-provision of community uses is appropriate for this site considering its existing uses and central location within Finsbury Park Town Centre.													

Table 3.110: Site Assessment FP10: Former George Robey Public House, 240 Seven Sisters Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>FP10: Former George Robey Public House, 240 Seven Sisters Road</b>	+	++	0	+	0	0	0	++	0	0	0	0	0	0

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>FP10 is allocated for hotel use with some business floorspace including affordable workspace.</p> <p>Development of the site will bring a centrally located site back into use. A new building would complete the street frontage and have a positive effect on the local environment. Planning permission for application P2017/3429/FUL has been approved and will see improvements to the public realm which can take advantage of a relatively large amount of pavement space here. The redevelopment and re-provision of the retail units on Seven Sisters Road will improve the quality of the A1 and A3 units. The previous building on the site has been demolished and the site is not in a conservation area although development will have to be sympathetic to the adjacent Grade II* listed Rainbow Theatre. A centrally located hotel in Finsbury Park is likely to support visitors to London rather than business users providing greater support to London's economy and may help 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> <p>As development of this site was completed in late 2019 it is proposed to remove the allocation from the Site Allocations DPD.</p>													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified.													

Table 3.111: Site Assessment FP11: 139-149 Fonthill Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>FP11: 139-149 Fonthill Road</b>	++	+	+	+	+	+	0	++	+	0	0	+	0	+
<b>Commentary on assessment of likely significant</b>	<p>FP11 is allocated for commercial-led mixed use development to include retail and office floorspace with an element of residential.</p> <p>A mix of retail, office and residential development could contribute to the vitality and viability of the specialist shopping area on Fonthill Road. Development should protect and enhance the locally listed building within the site at 141-149 Fonthill Road. The development will promote</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
effects of site allocations	sustainable neighbourhoods by providing replacement retail space and office space that can potentially be used by local businesses and those involved with the fashion industry on Fonthill Road. An element of residential use will make a small contribution to the housing supply and affordable housing supply in a highly accessible location. Redeveloped business floor space will benefit the economy and contribute to the significant amount of new business floor space around the station. This can also support a range of employment types and opportunities that can reduce barriers to employment and have a minor positive effect in relation to social inclusion. 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.													
Reasonable alternative summary	No reasonable alternative was identified. The site has planning permission that accords with the uses proposed in the draft allocation.													

Table 3.112: Site Assessment FP12: 179-199 Hornsey Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
FP12: 179-199 Hornsey Road	+	++	++	+	+	+	0	0	0	0	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	<p>FP12 is allocated for mixed use development with the retention of some D1 floorspace where necessary and has planning permission for residential use with the provision of D1/D2 floorspace.</p> <p>The allocation seeks to optimise the use of the listed building. The retention of some D1 community use floor space should allow the creation of space that is better able to adapt to changing needs. D1 community use will complement any residential use and provide social infrastructure for an increasing residential population. The site has significant heritage considerations and development should protect and enhance the locally</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	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.													
Reasonable alternative summary	No reasonable alternative was identified. The site has planning permission that accords with the uses proposed in the draft allocation.													

Table 3.113: Site Assessment FP13: Tesco, 103-115 Stroud Green Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
FP13: Tesco, 103-115 Stroud Green Road	+	++	0	+	++	+	0	+	0	0	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	<p>FP13 is allocated for the re-provision of retail floorspace and D1 uses with scope for residential development at upper levels.</p> <p>The allocation is an opportunity to re-provide retail floorspace and add residential floorspace in Finsbury Park town centre. The re-provision of retail floorspace is important in serving the needs of local residents. Intensification to provide housing is appropriate, taking advantage of the residential and retail context of the street and its good transport links. The site would provide affordable housing as part of any residential element. The development would contribute positively to promoting liveable neighbourhoods and provide modernised retail floorspace. 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.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Residential-led development	0	-	0	-	++	+	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>This alternative is where this site would be amended so that the allocation is for residential-led use.</p> <p>The site is located in Finsbury Park Town Centre where competing demands for land have to be carefully balanced, and non-residential uses are likely to be necessary to meet the needs of residents for services and facilities and promote diverse, vibrant and economically thriving town centres. Although development of this site for housing and the potential for intensification could help to make more efficient use of the site, this could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. Whilst residential-led development on this site could bring more residents into the town centre, potentially improving footfall for local businesses, it is considered that the alternative is likely to have a significant negative effect on economic growth. If developed for residential purposes, this site will no longer be contributing towards the borough's economy or supporting a range of jobs. The alternative could also have a minor negative effect on the promotion of liveable neighbourhoods which this objective seeks improved access for all residents to essential services.</p> <p>Allocating this site for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p>													



IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 2: Business-led development	0	+	0	-	0	+	0	++	0	0	0	0	0	0
Commentary on assessment of likely significant effects of Alternative 2	This alternative is where this site would be amended so that the allocation is for business-led use. There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. Allocating this site for business-led development could help the council work towards meeting its targets for business floorspace, and foster sustainable economic growth in the borough. This would help create employment opportunities that would support the council's social inclusion objectives. Whilst the provision of business space would be an appropriate town centre use, the focus on business-led development may not help to balance other competing demands for uses within town centres, including the provision of retail and leisure space, a minor negative for liveable neighbourhoods has therefore been identified.													
Conclusion	Two reasonable alternatives to the mixed-use allocation for FP13 were identified: residential-led development and business-led development. Although positive effects could be realised through both residential-led and business-led development, it is considered that a mixed-use allocation requiring the re-provision of retail and community uses along with some scope for residential use is appropriate for the site considering its existing uses and location within Finsbury Park Town Centre.													

Table 3.114: Site Assessment FP14: Andover Estate

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
FP14: Andover Estate	++	++	0	++	++	+	+	++	0	0	0	0	0	0
Commentary on assessment of	FP14 is allocated for residential development with retail, business and community floorspace including affordable workspace and public realm improvements.													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
likely significant effects of site allocations	Development will intensify the residential density of the estate and will improve the public realm, increasing connections and permeability and therefore increasing inclusivity. Improved connectivity could help with reducing the need to travel however the effects of this are uncertain and so a neutral effect has been identified.. Intensification of residential will provide affordable housing and commercial uses will create economic benefits and employment opportunities. Infill development seeks to make the most efficient use of previously developed land and the affordable workspace located in converted former garages will provide flexible spaces to adapt to different businesses needs. Development will promote the estate as a more liveable neighbourhood, providing new retail and commercial space and a significant amount of affordable workspace that will potentially enable local people to secure business space.													
Reasonable alternative summary	No reasonable alternative was identified. The site is a housing estate owned by the London Borough of Islington (LBI) identified as having potential to accommodate additional housing development and has planning permission that accords with the uses proposed in the draft allocation.													

Table 3.115 Site Assessment FP15: 216-220 Seven Sisters Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
FP15: 216-220 Seven Sisters Road	++	++	0	+	0	+	0	+	0	0	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	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 set out in SP6 which identifies the positive contribution to employment growth and the wider economy that Finsbury Park could make, given its potential to develop as a satellite location for business uses. This can also support a range of employment types and opportunities that can reduce barriers to employment and have a minor positive effect in relation to social inclusion. New development has potential to improve the street scene, but will need to respect and enhance the adjacent Grade II* listed													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	Rainbow Theatre. More retail space will have a positive effect on promoting a liveable neighbourhood, providing main town centre uses and services for residents.													
Reasonable Alternative 1: Mixed-use commercial and residential development	++	+	0	+	+	+	0	+	0	0	0	0	0	0
Commentary on assessment of likely significant effects of Alternative 1	<p>Alternative 1 is for mixed use commercial and residential development. New development would also help to improve the street scene, contributing to a better quality environment and the wider character of the area.</p> <p>Although the alternative would have a positive effect in terms of the efficient use of land and buildings, the flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. because certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace on site, thereby impacting on potential employment growth and Finsbury Park's potential to develop as a satellite location for business uses. However, a mixed use development would contribute towards an intensification of some commercial use on the site and therefore on balance the effect in relation to economic growth is considered to be a minor positive.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access for residents to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>Allocating this site for mixed-use development should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 2: Residential-led development	++	-	0	+	++	+	0	--	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>Alternative 2 is for residential-led development. New development would also help to improve the street scene, contributing to a better quality environment and the wider character of the area, but will need to respect and enhance the adjacent Grade II* listed Rainbow Theatre.</p> <p>Development of this site for housing could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. Although development of this site for housing and the potential for intensification could help to make more efficient use of the site, this could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. The site is located within Finsbury Park Town Centre, which has the potential to develop as a satellite location for business uses. Whilst residential-led development on this site could bring more residents into the town centre, potentially improving footfall for local businesses, it is considered that the alternative is likely to have a significant negative effect on economic growth.</p> <p>A residential-led allocation could have a positive effect on the promotion of liveable neighbourhoods, as it would bring more housing in to Angel Town Centre where residents can be close to facilities such as shops and other leisure activities.</p> <p>The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>													
<b>Conclusion</b>	<p>Two reasonable alternatives to the business-led allocation for FP15 were identified: mixed-use residential and commercial development and residential-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development could have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business-led development with retail floorspace at ground floor level was most appropriate for this site given its location within a Primary Shopping Area and the borough's need for additional employment floorspace and its promotion in Finsbury Park SP6 area spatial strategy.</p>													

Table 3.116 Site Assessment ARCH1: Vorley Road/Archway Bus Station

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
ARCH1: Vorley Road/Archway Bus Station, N19	++	++	0	+	++	+	+	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>ARCH1 is allocated for residential-led development with an element of business floorspace including affordable workspace and space suitable for SMEs. The allocation identifies that the northern part of the site presents an opportunity for the development of a local landmark building of up to 15 storeys, forming part of an Archway cluster of tall buildings.</p> <p>The allocation is an opportunity to develop residential and business floorspace in a central and highly accessible location in the town centre and optimise the use of previously developed land and buildings. This should improve access to town centre uses, foster economic growth through providing additional opportunity for employment and increase the supply of residential floorspace all of which result in positive effects. The site would provide affordable housing as part of any residential element. Permeability improvements at the site, would promote liveable neighbourhoods by improving residents connection to facilities and amenities.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Mixed-use development	++	++	0	+	+	0	0	+	0	0	0	0	0	0

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>This is for mixed-use development (including residential and commercial uses). The other provisions of policy ARCH1 remain unchanged, for example for example the opportunity for the development of a local landmark building of up to 15 storeys and permeability improvements.</p> <p>ARCH1 is located within a Town Centre but is owned by LB Islington who are committed to delivering a residential-led scheme in this location. Some housing would be delivered as part of mixed-use development, leading to a minor positive effect with regards to objective 5, but allocating the site for mixed-use rather than residential-led development would likely lead to a reduction in the overall number of new homes secured.</p> <p>Mixed-use development may have limited positive effects on liveable neighbourhoods and economic growth, through the co-location of a number of different uses improving access to a variety of facilities for residents, workers and visitors.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>Reasonable Alternative 2: Business-led development</b>	++	++	0	-	0	0	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>This alternative is where this site would be amended so that the allocation is for business-led development. The other provisions of policy ARCH1 remain unchanged, for example for example the opportunity for the development of a local landmark building of up to 15 storeys and permeability improvements.</p> <p>Business led development would have a positive effect on economic growth and contribute towards the wider economy of Archway Town Centre. There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. Allocating this site for business-led development could help towards meeting targets for business floorspace, and foster sustainable economic growth in the borough. This would help create employment opportunities that would support the council's social inclusion objectives. Whilst the provision of business space would be an appropriate town centre use, the focus on business-led development could however may not help to balance other competing demands for uses within town centres, including the provision of retail and leisure space, a minor negative for liveable neighbourhoods has therefore been identified.</p>													

I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>Conclusion</b>	Two reasonable alternatives to the residential-led allocation for ARCH1 were identified: mixed-use development and business-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and business-led development could have positive effects in terms of supporting economic growth, the site is considered to provide an opportunity to deliver a significant amount of new housing to contribute towards meeting the borough's identified need in an accessible town centre location. Whilst the site is in the town centre, it is set back from the main road and Primary Shopping Areas, it is adjacent to other residential properties in the neighbouring Girdlestone Estate and given the use of the site as a bus stand there is limited existing employment use on the site, in this instance on balance it is considered that some mix of town centre uses as part of a residential-led development is appropriate.													

Table 3.117 Site Assessment ARCH2: 4-10 Junction Road (buildings adjacent to Archway Underground Station)

I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>ARCH2: 4-10 Junction Road (buildings adjacent to Archway Underground Station), N19 5RQ</b>	+	+	0	+	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	ARCH2 is allocated for intensification of business use with retail on the ground floor.  The allocation will contribute positively to the vitality and viability of the town centre, optimising the use of previously developed land and contributing to the economic growth of the borough. This should provide more opportunity for residents to access employment in the borough, in													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	line with the social inclusion objective. The site is in a highly accessible location, adjacent to Archway Station. An improved shopfront design which takes advantage of adjacent public space would help to enhance the quality of the environment and enhance local character.													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Mixed-use commercial and residential development	0	+	0	+	+	0	0	+	0	0	0	0	0	0
Commentary on assessment of likely significant effects of Alternative 1	<p>Alternative 1 is for mixed use commercial and residential development.</p> <p>Although the alternative would have a positive effect in terms of the efficient use of land and buildings, the flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. The alternative has the potential to have a negative effect on economic growth because certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace on the site, thereby impacting on potential employment growth. However, a mixed use development could contribute towards an intensification of some commercial use on the site and therefore on balance the effect on economic growth is considered to be minor positive.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access for residents to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>Allocating this site for mixed-use development should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													



IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 2: Residential-led development	0	-	0	-	++	+	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>The site is located within Archway Town Centre where competing demands for land have to be carefully balanced, and non-residential uses are likely to be necessary to meet the needs of residents for services and facilities and promote diverse, vibrant and economically thriving town centres. Development of this site for housing could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. A residential led development would not contribute towards the provision of retail, employment or other uses which contribute towards the town centre and this is likely to have a minor negative effect on economic growth and the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services.</p> <p>The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>													
<b>Conclusion</b>	<p>Two reasonable alternatives to the business-led allocation for ARCH2 were identified: mixed-use residential and commercial development and residential-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development could have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business-led development with retail floorspace at ground floor level was most appropriate for this site given its location within a Primary Shopping Area and the borough's need for additional employment floorspace.</p>													

Table 3.118 Site Assessment ARCH3: Archway Central Methodist Hall, Archway Close

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>ARCH3: Archway Central Methodist Hall, Archway Close, N19 3TD</b>	+	+	+	+	0	0	0	+	0	0	0	0	+	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<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, which would have a positive effect with regards to resource efficiency. Bringing the building back into use would also contribute towards the character of the area, whilst cultural use would contribute towards the wider Archway Cultural Quarter. There is limited capacity for intensification at the site.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>Reasonable Alternative 1: Mixed-use development</b>	0	+	-/0	-	+	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>Allocating the site for a mix of commercial and residential uses is considered to be a reasonable alternative given the sites town centre location. Mixed-use could make more efficient use of a currently underused site, but could have a negative impact on the significance of the locally listed building and the surrounding conservation area if the design is not carefully considered and executed. A mixed-use development could have a positive effect in terms of economic growth, and for social inclusion if it creates jobs that help residents' access employment. In addition, it could have a positive effect on the delivery of affordable housing if housing were to be delivered as part of a mixed-use development. However, given the need to balance competing demands for land in the borough, it is considered a mixed-use allocation would result in the loss of some of</p>													

IJA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	Islington's limited supply of social and community infrastructure floorspace. This would have a minor negative effect in relation to liveable neighbourhoods and conflict with aims for the Archway Cultural Quarter.													
<b>Conclusion</b>	One reasonable alternative to the proposed allocation for ARCH3 for a cultural hub was identified: mixed-use development. Although a mixed-use scheme could have positive effects in terms of supporting a range of uses to meet the borough's development needs, it would also result in the loss of some of Islington's limited supply of social and community infrastructure floorspace to the detriment of aims for the Archway Cultural Quarter and may have heritage impacts. On balance it is considered the refurbishment/redevelopment for a cultural hub is appropriate.													

Table 3.119 Site Assessment ARCH4: Whittington Hospital Ancillary Buildings

IJA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>ARCH4: Whittington Hospital Ancillary Buildings, N19</b>	0	0	0	++	+	+	++	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	ARCH4 is allocated for the provision of health uses with an element of residential development. The allocation has a cumulative impact on the provision of social infrastructure in the borough. The relocation of St Pancras Mental Health Hospital is a significant positive benefit in terms of creating liveable neighbourhoods by providing essential social services and supporting the economy by providing employment opportunities. It will also have significant positive health impacts. There is also a provision of residential units													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	which has a positive contribution to the overall housing target. Part of the site is listed, therefore any development must consider and respond to this.													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Residential-led development	0	0	0	-	++	+	-	-	0	0	0	0	0	0
Commentary on assessment of likely significant effects of Alternative 1	<p>This alternative is for residential-led use. This would lead to the loss of social infrastructure and health care provision on the site which would have significant negative effect on health and liveable neighbourhoods. Given the employment generating use on the site it would also have a negative effect on economic growth.</p> <p>Allocating this site for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p>													
Reasonable Alternative 2: Business-led development	0	0	0	--	0	+	--	+	0	0	0	0	0	0
Commentary on assessment of likely significant effects of Alternative 2	<p>Business led development would have a positive effect on economic growth and optimise use of the site for employment use. There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. Allocating this site for business-led development could help towards meeting targets for business floorspace, and foster sustainable economic growth in the borough. This would help create employment opportunities that would support social inclusion objectives. The economic benefits overall are likely to be a minor positive given the employment generating use on the site currently. In addition the loss of social infrastructure and health care provision on the site which would have significant negative effect on health and liveable neighbourhoods.</p>													

I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>Conclusion</b>	Two reasonable alternatives to the mixed-use allocation for ARCH4 were identified: residential-led development and business-led development. Although positive effects could be realised through both residential-led and business-led development, it is considered that a mixed-use allocation requiring the provision of health uses along and retaining some potential for residential development is appropriate for the site considering its existing uses and location outside the town centre.													

Table 3.120 Site Assessment ARCH5: Archway Campus, Highgate Hill

I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>ARCH5: Archway Campus, Highgate Hill, N19</b>	+	++	0	+	++	+	0	0	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	ARCH5 is allocated for residential-led mixed use development with community and social infrastructure uses. The allocation of this site will substantially contribute to housing provision in the borough, including the provision of affordable housing, to help meet need. It also makes efficient use of land located in a highly accessible area which has been vacant for some time, and development should seek to improve linkages to Archway Town Centre, promoting a more liveable neighbourhood. Development of the site can help to enhance the local character of the area and promote a high quality built environment. An improved public realm and links to Archway Town Centre could help to promote walking and cycling however the specific effects are uncertain and so have been assessed as neutral.													
I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Mixed-use development	+	++	0	+	+	0	0	+	+	0	0	0	0	0
Commentary on assessment of likely significant effects of Alternative 1	<p>This alternative is where this site would be amended so that the allocation is for mixed-use development (including residential and commercial uses). The other provisions of policy ARCH5 remain unchanged, for example that development proposals should contribute towards and improved public realm and linkages to Archway town centre.</p> <p>Some housing would be delivered as part of mixed-use development, leading to a minor positive effect with regards to objective 5, but allocating the site for mixed-use rather than residential-led development would likely lead to less new homes secured overall.</p> <p>Mixed-use development may have limited positive effects on liveable neighbourhoods, economic growth and the need to travel, through the co-location of different uses improving access to a variety of facilities for residents, workers and visitors.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 2: Business-led development	+	++	0	0	0	+	0	++	0	0	0	0	0	0
Commentary on assessment of likely significant	<p>This alternative is where this the allocation is for business-led development. The other provisions of policy ARCH5 remain unchanged, for example for example that development proposals should contribute towards and improved public realm and linkages to Archway town centre.</p> <p>Business led development would have a positive effect on economic growth and optimise use of the site for employment use. There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. Allocating this site for</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
effects of Alternative 2	business-led development could help towards meeting targets for business floorspace, and foster sustainable economic growth in the borough. This would help create employment opportunities that would support social inclusion objectives.													
Conclusion	Two reasonable alternatives to the residential-led allocation for ARCH5 were identified: mixed-use development and business-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and business-led development could have positive effects in terms of supporting economic growth, the site is considered to provide an opportunity to deliver a significant amount of new housing to contribute towards meeting the borough's identified need in an accessible location.  <b>This allocation is subject to a modification which has been assessed separately in part 2.</b>													

Table 3.121 Site Assessment ARCH6: Job Centre, 1 Elthorne Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
ARCH6: Job Centre, 1 Elthorne Road , N19 4AL	+	++	0	+	+	+	0	++	0	0	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	ARCH6 is allocated for business led mixed-use development, including provision of SME workspace, with an element of residential use. The allocation is an opportunity to increase business floorspace, including SME space, and add residential use in a central location in the town centre. This should improve access to town centre uses and increase diversity and vibrancy in the centre; foster economic growth through providing additional opportunity for a range of employment types and increase the supply of residential floorspace, all of which result in positive effects. The allocation will optimise the use of previously developed land and provide affordable housing as part of any residential element. Development of the site can help to enhance the local character of the area and promote a high quality built environment.													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Residential-led development	0	-	0	0	++	+	0	-	0	0	0	0	0	0
Commentary on assessment of likely significant effects of Alternative 1	<p>The site is located in Archway Town Centre where competing demands for land have to be carefully balanced, and non-residential uses are likely to be necessary to meet the needs of residents for services and facilities and promote diverse, vibrant and economically thriving town centres. The development of this alternative could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. Whilst residential-led development on this site could bring more residents into the town centre, potentially improving footfall for local businesses, it is considered that the alternative is likely to have a significant negative effect on economic growth. If developed for residential purposes, this site will no longer be contributing towards the borough's economy, supporting a range of jobs or contribute towards future economic growth.</p> <p>Allocating the site for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p>													
Reasonable Alternative 2: Business-led development	0	+	0	0	0	+	0	++	0	0	0	0	0	0
Commentary on assessment of	<p>This alternative is where this site would be amended so that the allocation is for business-led use. The intensification of the site would help to optimise use of the site for employment use in a town centre location. There is a significant development need for additional business floorspace</p>													



IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
likely significant effects of Alternative 2	in the borough to meet projected economic growth to 2036. Allocating this site for business-led development could help towards meeting targets for business floorspace, and foster sustainable economic growth in the borough. This would help create employment opportunities that would support social inclusion objectives.													
Conclusion	Two reasonable alternatives to the mixed-use allocation for ARCH6 were identified: residential-led development and business-led development. Although positive effects could be realised through both residential-led and business-led development, it is considered that a mixed-use allocation requiring business uses with SME workspace as well as some residential use is appropriate for the site considering its existing uses and location within Archway Town Centre.													

Table 3.122 Site Assessment ARCH7: 207A Junction Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
ARCH7: 207A Junction Road, N19 5QA	+	++	0	+	+	0	0	0	0	0	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	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, but careful consideration must be given to the close proximity of railway infrastructure and the need to mitigate noise and vibration to ensure future residential amenity is not negatively affected. The allocation also suggests the existing D2 use of the site may be re-provided, which could positively contribute to the vitality of the area and increase cultural provision. Development of the site can help to enhance the local character of the area and promote a high quality built environment.													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Mixed-use development	+	+	0	-	+	+	0	+	0	0	0	0	0	0
Commentary on assessment of likely significant effects of Alternative 1	<p>This alternative is where this site would be amended so that the allocation is for mixed-use development (including residential and commercial uses). Development of the site can help to enhance the local character of the area and promote a high quality built environment and help to make efficient use of the site. Mixed use development would have a positive effect in terms of the efficient use of land and buildings. It is however noted that there is potential with mixed use allocations that higher-value residential uses may be chosen at the expense of delivering the employment floorspace needed to support Islington's projected economic growth.</p> <p>Some housing would be delivered as part of mixed-use development, leading to a minor positive effect with regards to objective 5. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p> <p>Some commercial uses on the site are likely to have a minor positive effect in relation to economic growth. This would help create employment opportunities that would support social inclusion objectives.</p> <p>The loss of the existing D2 use would however have a negative effect in relation to liveable neighbourhoods.</p>													
Reasonable Alternative 2: Business-led development	+	+	0	-	0	+	0	+	0	0	0	0	0	0

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	This alternative is for business-led development. The intensification of the site would help to optimise use of the site for employment use. Development of the site can help to enhance the local character of the area and promote a high quality built environment. Business led development would have a positive effect on economic growth. This would help create employment opportunities that would support social inclusion objectives. The loss of the existing D2 use would however have a negative effect in relation to liveable neighbourhoods.													
<b>Conclusion</b>	Two reasonable alternatives to the residential-led allocation for ARCH7 were identified: mixed-use development and business-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and business-led development could have positive effects in terms of supporting economic growth, the site is considered to provide an opportunity to deliver new housing to contribute towards meeting Islington's significant identified need in an appropriate location.													

Table 3.123 Site Assessment ARCH8: Brookstone House, 4-6 Elthorne Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>ARCH8: Brookstone House, 4-6 Elthorne Road, N19 4AJ</b>	0	+	0	0	0	+	0	+	+	0	0	+	0	+
<b>Commentary on assessment of likely significant effects of site allocations</b>	ARCH8 is allocated for the provision of business floorspace through the re-configuration of existing buildings and/or the construction of new buildings/extensions to accommodate additional business floorspace. The allocation will have a positive effect in optimising the use of previously developed land and buildings and increasing the density of business floorspace which is a main driver of economic growth. This should provide more opportunity for residents to access employment in the borough, in line with the social inclusion objective. The site contains a car park which, if re-developed into other priority uses as strongly encouraged in the allocation, will improve the quality of the environment by reducing car use in line with objective 9. In turn this should have a minor positive effect with regards to the borough's objectives to reduce contributions to climate change and improve air quality. Part of the site is locally listed.													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Mixed-use commercial and residential development	0	+	0	+	+	0	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>Alternative 1 is for mixed use commercial and residential development.</p> <p>Although the alternative would have a positive effect in terms of the efficient use of land and buildings, the flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. The alternative has the potential to have a negative effect on economic growth because certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace on the site, thereby impacting on potential employment growth. Given the existing business use on the site, a mixed use proposal could lead to the loss of some existing employment floorspace.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access for residents to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>Allocating this site for mixed-use development should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 2: Residential-led development	0	+	0	+	++	+	0	--	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>The development of this site for housing could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. The site is located within Archway Town Centre where competing demands for land have to be carefully balanced, and non-residential uses are likely to be necessary to meet the needs of residents for services and facilities and promote diverse, vibrant and economically thriving town centre. Whilst residential-led development on this site could bring more residents into Archway town centre, potentially improving footfall for local businesses, it is considered that the alternative is likely to have a significant negative effect on economic growth. If developed for residential purposes, this site will no longer be contributing towards the borough's economy or supporting a range of jobs. The site is currently fully in employment use, a residential-led development would lead to the loss of employment floorspace and not contribute towards future economic growth. As such this alternative has been assessed as having a significant negative effect in relation to economic growth.</p> <p>A residential-led allocation could have a positive effect on the promotion of liveable neighbourhoods, as it would bring more housing where residents can be close to facilities such as shops and other leisure activities. The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>													
<b>Conclusion</b>	<p>Two reasonable alternatives to the business-led allocation for ARCH8 were identified: mixed-use residential and commercial development and residential-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development could have positive effects in terms of the delivery of good-quality housing, on balance it was considered that the intensification of business uses including the provision of co-working space was most appropriate for this site given its existing uses and the borough's projected need for a significant amount of additional employment floorspace.</p>													

Table 3.124 Site Assessment ARCH9: 724 Holloway Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
ARCH9: 724 Holloway Road, N19 3JD	0	+	0	0	0	+	0	+	0	0	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	ARCH9 is allocated for office led development with main town centre uses at ground floor level. The allocation aims to achieve a limited increase in business floorspace which will contribute to the overall provision of business floorspace in the borough, which is a main driver of economic growth. This should provide more opportunity for residents to access employment in the borough, in line with the social inclusion objective.													
Reasonable alternative summary	No reasonable alternative was identified. The site has planning permission that accords with the uses proposed in the draft allocation.													

Table 3.125 Site Assessment ARCH10: Elthorne Estate, Archway

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
ARCH10: Elthorne Estate, Archway, N19 4AG	+	+	0	+	++	+	+	0	0	0	0	0	0	0

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>Commentary on assessment of likely significant effects of site allocations</b>	ARCH10 is allocated for residential development with associated public realm improvements. The allocation aims to optimise the use of land and positively contribute to the provision of residential floorspace in the borough. Affordable housing will be provided as part of the development, which is likely to have positive effects on social inclusion. In addition, the associated public realm improvements should improve the quality of the local environment making the neighbourhood more liveable. The public realm improvements could also help to promote walking and cycling however the specific effects are uncertain and so have been assessed as neutral..													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified. The site is a housing estate owned by the London Borough of Islington (LBI) identified as having potential to accommodate additional housing development and has planning permission that accords with the uses proposed in the draft allocation.													

Table 3.126 Site Assessment ARCH11: Dwell House, 619-639 Holloway Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>ARCH11: Dwell House, 619-639 Holloway Road, N19 5SS</b>	+	++	0	+	+	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	ARCH11 is allocated for mixed-use residential/business/retail development. The allocation is an opportunity to increase retail and residential floorspace, add business floorspace in a central location in the town centre and increase diversity and vibrancy in the centre. This should help meet residents needs and improve access to town centre uses, foster economic growth through providing additional opportunity for employment and increase the supply of residential floorspace, all of which result in positive effects. The allocation aims to optimise the use of land and positively contribute to the provision of quality housing in the borough. Affordable housing will be provided as part of any residential element. Business and retail provision will positively contribute to the vitality and viability of the Archway Town centre. It is noted that there is potential with mixed use allocations that higher-value residential uses may be chosen at the													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	expense of delivering the employment floorspace needed to support Islington's projected economic growth. Development of the site can help to enhance the local character of the area and promote a high quality built environment.													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Residential-led development	+	-	0	-	++	+	0	0	0	0	0	0	0	0
Commentary on assessment of likely significant effects of Alternative 1	<p>The site is located in Archway Town Centre where competing demands for land have to be carefully balanced, and non-residential uses are likely to be necessary to meet the needs of residents for services and facilities and promote diverse, vibrant and economically thriving town centres. The development of this could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. Whilst residential-led development on this site could bring more residents into the town centre, potentially improving footfall for local businesses, it is considered that the alternative is likely to have a significant negative effect on economic growth. If developed for residential purposes, this site will no longer be contributing towards the borough's economy, supporting a range of jobs or contribute towards future economic growth. This alternative has also been assessed as having a minor negative effect on the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services, and in relation to economic growth.</p> <p>Allocating the site for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p>													



IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 2: Business-led development	0	+	0	-	0	+	0	++	0	0	0	0	0	0
Commentary on assessment of likely significant effects of Alternative 2	This alternative is where this site would be amended so that the allocation is for business-led use. The intensification of the site would help to optimise use of the site for employment use in a town centre location. There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. Allocating this site for business-led development could help towards meeting targets for business floorspace, and foster sustainable economic growth in the borough. This would help create employment opportunities that would support social inclusion objectives. Whilst the provision of business space would be an appropriate town centre use, the focus on business-led development could however have a minor negative effect for liveable neighbourhoods through no longer providing accessible services such as retail.													
Conclusion	Two reasonable alternatives to the mixed-use allocation for ARCH11 were identified: residential-led development and business-led development. Although positive effects could be realised through both residential-led and business-led development, it is considered that a mixed-use allocation requiring retail, residential and business uses is appropriate for the site in this instance considering its existing uses and location within Archway Town Centre although it is recognised that the assessment of the preferred approach is quite finely balanced between the business led alternative.													

Table 3.127 Site Assessment ARCH12: 798-804 Holloway Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>ARCH12: 798-804 Holloway Road, N19 3JH</b>	+	+	0	+	+	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>ARCH12 is allocated for mixed-use development. Retail uses should be provided at ground floor. Business uses are considered suitable on upper floors alongside an element of residential use.</p> <p>The allocation is an opportunity to increase retail and residential floorspace, add business floorspace in a central location in the town centre and increase diversity and vibrancy in the centre. This should help meet residents needs and improve access to town centre uses, foster economic growth through providing additional opportunity for employment and increase the supply of residential floorspace, all of which result in positive effects. The allocation aims to optimise the use of land and positively contribute to the provision of quality housing in the borough. Affordable housing will be provided as part of any residential element. Business and retail provision will positively contribute to the vitality and viability of the Archway Town centre. The allocation will positively contribute to the vitality and viability of the town centre by providing a mix of town centre uses and maintaining active retail frontages at the ground floor.</p>													
<b>Reasonable alternative summary</b>	<p>No reasonable alternative was identified. The site has planning permission that accords with the uses proposed in the draft allocation.</p>													

Table 3.128 Site Assessment HC1: 12, 16-18, 20-22 and 24 Highbury Corner

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
HC1: 12, 16-18, 20-22 and 24 Highbury Corner	+	+	0	+	0	+	0	+	+	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>HC1 is allocated for commercial-led development with re-provision of a music venue; the re-provided venue should be operational before the existing venue ceases occupation on the current site. Possible new ticket hall with fully step-free access to Victoria Line. The site allocation identifies that comprehensive development could give greater scope to deliver against Local Plan objectives and which could help to optimise the use of the land. Associated public realm improvements alongside development could contribute towards an attractive public realm and high quality architecture.</p> <p>The allocation will contribute positively to the viability and vitality of the Lower Holloway Local Shopping Area and the economic growth of the borough in general, having a positive effect on optimising use of previously developed land and buildings. The site has potential to provide step-free access to the Victoria Line which will make the station more inclusive and the neighbourhood more liveable, as well as improving connectivity both within the borough and to other parts of London, this could have a positive effect in relation to need to travel by helping to make the boroughs transport network more accessible. 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 contributing to economic growth.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Residential-led development	+	+	0	-	++	+	0	0	0	0	0	0	0	0

<p><b>Commentary on assessment of likely significant effects of Alternative 1</b></p>	<p>This alternative is where the allocation is for residential-led use. The other provisions of policy HC1 remain unchanged, for example the possible new ticket hall, step free access, public realm improvements and potential for comprehensive development.</p> <p>The site is within the Lower Holloway Local Shopping Area where smaller-scale retail development to meet the needs of residents is encouraged. As such this alternative has been assessed as having a minor negative effect on the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services. The loss of the music venue would also have a negative effect in relation to liveable neighbourhoods.</p> <p>Allocating this site for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p>													
<p><b>IIA Objective / Site</b></p>	<p>1. HIGH QUALITY ENVIRON</p>	<p>2. EFFICIENT USE OF LAND</p>	<p>3. HERITAGE</p>	<p>4. LIVEABLE NEIGHBOURHOODS</p>	<p>5. HOUSING QUALITY</p>	<p>6. SOCIAL INCLUSION</p>	<p>7. HEALTH AND WELLBEING</p>	<p>8. ECONOMIC GROWTH</p>	<p>9. NEED TO TRAVEL</p>	<p>10. OPEN SPACE</p>	<p>11. BIODIVERSITY</p>	<p>12. CLIMATE CHANGE</p>	<p>13. RESOURCE EFFICIENCY</p>	<p>14. NATURAL RESOURCES</p>
<p><b>Reasonable Alternative 2: Business-led development</b></p>	<p>+</p>	<p>+</p>	<p>0</p>	<p>-</p>	<p>0</p>	<p>+</p>	<p>0</p>	<p>++</p>	<p>0</p>	<p>0</p>	<p>0</p>	<p>0</p>	<p>0</p>	<p>0</p>
<p><b>Commentary on assessment of likely significant effects of Alternative 2</b></p>	<p>This alternative is where the allocation is for business-led use. The other provisions of policy HC1 remain unchanged, for example for example the possible new ticket hall, step free access, public realm improvements and potential for comprehensive development.</p> <p>There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. Allocating this site for business-led development could help towards meeting targets for business floorspace, and foster sustainable economic growth in the borough. This would help create employment opportunities that would support social inclusion objectives. The site is within the Lower Holloway Local Shopping Area where smaller-scale retail development to meet the needs of residents is encouraged. As such this alternative has been assessed as having a minor negative effect on the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services. The loss of the music venue would also have a negative effect in relation to liveable neighbourhoods.</p>													
<p><b>Conclusion</b></p>	<p>Two reasonable alternatives to the mixed-use allocation for HC1 were identified: residential-led development and business-led development. Although positive effects could be realised through both residential-led and business-led development, it is considered that the commercial led allocation requiring a mixture of retail uses and re-provision of the existing music venue is appropriate for this specific site given the current uses on the site and its location.</p>													

Table 3.129 Site Assessment HC2: Spring House, 6-38 Holloway Road

IJA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
HC2: Spring House, 6-38 Holloway Road	0	+	0	+	0	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>HC2 is allocated for intensification for commercial/higher education uses.</p> <p>The allocation is an opportunity to increase commercial or higher education use in a Priority Employment Location and will have a positive effect on optimising use of previously developed land and buildings. Both uses support economic growth and provide opportunities for residents to develop skills and access employment in the borough, which accords with the social inclusion objective. The site is located in close proximity to Highbury and Islington Station. This good level of connectivity should have a positive effect with regards to reducing the need to travel by non-sustainable modes of transport, which in turn should help with the borough's aims of reducing contributions to climate change and improving air quality.</p>													
IJA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Mixed-use development	0	+	0	0	+	0	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant</b>	<p>The alternative is a mix of business and residential uses. This could have a positive effect in terms of optimising use of previously developed land and buildings. The site is already in education use, and is located within a designated Priority Employment Location. The loss of education use could have a negative effect on social infrastructure provision and therefore liveable neighbourhoods and social inclusion objectives. Conversely, development of a mix of uses could promote liveable neighbourhoods, providing residents with access to a range of services and facilities, overall</p>													

<b>effects of Alternative 1</b>	<p>this is considered to lead to a neutral effect on liveable neighbourhoods. Employment opportunities created at the site could contribute towards meeting the borough’s social inclusion and economic growth objectives.</p> <p>The provision of housing would have a positive effect in terms of meeting one of the borough’s priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p> <p>Overall, given the loss of education use, the alternative is considered to have a neutral effect on social inclusion.</p>
<b>Conclusion</b>	<p>One reasonable alternative to the proposed allocation for HC2 was identified: mixed-use development. Although positive effects could be realised through mixed-use development it is considered that as the site is already in education use and located within a PEL, an allocation that didn’t secure business or education uses would not be the most appropriate use of land.</p>

Table 3.130 Site Assessment HC3: Highbury and Islington Station, Holloway Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>HC3: Highbury and Islington Station, Holloway Road</b>	++	++	0	++	0	0	0	++	0	+	0/-	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>HC3 is allocated for redevelopment of existing buildings, with potential to deck over the existing railway lines and build above the tracks. There should be a significant element of open space, public realm and station forecourt improvements. The station will be retained. Mixed use development is appropriate with active ground floor retail, leisure and cultural uses encouraged on those parts of the site fronting on to the station forecourt, Highbury Corner and Holloway Road. Office uses (B1a) should be prioritised above the station. The large size of this site also lends support to the practicality of a designing a mixed use scheme.</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. Impacts on the North London Line East and West SINCs will need to be carefully addressed or there is the potential for development to have negative effects on green infrastructure and biodiversity.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Residential-led development	++	-	0	0/+	++	+	0	-	0	+	0/-	0	0	0
Commentary on assessment of likely significant effects of Alternative 1	<p>This alternative is for residential-led development. The other provisions of policy HC3 remain unchanged, for example a significant element of open space, public realm and station forecourt improvements with the station retained.</p> <p>The site is partially within the Highbury Corner Priority Employment Location (PEL) and Lower Holloway Local Shopping Area and where non-residential uses are likely to be necessary to meet the needs of residents for services and facilities and where employment provision is prioritised. The alternative could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. The alternative could have a minor negative effect on the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services, balanced against the wider public realm improvements this is likely to lead to a neutral/minor positive score overall. A minor negative has been identified in relation to economic growth because a residential-led scheme would not contribute towards the wider employment function of the PEL.</p> <p>Allocating this site for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 2: Business-led development	++	++	0	0/+	0	+	0	++	0	+	0/-	0	0	0
Commentary on assessment of	<p>This alternative is for business-led development. The other provisions of policy HC3 remain unchanged, for example a significant element of open space, public realm and station forecourt improvements with the station retained.</p>													

<b>likely significant effects of Alternative 2</b>	There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. The site is within a PEL where the delivery of business floorspace is a priority. Allocating this site for business-led development could help towards meeting targets for business floorspace, and foster sustainable economic growth in the borough. This would help create employment opportunities that would support the council's social inclusion objectives. A business-led development could result in a minor negative effect on the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services; balanced against the wider public realm improvements this is likely to lead to a neutral/minor positive score overall.
<b>Conclusion</b>	Two reasonable alternatives to the mixed-use allocation for HC3 were identified: residential-led development and business-led development. Although positive effects could be realised through both residential-led and business-led development, it is considered that a mixed-use allocation for retail, leisure, culture and business uses alongside public realm and open space improvements is appropriate for this site considering its excellent transport connections, existing uses and location within a PEL and LSA.

Table 3.131 Site Assessment HC4: Dixon Clark Court, Canonbury Road

<b>IIA Objective / Site</b>	<b>1. HIGH QUALITY ENVIRON</b>	<b>2. EFFICIENT USE OF LAND</b>	<b>3. HERITAGE</b>	<b>4. LIVEABLE NEIGHBOURHOODS</b>	<b>5. HOUSING QUALITY</b>	<b>6. SOCIAL INCLUSION</b>	<b>7. HEALTH AND WELLBEING</b>	<b>8. ECONOMIC GROWTH</b>	<b>9. NEED TO TRAVEL</b>	<b>10. OPEN SPACE</b>	<b>11. BIODIVERSITY</b>	<b>12. CLIMATE CHANGE</b>	<b>13. RESOURCE EFFICIENCY</b>	<b>14. NATURAL RESOURCES</b>
<b>HC4: Dixon Clark Court, Canonbury Road</b>	+	++	0	+	++	+	+	0	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>HC4 is allocated for additional housing, community space and public realm improvements.</p> <p>The allocation aims to optimise the use of the site by providing additional housing units. Affordable housing would be provided as part of any residential element, contributing towards meeting Islington's housing need as well as addressing objectives relating to social inclusion. It also provides an opportunity for community space and public realm improvements that enhance the quality and liveability of the area.</p>													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified. The site is a housing estate owned by the London Borough of Islington (LBI) identified as having potential to accommodate additional housing development and has planning permission that accords with the uses proposed in the draft allocation.													



Table 3.132 Site Assessment HC5: 2 Holloway Road, N7 8JL and 4 Highbury Crescent, London

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
HC5: 2 Holloway Road, N7 8JL and 4 Highbury Crescent, London	+	+	+	+	+	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>HC5 is allocated for mixed use commercial and residential redevelopment.</p> <p>The allocation will have a positive effect in optimising the use of previously developed land and buildings, providing commercial and residential uses in an appropriate location. The allocation will positively contribute to the viability and vitality of the Lower Holloway Local Shopping Area, creating a continuous active frontage along Holloway Road and contributing to local economic growth. Affordable housing would be provided as part of any residential element, contributing towards meeting Islington's housing need as well as addressing objectives relating to social inclusion. In addition, the development considerations specify that any proposals must be sensitively designed with regards to the adjacent Grade II listed building. It is noted that there is potential with mixed use allocations that higher-value residential uses may be chosen at the expense of delivering the employment floorspace needed to support Islington's projected economic growth.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Residential-led development	+	-	+	-	++	+	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant</b>	<p>This alternative is for residential-led development. The other provisions of policy HC5 remain unchanged, for example in relation the potential for intensification of the site, and the need for proposals to be sensitively designed with regards to the adjacent Grade II listed building, The site is within the Highbury Corner Priority Employment Location (PEL) and partially within Lower Holloway Local Shopping Area where non-residential uses are likely to be necessary to meet the needs of residents for services and facilities and where employment provision is prioritised.</p>													

<b>effects of Alternative 1</b>	<p>This alternative could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. This alternative has also been assessed as having a minor negative effect on the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services. A minor negative has been identified in relation to economic growth because a residential-led scheme would not contribute towards the wider employment function of the PEL.</p> <p>Allocating this site for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p>													
<b>IIA Objective / Site</b>	<b>1. HIGH QUALITY ENVIRON</b>	<b>2. EFFICIENT USE OF LAND</b>	<b>3. HERITAGE</b>	<b>4. LIVEABLE NEIGHBOURHOODS</b>	<b>5. HOUSING QUALITY</b>	<b>6. SOCIAL INCLUSION</b>	<b>7. HEALTH AND WELLBEING</b>	<b>8. ECONOMIC GROWTH</b>	<b>9. NEED TO TRAVEL</b>	<b>10. OPEN SPACE</b>	<b>11. BIODIVERSITY</b>	<b>12. CLIMATE CHANGE</b>	<b>13. RESOURCE EFFICIENCY</b>	<b>14. NATURAL RESOURCES</b>
<b>Reasonable Alternative 2: Business-led development</b>	+	+	+	-	-	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>This alternative is for business-led development. The other provisions of policy HC5 remain unchanged, for example in relation the potential for intensification of the site, and the need for proposals to be sensitively designed with regards to the adjacent Grade II listed building, There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. The site is within a PEL where the delivery of business floorspace is a priority. Allocating this site for business-led development could help towards meeting targets for business floorspace, and foster sustainable economic growth in the borough. This would help create employment opportunities that would support the council's social inclusion objectives. A business-led development could result in a minor negative effect on the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services. Given the existing residential use on the site a business-led development could see a loss of housing which would have a significant negative effect in relation to objective 4.</p>													
<b>Conclusion</b>	<p>Two reasonable alternatives to the mixed-use allocation for HC5 were identified: residential-led development and business-led development. Although positive effects could be realised through both residential-led and business-led development, it is considered that a mixed-use allocation for commercial and residential uses retaining the retail frontage onto Holloway Road is appropriate for this site in this instance considering its existing uses and location within a PEL and LSA.</p>													

Table 3.133 Site Assessment HC6: Land adjacent to 40-44 Holloway Road

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
HC6: Land adjacent to 40-44 Holloway Road	+	++	0	0	0	+	0	+	0	0	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	<p>HC6 is allocated for business-led development in line with its Priority Employment Location designation.</p> <p>The allocation provides an opportunity to optimise the use of vacant land and develop business space that will contribute to the overall provision of business floorspace needed for the borough’s economic growth. This should provide more opportunity for residents to access employment in the borough, in line with the social inclusion objective. Development should have a positive effect on the quality of the built environment given the site is currently a vacant plot, making the area a safer and more inclusive place to visit.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Mixed-use commercial and residential development	+	+	0	+	+	0	0	+	0	0	0	0	0	0
Commentary on assessment of likely significant effects of Alternative 1	<p>Alternative 1 is for mixed use commercial and residential development. This would continue to have a positive effect on the quality of the built environment given the site is currently a vacant plot, making the area a safer and more inclusive place to visit.</p> <p>Allocating this site for mixed-use commercial and residential development could have a minor positive effect in terms of the efficient use of land and buildings.</p>													

	<p>The alternative has the potential to have a negative effect on economic growth because certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace on the site, thereby impacting on potential employment growth. However, given the currently vacant nature of the site, a mixed use development would provide some intensification of employment use. A minor positive has therefore been identified in relation to economic growth.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access for residents to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>Allocating this site for mixed-use development should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses. Improved housing options would also have a positive effect in terms of social inclusion. It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 2: Residential-led development	+	+	0	0	++	+	0	-	0	0	0	0	0	0
Commentary on assessment of likely significant effects of Alternative 2	<p>Alternative 1 is for residential-led development. This would continue to have a positive effect on the quality of the built environment and had a positive effect on optimising the use of land given the site is currently a vacant plot</p> <p>It is considered that the alternative is likely to have a minor negative effect on economic growth if the site is developed for residential use given it falls within the Highbury Corner Priority Employment Location where the delivery of business floorspace is a priority. Allocating this site for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion. It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>													
Conclusion	<p>Two reasonable alternatives to the business-led allocation for HC6 were identified: mixed-use residential and commercial development and residential-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's</p>													

identified development needs, and residential-led development could have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business-led development was most appropriate for this site given its PEL designation and the borough's projected need for a significant amount of additional employment floorspace.

## Other Important Sites

Table 3.134 Site Assessment OIS1: Leroy House, 436 Essex Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
OIS1: Leroy House, 436 Essex Road, N1 3QP	+	+	0	0	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>OIS1 is allocated for refurbishment of employment space for small/medium sized enterprises. There may be some scope for intensification of business space, to provide improved quality and quantity of spaces for small/medium sized enterprises.</p> <p>The allocation will help support economic growth in a designated Priority Employment Location and provide more opportunity for residents to access employment in the borough, in line with the social inclusion objective. Intensification of the site will optimise use of previously developed land. Encouraging pedestrian and public realm improvements as well as providing a more active frontage will have a positive effect on creating a safer and more inclusive environment and more sustainable neighbourhood; this could help to promote walking and cycling however the specific effects are uncertain and so have been assessed as neutral.</p>													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified. The site has planning permission that accords with the uses proposed in the draft allocation.													

Table 3.135 Site Assessment OIS2: The Ivories, 6-8 Northampton Street

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
OIS2: The Ivories, 6-8 Northampton Street, N1 2HY	0	+	0	0	0	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>OIS2 is allocated for refurbishment of business space for small/medium sized enterprises. There may be some scope for intensification of business space, to provide improved quality and quantity of spaces for small/medium sized enterprises.</p> <p>The allocation will help support economic growth and in particular the cultural and third sectors in a designated Priority Employment Location, and provide more opportunity for residents to access employment in the borough in line with the social inclusion objective. Intensification of the site will optimise use of previously developed land.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Mixed-use commercial and residential development	0	+	0	+	+	0	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>Allocating this site for mixed-use commercial and residential development could have a limited positive effect in terms of the efficient use of land and buildings, as the site could accommodate a wider range of uses and there may be some scope for limited intensification.</p> <p>The flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. The alternative has the potential to have a negative effect on economic growth because certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace on the site, thereby impacting on potential employment growth. Given the current employment use of the site a mixed use development could also lead to the loss of existing business floorspace which would also have a negative impact on economic growth.</p>													

	<p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access for residents to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>Allocating this site for mixed-use development should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 2: Residential-led development	0	-	0	+	++	+	0	-	0	0	0	0	0	0
Commentary on assessment of likely significant effects of Alternative 2	<p>Allocating the site for residential-led development could lead negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations. The site is within the Northampton Street PEL where employment uses are prioritised. The site is also in existing employment use. A residential-led allocations in these locations may not adequately balance the competing demands for land in the borough and provide for the full range of development needs. A minor negative has therefore been identified in relation to the efficient use of land.</p> <p>It is considered that the alternative is likely to have a significant negative effect on economic growth if the site is developed for residential use given it falls within a Priority Employment Location where the delivery of business floorspace is a priority and given the employment use of the site.</p> <p>The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>													
Conclusion	<p>Two reasonable alternatives to the business-led allocation for OIS2 were identified: mixed-use residential and commercial development and residential-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development could have positive effects in terms of the delivery of good-quality housing, on</p>													

balance it was considered that business use was most appropriate for this site given its existing use, PEL designation and the borough's projected need for a significant amount of additional employment floorspace.

Table 3.136 Site Assessment OIS3: Belgravia Workshops, 157-163 Marlborough Road

I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
OIS3: Belgravia Workshops, 157-163 Marlborough Road, N19 4NF	0	+	0	0	0	+	0	+	0	0	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	OIS3 is allocated for refurbishment of business space for small/medium sized enterprises. There may be some scope for intensification of business space, to provide improved quality and quantity of spaces for small/medium sized enterprises. The allocation will help support economic growth and in particular the cultural and third sectors in a designated Priority Employment Location, and provide more opportunity for residents to access employment in the borough in line with the social inclusion objective. Intensification of the site will optimise use of previously developed land.													
I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Mixed-use commercial and residential development	0	+	0	+	+	0	0	-	0	0	0	0	0	0



**Commentary on assessment of likely significant effects of Alternative 1**

Allocating this site for mixed-use commercial and residential development could have a limited positive effect in terms of the efficient use of land and buildings, as the site could accommodate a wider range of uses and there may be some scope for limited intensification.

The flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. The alternative has the potential to have a negative effect on economic growth because certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace on the site, thereby impacting on potential employment growth. Given the current employment use of the site a mixed use development could also lead to the loss of existing business floorpace which would also have a negative impact on economic growth.

The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access for residents to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.

Residential development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.

It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 2: Residential-led development	0	-	0	+	++	+	0	--	0	0	0	0	0	0
Commentary on assessment of likely significant effects of Alternative 2	<p>Allocating the site for residential-led development could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations. The site is within the Hornsey Road/Marlborough Road Priority Employment Location where employment uses are prioritised. The sites is also in existing employment use. A residential-led allocation in this location may not adequately balance the competing demands for land in the borough and provide for the full range of development needs.</p> <p>It is considered that the alternative is likely to have a significant negative effect on economic growth if the site is developed for residential use given it falls within a Priority Employment Location where the delivery of business floorspace is a priority and given the employment use of the site.</p>													

	<p>Allocating this site for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>
<b>Conclusion</b>	<p>Two reasonable alternatives to the business-led allocation for OIS3 were identified: mixed-use residential and commercial development and residential-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development could have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business use was most appropriate for this site given its existing use, PEL designation and the borough's projected need for a significant amount of additional employment floorspace.</p>

Table 3.137 Site Assessment OIS4: The BT Telephone Exchange, Kingsland Green

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>OIS4: The BT Telephone Exchange, Kingsland Green</b>	+	+	0	+	+	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>OIS4 is allocated for mixed use commercial and residential development, which maximises the provision of office use at the ground floor and lower levels. Development which improves the quality and quantity of existing employment provision is encouraged.</p> <p>The allocation is an opportunity to increase business floorspace in a Priority Employment Location. The allocation will have a positive effect on optimising use of previously developed land and buildings. The allocation will have a positive effect on economic growth in the borough through retaining existing employment uses and promoting additional use of a partially vacant site. The site would provide affordable housing as part of any residential element, contributing towards meeting Islington's housing need as well as addressing objectives relating to social inclusion. It is</p>													

	noted that there is potential with mixed use allocations that higher-value residential uses may be chosen at the expense of delivering the employment floorspace needed to support Islington’s projected economic growth. The allocation promotes liveable neighbourhoods by requiring improvements to permeability between the site and the neighbouring Burder Close Estate.													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Residential-led development	+	-	0	-	++	+	0	-	0	0	0	0	0	0
Commentary on assessment of likely significant effects of Alternative 1	<p>This alternative is for residential-led development. The other provisions of policy OIS4 remain unchanged, for example improving permeability. The site is within the Balls Pond Road East PEL where employment uses are prioritised. The sites is also in existing employment use. A residential-led allocation in this location may not adequately balance the competing demands for land in the borough and provide for the full range of development needs. A minor negative effect in relation to the efficient use of land has therefore been identified. A minor negative has been identified in relation to economic growth because a residential-led scheme would not contribute towards the wider employment function of the PEL.</p> <p>Allocating this site for residential-led development would have a positive effect in terms of meeting one of the borough’s priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 2: Business-led development	0	+	0	0	0	+	0	++	0	0	0	0	0	0

<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>This alternative is for business-led development. The other provisions of policy OIS4 remain unchanged, for example improving permeability. Given a large part of the telephone exchange is vacant and the scope for comprehensive redevelopment is identified a business-led development within the PEL could have a minor positive effect in relation to the efficient use of the land.</p> <p>There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. The site is within a PEL where the delivery of business floorspace is a priority. Allocating this site for business-led development could help towards meeting targets for business floorspace, and foster sustainable economic growth in the borough. This would help create employment opportunities that would support social inclusion objectives.</p>
<b>Conclusion</b>	<p>Two reasonable alternatives to the mixed-use allocation for OIS4 were identified: residential-led development and business-led development. Although positive effects could be realised through both residential-led and business-led development, it is considered that a mixed-use allocation for commercial and residential uses is appropriate for this site in this instance considering its location within a PEL and close proximity to Dalston Town Centre.</p>

Table 3.138 Site Assessment OIS5: Bush Industrial Estate, Station Road

<b>IIA Objective / Site</b>	<b>1. HIGH QUALITY ENVIRON</b>	<b>2. EFFICIENT USE OF LAND</b>	<b>3. HERITAGE</b>	<b>4. LIVEABLE NEIGHBOURHOODS</b>	<b>5. HOUSING QUALITY</b>	<b>6. SOCIAL INCLUSION</b>	<b>7. HEALTH AND WELLBEING</b>	<b>8. ECONOMIC GROWTH</b>	<b>9. NEED TO TRAVEL</b>	<b>10. OPEN SPACE</b>	<b>11. BIODIVERSITY</b>	<b>12. CLIMATE CHANGE</b>	<b>13. RESOURCE EFFICIENCY</b>	<b>14. NATURAL RESOURCES</b>
<b>OIS5: Bush Industrial Estate, Station Road, N19 5UN</b>	0	+	0	0	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>OIS5 is allocated for the retention and intensification for industrial uses (light industrial, B2 and B8 uses). Office floorspace will only be acceptable as part of a hybrid workspace scheme.</p> <p>The allocation is an opportunity to increase industrial floorspace in a Locally Significant Industrial Site and will have a positive effect in optimising use of previously developed land and buildings. The allocation will have a positive effect on economic growth in the borough through retaining existing employment uses and providing new employment opportunities for residents, in line with the social inclusion objective. Although the allocation supports the intensification of industrial uses, which may have a negative impact on traffic congestion and air quality, this would be counteracted by keeping industrial suppliers in the borough thereby enabling shorter journeys and supply chains than if they had to travel into their central London clients from further afield. It is noted that Policy S7 provides strong criteria to mitigate any potential negative effects on air quality and the overall effect on the need to travel, climate change and natural resources has therefore been scored as neutral.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Housing co-location	0	-	0	-	+	0	0	-	-	0	0	-	0	-
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>Allocating the Bush Industrial Estate for the co-location of housing with industrial uses would bring some benefits in relation to the delivery of much needed additional housing.</p> <p>It is recognised that high quality architecture could be introduced as part of a mix of uses alongside industrial, this is also likely to be more challenging given the nature of the LSIS and this could also undermine the industrial character of the LSIS. The effect on the quality of the built environment will come down to scheme design and is therefore uncertain – a neutral effect has therefore been identified in relation to objective 1.</p> <p>Although residential uses can be accommodated elsewhere in the borough to meet the borough’s housing targets, locations suitable for industrial uses are significantly more constrained given land values in the borough and the potential for such uses to be viewed as ‘bad neighbours’. For alternative 1 co-location of industrial space with residential uses would help to achieve an effective use of land. Whilst this intensification of uses could bring some additional industrial floorspace to the LSIS, there needs to be a balance with protecting the full range of industrial functions. The co-location of industrial floorspace with housing is likely to lead to the exclusion of some traditional industrial uses in favour of light industrial activities which can coexist with residential development. This will have a minor negative effect on the balance of uses and industrial activities in the LSIS particularly in terms of focusing development in the most appropriate locations.</p> <p>With regards to the impact of alternative 1 on health and wellbeing, the co-location of residential uses with industrial uses within the LSIS could have an effect on the wellbeing of future residents relating to aspects of industrial operations such as noise that it may not be possible to mitigate against, however the effects of this are uncertain in relation to scheme design and site location and so a neutral effect has been identified overall. Whilst a minor positive effect in relation to the provision of housing that would contribute towards the borough’s evidenced need for housing is recognised, the effect of alternative 1 on social inclusion is considered to be neutral given that residential reduces employment floorspace which would deliver potential job opportunities for local residents.</p> <p>Alternative 1 would have a minor negative effect on economic growth. Whilst this alternative could bring some intensification of industrial floorspace, the extent to which industrial uses could be intensified would be more limited. It is also likely to reduce the range of business in the area because some types of industrial would be prioritised as being compatible for residential uses, therefore having an impact on range of business and jobs. The intensification of residential uses would not provide long-term employment opportunities and would likely limit the capacity for the existing business sectors to expand and the economic activity of the area.</p>													

	<p>Connected to this, although residential use within the LSIS could reduce travel in some ways – for example if future residents live close to their places of work – whilst it could lead to the intensification of industrial uses, the scope for intensification of industrial operations in the LSIS is lessened and the range of industrial uses could lead to the displacement of industrial businesses to Outer London industrial locations while still needing to travel to central London to access their markets. This could increase vehicle mileage through Islington, which risks increased congestion and emissions, and have negative impacts on climate change and air quality. The alternatives would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expanded in the longer term. In this way alternative 1 is considered to also have a minor negative effect in terms of reducing contributions to climate change (objective 12) and in relation to objective 14 (maximising protection of natural resources including water, land and air).</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 2 Office co-location	0	+	0	0	0	+	0	0	-	0	0	-	0	-
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>This alternative is for the co-location of industrial uses with office uses.</p> <p>Incorporating office uses into the LSIS allocations could undermine the industrial character of the built environment. Office occupiers have different demands to industrial operators in terms of floorspace requirements. Although it is recognised that high quality architecture could be introduced as part of a mix of uses alongside industrial, this is also likely to be more challenging given the nature of the LSIS and this could also undermine the industrial character of the LSIS. The effect on the quality of the built environment will come down to scheme design and is therefore uncertain – a neutral effect has therefore been identified in relation to objective 1.</p> <p>For Alternative 2, there will be a neutral effect on optimisation of land use and balancing economic needs. As a higher density employment use, offices could result in an optimisation of existing employment floorspace and some intensification of industrial floorspace. If new development is likely to introduce significant quantum of office, the land use balance could quickly shift to offices given the higher values of this use in the borough. Whilst there are land use benefits from the co-location of offices with industrial, depending on the extent to which offices are intensified, there are potential negative impacts that could arise from the displacement of industrial activities given that office needs can be demonstrated to be met elsewhere in the borough. On balance, this alternative is considered to have a neutral effect for the objective.</p> <p>For Alternative 2 there would be a minor positive effect on economic growth. Whilst on the one hand the intensification of new business floorspace as office space co-located with industrial will strengthen the local economy and provide a higher density of jobs by encouraging development of employment floorspace, there could be negative effects in the longer term sustainability of the LSIS. The function of the industrial</p>													

	<p>area would change as land values from office uses out-compete new industrial floorspace. As part of the balance, whilst there are other locations for housing and offices be promoted in the borough, industrial uses are only sought in LSISs and therefore the scope for intensification of offices is particularly important in this context. The scale of this effect would be dependent on the degree of the impact on the industrial function of the area caused by office development over time, and the scale of industrial activities lost, displaced and /or prevented from expanded in this location. The alternative would have a positive effect on social inclusion by providing opportunities for residents to access employment in the borough in line with the social inclusion objective. Industrial sectors provide job opportunities for resident population. Opportunities within these sectors may offer more diverse ways of accessing employment through learning skills on the job for those who have low qualification levels or no qualifications, who often face more barriers to access work. If these sectors are lost in the local area, residents dependent on these jobs may be at risk of unemployment.</p> <p>Alternative 2 could lead to the intensification of industrial uses, the scope for intensification of industrial operations in the LSIS is lessened and the range of industrial uses could lead to the displacement of industrial businesses to Outer London industrial locations while still needing to travel to central London to access their markets. This could increase vehicle mileage through Islington, which risks increased congestion and emissions, and have negative impacts on climate change and air quality. The alternatives would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expanded in this locations. In this way alternative 2 is considered to also have a minor negative effect in terms of reducing contributions to climate change (objective 12) and in relation to objective 14 (maximising protection of natural resources including air).</p> <p>The effects of alternative 2 on the other IIA objectives are considered to be neutral.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 3 Office and housing co-location	0	-	+	-	+	0	0	-/0	-	0	0	-	0	-
Commentary on assessment of likely significant effects of Alternative 3	<p>This alternative is for the co-location of industrial uses with office and housing.</p> <p>Incorporating office and housing uses into the LSIS allocations could undermine the industrial character of the built environment. Although it is recognised that high quality architecture could be introduced as part of a mix of uses alongside industrial, this is also likely to be challenging given the nature of the LSIS. However, the effect on the quality of the built environment will come down to scheme design and is therefore uncertain – a neutral effect has therefore been identified in relation to objective 1.</p>													

The co-location of mixed office and residential uses could optimise the use of sites and bring more efficient uses which are adaptable to future economic needs. However, there could be negative effects because the range of industrial uses or size of resulting facilities may not be suitable for all the range of existing and future operations in the LSIS (i.e. yard space), which would have a negative impact on balancing competing demand for development needs. A minor negative effect has therefore been identified in relation to objective 2.

Opening the LSIS up to residential development increases opportunities for conflict between industrial occupiers, who may operate long hours, generating noise and frequent vehicle movements, and new residential occupiers. As such alternative 1 is assessed as having a minor negative effect on the promotion of liveable neighbourhoods, as set out in objective 4.

Alternative 3 would lead to a smaller amount of affordable housing than alternative 1 as development would need to accommodate offices and industrial uses. Overall, this alternative will also have minor positive effects for housing.

The co-location of residential uses with industrial uses within the LSIS could have an effect on the wellbeing of future residents relating to aspects of industrial operations such as noise that it may not be possible to mitigate against, however the effects of this are uncertain in relation to scheme design and site location and so a neutral effect has been identified overall.

Alternative 3 could have a minor negative effect on economic growth. Whilst this alternative could bring some intensification of industrial floorspace, the extent to which industrial uses could be intensified would be more limited than if it is focused on industrial intensification. It is also likely to reduce the range of businesses because some types of industrial would be prioritised as being compatible for residential uses, therefore having an impact on range of business and jobs. The intensification of residential uses would not create long-term employment opportunities and would likely limit the capacity for the existing business sectors to expand. However, the intensification of some business floorspace as office space co-located with industrial will strengthen the local economy and provide a higher density of jobs albeit this could create negative effects on the longer term sustainability because the capacity to which industrial floorspace can be intensified will compete with offices. As part of the balance, whilst there are other locations for housing and offices promoted in the borough, industrial uses are only sought in LSISs and therefore the scope for intensification of industrial is particularly important in this context. The scale of this effect would be dependent on the degree of the impact on the industrial function caused by office development over time, and the scale of industrial activities lost, displaced and /or prevented from expanded in this location. Given this a neutral/minor negative effect has been identified overall.

Residential development would pose limitations to on-site loading and parking requirements of industrial uses. This could lead to increased traffic congestion and further pressures on road networks. Office uses are likely to create more journeys to work than many industrial uses, and for this reason are usually supported in locations which are more accessible than the LSIS. Considering these effects, Alternative 3 would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expanded in this location. In this way alternative 2 is considered to also have a minor negative effect in terms of reducing contributions to climate change (objective 12) and in relation to objective 14 (maximising protection of natural resources including air).

## Conclusion

Three reasonable alternatives to the allocated use (industrial consolidation and intensification) were identified for site OIS5: the co-location of industrial uses with housing, the co-location of industrial uses with offices and the co-location of industrial uses with both housing and offices. Although each of these alternative uses would have some positive effects - such as the provision of additional housing or the provision of



additional business floorspace to support the borough's economic growth - it is considered that this is outweighed by the borough's need to protect its limited supply of industrial floorspace and support the industrial function of the Bush Industrial Estate LSIS.

Table 3.139 Site Assessment OIS6: 100 Hornsey Road, N7 7NG

I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
OIS6: 100 Hornsey Road, N7 7NG	+	+	0	+	+	+	0	0	0	+	0/+	+	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>OIS6 is allocated for residential redevelopment with the provision of nursery open space, and public realm improvements. The allocation will optimise use of previously developed land, providing residential use in an appropriate location. The site would provide affordable housing as part of any residential element, contributing towards meeting Islington's housing need as well as addressing objectives relating to social inclusion and health and wellbeing by enabling people to move out of poor quality/inappropriate housing. The allocation promotes liveable neighbourhoods by requiring enhancements to the Hornsey Road streetscene. Open space improvements are required as part of the allocation, which could also have a positive effect on biodiversity.</p>													
<b>Reasonable alternative summary</b>	<p>No reasonable alternative was identified. The site has planning permission that accords with the uses proposed in the draft allocation.</p>													

Table 3.140 Site Assessment OIS7: Highbury Delivery Office, 2 Hamilton Lane

I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
OIS7:	0	+	0	0	+	+	0	++	0	0	0	0	0	0

<b>Highbury Delivery Office, 2 Hamilton Lane, N5 1SW</b>															
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>OIS7 is allocated for: retention and re-provision of business floorspace, an element of residential use may be acceptable. The re-provision of business floorspace will have a positive impact on economic growth. The site would provide affordable housing as part of any residential element, contributing towards meeting Islington's housing need as well as addressing objectives relating to social inclusion. The allocation seeks to optimise the use of the site, whilst respecting the constraints placed on development by its backland location.</p>														
<b>IIA Objective / Site</b>	<b>1. HIGH QUALITY ENVIRON</b>	<b>2. EFFICIENT USE OF LAND</b>	<b>3. HERITAGE</b>	<b>4. LIVEABLE NEIGHBOURHOODS</b>	<b>5. HOUSING QUALITY</b>	<b>6. SOCIAL INCLUSION</b>	<b>7. HEALTH AND WELLBEING</b>	<b>8. ECONOMIC GROWTH</b>	<b>9. NEED TO TRAVEL</b>	<b>10. OPEN SPACE</b>	<b>11. BIODIVERSITY</b>	<b>12. CLIMATE CHANGE</b>	<b>13. RESOURCE EFFICIENCY</b>	<b>14. NATURAL RESOURCES</b>	
<b>Reasonable Alternative 1: Mixed-use commercial and residential development</b>	0	+	0	+	+	0	0	-	0	0	0	0	0	0	
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>Allocating this site for mixed-use commercial and residential development could have a limited positive effect in terms of the efficient use of land and buildings, as the site could accommodate a wider range of uses.</p> <p>The flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. The alternative has the potential to have a negative effect on economic growth because certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace on the site, thereby impacting on potential employment growth. Given the current employment use of the site a mixed use development could also lead to the loss of existing business floorpace which would also have a negative impact on economic growth.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access for residents to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>Residential development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p>														

	It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 2: Residential-led development	0	+	0	+	++	+	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>Allocating the site for residential-led development could help to optimise use of the land whilst respecting the constraints placed on development by its backland location.</p> <p>Given the employment use of the site a residential-led development would lead to minor negative effect on economic growth.</p> <p>The most significant positive effect of Alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>													
<b>Conclusion</b>	Two reasonable alternatives to the business-led allocation for OIS7 were identified: mixed-use residential and commercial development and residential-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development could have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business-led development was the most appropriate use for this site given its existing use and the borough's projected need for a significant amount of additional employment floorspace.													

Table 3.141 Site Assessment OIS8: Legard Works, 17a Legard Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
OIS8: Legard Works, 17a Legard Road	0	+	0	0	0	+	0	+	0	0	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	OIS8 is allocated for retention and re-provision of business floorspace, and potential for limited intensification of business use. This will positively contribute to the borough's economic growth, and provide more opportunity for residents to access employment in the borough in line with the social inclusion objective.													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Mixed-use commercial and residential development	0	+	0	+	+	0	0	0	+	0	0	+	0	+
Commentary on assessment of likely significant effects of Alternative 1	<p>Allocating this site for mixed-use commercial and residential development could have a limited positive effect in terms of the efficient use of land and buildings, as the site could accommodate a wider range of uses and there may be some scope for limited intensification.</p> <p>The flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. The alternative has the potential to have a negative effect on economic growth because certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace on the site, thereby impacting on potential employment growth. Given the current employment use of the site a mixed use development could also lead to the loss of existing</p>													

	<p>business floorpace, however commercial use as part of a mix of uses could also provide employment use and so a neutral effect has been identified in relation to economic growth.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access for residents to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>Residential development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 2: Residential-led development	0	+	0	+	++	+	0	-	+	0	0	+	0	+
Commentary on assessment of likely significant effects of Alternative 2	<p>Allocating the site for residential-led development could help to optimise use of the land as there may be some scope for limited intensification. Given the employment use of the site however a residential-led development would lead to minor negative effect on economic growth. The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. Improved housing options would also have a positive effect in terms of social inclusion. It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>													
Conclusion	<p>Two reasonable alternatives to the business-led allocation for OIS8 were identified: mixed-use residential and commercial development and residential-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development could have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business use was most appropriate for this site given its existing use and the borough's projected need for a significant amount of additional employment floorspace.</p>													

Table 3.142 Site Assessment OIS9: Ladbroke House, 62-66 Highbury Grove

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
OIS9: Ladbroke House, 62-66 Highbury Grove	0	0	0	+	0	0	0	+	0	0	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	OIS9 is allocated for retention of education use. This would have a positive impact on the liveability of the neighbourhood by providing an essential social infrastructure use for local residents as well as employment opportunities. The use of the site is already optimised and no extra floorspace is expected.													
Reasonable alternative summary	No reasonable alternative was identified. As development of this site was completed in late 2019 it is proposed to remove the allocation from the Site Allocations DPD.													

Table 3.143 Site Assessment OIS10: Hornsey Road and Grenville Works, 2A Grenville Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
OIS10:	+	+	0	0	0	+	0	+	0	0	0	0	0	0

<b>Hornsey Road and Grenville Works, 2A Grenville Road</b>															
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>OIS10 is allocated for business-led redevelopment with re-provision and intensification for business use (particularly B1c). Development of the site can help to enhance the local character of the area and promote a high quality built environment.</p> <p>The allocation optimises the use of previously developed land and the provision of business floorspace would have a positive impact on local economic growth in a Priority Employment Location, providing opportunities for residents to access employment in the borough in line with the social inclusion objective.</p>														
<b>IIA Objective / Site</b>	<b>1. HIGH QUALITY ENVIRON</b>	<b>2. EFFICIENT USE OF LAND</b>	<b>3. HERITAGE</b>	<b>4. LIVEABLE NEIGHBOURHOODS</b>	<b>5. HOUSING QUALITY</b>	<b>6. SOCIAL INCLUSION</b>	<b>7. HEALTH AND WELLBEING</b>	<b>8. ECONOMIC GROWTH</b>	<b>9. NEED TO TRAVEL</b>	<b>10. OPEN SPACE</b>	<b>11. BIODIVERSITY</b>	<b>12. CLIMATE CHANGE</b>	<b>13. RESOURCE EFFICIENCY</b>	<b>14. NATURAL RESOURCES</b>	
<b>Reasonable Alternative 1: Mixed-use commercial and residential development</b>	+	+	0	+	+	0	0	-	0	0	0	0	0	0	
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>This alternative is for mixed-use commercial and residential development. The other provisions of policy OIS10 remain unchanged. Allocating this site for mixed-use commercial and residential development could have a limited positive effect in terms of the efficient use of land and buildings, as the site could accommodate a wider range of uses and given there is some scope for intensification.</p> <p>The flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. The alternative has the potential to have a negative effect on economic growth because certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace on the site, thereby impacting on potential employment growth. Given the site is within the Hornsey Road/Marlborough Road Priority Employment Location and the current employment use of the site a mixed use development could also lead to the loss of existing business floorspace which would also have a negative impact on economic growth.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access for residents to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p>														

	<p>Residential development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential development, which is likely to have positive effects on social inclusion.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 2: Residential-led development	+	-	0	+	++	+	0	--	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>This alternative is for residential-led development. The other provisions of policy OIS10 remain unchanged</p> <p>Allocating the site for residential-led development may not focus development in the most appropriate locations. The site is within the Hornsey Road/Marlborough Road Priority Employment Location where employment uses are prioritised. The sites is also in existing employment use. A residential-led allocations in thislocation may not adequately balance the competing demands for land in the borough and provide for the full range of development needs. A negative effect on the efficient use of land has been identified. It is considered that the alternative is likely to have a significant negative effect on economic growth if the site is developed for residential use given it falls within a Priority Employment Location where the delivery of business floorspace is a priority and given the employment use of the.</p> <p>The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>													
<b>Conclusion</b>	<p>Two reasonable alternatives to the business-led allocation for OIS10 were identified: mixed-use residential and commercial development and residential-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development could have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business use was most appropriate for this site given its existing use and the borough's projected need for a significant amount of additional employment floorspace.</p>													



This allocation is subject to a modification which has been assessed separately in part 2.

Table 3.144 Site Assessment OIS11: Park View Estate, Collins Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
OIS11: Park View Estate, Collins Road	+	+	0	0	+	+	+	0	0	+	+	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>The site is allocated for residential development including the provision/improvement of residential amenity space, community floorspace; and public realm improvements, and has planning permission.</p> <p>The allocation aims to optimise the use of land located in a residential area, offering the opportunity to deliver quality housing in an appropriate location. Affordable housing would be provided as part of the development of the site, contributing towards meeting Islington's housing need as well as addressing objectives relating to social inclusion and health and wellbeing by enabling people to move out of poor quality/inappropriate housing. The allocation requires public realm improvements which will improve the quality of the built environment, creating a safer and more inclusive environment. This improved connectivity could help to promote walking and cycling however the specific effects are uncertain and so have been assessed as neutral.. Improvements to estate amenity space could have minor positive effects in relation to open space and biodiversity.</p>													
<b>Reasonable alternative summary</b>	<p>No reasonable alternative was identified. The site is a housing estate owned by the London Borough of Islington (LBI) identified as having potential to accommodate additional housing development and has planning permission that accords with the uses proposed in the draft allocation.</p>													

Table 3.145 Site Assessment OIS12: 202-210 Fairbridge Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
OIS12: 202-210 Fairbridge Road	0	+	0	0	0	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>The site has planning permission for a mixed use business (B1 and B8) and residential scheme. Should the site be subject to further amendments or new applications, proposals should prioritise intensification of business floorspace.</p> <p>The allocation optimises the use of previously developed land and the provision of business floorspace would have a positive impact on local economic growth in a Priority Employment Location, providing opportunities for residents to access employment in the borough in line with the social inclusion objective.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 1: Mixed-use commercial and residential development	0	+	0	0	+	+	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant</b>	<p>This alternative is for mixed-use business and residential development reflective of the planning consent for the site.</p>													

<b>effects of Alternative 1</b>	<p>The alternative would provide affordable housing as part of any residential element, contributing towards meeting Islington's housing need as well as addressing objectives relating to social inclusion.</p> <p>Allocating this site for mixed-use commercial and residential development could have a limited positive effect in terms of the efficient use of land and buildings, as the site could accommodate a wider range of uses.</p> <p>The alternative has the potential to have a negative effect on economic growth because certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace on the site, thereby impacting on potential employment growth. Given the site is within the Hornsey Road/Marlborough Road Priority Employment Location and the current employment use of the site a mixed use development could lead to the loss of existing business floorspace. A minor negative effect in relation to economic growth has been identified.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>
<b>Conclusion</b>	<p>One reasonable alternative to the business-intensification for OIS12 was identified: mixed-use residential and business development, reflective of the planning permission for the site. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development could have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business intensification is appropriate for this site given its existing use, its location within a PEL and the borough's projected need for a significant amount of additional employment floorspace.</p>

Table 3.146 Site Assessment OIS13: Highbury Roundhouse Community Centre, 71 Ronald's Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
OIS13: Highbury Roundhouse Community Centre, 71 Ronald's Road	0	+	0	++	+	+	+	0	0	0	0	0	0	0

<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>OIS13 is allocated for re-provision of the community centre. Residential development may be acceptable on the Ronalds Road frontage of the site.</p> <p>The most significant positive effect of the allocation is retention of the community centre, which provides a variety of services for residents including childcare, lunch and social clubs for older people, and health and fitness activities for all ages. In addition there will be a positive effect from any residential development at the site which would provide affordable housing and contribute towards meeting Islington's housing need. The allocation will also make more efficient use of the site.</p>
<b>Reasonable alternative summary</b>	No reasonable alternative was identified. The site has planning permission for the construction of a community centre that is close to completion, and the introduction of uses other than residential is not considered feasible in this primarily residential location.

Table 3.147 Site Assessment OIS14: 17-23 Beaumont Rise

<b>IIA Objective / Site</b>	<b>1. HIGH QUALITY ENVIRON</b>	<b>2. EFFICIENT USE OF LAND</b>	<b>3. HERITAGE</b>	<b>4. LIVEABLE NEIGHBOURHOODS</b>	<b>5. HOUSING QUALITY</b>	<b>6. SOCIAL INCLUSION</b>	<b>7. HEALTH AND WELLBEING</b>	<b>8. ECONOMIC GROWTH</b>	<b>9. NEED TO TRAVEL</b>	<b>10. OPEN SPACE</b>	<b>11. BIODIVERSITY</b>	<b>12. CLIMATE CHANGE</b>	<b>13. RESOURCE EFFICIENCY</b>	<b>14. NATURAL RESOURCES</b>
<b>OIS14: 17-23 Beaumont Rise</b>	+	+	0	+	++	+	0	0	0	0	+	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>OIS14 is allocated for new housing including supported living accommodation, with provision of staff facilities, private and communal amenity space and communal rooms. The site has planning permission (P2017/2330/FUL) for 10 flats and 17 supported living units.</p> <p>The most significant positive effect of the allocation is the provision of housing, including supported living accommodation, to meet need in the borough as well as addressing objectives relating to social inclusion. 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.</p>													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified. The site is a housing estate owned by the London Borough of Islington (LBI) identified as having potential to accommodate additional housing development and has planning permission that accords with the uses proposed in the draft allocation.													

Table 3.148 Site Assessment OIS15: Athenaeum Court, 94 Highbury New Park

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>OIS15:</b> Athenaeum Court, 94 Highbury New Park	+	+	0	0	+	+	0	0	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	OIS15 is allocated for infill residential development. The allocation optimises the use of land through infill residential development and positively contributes to the quality of housing provision in the borough. Affordable housing would be provided as part of the development of the site, contributing towards meeting Islington's housing need as well as addressing objectives relating to social inclusion.													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified. The site is a housing estate owned by the London Borough of Islington (LBI) identified as having potential to accommodate additional housing development. It would not be made available for other types of development as this would not align with the Council's objectives for the estate.													

Table 3.149 Site Assessment OIS16: Harvist Estate Car Park

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>OIS16:</b> Harvist Estate Car Park	+	+	0	+	+	+	0	0	+	0	0	+	0	+
<b>Commentary on assessment of likely significant</b>	OIS16 is allocated for residential development with associated amenity space and improvements to the public realm. This is considered to have a positive impact on housing provision, optimising the use of land previously used as a car park and improving the quality of the environment. Affordable housing would be provided as part of the development of the site, contributing towards meeting Islington's housing need as well as													

<b>effects of site allocations</b>	addressing objectives relating to social inclusion. The reduction in car parking could help to reduce dependence on cars, reducing the need to travel, which may also have minor positive effects in relation to the borough's objectives to reduce contributions to climate change and improve air quality.
<b>Reasonable alternative summary</b>	No reasonable alternative was identified. The site is a housing estate owned by the London Borough of Islington (LBI) identified as having potential to accommodate additional housing development and has planning permission that accords with the uses proposed in the draft allocation.

Table 3.150 Site Assessment OIS17: Hathersage and Besant Courts, Newington Green

<b>IIA Objective / Site</b>	<b>1. HIGH QUALITY ENVIRON</b>	<b>2. EFFICIENT USE OF LAND</b>	<b>3. HERITAGE</b>	<b>4. LIVEABLE NEIGHBOURHOODS</b>	<b>5. HOUSING QUALITY</b>	<b>6. SOCIAL INCLUSION</b>	<b>7. HEALTH AND WELLBEING</b>	<b>8. ECONOMIC GROWTH</b>	<b>9. NEED TO TRAVEL</b>	<b>10. OPEN SPACE</b>	<b>11. BIODIVERSITY</b>	<b>12. CLIMATE CHANGE</b>	<b>13. RESOURCE EFFICIENCY</b>	<b>14. NATURAL RESOURCES</b>
<b>OIS17: Hathersage and Besant Courts, Newington Green</b>	+	+	0	++	++	+	0	0	0	+	+	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	OIS17 is allocated for new housing, play space, open space and improvements to communal facilities and landscaping. The allocation aims to optimise the use of land located in a residential area, offering the opportunity to deliver quality housing in an appropriate location. Affordable housing would be provided as part of the development of the site, contributing towards meeting Islington's housing need as well as addressing objectives relating to social inclusion. The allocation requires improvements to the permeability of the site which will improve the quality of the built environment, creating a safer and more inclusive environment.; this could help to promote walking and cycling however the specific effects are uncertain and so have been assessed as neutral.. Improvements to open space and landscaping should have minor positive effects in relation to objectives 10 (open space) and 11 (biodiversity).													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified. The site is a housing estate owned by the London Borough of Islington (LBI) identified as having potential to accommodate additional housing development and has planning permission that accords with the uses proposed in the draft allocation.													

Table 3.151 Site Assessment OIS18: Wedmore Estate Car Park

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>OIS18: Wedmore Estate Car Park</b>	+	+	0	+	+	+	0	0	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>OIS18 is allocated for residential development.</p> <p>The allocation aims to optimise the use of land located in a residential area, offering the opportunity to deliver quality housing in an appropriate location. Affordable housing would be provided as part of the development of the site, contributing towards meeting Islington's housing need as well as addressing objectives relating to social inclusion and health and wellbeing by enabling people to move out of poor quality/inappropriate housing. The landscape and public realm improvements required by the allocation will improve the quality of the environment creating a safer and more inclusive environment which includes re-provision of the playground. This improved connectivity this could help to promote walking and cycling however the specific effects are uncertain and so have been assessed as neutral</p>													
<b>Reasonable alternative summary</b>	<p>No reasonable alternative was identified. The site is a housing estate owned by the London Borough of Islington (LBI) identified as having potential to accommodate additional housing development and has planning permission that accords with the uses proposed in the draft allocation.</p>													

Table 3.152 Site Assessment OIS19: 25-27 Horsell Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>OIS19: 25-27 Horsell Road</b>	0	+	0	0	0	0	0	+	0	0	0	0	0	0

<b>Commentary on assessment of likely significant effects of site allocations</b>	OIS19 has planning permission for mixed use development including residential uses and reconfigured office use. Should the site be subject to further amendments or new applications, intensification of business floorspace should be prioritised. The allocation aims to protect business floorspace with limited intensification which is positive for economic growth. The allocation will also make more efficient use of the site.													
<b>IIA Objective / Site</b>	<b>1. HIGH QUALITY ENVIRON</b>	<b>2. EFFICIENT USE OF LAND</b>	<b>3. HERITAGE</b>	<b>4. LIVEABLE NEIGHBOURHOODS</b>	<b>5. HOUSING QUALITY</b>	<b>6. SOCIAL INCLUSION</b>	<b>7. HEALTH AND WELLBEING</b>	<b>8. ECONOMIC GROWTH</b>	<b>9. NEED TO TRAVEL</b>	<b>10. OPEN SPACE</b>	<b>11. BIODIVERSITY</b>	<b>12. CLIMATE CHANGE</b>	<b>13. RESOURCE EFFICIENCY</b>	<b>14. NATURAL RESOURCES</b>
<b>Reasonable Alternative 1: Mixed-use commercial and residential development</b>	0	+	0	+	+	0	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>Allocating this site for mixed-use commercial and residential development could have a limited positive effect in terms of the efficient use of land and buildings, as the site could accommodate a wider range of uses and there may be some scope for limited intensification.</p> <p>The flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. The alternative has the potential to have a negative effect on economic growth because certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace on the site, thereby impacting on potential employment growth. Given the current employment use of the site a mixed use development could also lead to the loss of existing business floorspace which would also have a negative impact on economic growth.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access for residents to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>Residential development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													



IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 2: Residential-led development	0	+	0	+	++	+	0	--	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>Allocating the site for residential-led development could help to optimise use of the land as there may be some scope for intensification. It is considered that the alternative is likely to have a significant negative effect on economic growth if the site is developed for residential use given the employment use of the site.</p> <p>A residential led development would not contribute towards the provision of retail, employment or other uses which contribute towards the town centre and this is likely to have a minor negative effect on economic growth and the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services.</p> <p>The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>													
<b>Conclusion</b>	<p>Two reasonable alternatives to the business-led allocation for OIS19 were identified: mixed-use residential and commercial development and residential-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development could have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business use was most appropriate for this site given its existing use and the borough's projected need for a significant amount of additional employment floorspace.</p>													

Table 3.153 Site Assessment OIS20: Vernon Square, Penton Rise

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
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<b>OIS20: Vernon Square, Penton Rise</b>	0	+	0	0	0	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>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. This will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion</p> <p>The allocation will also make more efficient use of the site. The building was used previously as a higher education facility. Social infrastructure loss will not be permitted unless it can be robustly demonstrated that it will not have a negative impact on the borough and its residents, hence there is considered to be no effect in relation to objective 4.</p>													
<b>IIA Objective / Site</b>	<b>1. HIGH QUALITY ENVIRON</b>	<b>2. EFFICIENT USE OF LAND</b>	<b>3. HERITAGE</b>	<b>4. LIVEABLE NEIGHBOURHOODS</b>	<b>5. HOUSING QUALITY</b>	<b>6. SOCIAL INCLUSION</b>	<b>7. HEALTH AND WELLBEING</b>	<b>8. ECONOMIC GROWTH</b>	<b>9. NEED TO TRAVEL</b>	<b>10. OPEN SPACE</b>	<b>11. BIODIVERSITY</b>	<b>12. CLIMATE CHANGE</b>	<b>13. RESOURCE EFFICIENCY</b>	<b>14. NATURAL RESOURCES</b>
<b>Reasonable Alternative 1: Residential-led development</b>	0	-	0	0	+	+	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>The site is within the CAZ, which requires additional employment floorspace to support Islington's projected economic growth and employment uses are prioritised. By promoting residential rather than business use in a location prioritised for employment uses, the alternative would have a negative effect on the borough's approach to fostering sustainable economic growth and increasing employment opportunities. This may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs and therefore a minor negative in relation to the efficient use of land is identified.</p> <p>Allocating this site for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 2 Office co-location	0	+	0	+	0	+	0	+	0	0	0	0	0	0
Commentary on assessment of likely significant effects of Alternative 2	<p>The site is in temporary educational use, but is expected to be vacant again in 2023/24 when the current occupier moves to new premises. An allocation requiring retention of social and community infrastructure on site could help to balance competing demands between land uses, and therefore make efficient use of the site. However, the site is within the CAZ and would also be appropriate for employment use. Social infrastructure supports liveable neighbourhoods by providing access to essential services, and can promote social inclusion and economic growth by improving opportunities for learning and skills development which reduces barriers to employment.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 3: Mixed use and commercial development	0	+	0	+	+	+	0	+	0	0	0	0	0	0
Commentary on assessment of likely significant effects of Alternative 3	<p>This alternative is for mixed-use commercial and residential development. Allocating this site for mixed-use commercial and residential development could have a limited positive effect in terms of the efficient use of land and buildings, as the site could accommodate a wider range of uses. Some housing would be delivered as part of mixed-use development, leading to a minor positive effect with regards to objective 5. Some commercial uses on the site are likely to have a minor positive effect in relation to economic growth. Both uses would contribute towards social inclusion objectives. Mixed-use development may have limited positive effects on liveable neighbourhoods and economic growth, through the co-location of a number of different uses improving access to a variety of facilities for residents, workers and visitors.</p>													
Conclusion	<p>Three reasonable alternatives to the business-led allocation for OIS20 were identified: residential-led development, the retention of social infrastructure and mixed use commercial and residential development. Whilst the residential-led development could have positive effects in terms of the delivery of good-quality housing, the retention of social infrastructure could have a positive effect by providing learning and skills</p>													

development, and mixed use development could have positive effects in relation to housing and economic growth, on balance it was considered that business use was most appropriate for this site given its PEL designation, location within the CAZ and the borough's projected need for a significant amount of additional employment floorspace. although it is recognised that the assessment is quite finely balanced between the mixed use alternative and the preferred approach.

Table 3.154 Site Assessment OIS21: Former railway sidings adjacent to Caledonian Road Station

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>OIS21: Former railway sidings adjacent to Caledonian Road Station</b>	+	++	-	0	+	+	+	+	0	0	-0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>OIS21 is allocated for residential-led, mixed use development including the introduction of retail uses at ground floor level. The station must be retained and protected. The allocation also identifies that the site offers the opportunity for the development of a special local landmark building up to a height of 12 storeys.</p> <p>The allocation optimises the use of a previously developed building and the adjacent vacant land. It will contribute positively to the provision of quality housing in the borough and help to meet housing and affordable housing need. The allocation should improve the safety and inclusivity of the area by introducing some active retail frontages. The development may have a negative impact on the Caledonian Road Station which is a grade II listed building. The design of any proposal would be sensitive to the specific location, reflecting the need to preserve the heritage asset and ensure amenity impacts from the rail line are mitigated. Similarly impacts on the Holloway Road to Caledonian Road RAILSIDES SINC will need to be carefully addressed or there is the potential for development to have negative effects on green infrastructure and biodiversity.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES

<b>Reasonable Alternative 1: Mixed-use development</b>	+	++	-	+	+	+	0	+	0	0	-/0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>This alternative is for mixed-use commercial and residential development. The other provisions of policy OIS21 remain unchanged for example, the opportunity for the development of a special local landmark building up to a height of 12 storeys and the optimisation of the use of a previously developed building and the adjacent vacant land.</p> <p>Some housing would be delivered as part of mixed-use development, leading to a minor positive effect with regards to objective 5. Some commercial uses on the site are likely to have a minor positive effect in relation to economic growth. Both uses would contribute towards social inclusion objectives. Mixed-use development may have limited positive effects on liveable neighbourhoods, economic growth and the need to travel, through the co-location of a number of different uses improving access to a variety of facilities for residents, workers and visitors.</p>													
<b>IIA Objective / Site</b>	<b>1. HIGH QUALITY ENVIRON</b>	<b>2. EFFICIENT USE OF LAND</b>	<b>3. HERITAGE</b>	<b>4. LIVEABLE NEIGHBOURHOODS</b>	<b>5. HOUSING QUALITY</b>	<b>6. SOCIAL INCLUSION</b>	<b>7. HEALTH AND WELLBEING</b>	<b>8. ECONOMIC GROWTH</b>	<b>9. NEED TO TRAVEL</b>	<b>10. OPEN SPACE</b>	<b>11. BIODIVERSITY</b>	<b>12. CLIMATE CHANGE</b>	<b>13. RESOURCE EFFICIENCY</b>	<b>14. NATURAL RESOURCES</b>
<b>Reasonable Alternative 2: Business-led development</b>	+	++	-	0	0	+	0	+	0	0	-/0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>This alternative is for business-led development. The other provisions of policy OIS21 remain unchanged for example, the opportunity for the development of a special local landmark building up to a height of 12 storeys and the optimisation of the use of a previously developed building and the adjacent vacant land.</p> <p>There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. Allocating this site for business-led development could help towards meeting targets for business floorspace, and foster sustainable economic growth in the borough. This would help create employment opportunities that would support the council's social inclusion objectives. Business led development would have a positive effect on economic growth.</p>													
<b>Conclusion</b>	<p>Two reasonable alternatives to the residential-led allocation for OIS21 were identified: mixed-use development and business-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and business-led development could have positive effects in terms of supporting economic growth, the site is considered to provide an opportunity to deliver new housing to contribute towards meeting Islington's significant identified need in an appropriate location outside of designated priority employment areas.</p>													

Table 3.155 Site Assessment OIS22: 114 Balls Pond Road and 1 King Henry's Walk

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
OIS22: 114 Balls Pond Road and 1 King Henry's Walk	0	++	0	0	++	+	0	0	0	0	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	OIS22 is allocated for residential development. The site will optimise the use of a previously developed building and the adjacent vacant land. The allocation will contribute positively to the provision of quality housing in the borough and help to meet housing need. Affordable housing would be provided as part of the development of the site, contributing towards meeting Islington's housing need as well as addressing objectives relating to social inclusion.													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES

<b>Reasonable Alternative 1: Mixed-use development</b>	0	++	0	+	+	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>This alternative is for mixed-use commercial and residential development. A mixed use development would help to optimise the use of a previously developed building and adjacent vacant land.</p> <p>Some housing would be delivered as part of mixed-use development, leading to a minor positive effect with regards to objective 5. Some commercial uses on the site are likely to have a minor positive effect in relation to economic growth. Both of these uses would also have positive effects in relation to social inclusion.</p> <p>Mixed-use development may have limited positive effects on liveable neighbourhoods, economic growth and the need to travel, through the co-location of a number of different uses improving access to a variety of facilities for residents, workers and visitors. This in turn could have minor positive effects on the council's objectives to reduce contributions to climate change and improve air quality.</p>													
<b>IIA Objective / Site</b>	<b>1. HIGH QUALITY ENVIRON</b>	<b>2. EFFICIENT USE OF LAND</b>	<b>3. HERITAGE</b>	<b>4. LIVEABLE NEIGHBOURHOODS</b>	<b>5. HOUSING QUALITY</b>	<b>6. SOCIAL INCLUSION</b>	<b>7. HEALTH AND WELLBEING</b>	<b>8. ECONOMIC GROWTH</b>	<b>9. NEED TO TRAVEL</b>	<b>10. OPEN SPACE</b>	<b>11. BIODIVERSITY</b>	<b>12. CLIMATE CHANGE</b>	<b>13. RESOURCE EFFICIENCY</b>	<b>14. NATURAL RESOURCES</b>
<b>Reasonable Alternative 2: Business-led development</b>	0	++	0	0	-	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>This alternative is for business-led development. This alternative would help to optimise the use of a previously developed building and adjacent vacant land.</p> <p>There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. Allocating this site for business-led development could help towards meeting targets for business floorspace, and foster sustainable economic growth in the borough. This would help create employment opportunities that would support the council's social inclusion objectives. Business led development would have a significant positive effect on economic growth.</p>													
<b>Conclusion</b>	<p>Two reasonable alternatives to the residential-led allocation for OIS22 were identified: mixed-use development and business-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs,</p>													

and business-led development could have positive effects in terms of supporting economic growth, the site is considered to provide an opportunity to deliver new housing to contribute towards meeting Islington's significant identified need in an appropriate location outside of designated priority employment areas.

Table 3.156 Site Assessment OIS23: 1 Lowther Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>OIS23: 1 Lowther Road</b>	0	+	0	+	0	+	++	0	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>The site allocation for OIS23 protects the existing healthcare use of the site and encourages intensification/consolidation of healthcare and social and community infrastructure uses.</p> <p>The allocation will have a positive impact on the liveability of the neighbourhood by securing an important health service for the local community, and presenting an opportunity for other social and community infrastructure uses to locate at the site. It will contribute to social inclusion and health and wellbeing by providing services supporting people with protected characteristics.</p>													
<b>Reasonable alternative summary</b>	<p>No reasonable alternative was identified. The allocation supports the existing healthcare use of the site with the intention of securing and protecting a social and community infrastructure use that benefits the borough.</p>													

Table 3.157 Site Assessment OIS24: Pentonville Prison, Caledonian Road



IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>OIS24: Pentonville Prison, Caledonian Road</b>	++	++	++	+	++	+	0	0/+	0	+	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>OIS24 is allocated for a heritage-led, predominantly residential scheme including appropriate provision of community uses, open space and an element of business use may be acceptable. Any development at the site is subject to the loss of social infrastructure being justified.</p> <p>The allocation will have a significant positive effect in optimising the use of previously developed land and buildings, providing residential, community and possibly business uses in an appropriate location. A significant amount of affordable housing will be required as part of any residential development to help meet need in the borough, contributing towards meeting Islington's housing need as well as addressing objectives relating to social inclusion. The site has been assessed as having no effect or a minor positive effect in relation to objective 8, as although business use is likely to have a positive effect on economic growth, its delivery on the site is uncertain. Depending on the final design, development of this currently closed site will enhance local character and distinctiveness. The allocation promotes liveable and inclusive neighbourhoods by requiring the provision of new community facilities and open space. The allocation can also positively contribute to the creation of a high quality environment by integrating the isolated site with the surrounding urban context as well as improving permeability through the site. Conserving the heritage of the site is a major aim of the allocation; opening up the site will provide greater visibility of heritage assets.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>Reasonable Alternative 1: Mixed-use development</b>	++	++	++	+	+	+	0	+	+	+	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>This alternative is for mixed-use development. The other provisions of policy OIS21 remain unchanged for example, a heritage-led development with the provision of active frontages, permeability and open space.</p>													

	<p>Some housing would be delivered as part of mixed-use development, leading to a minor positive effect with regards to objective 5. Some commercial uses on the site are likely to have a minor positive effect in relation to economic growth. Both of these uses would also have positive effects in relation to social inclusion.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access for residents to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable Alternative 2: Business-led development	++	-	++	0	0	+	0	++	0	+	0	0	0	0
Commentary on assessment of likely significant effects of Alternative 2	<p>This alternative is for business-led development. The other provisions of policy OIS21 remain unchanged for example, a heritage-led development with the provision of active frontages, permeability and open space. The site is outside of the a town centre and employment designation therefore is not considered to be the most appropriate location for business-led mixed use redevelopment. A business led development in this location is likely to have a significant positive effect on economic growth given the size of the site as well as a positive effect in relation to social inclusion. There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. Allocating this site for business-led development could help towards meeting targets for business floorspace, and foster sustainable economic growth in the borough.</p>													
Conclusion	<p>Two reasonable alternatives to the residential-led allocation for OIS22 were identified: mixed-use development and business-led development. Whilst mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and business-led development could have positive effects in terms of supporting economic growth, the site is considered to provide an opportunity to deliver new housing to contribute towards meeting Islington's significant identified need in an appropriate location outside of designated priority employment areas.</p>													

Table 3.158 Site Assessment OIS25: Charles Simmons House, 3 Margery Street

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>OIS25:</b> Charles Simmons House, 3 Margery Street	+	+	0	+	+	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>OIS25 is allocated for residential development with some community floorspace and retail use.</p> <p>The allocation will optimise the use of land and positively contribute to the provision of housing in the borough. The site would provide affordable housing as part of any residential element, contributing towards meeting Islington's housing need as well as addressing objectives relating to social inclusion. The provision of community floorspace and retail uses will contribute to a more liveable neighbourhood, and may also have a minor positive effect on economic growth by providing some employment opportunities. The allocation may improve the immediate environment with landscaping.</p>													
<b>Reasonable alternative summary</b>	<p>No reasonable alternative was identified. The site is a housing estate owned by the London Borough of Islington (LBI) identified as having potential to accommodate additional housing development and has planning permission that accords with the uses proposed in the draft allocation. It would not be made available for other types of development as this would not align with the Council's objectives for the estate.</p>													

Table 3.159 Site Assessment OIS26: Amwell Street Water Pumping Station

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>OIS26:</b> Amwell Street Water Pumping Station	0	+	++	0	0/+	0	0	0/+	0	0	0	0	0	0
<b>Commentary on assessment of</b>	<p>OIS26 is allocated for conservation of heritage assets and sensitive re-use of existing buildings for residential or office use.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
likely significant effects of site allocations	The allocation aims to preserve a Grade II listed site which will positively contribute to the historical character of the borough. The allocation will also make more efficient use of the site. It is likely that only either residential or office uses can be realised, hence the allocation may have no effect or a minor positive effect relating to objectives 5 and 8.													
Reasonable alternative summary	No reasonable alternative was identified. The allocation for the conservation of heritage assets and re-use of buildings for residential or office uses is flexible in its current form. Given the limited scope for development at the site no capacity assumptions have been made for the site in relation to either housing numbers or office floorspace.													

## Assessment of Bunhill and Clerkenwell Site Allocations

Table 3.160 Site Assessment BC1: City Barbican Thistle Hotel, Central Street

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC1: City Barbican Thistle Hotel, Central Street, EC1V 8DS	+	0	0	0	0	+	0	++ / +	0	0	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	BC1 is allocated for refurbishment or redevelopment of the existing buildings for office-led mixed use development. Re-provision of a hotel may be suitable given the existing hotel use on site. The allocation aims to provide business floorspace within the CAZ which will have a significant positive effect on the economic growth of the borough. Lack of office floorspace is a barrier to economic growth in the area. The Local Plan strategy is that new business floorspace will be focused in the CAZ, Bunhill and Clerkenwell AAP area, the CAZ Fringe Spatial Strategy Areas and the Locally Strategic Industrial Sites. Given													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	<p>land constraints and high need (400,000sqm up to 2036) needs will not be met without prioritising business space in these areas, including the BCAAP area. The location of Bunhill and Clerkenwell is particularly suited to development of employment uses, with easy access to the major centres of employment and business of the London's West End, the City of London, Canary Wharf, as well as the emerging clusters of the City Fringe, Tech City, King's Cross and the Knowledge Quarter. The Local Plan prioritises employment floorspace in the BCAAP in BC1 and also by allocating the majority of site allocation sites in the BCAAP for employment (office) uses, to the exclusion of housing development on these sites. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.</p> <p>Retaining the hotel will have a minor positive effect on economic development. Redevelopment of these buildings offers an opportunity to improve the local environment as both buildings are of unremarkable design and merit and contribute little to the street or townscape. Provision of active frontages will help create a safer and more inclusive local environment.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable alternative: mixed use	+	-	0	0	+	+	0	-	-	0	0	0	0	0
Commentary on assessment of likely significant effects of alternative	<p>This alternative is where this site would be amended so that the allocation allows up to 50% of the uplift in floorspace to be provided as housing. The other provisions of policy BC1 remain unchanged, for example exclusions to this policy remain, including for publicly funded uses.</p> <p>As with the preferred approach this alternative will have positive effects on the local environment by redeveloping buildings of unremarkable design merit.</p> <p>The alternative would have minor negative effects against the efficient use of land as the Bunhill and Clerkenwell Area is the most efficient location to locate offices as it is the accessible and connected as well as being the most valuable for office development due to close proximity to London's office markets. Offices can take advantage of the agglomeration benefits of the central London location and will have close access to the wide range of supporting services.</p> <p>The alternative would have minor positive effects against the objective for providing affordable housing as it would allow more housing to be developed which would include a proportion of affordable housing. The affordable housing will have positive effects on social inclusion.</p> <p>The alternative would have significant negative effects on economic growth. The additional housing would displace office floorspace, which is needed to meet demand from businesses, grow the economy, and provide employment and training opportunities. The Employment Land Study</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	identifies the arc between Shoreditch and King's Cross including along City Road the focus of priority for site assembly and for provision of Grade A office space, to maintain and enhance the area's role in supporting London's strategic business role. This site lies broadly within this corridor. The alternative would have minor negative impacts on reducing the need to travel by locating residential in the CAZ, rather than high trip generating office uses which can take advantage of the high accessibility by public transport and active travel, reducing trips by car.													
<b>Conclusion</b>	The preferred approach will support economic development by locating offices in the optimum location. The alternative allows more housing in this location in place of offices which will have negative effects on economic growth, the efficient use of land, and transport. While this additional housing has positive effects it is considered on balance office-led mixed use is more appropriate given the site's location in the CAZ and in an area that is prioritised for Grade A office space t.													

Table 3.161: Site Assessment BC2: City Forum, 250 City Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>BC2: City Forum, 250 City Road, EC1V 2PU</b>	+	++	0	+	++	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>The site is under construction with a planning permission for the development of four blocks ranging in height from 7 to 42 storeys to provide up to 995 residential units, 7,600sqm of B1 floorspace and a mix of other uses.</p> <p>The allocations states that should the site be subject to further amendments or new applications, the council will seek to maximise provision of affordable housing and affordable workspace.</p> <p>The scheme under construction will have positive effects on a number of criteria, but in particular there will be significant effects on housing and economic growth by providing a large number of new homes including affordable homes and a significant quantum of office floorspace. The affordable housing will have positive effects on social inclusion. The scheme will have significant positive effects on the efficient use of land by optimising development on previously developed land in a highly accessible location. In addition, the allocation will have a minor positive effect on creating a high quality environment through creating a safer and more inclusive public realm with through-site pedestrian links, particularly north-</p>													

I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	south, as part of a clearly defined public realm. The new links through the site and the improved public realm could help to promote walking and cycling however the specific effects are uncertain and so have been assessed as neutral.													
Reasonable alternative summary	No reasonable alternative was identified for this allocation. The site has planning permission which is currently under construction.													

Table 3.162 Site Assessment BC3: Islington Boat Club, 16-34 Graham Street,

I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC3: Islington Boat Club, 16-34 Graham Street, N1 8JX	+	+	0	+	+	+	0	0	+	+	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	<p>BC3 is allocated for refurbishment of boat club facilities and provision of residential units.</p> <p>Refurbishment of the boat club will have minor positive effects on liveable neighbourhoods by retaining the leisure use on site which enables community use of the open water in the basin. The redevelopment of the site will include provision of new homes which will have positive effects on housing provision and affordable housing delivery. The affordable housing will have positive effects on social inclusion. The allocation represents a more efficient use of land by providing new housing on the site which at present only has the boat club. The allocation will have minor positive effects on the transport, open space, and high quality environment objectives by requiring the redevelopment improve public access between Graham Street and the canal basin, improving conditions for walking and cycling and improving access to the open space.</p>													
Reasonable alternative summary	<p>No reasonable alternative was identified for this allocation. This allocations maximises the amount of residential development reasonably possible on site, while retaining and improving the boat club, which is a valued social infrastructure use.</p> <p>This allocation is for refurbishment of boat club facilities and provision of residential units. The Islington Boat Club is a valued social infrastructure use and must be retained on site. In addition a small number of homes may be developed on the site. Residential was identified for this site because of the surrounding context. The surrounding uses are predominantly residential, including across City Road Basin. The area has high</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	amenity for residential uses for a central London location with low levels of traffic noise and pollution, and the site adjoins Graham Street Gardens, and benefits from views across the City Road Basin. The Bunhill and Clerkenwell AAP directs commercial uses to busier, more accessible locations including along City Road and around the Old Street roundabout and surrounding area.													

Table 3.163: Site Assessment BC4: Finsbury Leisure Centre

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC4: Finsbury Leisure Centre, EC1V 3PU	+	++	0	++	++	+	+	0	0	0	0	+	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>The Council plans to redevelop the Finsbury Leisure Centre into a new civic development which will include new indoor leisure facilities and outdoor sports pitches, new council and private homes, a GP surgery, a nursery, and the Bunhill Energy Centre. The development will also provide an enhanced public realm, including improvements to the surrounding streets and spaces particularly for pedestrian and cycling connections.</p> <p>The proposal will have significant positive effects on housing by providing new homes and affordable homes, and make more efficient use of the land by providing additional floorspace across a number of uses on site. The affordable housing will have positive effects on social inclusion. The scheme will have minor positive effects on the reducing climate change objective by development of a new energy centre. There will be minor positive effects on the high quality environment objective with an improved public realm and minor positive effects on the health and wellbeing objective with the provision of improved sports facilities. Improved permeability across the site and public realm improvements could help to promote walking and cycling however the specific effects are uncertain and so have been assessed as neutral.</p>													
<b>Reasonable alternative summary</b>	<p>No reasonable alternative was identified for this allocation. This allocation maximises the amount of residential development reasonably possible on site, while re-providing and improving the leisure centre, as well as providing a new nursery and energy centre on site.</p> <p>The allocation for this site is demanding as redevelopment must meet a number of needs in a relatively small area. The allocation is for redevelopment to provide new high quality leisure facilities and meet increased demand, as well as a nursery, energy centre, housing (including a significant amount of genuinely affordable housing) and public open space. Permeability must also be improved across the site.</p>													



IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	<p>Surrounding the site are predominantly residential buildings and development in this location should preserve amenity for local residents. The Bunhill and Clerkenwell AAP directs commercial uses to areas with higher accessibility and a busier more commercial context, including along City Road and around the Old Street Roundabout.</p> <p>The Council has developed detailed designs for the site, which have been evolved over a number of years, have been subject to extensive consultation, and have been revised and improved based on local feedback. The plans are at an advanced stage of development. For the above reasons no alternative allocations were considered reasonable for this site.</p>													

Table 3.164: Site Assessment BC5: London College of Fashion Golden Lane Campus

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC5: London College of Fashion Golden Lane Campus	0	++	+	0	0	+	0	++	0	0	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	<p>BC5 is allocated for refurbishment of the existing building for office use, subject to justifying the loss of social infrastructure in line with relevant Local Plan policies. There may be potential for further intensification of office space through sensitive infill development on the undeveloped part of the site.</p> <p>This allocation will have significant positive effects on economic development by providing employment (office) floorspace in an appropriate location in the CAZ. Lack of office floorspace is a barrier to economic growth in the area. The Local Plan strategy is that new business floorspace will be focused in the CAZ, Bunhill and Clerkenwell AAP area, the CAZ Fringe Spatial Strategy Areas and the Locally Strategic Industrial Sites. Given land constraints and high need (400,000sqm up to 2036) needs will not be met without prioritising business space in these areas, including the BCAAP area. The location of Bunhill and Clerkenwell is particularly suited to development of employment uses, with easy access to the major centres of employment and business of the London's West End, the City of London, Canary Wharf, as well as the emerging clusters of the City Fringe, Tech City, King's Cross and the Knowledge Quarter. The Local Plan prioritises employment floorspace in the BCAAP in BC1 and also by allocating the majority of site allocation sites in the BCAAP for employment (office) uses, to the exclusion of housing development on these sites.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	<p>The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.</p> <p>The allocation will have minor positive effects on the efficient use of land objective by optimising the use of previously developed buildings as well as some vacant land. The loss of social infrastructure at the site will only be permitted if it can be robustly demonstrated that such loss will not have a negative effect on meeting Islington's resident's needs and will therefore have no effect on the liveable neighbourhoods objective. The allocation details designations relevant to the site which much be considered carefully in development proposals, including its locally listed status and location within the St. Luke's conservation area.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable alternative: mixed use	0	+	+	0	+	+	0	-	-	0	0	0	0	0
Commentary on assessment of likely significant effects of alternative	<p>This alternative is where this site allocation would be amended to allow an element of housing to be provided on site.</p> <p>The alternative will have minor positive effects against the efficient use of land objective as it will lead to more development on previously developed land in an accessible location, however it will not be as efficient as the preferred approach as the Bunhill and Clerkenwell Area is the most efficient location to locate offices as it is the accessible and connected as well as being the most valuable for office development due to close proximity to London's office markets. Offices can take advantage of the agglomeration benefits of the central London location and will have close access to the wide range of supporting services.</p> <p>As with the preferred approach the alternative would have minor positive impacts on heritage as the allocation details designations relevant to the site which much be considered carefully in development proposals, including locally listed status and location within the St. Luke's conservation area.</p> <p>The alternative would have minor positive effects against the objective for providing affordable housing as it would allow more housing to be developed which would include a proportion of affordable housing. The affordable housing will have positive effects on social inclusion.</p> <p>The alternative would have significant negative effects on economic growth. The additional housing would displace office floorspace, which is needed to meet demand from businesses, grow the economy, and provide employment and training opportunities.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	The alternative would have minor negative impacts on reducing the need to travel by locating residential in the CAZ, rather than high trip generating office uses which can take advantage of the high accessibility by public transport and active travel, reducing trips by car.													
<b>Conclusion</b>	The preferred approach will support economic development by locating offices in the optimum location. The alternative allows more housing in this location in place of offices which will have negative effects on economic growth, the efficient use of land, and transport. While this additional housing has positive effects it is considered on balance the site is more appropriate for office use, subject to justifying the loss of social infrastructure, due to the site's location in the CAZ, it's accessible location and proximity to the City of London.													

Table 3.165 : Site Assessment BC6: Redbrick Estate: Vibast Centre, garages and car park, Old Street

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>BC6: Redbrick Estate: Vibast Centre, garages and car park, Old Street, EC1V 9NH</b>	+	+	0	+	++	+	0	0	+	0	0	+	0	+
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>BC6 is allocated for residential development.</p> <p>The site has planning permission for the construction of 55 new homes, a community centre, two flexible A1/A2 use units and the provision of a new amenity space. There will be significant positive effects on the housing objective by providing 55 additional homes, 70% of which will be affordable. The development optimises density on a previously developed site and will therefore have minor positive effects on the efficient use of land objective. The development will have minor positive effects on the liveable neighbourhoods objective and the high quality environment objective by improvements to the public realm, access, and passive surveillance. There will be minor positive effects on the social inclusion objective by provision of the community centre. Planning permission P2015/0709/FUL involves a significant reduction in car parking on site. This will have help shift trips to more sustainable form of transport with minor positive effects on the objectives for transport, climate change, and natural resources (air quality).</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable alternative summary	No reasonable alternative was identified for this allocation. The site has planning permission which is currently under construction.													

Table 3.166: BC7: 198-208 Old Street (petrol station)

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC7: 198-208 Old Street (petrol station), EC1V 9FR	+	++	+	+	0	+	0	++	0	0	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	<p>BC7 is allocated for redevelopment of the petrol station to provide a new building comprising retail/leisure uses at ground floor level with business uses above.</p> <p>This allocation will remove the petrol station use which provides a poor quality urban environment with large areas of hard standing and large areas of advertising signage and lighting. This change will have significant positive effects on the efficient use of land objective, and minor positive effects on the objectives for a high quality environment, heritage, and liveable neighbourhoods.</p> <p>The allocation will have significant positive effects on economic development by providing business / employment uses which will benefit economic growth. Lack of office floorspace is a barrier to economic growth in the area. The Local Plan strategy is that new business floorspace will be focused in the CAZ, Bunhill and Clerkenwell AAP area, the CAZ Fringe Spatial Strategy Areas and the Locally Strategic Industrial Sites. Given land constraints and high need (400,000sqm up to 2036) needs will not be met without prioritising business space in these areas, including the BCAAP area. The location of Bunhill and Clerkenwell is particularly suited to development of employment uses, with easy access to the major centres of employment and business of the London's West End, the City of London, Canary Wharf, as well as the emerging clusters of the City Fringe, Tech City, King's Cross and the Knowledge Quarter. The Local Plan prioritises employment floorspace in the BCAAP in BC1 and also by allocating the majority of site allocation sites in the BCAAP for employment (office) uses, to the exclusion of housing development on these sites. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable alternative: mixed use	+	+	+	+	+	+	0	-	-	0	0	0	0	0
Commentary on assessment of likely significant effects of alternative	<p>This alternative is where this site allocation would allow housing led mixed use development, with a retail or leisure at the ground floor and housing above.</p> <p>As with the preferred approach this allocation will remove the petrol station use which provides a poor quality urban environment with large areas of hard standing and large areas of advertising signage and lighting. This change will have minor positive effects on the efficient use of land objective, and minor positive effects on the objectives for a high quality environment, heritage, and liveable neighbourhoods.</p> <p>The alternative makes less efficient use of land compared to the preferred approach as the Bunhill and Clerkenwell Area is the most efficient location to locate offices as it is the accessible and connected as well as being the most valuable for office development due to close proximity to London's office markets. Offices can take advantage of the agglomeration benefits of the central London location and will have close access to the wide range of supporting services.</p> <p>The alternative would have minor positive effects against the objective for providing affordable housing as it would allow more housing to be developed which would include a proportion of affordable housing. The affordable housing will have positive effects on social inclusion by.</p> <p>The alternative could have significant negative effects on economic growth. Additional housing would displace office floorspace, which is needed to meet demand from businesses, grow the economy, and provide employment and training opportunities. The site is located within the City Fringe Opportunity Area, fronting the busy Old Street and only 50m from the Old Street roundabout (the approximate centre for East London Tech City) and next to the landmark White Collar Factory office development. The site has very close access to the Old Street Station and close access to the shops, cafes, and restaurants of the area including within the Old Street Local Shopping Area, along Old Street, and at the Bower development across the road. The site is located on the arc between King's Cross and Shoreditch which the Employment Land Study identifies as the focus and priority for provision of Grade A office floorspace, but also for space for SMEs, tech city-looking businesses and business service uses, which may be more appropriate due to the size of this site. This highly prominent address is valuable for an office use and would provide good access and local services for its staff. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	The alternative would have minor negative impacts on reducing the need to travel by locating residential in the CAZ, rather than high trip generating office uses which can take advantage of the high accessibility by public transport and active travel, reducing trips by car. Residential uses may have challenges in providing protection from the noise and air pollution in this location (although air quality problems will decrease following public realm improvements in this area). It may also be challenging to provide an adequate outlook for homes toward the south and west of the site due to the blank walls of abutting buildings. There is some uncertainty about the likelihood of these impacts as good design may be able to overcome the limitations of the site for residential development which is why the scoring has been maintained as a minor positive effects against the objective for housing, nevertheless this is a highly constrained location for residential development.													
<b>Conclusion</b>	The preferred approach will support economic development by locating offices in the optimum location. The alternative allows more housing in this location in place of offices which will have negative effects on economic growth, the efficient use of land, and transport. While this additional housing has positive effects it is considered on balance the site is considered more appropriate for business-led development given its location within the City Fringe Opportunity Area, it's location fronting Old Street, proximity to Tech City and access to the Old Street Station.													

Table 3.167 Site Assessment BC8: Old Street roundabout area,

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>BC8: Old Street roundabout area, EC1V 9NR</b>	++	+	0	++	0	0	0	0	+	+	0	+	0	+
<b>Commentary on assessment of likely significant effects of site allocations</b>	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 high quality environment objective and minor positive effects on the transport and climate change objectives by improving the area for walking and cycling and making it easier to enter and exit the station including providing step free access. The allocation will reduce the impacts of traffic including noise and air pollution which will have minor positive effects on the natural resources (air quality) objective. The allocation will transform carriageway space for pedestrianised public space with minor positive effects on the open space objective.													

I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>Reasonable alternative summary</b>	No reasonable alternative was identified for this allocation as the site is allocated predominantly as a public realm improvement scheme with related small scale commercial uses. The Old Street Roundabout is a TfL led and predominantly a scheme which improves the public realm with a small amount of related supporting retail. There are no larger buildings proposed which could be allocated for the development of housing. This site is already at an advanced stage of construction.													

Table 3.168: BC9: Inmarsat, 99 City Road (east of roundabout),

I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>BC9: Inmarsat, 99 City Road (east of roundabout), EC1Y 1BJ</b>	+	++	0	0	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>BC9 is allocated for refurbishment of the existing building for commercial offices, with an element of retail/leisure, or other appropriate uses which provide active frontages at ground floor. Redevelopment of the building may be acceptable if it can be demonstrated that the existing building is no longer fit for the purposes for which it was designed. The allocation will have minor positive effects on the high quality environment objective as the refurbishment or redevelopment presents an opportunity to improve the quality of the local environment and public realm.</p> <p>Islington's Tall Building Study suggests there is potential to redevelop Inmarsat House as a district landmark building of up to 26 office storeys (106m). A larger building here as part of the planned cluster would have significant positive effects on the efficient use of land.</p> <p>This allocation will have significant positive effects on economic growth by providing employment (office) floorspace with floorspace for smaller businesses encouraged. Lack of office floorspace is a barrier to economic growth in the area. The Local Plan strategy is that new business floorspace will be focused in the CAZ, Bunhill and Clerkenwell AAP area, the CAZ Fringe Spatial Strategy Areas and the Locally Strategic Industrial Sites. Given land constraints and high need (400,000sqm up to 2036) needs will not be met without prioritising business space in these areas, including the BCAAP area. The location of Bunhill and Clerkenwell is particularly suited to development of employment uses, with easy access to the major centres of employment and business of the London's West End, the City of London, Canary Wharf, as well as the emerging clusters of the City Fringe, Tech City, King's Cross and the Knowledge Quarter. The Local Plan prioritises employment floorspace in the BCAAP</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	in BC1 and also by allocating the majority of site allocation sites in the BCAAP for employment (office) uses, to the exclusion of housing development on these sites. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable alternative: mixed use	+	+	0	0	+	+	0	-	-	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of alternative</b>	<p>This alternative is where this site allocation would be amended to allow more housing to be developed, allowing up to 50% of the uplift to be provided as housing with the other 50% office use, in addition to retail and leisure use on the ground floor.</p> <p>As with the preferred approach the alternative will have minor positive effects on the high quality environment objective as the refurbishment or redevelopment presents an opportunity to improve the quality of the local environment and public realm, and will make more efficient use of land by developing a larger building. The alternative makes less efficient use of land than the preferred approach as the Bunhill and Clerkenwell Area is the most efficient location to locate offices as it is the accessible and connected as well as being the most valuable for office development due to close proximity to London's office markets. Offices can take advantage of the agglomeration benefits of the central London location and will have close access to the wide range of supporting services.</p> <p>The alternative would have minor positive effects against the objective for providing affordable housing as it would allow more housing to be developed which would include a proportion of affordable housing. The affordable housing will have positive effects on social inclusion by.</p> <p>The alternative would have significant negative effects on economic growth. The additional housing would displace office floorspace, which is needed to meet demand from businesses, grow the economy, and provide employment and training opportunities. This site is particularly suitable for office development. The site is located within the City Fringe Opportunity Area, directly fronting the Old Street roundabout. This is a landmark building which has been in a long standing tech sector office use and along with the White Collar Factory is associated with being at the heart of the East London Tech City. The site has very close access to the Old Street Station and to the office workforce focussed shops, cafes, and restaurants of the area. The site is located on the arc between King's Cross and Shoreditch which the Employment Land Study identifies as the focus and priority for provision of Grade A office floorspace. This highly prominent address is valuable for an office use. Retaining this large prominent site in office use will anchor and support the tech cluster and providing space for a large scale and high profile business. The additional</p>													



I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	<p>office floorspace would have positive effects on social inclusion through provision of a range of job opportunities, but less than an all office scheme.</p> <p>The alternative would have minor negative impacts on reducing the need to travel by locating residential in the CAZ, rather than high trip generating office uses which can take advantage of the high accessibility by public transport and active travel, reducing trips by car.</p> <p>While there are residential uses fronting Old Street, the area suffers from high levels of noise and pollution which make providing an adequate level of amenity problematic, although these issues will decrease following public realm improvements in this area. There is some uncertainty about the likelihood of these impacts as good design may be able to overcome the limitations of the site for residential development which is why the scoring has been maintained as a minor positive effects against the objective for housing, nevertheless this is a constrained location for residential development.</p>													
<b>Conclusion</b>	<p>The preferred approach will support economic development, by locating offices in the optimum location. The alternative allows more housing in this location in place of offices which will have negative effects on economic growth, the efficient use of land, and transport. While this additional housing has positive effects it is considered on balance the site is considered more appropriate for offices with active uses at the ground floor given its current use, its location within the City Fringe Opportunity Area, it's location on Old Street, proximity to Tech City and access to the Old Street Station.</p>													

Table 3.169: Site Assessment BC11: Longbow House, 14-20 Chiswell Street

I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>BC11: Longbow House, 14-20 Chiswell Street, EC1Y 4TW</b>	0	+	+	0	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of</b>	<p>BC11 is allocated for redevelopment of the site to provide a new, high quality building incorporating commercial office uses. This allocation will have a significant positive effect on economic growth by providing employment (office) floorspace. Lack of office floorspace is a barrier to</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>likely significant effects of site allocations</b>	<p>economic growth in the area. The Local Plan strategy is that new business floorspace will be focused in the CAZ, Bunhill and Clerkenwell AAP area, the CAZ Fringe Spatial Strategy Areas and the Locally Strategic Industrial Sites. Given land constraints and high need (400,000sqm up to 2036) needs will not be met without prioritising business space in these areas, including the BCAAP area. The location of Bunhill and Clerkenwell is particularly suited to development of employment uses, with easy access to the major centres of employment and business of the London's West End, the City of London, Canary Wharf, as well as the emerging clusters of the City Fringe, Tech City, King's Cross and the Knowledge Quarter. The Local Plan prioritises employment floorspace in the BCAAP in BC1 and also by allocating the majority of site allocation sites in the BCAAP for employment (office) uses, to the exclusion of housing development on these sites. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.</p> <p>The allocation will result in minor positive effects on the efficient use of land objective as it will optimise development on previously developed land in a highly accessible location. The allocation requires development to consider the impacts on the surrounding heritage assets including the Grade II* headquarters at Armoury House and the Honourable Artillery Company's training grounds and will therefore have minor positive effects on the heritage objective.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>Reasonable alternative: mixed use</b>	0	+	+	0	+	+	0	-	-	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of alternative</b>	<p>This alternative is where this site allocation would be amended for more housing to be developed, allowing up to 50% of the uplift to be provided as housing with the other 50% office use.</p> <p>As with the preferred approach the alternative requires development to consider the impacts on the surrounding heritage assets including the Grade II* headquarters at Armoury House and the Honourable Artillery Company's training grounds and will therefore have minor positive effects on the heritage objective.</p> <p>The alternative will have minor positive effects against the efficient use of land objective as it will lead to more development on previously developed land in an accessible location, however it will not be as efficient as the preferred approach as the Bunhill and Clerkenwell Area is the most efficient location to locate offices as it is the accessible and connected as well as being the most valuable for office development due to</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	<p>close proximity to London's office markets. Offices can take advantage of the agglomeration benefits of the central London location and will have close access to the wide range of supporting services.</p> <p>The alternative would have minor positive effects against the objective for providing affordable housing as it would allow more housing to be developed which would include a proportion of affordable housing. The additional affordable housing is likely to have positive effects on social inclusion.</p> <p>The alternative would have significant negative effects on economic growth. The additional housing would displace office floorspace, which is needed to meet demand from businesses, grow the economy, and provide employment and training opportunities.</p> <p>The alternative would have minor negative impacts on reducing the need to travel by locating residential in the CAZ, rather than high trip generating office uses which can take advantage of the high accessibility by public transport and active travel, reducing trips by car.</p> <p>Longbow House is located in the City Fringe Opportunity Area and close to the cluster of large scale office developments at Moorgate, including Citypoint, the Heron, and Ropemaker Place. The location has close access to the City of London and its agglomeration of business uses. With the commercial in use and has a high density and high site coverage built form. These characteristics make it an ideal location for development of offices where businesses can take advantage of the agglomeration benefits of the area and its role and a world city centre of business.</p> <p>While residential uses could be feasible in this location there would be challenges in providing adequate amenity, outdoor space, and outlook due to the density, site coverage, and built form. Good design may overcome these limitations to provide a good standard of residential accommodation, which is why the assessment shows likely positive effects against the objective for housing, however this will be a constrained site for residential development.</p>													
<b>Conclusion</b>	<p>The preferred approach will support economic development, by locating offices in the optimum location. The alternative allows more housing in this location in place of offices which will have negative effects on economic growth, the efficient use of land, and transport. While this additional housing has positive effects it is considered on balance they are outweighed by the effects on other objectives. The site is considered to be more appropriate for office use given the current use of the site, its location within the CAZ and City Fringe Opportunity Area.</p>													

Table 3.170: Site Assessment BC12: Cass Business School, 106 Bunhill Row,

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>BC12: Cass Business School, 106 Bunhill Row, EC1Y 8TZ</b>	0	0	0	+	0	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	BC12 is allocated for limited intensification of education floorspace. This allocation will improving access to educational services which will have minor positive effects on the economic growth objective, liveable neighbourhoods, and social inclusion objectives. The allocation will likely have no other significant effects as the site already has full site coverage and is not a site allocated for a tall building so any development could only be a small upward extension.													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified for this allocation as the site is allocated for expansion of the social infrastructure (education) use. The Cass Business School has full site coverage and accommodating residential uses on site would be difficult with regard to space, access, and conflict between the homes and the education use.													

Table 3.171: Site Assessment BC13: Car park at 11 Shire House, Whitbread Centre, Lamb's Passage,

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>BC13: Car park at 11 Shire House, Whitbread Centre, Lamb's Passage, EC1Y 8TE</b>	+	++	0	0	0	+	0	++	+	0	0	+	0	+

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<p><b>Commentary on assessment of likely significant effects of site allocations</b></p>	<p>BC13 allocated site has planning permission for the development of a 61 bedroom hotel, 35 residential units, 1,954sqm of office, 80sqm of retail, 1,536sqm of restaurant use, and 263sqm of leisure floorspace. The allocation states that should the site be subject to further amendments or new applications, the council will seek redevelopment to provide an office development including affordable workspace and small scale business uses. The allocation will have minor positive effects on economic growth through the development of employment floorspace. The additional office floorspace would have positive effects on social inclusion through provision of a range of job opportunities. The site is currently a ground level car park and the allocation will have significant positive effects on the efficient use of land by bringing this into use and removing the car parking. The removal of car parking will have sustainability benefits and contribute to wider strategic aims to encourage more sustainable forms for transport, resulting in minor positive effects on the objectives for climate change, transport, and natural resources (improved air quality). The scheme will also create a safer and more inclusive environment by introducing active frontages and activity to this currently largely empty site, resulting in minor positive effects on the high quality environment objective.</p>													
<p><b>Reasonable alternative: Mixed use development with office and hotel use</b></p>	+	+	0	0	+	+	0	+	+	0	0	+	0	+
<p><b>Commentary on assessment of likely significant effects of site allocations</b></p>	<p>This alternative is for an allocation for a mixed use development including office and hotel use. This reflects the scheme permitted on this site (P2016/0488/FUL) for the development of a 61 bedroom hotel, 35 residential units, 1,954sqm of office, 80sqm of retail, 1,536sqm of restaurant use, and 263sqm of leisure floorspace.</p> <p>The alternative will have mostly the same effects as the preferred approach. The removal of car parking will encourage more sustainable forms for transport resulting in minor positive effects on the objectives for climate change, transport, and natural resources (improved air quality). The scheme will also create a safer and more inclusive environment by introducing active frontages and activity to this currently largely empty site, resulting in minor positive effects on the high quality environment objective. The will have minor positive effects on the housing objective by providing homes and affordable homes on site. The additional affordable housing is likely to have positive effects on social inclusion.</p> <p>The effects differ against the objectives for the efficient use of land and economic development. The alternative will still have minor positive effects on economic growth through the development of employment floorspace, and other commercial uses including retail, restaurant and a hotel. However these effects are less than if the scheme provided a greater amount of office floorspace, which is a higher priority land use for this location, and would support the growth of business and employment in the borough. The alternative will have minor positive effects on the</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	efficient use of land by converting a ground level car park into more valuable uses, however it will not have the significant positive effects of an allocation which maximises office floorspace due to the high demand for and high value of offices in this location and their role in boosting Islington's economy and employment. As with the preferred approach the additional office floorspace would have positive effects on social inclusion through provision of a range of job opportunities.													
<b>Conclusions</b>	The preferred approach will have minor positive effects on economic growth through the development of employment floorspace. The alternative was identified as have similar effects, however the effects on economic growth and efficient use of land are considered to be less than a scheme that provides a greater amount of office space. The positive effects of the alternative in relation to housing provision are recognised. On balance it was considered that the preferred approach is more appropriate given the high priority given to office and business use given the sites location within the CAZ and City Fringe Opportunity Area,  <b>This allocation is subject to a modification which has been assessed separately in part 2.</b>													

Table 3.172: Site Assessment BC14: Peabody Whitecross Estate, Roscoe Street,

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>BC14: Peabody Whitecross Estate, Roscoe Street, EC1Y 8SX</b>	+	+	0	+	+	+	+	0	0	+	0	0	0	0
<b>Commentary on assessment of likely significant</b>	BC14 is allocated for improved public open space and design measures to improve the definition between public and private space, alongside some new housing. The allocation will have minor positive effects on the housing objective by providing new homes (4 family homes is feasible). The additional housing i positive effects on social inclusion by reducing overcrowding. The allocation will create a safer and more inclusive neighbourhood and													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>effects of site allocations</b>	public realm by improving the open space and providing areas for sports and play with minor positive effects on the high quality environment, open space, liveable neighbourhoods, and health and wellbeing objectives. The allocation will make more efficient use of land by improving amenity spaces into multi-function open spaces, resulting in minor positive effects on the efficient use of land objective.													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified for this allocation as the site is allocated primarily as a public realm scheme with a small amount of housing, introducing other uses on this site would not be appropriate. This allocation is for improved public open space and design measures to improve the definition between public and private space, alongside some new housing. The owners, Peabody, have ambitions to improve the public realm across the estate to improve amenity, biodiversity, security, accessibility, and provide more opportunities for enjoyment and recreation. The allocation is primarily a public realm improvement scheme, with potential to develop a small number of homes in one identified location on the estate.													

Table 3.173: Site Assessment BC15: Richard Cloudesley School, 99 Golden Lane

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>BC15: Richard Cloudesley School, 99 Golden Lane, EC1Y 0TZ</b>	+	+	0	++	++	+	+	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	The allocation is for redevelopment of the former Richard Cloudesley school building to provide a new school, residential development, play and sports facilities. The scheme will have significant positive effects on affordable housing delivery by providing 66 social rented homes, and on liveable neighbourhoods through provision of a new school. It will have minor positive effects on economic growth by providing a small amount of affordable workspace. The education use will have minor positive effects social inclusion by providing opportunities for learning. The additional affordable housing is likely to have positive effects on social inclusion. The scheme makes efficient use of land by providing all of this along with													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	additional school floorspace on site. The residential building is a taller building (10 storeys on a 4 storey podium). There will be minor positive effects on the health and wellbeing objective by provision of sport facilities (a MUGA), which will also be available to residents outside of school hours.													
Reasonable alternative summary	No reasonable alternative was identified for this allocation. The site has planning permission which is currently under construction.													

Table 3.174: Site Assessment BC16: 36-43 Great Sutton Street (Berry Street),

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC16: 36-43 Great Sutton Street (Berry Street), EC1V 0AB	0	+	0	0	0	+	0	+	0	0	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	<p>BC16 is allocated for refurbishment or extension of the existing building to provide office development.</p> <p>There is likely to be positive effects on economic development by providing additional employment floorspace, and on the efficient use of land through the optimisation of development on site through potential extensions. Lack of office floorspace is a barrier to economic growth in the area. The Local Plan strategy is that new business floorspace will be focused in the CAZ, Bunhill and Clerkenwell AAP area, the CAZ Fringe Spatial Strategy Areas and the Locally Strategic Industrial Sites. Given land constraints and high need (400,000sqm up to 2036) needs will not be met without prioritising business space in these areas, including the BCAAP area. The location of Bunhill and Clerkenwell is particularly suited to development of employment uses, with easy access to the major centres of employment and business of the London's West End, the City of London, Canary Wharf, as well as the emerging clusters of the City Fringe, Tech City, King's Cross and the Knowledge Quarter. The Local Plan prioritises employment floorspace in the BCAAP in BC1 and also by allocating the majority of site allocation sites in the BCAAP for employment (office) uses, to the exclusion of housing development on these sites. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.</p>													



IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable alternative: mixed use	0	+	0	0	+	+	0	-	-	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of alternative</b>	<p>This alternative is where this site allocation would be amended for more housing to be developed, allowing an element of residential to be provided on site, with no net loss of office floorspace.</p> <p>The alternative will have minor positive effects against the efficient use of land objective as it will lead to more development on previously developed land in an accessible location, however it will not be as efficient as the preferred approach as the the Bunhill and Clerkenwell Area is the most efficient location to locate offices as it is the accessible and connected as well as being the most valuable for office development due to close proximity to London's office markets. Offices can take advantage of the agglomeration benefits of the central London location and will have close access to the wide range of supporting services.</p> <p>The alternative would have minor positive effects against the objective for providing affordable housing as it would allow more housing to be developed which would include a proportion of affordable housing. The additional affordable housing is likely to have positive effects on social inclusion.</p> <p>The alternative would have minor negative effects on economic growth. The additional housing would displace office floorspace, which is needed to meet demand from businesses, grow the economy, and provide employment and training opportunities. This site is surrounded by a mix of uses, including offices, pubs, galleries, showrooms, and some residential – however the context is primarily that of a commercial uses. It is an area highly valued by the tech and creative sectors and SMEs for this blend of uses, proximity to linked businesses and services, and also leisure uses which are appealing to this workforce. The introduction of a significant proportion of residential uses will likely contribute to negative impacts on economic development by reducing the supply of office floorspace in this area suited to these sectors.</p> <p>The alternative would have minor negative impacts on reducing the need to travel by locating residential in the CAZ, rather than high trip generating office uses which can take advantage of the high accessibility by public transport and active travel, reducing trips by car.</p>													
<b>Conclusion</b>	<p>The preferred approach will support economic development by locating offices in the optimum location. The alternative allows more housing in this location in place of offices which will have negative effects on economic growth, the efficient use of land, and transport. While this additional housing has positive effects . on balance it is considered that office development is more appropriate on this site given its current use, is high levels of accessibility and location within the CAZ.</p>													

Table 3.175: Site Assessment BC17: Caxton House, 2 Farringdon Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC17: Caxton House, 2 Farringdon Road, EC1M 3HN	+	+	0	+	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>Formerly in office and retail use, buildings were demolished to facilitate Elizabeth Line (Crossrail) construction works.</p> <p>The site has planning permission for the development of 27,100sqm commercial/retail floorspace. BC17 allocation reflects the consent and is for office development with ground floor active retail/leisure floorspace.</p> <p>The allocation will have a significant positive effect on economic growth and minor positive effects on the efficient use of land by providing additional better quality office and retail floorspace. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion. The allocation will also have minor positive effects on the high quality environment objective and liveable neighbourhoods objective by replacing an unremarkable 9 storey tower including two storey podium with an 8 storey office building with a more contextual and appropriate design for the historic perimeter block development pattern typical of Farringdon.</p>													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified for this allocation. The site has planning permission which is currently under construction.													

Table 3.176: Site Assessment BC18: Cardinal Tower, 2A, 4-12 Farringdon Road and 48-50 Cowcross Street,

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC18: Cardinal Tower, 2A, 4-12	+	+	0	+	0	+	0	++	0	0	0	0	0	0

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Farringdon Road and 48-50 Cowcross Street, EC1M 3HP														
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>BC18 is allocated for office development with ground floor active retail/leisure floorspace. The site has planning permission for the development of a seven storey building providing 17,466sqm of office floorspace and 1,050sqm of ground floor retail floorspace. The site is being redeveloped as part of the Elizabeth Line (Crossrail) project.</p> <p>The allocation will have significant positive effects on economic growth and minor positive effects on the efficient use of land by providing additional quality office floorspace. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion. The allocation will also have positive effects on the local environment, liveable neighbourhoods, and heritage by replacing a 13 storey modernist tower with two storey podium with a 7 storey office building on a smaller footprint which is more contextual to the historic perimeter block development pattern and nearby listed buildings and also provides a more generous and improved public realm.</p>													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified for this allocation. The site has planning permission which is currently under construction.													

Table 3.177: Site Assessment BC19: Farringdon Place, 20 Farringdon Road,

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC19: Farringdon Place, 20 Farringdon Road, EC1M 3NH	+	+	0	0	0	+	0	+	0	0	0	0	0	0

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<p><b>Commentary on assessment of likely significant effects of site allocations</b></p>	<p>BC19 is allocated for intensification of business use and improved pedestrian connections to Turnmill Street and Farringdon Station. Only a smaller upward extension is likely, as such the effect of this allocation is minor positive effects on economic growth by providing additional employment floorspace and an improved and more inclusive public realm. Lack of office floorspace is a barrier to economic growth in the area. The Local Plan strategy is that new business floorspace will be focused in the CAZ, Bunhill and Clerkenwell AAP area, the CAZ Fringe Spatial Strategy Areas and the Locally Strategic Industrial Sites. Given land constraints and high need (400,000sqm up to 2036) needs will not be met without prioritising business space in these areas, including the BCAAP area. The location of Bunhill and Clerkenwell is particularly suited to development of employment uses, with easy access to the major centres of employment and business of the London's West End, the City of London, Canary Wharf, as well as the emerging clusters of the City Fringe, Tech City, King's Cross and the Knowledge Quarter. The Local Plan prioritises employment floorspace in the BCAAP in BC1 and also by allocating the majority of site allocation sites in the BCAAP for employment (office) uses, to the exclusion of housing development on these sites. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.</p> <p>The allocation will have a minor positive effects on the efficient use of land and objective by providing additional floorspace on site in a highly accessible central London location.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<p><b>Reasonable alternative: mixed use</b></p>	+	+	0	0	+	+	0	-	-	0	0	0	0	0
<p><b>Commentary on assessment of likely significant effects of alternative</b></p>	<p>This alternative is where this site allocation would be amended for more housing to be developed, allowing an element of residential to be provided on site, with no net loss of office floorspace.</p> <p>This alternative will have a positive effect on the local environment through improved public realm and pedestrian connections as with the preferred approach.</p> <p>The alternative will have minor positive effects against the efficient use of land objective as it will lead to more development on previously developed land in an accessible location, however it will not be as efficient as the preferred approach as the Bunhill and Clerkenwell Area is the most efficient location to locate offices as it is the accessible and connected as well as being the most valuable for office development due to</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	<p>close proximity to London's office markets. Offices can take advantage of the agglomeration benefits of the central London location and will have close access to the wide range of supporting services.</p> <p>The alternative would have minor positive effects against the objective for providing affordable housing as it would allow more housing to be developed which would include a proportion of affordable housing. The additional affordable housing is likely to have positive effects on social inclusion.</p> <p>The alternative would have minor negative effects on economic growth. The additional housing would displace office floorspace, which is needed to meet demand from businesses, grow the economy, and provide employment and training opportunities. Both this site and BC20 (50 Farringdon Road) are located in the strip of land between the railway cutting for the London Underground and Farringdon Road. They are both very close to Farringdon Station. Farringdon Road has a significant number of large scale offices along it, and is a busy main road. The Employment Land Study states that intensification of office use around Farringdon Station should be accepted and that this area should be nurtured in office market terms. These characteristics make it an ideal location for office development as commercial tenants will be attracted by the prominent location and proximity to Farringdon Station (including connection to the Elizabeth Line).</p> <p>The alternative would have minor negative impacts on reducing the need to travel by locating residential in the CAZ, rather than high trip generating office uses which can take advantage of the high accessibility by public transport and active travel, reducing trips by car.</p> <p>The noise from the railway line and Farringdon Road (and air pollution from the road) will serve as disbenefits for locating residential development, where it may be difficult to design in adequate levels of amenity. There is some uncertainty about the likelihood of these impacts as good design may be able to overcome the limitations of the site for residential development which is why the scoring has been maintained as a minor positive effects against the objective for housing, nevertheless this is a constrained location for residential development.</p>													
<b>Conclusion</b>	<p>The preferred approach will support economic by locating offices in the optimum location. The alternative allows more housing in this location in place of offices which will have negative effects on economic growth, the efficient use of land, and transport. While this additional housing has positive effects it is considered on balance intensification for business use is considered more appropriate on this site given the current use on the site and its accessible location in close proximity to Farringdon Station which is identified as an area of intensification for office uses.</p>													

Table 3.178: Site Assessment BC20: Lincoln Place, 50 Farringdon Road,

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC20: Lincoln Place, 50 Farringdon Road, EC1M 3NH	+	+	0	0	0	+	0	+	+	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>BC20 is allocated for intensification of business use with improved pedestrian connections to Turnmill Street and Farringdon Station. The intensification of the site will have a minor positive effect on the efficient use of land.</p> <p>There is a minor positive effect on economic growth by providing improved standard office accommodation. Lack of office floorspace is a barrier to economic growth in the area. The Local Plan strategy is that new business floorspace will be focused in the CAZ, Bunhill and Clerkenwell AAP area, the CAZ Fringe Spatial Strategy Areas and the Locally Strategic Industrial Sites. Given land constraints and high need (400,000sqm up to 2036) needs will not be met without prioritising business space in these areas, including the BCAAP area. The location of Bunhill and Clerkenwell is particularly suited to development of employment uses, with easy access to the major centres of employment and business of the London's West End, the City of London, Canary Wharf, as well as the emerging clusters of the City Fringe, Tech City, King's Cross and the Knowledge Quarter. The Local Plan prioritises employment floorspace in the BCAAP in BC1 and also by allocating the majority of site allocation sites in the BCAAP for employment (office) uses, to the exclusion of housing development on these sites. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.</p> <p>Should the site be redeveloped there may be positive effects on creating a high quality public realm and also on the transport objective by improving connections to the station and to Turnmill Street.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable alternative: mixed use	0	+	0	0	+	+	0	-	-	0	0	0	0	0
<b>Commentary on assessment of likely significant</b>	<p>This alternative is where this site allocation would be amended for more housing to be developed, allowing an element of residential to be provided on site, with no net loss of office floorspace.</p> <p>The alternative will have minor positive effects against the efficient use of land objective as it will lead to more development on previously developed land in an accessible location, however it will not be as efficient as the preferred approach as the Bunhill and Clerkenwell Area is the</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>effects of alternative</b>	<p>most efficient location to locate offices as it is the accessible and connected as well as being the most valuable for office development due to close proximity to London's office markets. Offices can take advantage of the agglomeration benefits of the central London location and will have close access to the wide range of supporting services.</p> <p>The alternative would have minor positive effects against the objective for providing affordable housing as it would allow more housing to be developed which would include a proportion of affordable housing. The additional affordable housing is likely to have positive effects on social inclusion.</p> <p>The alternative would have minor negative effects on economic growth. The additional housing would displace office floorspace, which is needed to meet demand from businesses, grow the economy, and provide employment and training opportunities. Both this site and BC19 (Farringdon Place, 20 Farringdon Road) are located in the strip of land between the railway cutting for the London Underground and Farringdon Road. They are both very close to Farringdon Station. Farringdon Road has a significant number of large scale offices along it, and is a busy main road. The Employment Land Study states that intensification of office use around Farringdon Station should be accepted and that this area should be nurtured in office market terms. These characteristics make it an ideal location for office development as commercial tenants will be attracted by the prominent location and proximity to Farringdon Station (including connect to the Elizabeth Line).</p> <p>The alternative would have minor negative impacts on reducing the need to travel by locating residential in the CAZ, rather than high trip generating office uses which can take advantage of the high accessibility by public transport and active travel, reducing trips by car.</p> <p>The noise from the railway line and Farringdon Road (and air pollution from the road) will serve as disbenefits for locating residential development, where it may be difficult to design in adequate levels of amenity. There is some uncertainty about the likelihood of these impacts as good design may be able to overcome the limitations of the site for residential development which is why the scoring has been maintained as a minor positive effects against the objective for housing, nevertheless this is a constrained location for residential development.</p>													
<b>Conclusion</b>	<p>The preferred approach will support economic by locating offices in an optimum location. The alternative allows more housing in this location in place of offices which will have positive effects in relation to meeting housing needs but would have negative effects on economic growth, the efficient use of land and transport. It is considered on balance intensification for office use is considered more appropriate on this site given the current use on the site and its accessible location in close proximity to Farringdon Station which is identified as an area of intensification for office uses.</p>													

Table 3.179: Site Assessment BC21: 2, 4-10 Clerkenwell Road, 29-39 Goswell Road & 1-4 Great Sutton Street,

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC21: 2, 4-10 Clerkenwell Road, 29-39 Goswell Road & 1-4 Great Sutton Street, Islington, London EC1M 5PQ	+	++	0	0	0	+	0	++	+	0	0	+	0	+
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>BC21 is allocated for office-led redevelopment with retail and leisure uses at ground floor fronting Clerkenwell Road and Goswell Road. Development should provide units suitable for SMEs.</p> <p>The allocation will likely have minor positive effects on the local environment and significant positive effects on the efficient use of land by developing a ground level car park into a quality contextual building with active uses on the ground floor. The removal of car parking will have minor positive effects against the transport, climate change, and natural resources (air quality) objectives by encouraging more sustainable forms of travel. The allocation will also have significant positive effects on economic growth by providing a large amount of office floorspace as well as retail and leisure floorspace. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.</p>													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified for this allocation. The site has planning permission which is currently under construction.													

Table 3.180: Site Assessment BC22: Vine Street Bridge

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC22: Vine Street Bridge, EC1R 3AU	++	+	+	+	0	0	+	0	+	++	+	0	0	0



IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>Commentary on assessment of likely significant effects of site allocations</b>	BC22 is allocated for conversion of the bridge from carriageway space to public open space. This will have significant positive effects on the high quality environment and open space objectives by providing much needed green open space in the area. The improved public realm and green infrastructure will also have minor positive effects on the liveable neighbourhoods, health and wellbeing, and biodiversity objectives. This allocation will have minor positive effects by against the efficient use of land objective as the open space would provide a higher value than the carriageway space, which is largely redundant. The allocation will also protect views to St Paul's Cathedral which will have minor positive effects against the heritage objective. The replacement space will be safer and more pleasant for walking and cycling and have minor positive effects on the transport objective.													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified for this allocation because it is allocated for public realm and the development on this site of a building is not appropriate on this site. Vine Street Bridge is conversion of carriageway to open space with no buildings proposed. The Council does not consider it appropriate to develop this site for a building due to the harm this would cause to the character, amenity, views, and permeability of the area.													

Table 3.181: Site Assessment BC23: Sycamore House, 5 Sycamore Street

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>BC23: Sycamore House, 5 Sycamore Street, EC1Y 0SR</b>	+	+	0	0	0	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	BC23 is allocated for the intensification of office use, which will provide minor positive effects on economic growth by providing more employment floorspace as well as help to make efficient use of land. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion. The consented scheme will also have a positive effects on the local environment by replacing a building with a poor appearance with a high quality design.													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>Reasonable alternative summary</b>	No reasonable alternative was identified for this allocation as the site has planning permission. The planning permission (P2016/4807/FUL) is for demolition of the existing office and replacement with a new office building, in accordance with the allocation.													

Table 3.182: Site Assessment BC24: Clerkenwell Fire Station, 42-44 Rosebery Avenue

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>BC24: Clerkenwell Fire Station, 42-44 Rosebery Avenue, EC1R 4RN</b>	+	++	++	+	++	+	0	0	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	BC24 is allocated for residential led development and to include some re-provision of social infrastructure/ community use. This would have significant positive effects on housing quality by providing additional good quality homes. Affordable housing would be provided as part of the development of the site. The additional affordable housing is likely to have positive effects on social inclusion. The allocation would have significant positive effects on the historic environment and the efficient use of land, by ensuring a listed building is protected by being brought back into economic use. The heritage led design will have positive effects in terms of the local environment by retaining this building which adds to local character and identity. The re-provision of services for residents will have a positive effect on the objective for providing liveable neighbourhoods.													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified for this allocation. This allocation maximises the amount of residential development reasonably possible on site, while also re-providing social infrastructure.  This allocation is for residential-led development to include some re-provision of social infrastructure or community use. Development on the site will need to be heritage led, as it must preserve the Grade II listed Clerkenwell Fire Station in the centre of the site. Development is also possible in the yard at the rear of the site, along with some open space. Development must take consideration of the Planning Brief for Clerkenwell Fire Station (November 2014). The planning brief states that the site should be developed for social infrastructure, homes, and open space. The brief states that homes may be developed (dependent on heritage impacts) on the upper floors on the Fire Station Building and in a new building in the yard. There are also a number of surrounding residential buildings, and the amenity of these homes must be protected. Furthermore the listed fire													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	station and the yard space would not allow development of large floorplate open plan offices. For the above reasons the Council did not consider it reasonable to assess for commercial uses on this site.													

Table 3.183: Site Assessment BC25: Mount Pleasant Post Office, 45 Rosebery Avenue,

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>BC25: Mount Pleasant Post Office, 45 Rosebery Avenue, EC1R 4TN</b>	+	++	0	+	++	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>The Mount Pleasant Sorting Office has an implemented planning permission for comprehensive redevelopment of the site to provide over 300 homes (on Islington's part of the site) with office, retail and community floorspace. Royal Mail operations are retained at the site, part of which is screened behind an acoustic deck to separate the operation from new homes. The allocation states that should the planning permission be subject to amendment, or new applications submitted, a mixed use development with priority given to the provision of affordable housing and affordable workspace will be required.</p> <p>The development will have significant positive effects on the housing and the efficient use of land objectives, by providing a significant number of new homes including affordable housing, as well as significant positive effects on economic growth objective with provision of office and retail floorspace. The large size of this site also lends support to the practicality of a designing a mixed use scheme. The additional affordable housing is likely to have positive effects on social inclusion. The additional office floorspace would have positive effects on social inclusion through provision of a range of job opportunities. The development will have minor positive effects on the liveable neighbourhoods objective by providing community floorspace, and will have minor positive effects on the built environment objective and by improving connectivity. Through site pedestrian links and public realm improvements could help to promote walking and cycling however the specific effects are uncertain and so have been assessed as neutral.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable alternative summary	No reasonable alternative was identified for this allocation as the site has planning permission which is currently under construction.													

Table 3.184: Site Assessment BC26: 68-86 Farringdon Road (NCP carpark),

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC26: 68-86 Farringdon Road (NCP carpark), EC1R 0BD	+	++	0	0	0	0	0	++	0	0	0	+	0	+
Commentary on assessment of likely significant effects of site allocations	<p>The site has planning permission for the demolition of the existing building and redevelopment to provide 4,242sqm of office floorspace, a hotel with up to 171 bedrooms and 527sqm retail floorspace. BC26 allocation states that should the site be subject to further amendments or new applications, the council will seek a mixed use redevelopment of the site with priority for housing and office development, alongside a substantial amount of public open space. Affordable housing and affordable workspace will be a particular priority. The Council will also seek removal of car parking from the site to provide a car free scheme as part of redevelopment.</p> <p>The redevelopment will have significant positive effects on economic growth by providing new office floorspace and potentially other uses including hotel and retail. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion. It also replaces a multi storey car park which is housed in an unattractive building resulting in positive effects on the built environment (through replacement with a quality building with active frontages), and on transport, air quality (the natural resources objective) and climate change objectives by removing car parking and therefore reducing private car use.</p>													
Commentary on assessment of likely significant	No reasonable alternative was identified for this allocation. The site has planning permission which is currently under construction.													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
effects of alternative														

Table 3.185: Site Assessment BC27: Finsbury Health Centre and Pine Street Day

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC27: Finsbury Health Centre and Pine Street Day Centre, EC1R 0LP	+	0	++	++	0	0	+	0	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>BC27 is allocated for the refurbishment of the Finsbury Health Centre for healthcare. The Michael Palin Centre for Stammering may be suitable for redevelopment for community/social infrastructure uses. The allocation also requires retention of the listed building.</p> <p>The retention and refurbishment of the Grade I listed building will have significant positive effects on the heritage objective and minor positive effects on the high quality environment objective, as it retains the building which is described as both a brilliant piece of planning and as the prototype on a national level for modern construction and communal architecture such as NHS clinics, and health and treatment centres. Retention of the medical use in this location will have significant positive effects on the liveable neighbourhoods objective and minor positive effects on the health and wellbeing objective.</p>													
<b>Reasonable alternative summary</b>	<p>No reasonable alternative was identified for this allocation as the site is allocated for retention of the social infrastructure use and other uses cannot be practically accommodated on site. Significant additional floorspace could not be added without unacceptable harm to the listed building and its setting. The building is not suitable for conversion to residential use due to the need to retain the health use, and the importance of the health use to the special historic interest of the listed building.</p>													

Table 3.186: Site Assessment BC28: Angel Gate, Goswell Road,

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC28: Angel Gate, Goswell Road, EC1V 2PT	+	++	0	0	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>BC28 is allocated for redevelopment of the site to provide office-led development, with a significant intensification of office floorspace alongside active frontages for commercial uses fronting Goswell Road.</p> <p>Redevelopment will have minor positive effects on the environment as the current building is a dated office development and its replacement offers an opportunity for better urban design and architecture. Redevelopment will have significant positive effects on the efficient use of land because the current layout with large areas of ground level road circulation space is inefficient.</p> <p>Redevelopment on this site will have significant positive effects on economic growth as it will provide large amounts of quality employment floorspace in an appropriate location in the CAZ. Lack of office floorspace is a barrier to economic growth in the area. The Local Plan strategy is that new business floorspace will be focused in the CAZ, Bunhill and Clerkenwell AAP area, the CAZ Fringe Spatial Strategy Areas and the Locally Strategic Industrial Sites. Given land constraints and high need (400,000sqm up to 2036) needs will not be met without prioritising business space in these areas, including the BCAAP area. The location of Bunhill and Clerkenwell is particularly suited to development of employment uses, with easy access to the major centres of employment and business of the London's West End, the City of London, Canary Wharf, as well as the emerging clusters of the City Fringe, Tech City, King's Cross and the Knowledge Quarter. The Local Plan prioritises employment floorspace in the BCAAP in BC1 and also by allocating the majority of site allocation sites in the BCAAP for employment (office) uses, to the exclusion of housing development on these sites. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.</p> <p>Heritage impacts are neutral, as development would need to prevent impacts on the listed buildings fronting City Road.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable alternative: mixed use	+	+	0	0	+	+	0	+	-	0	0	0	0	0

<b>Commentary on assessment of likely significant effects of alternative</b>	<p>This alternative is where this site allocation would be amended for more housing to be developed, allowing up to 50% of the uplift to be provided as housing with the other 50% office use, in addition to commercial uses fronting Goswell Road.</p> <p>As with the preferred approach this alternative will have minor positive effects on the environment as the current building is a dated office development and its replacement offers an opportunity for better urban design and architecture.</p> <p>The alternative will have minor positive effects against the efficient use of land objective as the current layout with large areas of ground level road circulation space is inefficient, as well as being a highly accessible location. However it will be less efficient as the preferred approach as the Bunhill and Clerkenwell Area is the most efficient location to locate offices as it is the accessible and connected as well as being the most valuable for office development due to close proximity to London's office markets. Offices can take advantage of the agglomeration benefits of the central London location and will have close access to the wide range of supporting services.</p> <p>The alternative would have minor positive effects against the objective for providing affordable housing as it would allow more housing to be developed which would include a proportion of affordable housing. The additional affordable housing is likely to have positive effects on social inclusion.</p> <p>The alternative would have significant negative effects on economic growth. The additional housing would displace office floorspace, which is needed to meet demand from businesses, grow the economy, and provide employment and training opportunities. The site is located on the arc between King's Cross and Shoreditch which the Employment Land Study identifies as the focus and priority for provision of Grade A office floorspace. The scale of this site provides an opportunity for provision of a large high specification office. The site is well linked to the other central London office sub markets, located near the junction of Pentonville Road leading to King's Cross and the Knowledge Quarter, and City Road leading to Old Street, as well as being close to Angel Underground Station and the Northern Line.</p> <p>The alternative would have minor negative impacts on reducing the need to travel by locating residential in the CAZ, rather than high trip generating office uses which can take advantage of the high accessibility by public transport and active travel, reducing trips by car.</p>
<b>Conclusion</b>	<p>The preferred approach will support economic development and make the most efficient use of land by locating offices in an optimum location. The alternative allows more housing in this location, whilst this would have positive effects in relation to objective 5 it will have negative effects on economic growth, the efficient use of land, and transport. On balance it is considered office-led development is more appropriate on the site given its current use, its accessible location within the CAZ and the identified need for additional business floorspace.</p>

Table 3.187: Site Assessment BC29: Taylor House, 88 Rosebery Avenue

<b>IIA Objective / Site</b>	<b>1. HIGH QUALITY ENVIRON</b>	<b>2. EFFICIENT USE OF LAND</b>	<b>3. HERITAGE</b>	<b>4. LIVEABLE NEIGHBOURHOODS</b>	<b>5. HOUSING QUALITY</b>	<b>6. SOCIAL INCLUSION</b>	<b>7. HEALTH AND WELLBEING</b>	<b>8. ECONOMIC GROWTH</b>	<b>9. NEED TO TRAVEL</b>	<b>10. OPEN SPACE</b>	<b>11. BIODIVERSITY</b>	<b>12. CLIMATE CHANGE</b>	<b>13. RESOURCE EFFICIENCY</b>	<b>14. NATURAL RESOURCES</b>
<b>BC29: Taylor House, 88 Rosebery Avenue, EC1R 4QU</b>	0	+	0	0	0	+	0	+	0	0	0	0	0	0

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<p><b>Commentary on assessment of likely significant effects of site allocations</b></p>	<p>BC29 is allocated for redevelopment for office use, subject to justifying the loss of social infrastructure. Mixed-use office/social or community use development may also be acceptable where retention of social infrastructure use is required on site.</p> <p>This allocation will have minor positive effects on economic growth objective by providing employment floorspace in an appropriate location, if the loss of social infrastructure is justified. Lack of office floorspace is a barrier to economic growth in the area. The Local Plan strategy is that new business floorspace will be focused in the CAZ, Bunhill and Clerkenwell AAP area, the CAZ Fringe Spatial Strategy Areas and the Locally Strategic Industrial Sites. Given land constraints and high need (400,000sqm up to 2036) needs will not be met without prioritising business space in these areas, including the BCAAP area. The location of Bunhill and Clerkenwell is particularly suited to development of employment uses, with easy access to the major centres of employment and business of the London's West End, the City of London, Canary Wharf, as well as the emerging clusters of the City Fringe, Tech City, King's Cross and the Knowledge Quarter. The Local Plan prioritises employment floorspace in the BCAAP in BC1 and also by allocating the majority of site allocation sites in the BCAAP for employment (office) uses, to the exclusion of housing development on these sites. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.</p> <p>The allocation presents an opportunity to optimise the use of previously developed buildings with minor positive effects on the efficient use of land objective. The loss of social infrastructure at the site will only be permitted if it can be robustly demonstrated that such loss will not have a negative effect on Islington's residents, hence there is considered to be no effect in relation to the liveable neighbourhoods objective.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable alternative: mixed use	0	-	0	0	+	+	0	-	-	0	0	0	0	0
<p><b>Commentary on assessment of likely significant effects of alternative</b></p>	<p>This alternative is where this site allocation would be amended for more housing to be developed, allowing an element of residential to be provided on site, with no net loss of office floorspace.</p> <p>The alternative would have minor negative effects against the efficient use of land as the Bunhill and Clerkenwell Area is the most efficient location to locate offices as it is the accessible and connected as well as being the most valuable for office development due to close proximity to London's office markets. Offices can take advantage of the agglomeration benefits of the central London location and will have close access to the wide range of supporting services.</p>													



IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	<p>The alternative would have minor positive effects against the objective for providing affordable housing as it would allow more housing to be developed which would include a proportion of affordable housing. The additional affordable housing is likely to have positive effects on social inclusion.</p> <p>The alternative would have minor negative effects on economic growth. The additional housing would displace office floorspace, which is needed to meet demand from businesses, grow the economy, and provide employment and training opportunities.</p> <p>The alternative would have minor negative impacts on reducing the need to travel by locating residential in the CAZ, rather than high trip generating office uses which can take advantage of the high accessibility by public transport and active travel, reducing trips by car.</p>													
<b>Conclusion</b>	<p>The preferred approach will support economic development and make the most efficient use of land, in an optimum location. The alternative allows more housing in this location in place of offices which positive effects in relation to objective 5 but negative effects on economic growth, the efficient use of land, and transport. On balance it is considered that redevelopment for office use, subject to justifying the loss of social infrastructure, is more appropriate given the sites accessible location within the CAZ and proximity to Farringdon Station which is identified as an area of intensification for office uses.</p>													

Table 3.188: Site Assessment BC30: Telfer House, 27 Lever Street

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC30: Telfer House, 27 Lever Street, EC1V 3QX	0	+	0	0	++	+	0	0	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>BC30 is allocated for residential development with landscaping and associated works. The site has planning permission for the construction of 38 homes. The allocation will have significant positive effects on housing provision by providing new homes, including affordable housing. The allocation would also make more efficient use of land compared to the current low rise and relatively inefficient layout. The additional affordable housing is likely to have positive effects on social inclusion.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable alternative summary	No reasonable alternative was identified for this allocation as the site has planning permission.													

Table 3.189: Site Assessment BC31: Travis Perkins, 7 Garrett Street,

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC31: Travis Perkins, 7 Garrett Street, EC1Y 0TY	+	+	+	0	0	0	0	+	0	0	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	<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, character and distinctiveness.</p>													
Reasonable alternative summary	No reasonable alternative was identified for this allocation as the site has planning permission.													

Table 3.190: Site Assessment BC32: Monmouth House, 58-64 City Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC32: Monmouth House, 58-64 City Road, EC1Y 2AE	0	+	0	0	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	BC32 is allocated for intensification of business uses. The site has planning permission for the demolition of the existing buildings and redevelopment to provide 13,393sqm of office space including affordable workspace and 404sqm of retail floorspace. This should have significant positive effects on economic growth by providing a significant amount of office floorspace as well as retail uses. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion. The allocation would also make more efficient use of land.													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified for this allocation as the site has planning permission.													

Table 3.191: Site Assessment BC33: Oliver House, 51-53 City Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC33: Oliver House, 51-53 City Road, EC1Y 1AU	0	0	+	0	0	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	BC33 is allocated for refurbishment or intensification of office use. It will have minor positive effects on economic growth by providing employment (office) floorspace. Lack of office floorspace is a barrier to economic growth in the area. The Local Plan strategy is that new business floorspace will be focused in the CAZ, Bunhill and Clerkenwell AAP area, the CAZ Fringe Spatial Strategy Areas and the Locally Strategic Industrial Sites. Given land constraints and high need (400,000sqm up to 2036) needs will not be met without prioritising business space in these areas, including the BCAAP area. The location of Bunhill and Clerkenwell is particularly suited to development of employment uses, with easy access to the major centres of employment and business of the London's West End, the City of London, Canary Wharf, as well as the emerging clusters of the City Fringe, Tech City, King's Cross and the Knowledge Quarter. The Local Plan prioritises employment floorspace in the BCAAP in BC1 and also by													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	<p>allocating the majority of site allocation sites in the BCAAP for employment (office) uses, to the exclusion of housing development on these sites. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.</p> <p>The development site is adjacent to the Wesley's Chapel complex, which contains both Grade I and II listed buildings. The allocation will have minor positive effects on the heritage objective by setting out that development on this site must be designed to conserve or enhance the setting of the listed buildings.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable alternative: mixed use	0	-	0	0	+	+	0	-	-	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of alternative</b>	<p>This alternative is where this site allocation would be amended for more housing to be developed, allowing an element of residential to be provided on site, with no net loss of office floorspace.</p> <p>The alternative would have minor negative effects against the efficient use of land as the Bunhill and Clerkenwell Area is the most efficient location to locate offices as it is the accessible and connected as well as being the most valuable for office development due to close proximity to London's office markets. Offices can take advantage of the agglomeration benefits of the central London location and will have close access to the wide range of supporting services. The small size of this site also detracts from an efficient use of land with potential difficulties around designing a mixed use scheme.</p> <p>The alternative would have minor positive effects against the objective for providing affordable housing as it would allow more housing to be developed which would include a proportion of affordable housing. The additional affordable housing is likely to have positive effects on social inclusion.</p> <p>The alternative would have minor negative effects on economic growth. The additional housing would displace office floorspace, which is needed to meet demand from businesses, grow the economy, and provide employment and training opportunities. The location and surround context of Oliver House make it a valuable location for office development. It is within the City Fringe Opportunity Area, less than 200m from the Old Street roundabout, the centre of East London Tech City. The surrounding area has a strong commercial role and is home to a great many offices. The smaller site size is suitable for small and medium enterprises and the period building has potential for studio space and flexible and collaborative office space with revealed ceilings as valued by the digital and creative sectors.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	The alternative would have minor negative impacts on reducing the need to travel by locating residential in the CAZ, rather than high trip generating office uses which can take advantage of the high accessibility by public transport and active travel, reducing trips by car.													
<b>Conclusion</b>	The preferred approach will support economic development and make the most efficient use of land by locating offices in an optimum location. The alternative allows more housing in this location in place of offices, whilst this would have benefits in relation to objective 5, it will have negative effects on economic growth, the efficient use of land, and transport. On balance it is considered that refurbishment/intensification of office use is more appropriate given the current use of the site and its location within the CAZ and City Fringe Opportunity Area..													

Table 3.192: Site Assessment BC34: 20 Ropemaker Street, 101-117 Finsbury Pavement, 10-12 Finsbury Street

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>BC34: 20 Ropemaker Street, 101-117 Finsbury Pavement, 10-12 Finsbury Street, EC2Y 9AR</b>	+	++	0	0	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	BC34 is allocated for office led mixed use development with a significant increase in office floorspace, provision of affordable workspace and active commercial uses at ground floor level. The site has planning permission for a large quantum for office floorspace and will have significant positive effects on economic growth. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion. This allocation will have significant positive effects on the efficient use of land. Provision of commercial units at the ground floor will have minor positive effects on the high quality environment objective by creating a more vibrant and active environment that provides services to people living and working in the area.													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified for this allocation. The site has planning permission which is currently under construction.													

Table 3.193: Site Assessment BC35: Finsbury Tower, 103-105 Bunhill Row,

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC35: Finsbury Tower, 103-105 Bunhill Row, EC1Y 8LZ	0	+	0	0	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	BC35 is allocated for intensification of office use. The allocation will result in significant positive effects on economic growth by providing additional employment floorspace. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion. The allocation will have minor positive effects on the efficient use of land objective by increasing the floorspace on a previously developed site.													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified for this allocation. The site is currently at an advanced stage of construction with planning permission P2016/3939/FUL, so no reasonable alternative has been assessed.													

Table 3.194 Site Assessment BC36: London Metropolitan Archives and Finsbury Business Centre

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC36: London Metropolitan Archives and Finsbury Business Centre	0	+	0	+	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant</b>	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 significant positive effects on economic growth by providing employment (office) floorspace. Lack of office floorspace is a barrier to economic growth in the area. The Local Plan strategy is that new business floorspace will be focused in the													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>effects of site allocations</b>	<p>CAZ, Bunhill and Clerkenwell AAP area, the CAZ Fringe Spatial Strategy Areas and the Locally Strategic Industrial Sites. Given land constraints and high need (400,000sqm up to 2036) needs will not be met without prioritising business space in these areas, including the BCAAP area. The location of Bunhill and Clerkenwell is particularly suited to development of employment uses, with easy access to the major centres of employment and business of the London's West End, the City of London, Canary Wharf, as well as the emerging clusters of the City Fringe, Tech City, King's Cross and the Knowledge Quarter. The Local Plan prioritises employment floorspace in the BCAAP in BC1 and also by allocating the majority of site allocation sites in the BCAAP for employment (office) uses, to the exclusion of housing development on these sites. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.</p> <p>The allocation would also make more efficient use of land by adding floorspace to a previously developed site. The allocation will have minor positive effects on the liveable neighbourhoods objective as the allocation ensure that the ongoing operation of the London Metropolitan Archives must not be affected by any development on site, preserving this important cultural asset.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>Reasonable alternative: mixed use</b>	0	-	0	0	+	+	0	-	-	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of alternative</b>	<p>This alternative is where this site allocation would be amended for more housing to be developed, allowing up to 50% of the uplift to be provided as housing with the other 50% office use.</p> <p>The alternative would have minor negative effects against the efficient use of land as the Bunhill and Clerkenwell Area is the most efficient location to locate offices as it is the accessible and connected as well as being the most valuable for office development due to close proximity to London's office markets. Offices can take advantage of the agglomeration benefits of the central London location and will have close access to the wide range of supporting services.</p> <p>The alternative would have minor positive effects against the objective for providing affordable housing as it would allow more housing to be developed which would include a proportion of affordable housing. The additional affordable housing is likely to have positive effects on social inclusion.</p> <p>The alternative would have significant negative effects on economic growth. The additional housing would displace office floorspace, which is needed to meet demand from businesses, grow the economy, and provide employment and training opportunities. The Finsbury Business Centre</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	<p>Site provides flexible workspace and collaboration space for small and medium enterprises, and development on this site offers an opportunity to expand this role. The site is allocated to allow for the expansion of the existing cultural uses linked to the operation of the London Metropolitan Archives also requires that any development does not affect the operation of the London Metropolitan Archives. A larger scale residential use will not support the expansion of cultural uses on site or the expansion of provision for SMEs.</p> <p>The alternative would have minor negative impacts on reducing the need to travel by locating residential in the CAZ, rather than high trip generating office uses which can take advantage of the high accessibility by public transport and active travel, reducing trips by car.</p>													
<b>Conclusion</b>	<p>The preferred approach will support economic development and make the most efficient use of land by locating offices in the optimum location. The alternative allows more housing which will have positive effects in relation to objective 5 but will have negative effects on economic growth, the efficient use of land, and transport. On balance it is considered that intensification of business use and expansion of the existing uses linked to the operation of the London Metropolitan Archives is more appropriate given the current use of the site, its accessible location within the CAZ and proximity to Farringdon Station which is identified as an area of intensification for office uses.</p>													

Table 3.195 Site Assessment BC37: Triangle Estate, Goswell Road/Compton Street/Cyrus Street,

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC37: Triangle Estate, Goswell Road/Compton Street/Cyrus Street, EC1	+	+	0	0	++	+	0	0	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>BC37 is allocated for residential development and reprovision of retail floorspace. The extension and improvement of the Triangle Estate has planning permission and implementation will result in significant positive effects on housing by providing 54 new dwellings including 27 social rented units. The additional affordable housing is likely to have positive effects on social inclusion. Redevelopment will also have minor positive effects on the efficient use of land by infilling on an existing housing estate, and minor positive effects through associated improvements to access and common areas on the estate contributing to a safer and more inclusive environment.</p>													



IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable alternative summary	No reasonable alternative was identified for this allocation as the site has planning permission.													

Table 3.196: Site Assessment BC38: Moorfields Eye Hospital, City Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC38: Moorfields Eye Hospital, City Road, EC1V 2PD	++	+	+	+	0	+	0	++	0	+	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	<p>BC38 is allocated to deliver a very substantial quantum of office floorspace, a large proportion of which is expected to be Grade A office space. A range of unit types and sizes, including a significant proportion of small units, particularly for SMEs, must be provided and a substantial amount of affordable workspace at peppercorn rent will be delivered as part of the office floorspace. An element of social infrastructure will also be required, potentially consisting of two elements: Eye hospital/Institute of Ophthalmology “legacy” eye clinic facility and a GP/community health hub. Active shops, cafes, and restaurants, or drinking establishment uses on the ground floor will be sought as part of any future development proposal and a proportion will be affordable retail units.</p> <p>The redevelopment of the Moorfields Eye Hospital site will result in significant positive effects on economic growth by providing large scale high quality office floorspace in the City Fringe Opportunity Area. Lack of office floorspace is a barrier to economic growth in the area. The Local Plan strategy is that new business floorspace will be focused in the CAZ, Bunhill and Clerkenwell AAP area, the CAZ Fringe Spatial Strategy Areas and the Locally Strategic Industrial Sites. Given land constraints and high need (400,000sqm up to 2036) needs will not be met without prioritising business space in these areas, including the BCAAP area. The location of Bunhill and Clerkenwell is particularly suited to development of employment uses, with easy access to the major centres of employment and business of the London’s West End, the City of London, Canary Wharf, as well as the emerging clusters of the City Fringe, Tech City, King’s Cross and the Knowledge Quarter. The Local Plan prioritises employment floorspace in the BCAAP in BC1 and also by allocating the majority of site allocation sites in the BCAAP for employment (office) uses, to the exclusion of housing development on these sites. The additional office floorspace in this central London location will support the</p>													

	<p>economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.</p> <p>The allocation recognises the unique opportunity presented by this site which will make a significant contribution to both London and the national economy. It will also have positive economic effects by requiring SME space and affordable workspace which broadens the range of space for local businesses potentially providing more opportunity for local people tackling worklessness. The retail space also provides opportunities for employment. The hospital use is relocating within central London to a modern purpose built building so this clinical provision will not be lost maintaining a sub-regional service provision for residents.</p> <p>Redevelopment must retain key historic buildings fronting City Road therefore the allocation will have minor positive effects on the heritage objective. The increase in development on the site will have minor positive effects on the efficient use of land objective. There will be minor positive effects on the objective for open space by provision of a public open space. New links, and a quality public realm will improve permeability and create a safer conditions for walking and cycling however the specific effects are uncertain and so have been assessed as neutral.. Increased retail and leisure floorspace, social infrastructure uses, and the health hub will help provide more services for residents and create a more socially vibrant environment for visitors to the borough with minor positive effects on liveable neighbourhoods.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable alternative: mixed use	++	-	+	+	+	+	0	-	-	0	0	0	0	0
Reasonable alternative summary	<p>This alternative is where this site allocation would be amended for more housing to be developed, allowing an element of housing to be provided, in addition to the very substantial quantum of office floorspace, as well as social infrastructure uses (legacy eye clinic, GP surgery, community health hub), and retail and leisure uses on the ground floor.</p> <p>The alternative will have the same positive effects on the local environment, heritage, and liveable neighbourhoods as set out in the preferred approach above as these aspects will not be changed in this alternative.</p> <p>The alternative would have minor negative effects against the efficient use of land as the Bunhill and Clerkenwell Area is the most efficient location to locate offices as it is the accessible and connected as well as being the most valuable for office development due to close proximity to London's office markets. Offices can take advantage of the agglomeration benefits of the central London location and will have close access to the wide range of supporting services.</p>													

	<p>The alternative would have minor positive effects against the objective for providing affordable housing as it would allow more housing to be developed which would include a proportion of affordable housing. The additional affordable housing is likely to have positive effects on social inclusion.</p> <p>The alternative would have significant negative effects on economic growth. The additional housing would displace office floorspace, which is needed to meet demand from businesses, grow the economy, and provide employment and training opportunities. The Moorfields Eye Hospital site is an important location in the Bunhill and Clerkenwell area for provision of office floorspace to anchor a large scale employer in the area, to support the East London Tech City, and to build a critical mass of employment uses in close proximity to the Old Street Roundabout. The Employment Land Study identifies the arc between Shoreditch and King's Cross including along City Road the focus of priority for site assembly and for provision of Grade A office space, to maintain and enhance the area's role in supporting London's strategic business role. The site occupies a key location with frontage to the commercial corridor of City Road and is located close to the Old Street Roundabout, the central identifiable point for the East London Tech City. This is one of the largest development sites in the AAP area and it is important to secure a large high quality office, which facilitate a large scale employer a prominent central London address in the area. The site is also within the City Fringe Opportunity Area. A new high quality large scale office development in this area will act as a catalyst, building confidence in the area and attracting smaller businesses and supporting service businesses.</p> <p>The alternative would have minor negative impacts on reducing the need to travel by locating residential in the CAZ, rather than high trip generating office uses which can take advantage of the high accessibility by public transport and active travel, reducing trips by car.</p>
<b>Conclusion</b>	<p>The preferred approach will support economic development and make the most efficient use of land by locating offices in an optimum location. The alternative allows more housing which would have positive effects in relation to objective 5 but will have negative effects on economic growth, the efficient use of land, and transport. On balance it is considered that providing for a significant amount of business space alongside an element of social infrastructure is considered more appropriate given the employment benefits of the current use, the site's location within the CAZ and the City Fringe Opportunity Area and its proximity to the wider Tech City Area.</p>

Table 3.197: Site Assessment BC39: Laser House, 132-140 Goswell Road,

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC39: Laser House, 132-140 Goswell Road, EC1V 7DY	0	+	0	0	0	+	0	+	0	0	0	0	0	0

I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>Commentary on assessment of likely significant effects of site allocations</b>	BC39 is allocated for intensification of business use. This allocation will have positive effects on economic growth by providing employment (office) floorspace and will ensure the efficient use of land. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified for this allocation. The site has planning permission which is currently under construction.													

Table 3.198: Site Assessment BC40: The Pentagon, 48 Chiswell Street

I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>BC40: The Pentagon, 48 Chiswell Street, EC1Y 4XX</b>	0	+	0	0	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	BC40 is allocated for intensification of office floorspace. This allocation will have significant positive effects on economic growth by providing employment (office) floorspace and will ensure the efficient use of land. Lack of office floorspace is a barrier to economic growth in the area. The Local Plan strategy is that new business floorspace will be focused in the CAZ, Bunhill and Clerkenwell AAP area, the CAZ Fringe Spatial Strategy Areas and the Locally Strategic Industrial Sites. Given land constraints and high need (400,000sqm up to 2036) needs will not be met without prioritising business space in these areas, including the BCAAP area. The location of Bunhill and Clerkenwell is particularly suited to development of employment uses, with easy access to the major centres of employment and business of the London's West End, the City of London, Canary Wharf, as well as the emerging clusters of the City Fringe, Tech City, King's Cross and the Knowledge Quarter. The Local Plan prioritises employment floorspace in the BCAAP in BC1 and also by allocating the majority of site allocation sites in the BCAAP for employment (office) uses, to the exclusion of housing development on these sites. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable alternative: mixed use	0	-	0	0	+	+	0	-	-	0	0	0	0	0
Commentary on assessment of likely significant effects of alternative	<p>This alternative is where this site allocation would be amended for more housing to be developed, allowing an element of residential to be provided on site, with no net loss of office floorspace.</p> <p>The alternative would have minor negative effects against the efficient use of land as the Bunhill and Clerkenwell Area is the most efficient location to locate offices as it is the accessible and connected as well as being the most valuable for office development due to close proximity to London's office markets. Offices can take advantage of the agglomeration benefits of the central London location and will have close access to the wide range of supporting services.</p> <p>The alternative would have minor positive effects against the objective for providing affordable housing as it would allow more housing to be developed which would include a proportion of affordable housing. The additional affordable housing is likely to have positive effects on social inclusion.</p> <p>The alternative would have significant negative effects on economic growth. The additional housing would displace office floorspace, which is needed to meet demand from businesses, grow the economy, and provide employment and training opportunities. This site is located in the City Fringe Opportunity Area and close to the cluster of large scale office developments at Moorgate, including Citypoint, the Heron, and Ropemaker Place. The location is also close to the border with the City of London, and can benefit from this agglomeration of business uses. These characteristics make it an ideal location for development of offices where businesses can take advantage of the agglomeration benefits of the area and its role as a world city centre of business.</p> <p>The alternative would have minor negative impacts on reducing the need to travel by locating residential in the CAZ, rather than high trip generating office uses which can take advantage of the high accessibility by public transport and active travel, reducing trips by car.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	In addition, while the surrounding area is mixed use (including significant residential and the Barbican and the Whitbread Estate) the site is less suited to residential use due the high density and a high site coverage built form of the site and surrounding context, which will present challenges for providing adequate amenity, outdoor space, and outlook for homes. There is some uncertainty about the likelihood of these impacts as good design may be able to overcome the limitations of the site for residential development which is why the scoring has been maintained as a minor positive effects against the objective for housing, nevertheless this is a highly constrained location for residential development.													
<b>Conclusion</b>	The preferred approach will support economic development and make the most efficient use of land by locating offices in an optimum location. The alternative allows more housing in place of offices which will positive effects in relation to objective 5 however it would have negative effects on economic growth, the efficient use of land, and transport. On balance it is considered that intensification of office use is more appropriate given the current use of the site, its location in the City Fringe Opportunity Area and proximity to City of London and the cluster of large scale office developments at Moorgate, including Citypoint, the Heron, and Ropemaker Place.													

Table 3.199: BC41: Site Assessment Central Foundation School, 15 Cowper Street, 63-67 Tabernacle Street and 19 [Shoreditch County Court] & 21-23 Leonard Street

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC41: Central Foundation School, 15 Cowper Street, 63-67 Tabernacle Street and 19 [Shoreditch County Court] & 21-23 Leonard Street, EC2	0	+	0	+	0	+	+	++	0	0	0	0	0	0

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>BC41 is allocated for improved education and sports facilities with the provision of office floorspace. The site has planning permission for the construction of a 4-storey building for science teaching, development of a partially sunken sports hall in the courtyard and the erection of an 8-storey office building.</p> <p>The proposed development will have significant positive effects on economic growth by enhancing the quality of education offered and facilitating the increased student numbers, and by providing employment floorspace (an 8 storey office building) on site. These elements will also make more efficient use of the land by adding uses on site and have a positive effect on provision of services for residents. The education use will have minor positive effects social inclusion by providing opportunities for learning. The provision of sports facilities in line with the allocation will have minor positive effects on health and wellbeing.</p>													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified for this allocation as the site is has planning permission which is under construction.													

Table 3.200: Site Assessment BC42: Site of electricity substation opposite 15-27 Gee Street and car park spaces at 90-98 Goswell Road,

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>BC42: Site of electricity substation opposite 15-27 Gee Street and car park spaces at 90-98 Goswell Road, EC1</b>	0	++	0	+	0	+	0	+	+	0	0	+	0	+

I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>BC42 is allocated for office use with retail at ground floor level.</p> <p>The current use is predominantly a ground level car park with an electricity substation on a corner of the site. The allocation will have significant positive effects on the efficient use of land by bringing this site into a better use. It will have positive effects on economic development by providing employment (office) floorspace and minor positive effects on liveable neighbourhoods by providing an active frontage and retail space increasing provision of services for residents. The additional office floorspace would have positive effects on social inclusion through provision of a range of job opportunities, but less than an all office scheme. The removal of car parking will have benefits in moving more trips to sustainable forms of transport which will have minor positive effects against the objectives for transport, climate change, and natural resources (air quality).</p>													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified for this allocation. The site has planning permission which is currently under construction.													

Table 3.201: Site Assessment BC43: Easy Hotel, 80-86 Old Street

I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>BC43: Easy Hotel, 80-86 Old Street, EC1V 9AZ</b>	0	0	0	0	0	0/+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>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 re-provision of existing quantum of hotel floorspace</p> <p>Whether development is for additional hotel use or for office use (if the site is redeveloped) there will likely be positive effects on economic growth by providing either hotel use which supports the economic functions of the area or office use by directly providing employment floorspace. Provision of business floorspace would have a positive effect as it would meet the identified need set out in the Employment Study. If office is provided it will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.</p>													



IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable alternative summary	No reasonable alternative was identified for this allocation as the site has planning permission.													

Table 3.202 Site Assessment BC44: Crown House 108 Aldersgate Street,

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC44: Crown House 108 Aldersgate Street, EC1A 4JN	0	+	0	0	0	0	0	+	0	0	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	BC44 is allocated for intensification of office floorspace. This allocation will have positive effects on economic growth by providing employment (office) floorspace and will ensure the efficient use of land. Lack of office floorspace is a barrier to economic growth in the area. The Local Plan strategy is that new business floorspace will be focused in the CAZ, Bunhill and Clerkenwell AAP area, the CAZ Fringe Spatial Strategy Areas and the Locally Strategic Industrial Sites. Given land constraints and high need (400,000sqm up to 2036) needs will not be met without prioritising business space in these areas, including the BCAAP area. The location of Bunhill and Clerkenwell is particularly suited to development of employment uses, with easy access to the major centres of employment and business of the London's West End, the City of London, Canary Wharf, as well as the emerging clusters of the City Fringe, Tech City, King's Cross and the Knowledge Quarter. The Local Plan prioritises employment floorspace in the BCAAP in BC1 and also by allocating the majority of site allocation sites in the BCAAP for employment (office) uses, to the exclusion of housing development on these sites.													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable alternative: mixed use	0	-	0	0	+	+	0	-	-	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of alternative</b>	<p>This alternative is where this site would be amended so that the allocation would allow for either office development or for residential development. Due to the small site size and inefficiencies in providing mixed use this allocation would allow an entirely residential redevelopment. The alternative would have minor negative effects against the efficient use of land as the Bunhill and Clerkenwell Area is the most efficient location to locate offices as it is the accessible and connected as well as being the most valuable for office development due to close proximity to London's office markets. Offices can take advantage of the agglomeration benefits of the central London location and will have close access to the wide range of supporting services.</p> <p>The alternative would have minor positive effects against the objective for providing affordable housing as it would allow more housing to be developed which would include a proportion of affordable housing. The additional affordable housing is likely to have positive effects on social inclusion.</p> <p>The alternative would have minor negative effects on economic growth. The additional housing would displace office floorspace, which is needed to meet demand from businesses, grow the economy, and provide employment and training opportunities. This prominent location on the busy Goswell Road would be a valuable location for office use due to the high exposure, excellent public transport accessibility, and close proximity to the City of London.</p> <p>The alternative would have minor negative impacts on reducing the need to travel by locating residential in the CAZ, rather than high trip generating office uses which can take advantage of the high accessibility by public transport and active travel, reducing trips by car.</p>													
<b>Conclusion</b>	<p>The preferred approach will support economic development and make the most efficient use of land by locating offices in an optimum location. The alternative allows more housing in this location in place of offices which would have positive effects in relation to objective 5 but negative effects on economic growth, the efficient use of land, and transport. On balance it is considered that intensification of office space is more appropriate on this site given the current use of the site and its accessible location in the CAZ in close proximity to the City of London.</p>													

Table 3.203: Site Assessment BC45: 27 Goswell Road,

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC45: 27 Goswell Road, EC1M 7AJ	0	+	0	0	0	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	BC45 is allocated for refurbishment and intensification of office floorspace. This allocation will have positive effects on economic development by providing employment (office) floorspace and also by potentially refurbishing and bringing the existing employment floorspace up to a higher standard. Lack of office floorspace is a barrier to economic growth in the area. The Local Plan strategy is that new business floorspace will be focused in the CAZ, Bunhill and Clerkenwell AAP area, the CAZ Fringe Spatial Strategy Areas and the Locally Strategic Industrial Sites. Given land constraints and high need (400,000sqm up to 2036) needs will not be met without prioritising business space in these areas, including the BCAAP area. The location of Bunhill and Clerkenwell is particularly suited to development of employment uses, with easy access to the major centres of employment and business of the London's West End, the City of London, Canary Wharf, as well as the emerging clusters of the City Fringe, Tech City, King's Cross and the Knowledge Quarter. The Local Plan prioritises employment floorspace in the BCAAP in BC1 and also by allocating the majority of site allocation sites in the BCAAP for employment (office) uses, to the exclusion of housing development on these sites. The increased floorspace provided on site will have minor positive effects against the objective of efficient use of the land. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable alternative: mixed use	0	-	0	0	+	+	0	-	-	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of alternative</b>	This alternative is where this site allocation would be amended for more housing to be developed, allowing an element of residential to be provided on site, with no net loss of office floorspace. The alternative would have minor negative effects against the efficient use of land as the Bunhill and Clerkenwell Area is the most efficient location to locate offices as it is the accessible and connected as well as being the most valuable for office development due to close proximity to London's office markets. Offices can take advantage of the agglomeration benefits of the central London location and will have close access to the wide range of supporting services.													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	<p>The alternative would have minor positive effects against the objective for providing affordable housing as it would allow more housing to be developed which would include a proportion of affordable housing. The additional affordable housing is likely to have positive effects on social inclusion.</p> <p>The alternative would have minor negative effects on economic growth. The additional housing would displace office floorspace, which is needed to meet demand from businesses, grow the economy, and provide employment and training opportunities. The site is a valuable location for office development with a prominent address on Goswell Road, high accessibility for public transport, in close proximity to the Clerkenwell Road, a corridor with strong commercial role.</p> <p>The alternative would have minor negative impacts on reducing the need to travel by locating residential in the CAZ, rather than high trip generating office uses which can take advantage of the high accessibility by public transport and active travel, reducing trips by car.</p>													
<b>Conclusion</b>	<p>The preferred approach will support economic development and make the most efficient use of land by locating offices in an optimum location. The alternative allows more housing in this location in place of offices which will have a positive effect in relation to objective 5 but negative effects on economic growth, the efficient use of land, and transport. On balance it is considered that refurbishment and intensification of office floorspace is appropriate on this site given its current use and its accessible location in the CAZ in close proximity to the City of London.</p>													

Table 3.204: Site Assessment BC46: City, University of London, 10 Northampton Square,

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC46: City, University of London, 10 Northampton Square, EC1V 0HB	+	+	0	+	0	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant</b>	<p>BC46 is allocated for refurbishment and redevelopment of buildings to provide improved education floorspace, teaching facilities and uses ancillary to teaching. Increased teaching facilities may be suitable where they can be accommodated in line with other Local Plan policies.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>effects of site allocations</b>	<p>Improvements to the site will allow the University to continue to function on site while accommodating increasing student numbers, supporting economic growth, and providing enhanced services for residents. Expansion of the University on its existing highly accessible central London Campus will have minor positive effects on the objective for making efficient use of land. The education use will have minor positive effects social inclusion by providing opportunities for learning.</p> <p>The improvements will also improve the public realm on site and in the area and the appearance of the campus contributing to a safer and more inclusive environment. Improvements to the public realm and permeability could help to encourage walking and cycling however the specific effects are uncertain and so have been assessed as neutral.,</p>													
<b>Reasonable alternative summary</b>	<p>No reasonable alternative was identified for this allocation as the site is allocated for improvement of the social infrastructure use and other uses cannot be practically accommodated on site. The priority for this site to retain and improve the university use and help meet the needs of growing student numbers within the limited space. There are no opportunities to provide other uses on site without comprising the function of the university. Development must have consideration of The City University London Northampton Square Campus Planning Brief (September 2009) which sets out how the university plans to extend and improve the campus. All development set out in the planning brief is university use and does not require enabling development.</p>													

Table 3.205: BC47: Braithwaite House and Quaker Court, Bunhill Row,

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>BC47: Braithwaite House and Quaker Court, Bunhill Row, EC1Y 8NE</b>	+	+	0	0	++	+	0	0	0	0	+/0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>BC47 is allocated for residential development. LB Islington's Housing Service are proposing to provide 38 new homes at the estate by demolishing and redeveloping the Braithwaite House podium and garages, adding two storeys to Quaker Court and constructing a new block adjacent to Braithwaite House. Possible landscaping improvements to Quaker Gardens which may include benefit to biodiversity.</p> <p>The allocation will have significant positive effects on housing by providing new homes including affordable housing. It will also ensure efficient use of land and improve the public realm. The additional affordable housing is likely to have positive effects on social inclusion.</p>													

I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>Reasonable alternative summary</b>	<p>No reasonable alternative was identified for this allocation. This allocation maximises the amount of residential development reasonably possible on site.</p> <p>This site is a Council housing estate and has been allocated to provide new homes at the estate through redevelopment, upwards extensions, and a new block. It was not considered reasonable to develop this site for other uses as development in the estate needs to preserve amenity for the existing residents and should complement the existing residential character and function of the estate. Furthermore development in this estate and the associated disruption caused by construction is justified by the additional housing and affordable housing that can be provided as well as improvements for existing residents. The Council will not make the site available for non-residential development as this would not align with the Council's objectives for the estate</p>													

Table 3.206: Site Assessment BC48: Castle House, 37-45 Paul Street and Fitzroy House, 13-17 Epworth Street and 1-15 Clere Street

I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>BC48: Castle House, 37-45 Paul Street, EC2A 4JU and Fitzroy House, 13-17 Epworth Street, EC2A 4DL and 1-15 Clere Street, EC2A 4UY</b>	+	++	0	0	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant</b>	<p>BC48 is allocated for intensification of office use. This allocation will have significant positive effects on economic development by providing employment (office) floorspace with potential for additional floorspace. Lack of office floorspace is a barrier to economic growth in the area. The Local Plan strategy is that new business floorspace will be focused in the CAZ, Bunhill and Clerkenwell AAP area, the CAZ Fringe Spatial Strategy Areas and the Locally Strategic Industrial Sites. Given land constraints and high need (400,000sqm up to 2036) needs will not be met</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
effects of site allocations	<p>without prioritising business space in these areas, including the BCAAP area. The location of Bunhill and Clerkenwell is particularly suited to development of employment uses, with easy access to the major centres of employment and business of the London's West End, the City of London, Canary Wharf, as well as the emerging clusters of the City Fringe, Tech City, King's Cross and the Knowledge Quarter. The Local Plan prioritises employment floorspace in the BCAAP in BC1 and also by allocating the majority of site allocation sites in the BCAAP for employment (office) uses, to the exclusion of housing development on these sites. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.</p> <p>It will also have significant positive effects on the efficient use of land. In addition, introducing active frontages will help to contribute to creating a safer and more inclusive environment with minor positive effects on the high quality environment objective.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable alternative: mixed use	+	+	0	0	+	+	0	-	-	0	0	0	0	0
Reasonable alternative summary	<p>This alternative is where this site allocation would be amended to allow more housing to be developed, allowing up to 50% of the uplift to be provided as housing with the other 50% office use.</p> <p>As with the preferred approach the alternative will have positive effects on the high quality environment objective through introducing active frontages.</p> <p>The alternative will have minor positive effects against the efficient use of land objective as it will lead to more development on previously developed land in an accessible location, however it will not be as efficient as the preferred approach as the Bunhill and Clerkenwell Area is the most efficient location to locate offices as it is the accessible and connected as well as being the most valuable for office development due to close proximity to London's office markets. Offices can take advantage of the agglomeration benefits of the central London location and will have close access to the wide range of supporting services.</p> <p>The alternative would have minor positive effects against the objective for providing affordable housing as it would allow more housing to be developed which would include a proportion of affordable housing. The additional affordable housing is likely to have positive effects on social inclusion.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	<p>The alternative would have significant negative effects on economic growth. The additional housing would displace office floorspace, which is needed to meet demand from businesses, grow the economy, and provide employment and training opportunities. This site is valuable for offices as the surrounding context is predominantly commercial uses, with a relatively small number of mixed use and residential buildings nearby. The site is also within the City Fringe Opportunity Area. The site forms part of a dense network of employment uses, including tech, creative, and SME uses and links into the priority corridor for offices stretching from King's Cross to Shoreditch as identified in the Employment Land Review. While there are many homes mixed into this area which add life and character, this site is needed to meet Local Plan objectives of providing jobs as a commercial location.</p> <p>The alternative would have minor negative impacts on reducing the need to travel by locating residential in the CAZ, rather than high trip generating office uses which can take advantage of the high accessibility by public transport and active travel, reducing trips by car.</p>													
<b>Conclusion</b>	<p>The preferred approach will support economic development and make the most efficient use of land by locating offices in an optimum location. The alternative allows more housing in this location in place of offices which will have positive effects in relation to objective 5 but negative effects on economic growth, the efficient use of land, and transport. On balance it is considered intensification for office use is more appropriate on this site given the current use of the site and its location within the CAZ and City Fringe Opportunity Area.</p>													

Table 3.207: Site Assessment BC49: Building adjacent to railway lines and opposite 18-20 Farringdon Lane

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>BC49: Building adjacent to railway lines and opposite 18-20 Farringdon Lane, EC1R</b>	+	+	0	0	0	0	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant</b>	<p>BC49 is allocated for intensification of business use particularly light industrial uses. The building is a former escalator workshop and has an industrial appearance with no external windows. Redevelopment could have positive effects on the local environment by providing a building with more active frontages and an improved relationship with the street and area.</p>													



IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
effects of site allocations	This allocation will have significant positive effects on economic growth by providing employment floorspace, and minor on the efficient use of land.													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable alternative: mixed use	+	+	0	0	+	+	0	-	-	0	0	0	0	0
Commentary on assessment of likely significant effects of alternative	<p>This alternative is where this site allocation would be amended to allow more housing to be developed, allowing up to 50% of the uplift to be provided as housing with the other 50% office or light industrial use.</p> <p>As with the preferred approach the alternative will have positive effects on the local environment by redevelopment providing a building with more active frontages and an improved relationship with the street and area.</p> <p>The alternative will have minor positive effects against the efficient use of land objective as it will lead to more development on previously developed land in an accessible location, however it will not be as efficient as the preferred approach as the Bunhill and Clerkenwell Area is the most efficient location to locate offices as it is the accessible and connected as well as being the most valuable for office development due to close proximity to London's office markets. Offices can take advantage of the agglomeration benefits of the central London location and will have close access to the wide range of supporting services.</p> <p>The alternative would have minor positive effects against the objective for providing affordable housing as it would allow more housing to be developed which would include a proportion of affordable housing. The additional affordable housing is likely to have positive effects on social inclusion.</p> <p>The alternative would have significant negative effects on economic growth. The additional housing would displace office or light industrial floorspace, which is needed to meet demand from businesses, grow the economy, and provide employment and training opportunities. The site is valuable for office or light industrial development due to its prominent location near the junction of Farringdon Road and Clerkenwell Road, both roads which are home to a large number of commercial uses along these corridors. In addition Farringdon Lane is predominantly commercial uses.</p> <p>The alternative would have minor negative impacts on reducing the need to travel by locating residential in the CAZ, rather than high trip generating office uses which can take advantage of the high accessibility by public transport and active travel, reducing trips by car.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	There are also some characteristics of this prominent location which may make residential uses less suitable. Traffic noise and air pollution from Farringdon Road and Clerkenwell Road will have some impacts on this site. Immediately adjoining the site to the west is a railway cutting for London Underground lines. Furthermore there is a night time economy role of this area and there are three pubs in close vicinity. It may be challenging to mitigate the noise impacts for residential schemes on this relatively small site. There is some uncertainty about the likelihood of these impacts as good design may be able to overcome the limitations of the site for residential development which is why the scoring has been maintained as a minor positive effects against the objective for housing, nevertheless this is a highly constrained location for residential development.													
<b>Conclusion</b>	The preferred approach will support economic development and make the most efficient use of land by locating offices or light industrial in a priority location. The alternative allows more housing in this location in place of commercial uses which will have positive effects in relation to objective 5 but negative effects on economic growth, the efficient use of land, and transport. On balance it is considered that intensification of business use is considered more appropriate given the previous employment use of the site, its accessible location within the CAZ and proximity to Farringdon Station.													

Table 3.208 Site Assessment BC50: Queen Mary University, Charterhouse Square Campus

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>BC50: Queen Mary University, Charterhouse Square Campus, EC1M 6BQ</b>	+	+	+	+	0	+	0	+	+	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	BC50 is allocated for higher education and medical and research uses, alongside improvements to increase permeability through the site. Development on the site may include some office space and research space linked to overarching higher education, medical, and/or research uses. The allocation seeks to optimise the use of the site to accommodate uses which are beneficial to the health of the borough's residents and the wider population. The uses also support economic growth in the borough. Further development on the existing campus will have minor positive effects against the objective for making efficient use of land. The allocation is clear that the capacity to intensify the use of the site is constrained													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	by the historic nature of the buildings and their surroundings. The allocation promotes a high quality environment and a safer and more inclusive neighbourhood by encouraging permeability improvements at the site and explicitly stating that the development of a new pedestrian route through the site from Charterhouse Buildings to Rutland Place should be a priority of development. The increased permeability created by this route will have minor positive effects against the objective for transport, by providing more direct routes for walking and potentially cycling. The education use will have minor positive effects social inclusion by providing opportunities for learning.													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified for this allocation as the site is allocated for expansion of the social infrastructure use and other uses cannot be practically accommodated on site. The priority for the site is to retain and improve the university. There are no opportunities to provide other uses on site without comprising the function of these university.													

Table 3.209: Site Assessment BC51: Italia Conti School, 23 Goswell Road,

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>BC51: Italia Conti School, 23 Goswell Road, EC1M 7AJ</b>	0	0	0	0/+	0	0/+	0	0/+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	BC51 is allocated for retention of social or community use unless the loss of social or community use can be robustly justified, in which case office development may be suitable in this location. Therefore the allocation could have a positive effect on economic growth if it provides offices. Lack of office floorspace is a barrier to economic growth in the area. The Local Plan strategy is that new business floorspace will be focused in the CAZ, Bunhill and Clerkenwell AAP area, the CAZ Fringe Spatial Strategy Areas and the Locally Strategic Industrial Sites. Given land constraints and high need (400,000sqm up to 2036) needs will not be met without prioritising business space in these areas, including the BCAAP area. The location of Bunhill and Clerkenwell is particularly suited to development of employment uses, with easy access to the major centres of employment and business of the London's West End, the City of London, Canary Wharf, as well as the emerging clusters of the City Fringe, Tech City, King's Cross and the Knowledge Quarter. The Local Plan prioritises employment floorspace in the BCAAP in BC1 and also by allocating the majority of site allocation sites in the BCAAP for employment (office) uses, to the exclusion of housing development on these sites. If developed													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	<p>the additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.</p> <p>The allocation will have a neutral impact on the objective for liveable neighbourhoods if the loss of social infrastructure is justified or a positive effect on liveable neighbourhoods through provision of social infrastructure.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable alternative: mixed use	0	-	0	0	0/+	0/+	0	0/-	-	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of alternative</b>	<p>This alternative is where this site allocation would be amended to allow more housing to be developed, allowing up to 50% of the uplift to be provided as housing with the other 50% office use.</p> <p>If the loss of social infrastructure is justified, the alternative will the following effects:</p> <p>It would have minor negative effects against the efficient use of land as the Bunhill and Clerkenwell Area is the most efficient location to locate offices as it is the accessible and connected as well as being the most valuable for office development due to close proximity to London's office markets. Offices can take advantage of the agglomeration benefits of the central London location and will have close access to the wide range of supporting services. The small size of this site also detracts from an efficient use of land and the potential difficulties around designing a mixed use scheme.</p> <p>The alternative would have minor positive effects against the objective for providing affordable housing as it would allow more housing to be developed which would include a proportion of affordable housing. The additional affordable housing is likely to have positive effects on social inclusion.</p> <p>The alternative would have significant negative effects on economic growth. The additional housing would displace office floorspace, which is needed to meet demand from businesses, grow the economy, and provide employment and training opportunities. The site is a valuable location for office development as it has a prominent address on Goswell Road, high accessibility for public transport, is in close proximity to the Clerkenwell Road, a corridor with strong commercial role.</p> <p>The alternative would have minor negative impacts on reducing the need to travel by locating residential in the CAZ, rather than high trip generating office uses which can take advantage of the high accessibility by public transport and active travel, reducing trips by car.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>Conclusions</b>	<p>The preferred approach will support economic development and make the most efficient use of land by locating offices in an optimum location, or by retaining a social infrastructure use, if required. The alternative allows more housing in this location in place of offices which will have positive effects in relation to objective 5 but negative effects on economic growth, the efficient use of land, and transport. On balance it is considered retention of social infrastructure or office development are more appropriate on this site given its current use, its accessible location in the CAZ and proximity to the City of London,</p>													

## **4 Modifications assessments: screening of modifications**

The IIA examination addendum May 2022 considers and assesses, where necessary, changes made to the plan, known as main modifications which are considered necessary for soundness. The main modifications replace all of, and in some instances supersede, the earlier pre-hearing modifications that were consulted on previously during the examination process in March 2021. The main modifications are those that are considered to be necessary to make the Plan sound.

The modifications relate to the three Development Plan documents – Strategic and Development Management Policies, the Bunhill and Clerkenwell Area Action Plan and Site Allocations.

All the main modifications made to the draft Local Plan have been screened to consider which changes need to be assessed in the tables below. Minor modifications are automatically screened out because by their nature they cannot make a material change to the plan's policies and therefore would not change any effects identified in the assessment.

**Table 4.1: Strategic and Development Management Policies screening**

Reference	Section	Paragraph/ Policy	Description	Screening Assessment
SD-MM-01	Introduction	Paragraph 1.2	The plan period is to be extended to complete in 2036/37 to allow a full 15 years of plan period. This is necessary as the plan is unlikely to be adopted before April 2022.	The amendment will change the end of the plan period and this has been reflected in relevant parts of the plan which will be screened separately however this modification is not considered to have an effect and no further assessment is needed.
SD-MM-02	Introduction	Table 1.1	To be positively prepared and justified and clarify the strategic policies and non-strategic policies.	Further assessment is not considered necessary as the amendments do not change the policy requirements and would not change the effects previously assessed.
SD-MM-03	Introduction	Paragraph 1.38	Modification made removing requirement for student bursaries for soundness.	Assessment of the removal of the requirement for student bursaries is set out under Policy H6.
SD-MM-04	Area Spatial Strategies	Figure 2.1: Key Diagram	Boundary to LSIS updated for effectiveness taking into account residential sites as set out in Examination Library document reference LBI18.	Further assessment is not considered necessary as the amendments do not change the policy requirements and would not change the effects previously assessed. The effects of this are also considered under Policy SP3.
SD-MM-05	Area Spatial Strategies	Policy SP1: Bunhill and Clerkenwell	Main modification to cross reference expected number of dwellings and office jobs from site allocations.	The factual cross reference is not considered to have an effect.
SD-MM-06	Area Spatial Strategies	Policy SP2: King's Cross and	Main modifications include: <ul style="list-style-type: none"> <li>Removing reference to the knowledge quarter from the policy and supporting text (clause B).</li> </ul>	Screened in. Assessment required.



		Pentonville Road and supporting text	<ul style="list-style-type: none"> <li>• Modifications to part H with regard to criteria for residential moorings and boater facilities.</li> <li>• An additional clause Part I on how the council will work to meet boat dwellers needs.</li> <li>• New Part L which clarifies where housing development will come forward in the spatial area.</li> <li>• A factual cross reference in new Part M on the expected capacity as set out in the site allocations.</li> </ul> <p>Amended supporting text in paragraph 2.13, deletion of paragraph 2.15 and addition of paragraphs 2.23 and 2.24.</p>	
SD-MM-07	Area Spatial Strategies	Figure 2.3: King's Cross and Pentonville Road Spatial Strategy diagram	Update to map to reflect changes to site allocations.	Further assessment is not considered necessary as the amendments are factual and do not change the policy requirements for the site allocations. See Site Allocation screening for further details.
SD-MM-08	Area Spatial Strategies	Policy SP3: Vale Royal/Brewery Road Locally Significant Industrial Site, parts A, B, C,	Modifications to Part A to be positively prepared and justified and to cross-reference to other relevant policies. Changes also clarify the Council's approach following the 2020 amendments to the Use Classes Order and the introduction of Class E.	Screened in. Assessment necessary.

		D, E, F, G and H, and supporting text paragraphs 2.31, 2.32, 2.35 and 2.36	<p>Update to part C to add reference to research and development uses in the same context as office uses to ensure consistency with other modifications.</p> <p>Updated parts A to D to reflect the modifications regarding office co-location (examination library reference INS15).</p> <p>Deletion of former parts E, F and G (examination library reference INS15).</p> <p>Addition of new Part H which adds the office delivery figures for the spatial policy area from the Site Allocations document for effectiveness.</p> <p>Updates to paragraph 2.31 and 2.32 and new paragraph in relation to UCO changes and to provide relevant context to the function of the LSIS in light of changes to Parts A and C.</p> <p>Deletion of paragraph 2.36 for consistency with other policy changes (examination library reference INS15).</p>	
SD-MM-09	Area Spatial Strategies	Figure 2.4: Vale Royal/Brewery Road Locally Significant Industrial Site Spatial	Boundary to LSIS updated for effectiveness taking into account residential sites as set out in note LBI18.	Further assessment is not considered necessary as the amendments do not change the policy requirements and would not change the effects previously assessed.

		Strategy diagram		
SD-MM-10	Area Spatial Strategies	Policy SP4: Angel and Upper Street, part E and I and new parts Q and R and supporting text paragraph 2.52	<p>Amendments to policy in relation to housing in the town centre. Amendment to Part E to ensure clarity regarding the approach to residential in Specialist Shopping Areas (SSAs) and related changes to Part Q to be positively prepared and justified by providing additional text on role of residential in the spatial area.</p> <p>Clarification to part I in relation to changes to the Use Classes Order.</p> <p>Addition of Part R which adds the office and housing delivery figures for the spatial policy area from the Site Allocations document for effectiveness.</p> <p>Update to paragraph 2.52 to provide updated text in relation to Crossrail 2.</p>	Screened in. Assessment necessary.
SD-MM-11	Area Spatial Strategies	Figure 2.5: Angel and Upper Street Spatial Strategy diagram	<p>To reflect the inclusion of new site allocations, KC8, OIS28, OIS30 and the amended boundary for site allocation OIS24.</p> <p>Please see Site Allocation modifications for further details.</p>	Further assessment is not considered necessary as the amendments are factual and do not change the policy requirements for the site allocations. See Site Allocation screening for further details.
SD-MM-12	Area Spatial Strategies	Policy SP5: Nag's Head and Holloway, part E, part K and new Part	<p>Amendment to Part E to provide clarification for consistency with modification to Site Allocation NH1.</p> <p>Amendment made to Part I for clarity.</p>	Policy modifications to Part E to reflect the change in emphasis for residential development on site allocation NH1 from retail-led mixed use to mixed-use development with a greater proportion of

		<p>O and supporting text at paragraph 2.58.</p>	<p>Addition to Part K in response to Matter 2 to be positively prepared and justified by providing text which ensures impacts on existing businesses and residents are considered.</p> <p>Addition of Part N to be positively prepared and justified by providing additional text on role of residential in the spatial area, in response to Matter 2.</p> <p>Addition of Part O which adds the office and housing delivery figures for the spatial policy area from the Site Allocations document for effectiveness.</p> <p>Change to paragraph 2.58 related to amendment to Part E to provide clarification for consistency with modification to Site Allocation NH1.</p>	<p>housing. The amendments are assessed under Site Allocation NH1 - see screening in table 1.4 below. No further assessment on this needed.</p> <p>Changes to Part I to cross reference policy elsewhere in the plan and no assessment required.</p> <p>Change to Part K includes modification to consider effects on neighbours and businesses is not considered likely to affect the minor positive effects already identified in relation to objective 4.</p> <p>Change to Part N is not considered that adding reference to utilising upper floors for housing and windfall sites will change the minor positive effects already identified in relation to objective 5.</p> <p>The factual cross reference in part O to delivery figures does not have an effect.</p>
SD-MM-13	Area Spatial Strategies	Figure 2.6: Nag's Head and Holloway Spatial Strategy diagram	Updated map for effectiveness to reflect changes to site allocations.	Further assessment is not considered necessary as the amendments are factual and do not change the policy requirements for the site allocations. See Site Allocation screening for further details.

SD-MM-14	Area Spatial Strategies	Policy SP6: Finsbury Park and supporting text at paragraph 2.70.	<p>Addition to Part C to ensure clarity regarding the approach to residential in Specialist Shopping Areas.</p> <p>Reference to 'CAZ satellite' removed from part D to ensure policy is justified. Update to Part D to reflect changes to Use Classes Order.</p> <p>Amendment to part E to be positively prepared and justified in relation to residential use in the spatial area.</p> <p>Amendment made to Part M to ensure the policy is effective in protecting heritage assets in neighbouring boroughs.</p> <p>Addition of Part P which adds the office and housing delivery figures for the spatial policy area from the Site Allocations document for effectiveness.</p> <p>Updates to supporting text to ensure consistency with changes to FP6 and reflect changes to Use Classes Order.</p>	<p>Change to Part C in relation to SSA will have no effect on assessment</p> <p>Update to Part D which removes the reference to Finsbury Park as a CAZ 'satellite' is considered to have no effect on the assessment, as reference to the town centre as a potential business location remains. The updates to references following changes to the Use Classes Order do not change the policy approach, no further assessment is necessary.</p> <p>The change to Part E is not considered to change the minor positive effect already identified in relation to objective 5.</p> <p>The screening has identified the addition to criteria M of the policy does not need assessment as it is not considered to change the assessment and minor positive effects identified in relation to objective 3.</p> <p>The factual cross reference in Part P to delivery figures does not have an effect.</p> <p>No additional effects identified from supporting text changes.</p>
SD-MM-15	Area Spatial Strategies	Figure 2.7: Finsbury Park Spatial	Updated for effectiveness to reflect changes to site allocation.	Further assessment is not considered necessary as the amendments are factual and do not change the policy requirements

		Strategy diagram		for the site allocations. See Site Allocation screening for further details.
SD-MM-16	Area Spatial Strategies	Policy SP7: Archway and supporting text at paragraph 2.83 and 2.84	<p>Modification to Part B to delete references within Policy SP7 to Archway cultural quarter.</p> <p>Update to Part F to reflect changes to Use Class Order.</p> <p>Additional Part N added to be positively prepared and justified by providing additional text on role of residential in the spatial area.</p> <p>Addition of Part O which adds the office and housing delivery figures for the spatial policy area from the Site Allocations document for effectiveness.</p> <p>Changes made to supporting text for consistency with changes to policy and following changes to Use Classes Order.</p>	<p>The removal of the reference to the cultural quarter is not considered to change the effects identified in the assessment overall with other aspects of Policy SP7 contributing positive effects. The town centre will remain the focus of development for commercial and cultural uses despite removal of the cultural quarter designation. The change and other changes relating to cultural policy are considered under the assessment of policy R10.</p> <p>The change to part F is a factual change to reflect changes to the Use Classes Order and does not have an effect.</p> <p>Change to Part N adding reference to windfall sites is not considered to change the minor positive effects already identified in relation to objective 5.</p> <p>The factual cross reference in Part O to delivery figures does not have an effect.</p> <p>No additional effects identified from supporting text changes.</p>

SD-MM-17	Area Spatial Strategies	Figure 2.8: Archway Spatial Strategy diagram	Map updated for effectiveness to reflect changes to site allocations.	Further assessment is not considered necessary as the amendments are factual and do not change the policy requirements for the site allocations. See Site Allocation screening for further details.
SD-MM-18	Area Spatial Strategies	Policy SP8: Highbury Corner and Lower Holloway	Additional Part H added to be positively prepared and justified by providing additional text on role of residential in the spatial area.  Addition of Part I which adds the office and housing delivery figures for the spatial policy area from the Site Allocations document for effectiveness.	Screened in. Assessment required.
SD-MM-19	Area Spatial Strategies	Figure 2.9: Highbury Corner and Lower Holloway Spatial Strategy diagram	Updated map for effectiveness to reflect amendments to site allocations.	Further assessment is not considered necessary as the amendments are factual and do not change the policy requirements for the site allocations. See Site Allocation screening for further details.
SD-MM-20	Thriving communities	Policy H1: Thriving Communities	Updates and cross references added for effectiveness.  Modifications to Part M to ensure consistency with changes to Policy H6 and delete requirement for student bursaries.  Modifications to parts N and Q to ensure policy is positively prepared.	Further assessment is not considered necessary for the factual changes and changes to provide cross references. Changes to policies in H1 as the strategic housing policy, reflect changes to other detailed housing policies.  The removal of policy for student bursaries and approach to purpose built student are

			Change to part R reflects changes to policy H12.	considered under Policy H6 so no further assessment required.
SD-MM-21	Thriving communities	Policy H2: New and existing conventional housing, Parts A, C, F, G and H and supporting text paragraphs 3.29, 3.34 and 3.35	<p>Modification made to Part A to be positively prepared and set out the overall housing requirement for the Plan period.</p> <p>Modification made to Part C to include supporting text from paragraph 3.29 for soundness and consistency with the London Plan. Policy restructured for clarity. Supporting text restructured for clarity. Modification made to part (i) make policy positive worded.</p> <p>Modification made to part F make policy positively prepared.</p> <p>Amendments to part G necessary for effectiveness.</p> <p>Modification for soundness to delete entire Part H (examination library ref: INS14).</p> <p>Modification to make supporting text positively worded in line with modification to part F.</p> <p>Modification for soundness to delete entire paragraph 3.35 in relation to removal of Part H.</p>	Screened in. Assessment required.
SD-MM-22	Thriving communities	Policy H3: Genuinely affordable housing	Modifications to Part B, C, D, E, F, G, J and new part I and supporting text to ensure the plan is justified and for effectiveness.	Further assessment is not considered necessary as the modifications to the policy would not change the significant positive effects previously identified. The changes add a degree of flexibility, but are not



		And supporting text at paragraphs 3.44, 3.45, 3.46, 3.47, 3.48, 3.49, 3.51, 3.60, 3.61, 3.62 and 3.63.	This includes modifications to make clear the level of affordable housing requirements required for private and public sector ownership sites, setting out the exceptional circumstances when viability evidence maybe accepted, additions to clarify the portfolio approach and off site contributions and revisions to the policy for the application of vacant building credit.	considered to change the effects already identified in the assessment.
SD-MM-23	Thriving communities	Policy H4: Delivering high quality housing and supporting text at paragraphs 3.71, 3.73-3.76 and 3.89	<p>Modification made to Part A for soundness as not all parts of Policy H4 are relevant to Policy H6 and H10.</p> <p>Modification to Part B to reflect London Plan. Also modification required to move paragraph 3.74 into policy.</p> <p>Modification made to part J to make policy positively prepared.</p> <p>Modification of paragraph 3.71 for effectiveness to differentiate Approved Document M Category M4(3)(2)(a) and M4(3)(2)(b)</p>	<p>The changes to Part B regarding tenure have removed the ability to clearly apply the requirement for 10% Wheelchair Accessible Units (WAU) to be made accessible (M4(3)(2)(b) for all tenures from the outset.</p> <p>Whilst there is potential for short term effects, as some homes would be adaptable on completion rather than accessible, should the need arise Part B maintains the ability to deliver the same overall percentage of units. Therefore long term effects and overall effects remain the same..</p>

			<p>Modification for soundness to delete paragraphs 3.73- 3.76.</p> <p>Modifications to paragraph 3.89 made for soundness and to justify policy approach with the additional supporting text added which provides an example of where dual aspect may be considered impossible.</p>	Regarding paragraph 3.89 further assessment is not considered necessary as the amendments do not change the policy requirements and would not change the effects previously assessed.
SD-MM-24	Thriving communities	Policy H6: Purpose-built student accommodation and supporting text paragraphs 3.99, 3.100 and 3.101, 3.105, 3.106 and 3.107	<p>Amendment proposed to Part A to clarify approach to student accommodation provision on university campus' as part of master planned approach.</p> <p>Three modifications made for soundness to Part B:</p> <ul style="list-style-type: none"> <li>• The first, to reduce the amount of bedspaces to be made accessible for wheelchairs from 10% to 5% and to change the requirement to easily adaptable for occupation from accessible from the outset.</li> <li>• The second change to Part B to completely remove the policy requirement for financial contributions for bursaries to be made for students.</li> <li>• The third to bring the temporary use of student accommodation for ancillary uses in line with London Plan policy.</li> </ul>	Screened in. Assessment required.
SD-MM-25	Thriving communities	Policy H7: Meeting the needs of	Amendments to Part A and Part C made to be positively prepared and justified and consistent with	The amendments add reference to a strategic element of need (the London Plan benchmark) to be considered which could

		vulnerable older people, Parts A, C and F  Supporting text, paragraphs 3.108 to 3.109	the London Plan, providing reference to relevant benchmark figure for Islington.  Amendments made to supporting text to be positively prepared, justified and consistent with the London Plan.	lead to more older peoples housing proposals coming forward. The policy emphasis on meeting local needs for affordable older persons accommodation remains. There is no change in positive effects considered to occur for the changes made to policy and no further assessment is necessary.
SD-MM-26	Thriving communities	Policy H10: Houses in Multiple Occupation (HMOs), Parts A and C  Supporting text paragraphs 3.129 and 3.130	Amendments made to Part A to be consistent with other policies in the Plan.  Amendments made to Part C which ensure it is positively prepared, justified and consistent with the London Plan in respect to application of the affordable housing policy.  Amendments made to supporting text to be positively prepared, justified and consistent with the London Plan.	No further assessment necessary. The changes made to policy are not considered to change the effects identified previously.
SD-MM-27	Thriving communities	Policy H11: Purpose Built Private Rented Sector development, Part A  Supporting text, paragraphs	Various amendments to be positively prepared and justified and consistent with the London Plan including reduction in covenant period from 50 years to 15 years, reference to partnership management arrangements, amendment of tenancy notice period and more positive policy approach.	The effects of the additional flexibility added through amendments are uncertain and are not considered to change the effects already identified. No further assessment necessary.

		3.139, 3.141-3.142		
SD-MM-28	Thriving communities	<p>Policy H12: Gypsy and Traveller Accommodation, part A</p> <p>Supporting text, paragraphs 3.146-3.150</p>	<p>Amendment made to Part A to revise the identified need figure down from 10 pitches to 6 gypsy and traveller pitches to reflect London Plan paragraph 3.148 and the need figure which reflects Government's Planning Policy for Travellers definition. Amendment also made to remove references to exploring sites through use of own land/sub-regional working and replaced with reference to allocation of suitable sites as set out in Site Allocations DPD.</p> <p>Amendment made to Part B for effectiveness and consistency.</p> <p>Clarifications and updates to the supporting text.</p>	Screened in. Assessment required.
SD-MM-29	Thriving communities	<p>Policy SC1: Social and Community Infrastructure, Part A, new Criterion C</p> <p>Supporting text, paragraphs 3.154 and 3.165</p>	<p>Amendment made to Part A to clarify the Council will support proposals for new or extended community infrastructure subject to an assessment of need.</p> <p>Addition of Criterion C and supporting text to clarify the Council's approach following amendments to the Use Classes Order and introduction of Class E</p> <p>Amendment made to Criterion I (formerly E) and update to supporting text to reflect updated</p>	<p>No further assessment necessary. The amendment to part A is not considered to change the effects identified in the original assessment.</p> <p>The addition of Criterion C and amendment to Criterion E are not considered to change the positive effects already identified through the protection of social and community infrastructure.</p> <p>No further assessment necessary regarding</p>

			Approved Document M requirements for provision of Changing Places toilets.	the amendment to Part I, this change is not considered to change the previous assessment of effects overall.
SD-MM-30	Thriving communities	Policy SC2: Play space, part A, part C	Modification made to Part A for effectiveness to reflect requirements for maintenance set out within paragraph 3.169 in the policy.  Modification made to Part C for effectiveness, to explain how unrestricted access to replacement play space under part A is to be secured.	The screening has identified that further assessment of modifications to Parts A and C are not considered necessary as the amendments to policy would not change the effects previously identified.
SD-MM-31	Thriving communities	Policy SC3: Health Impact Assessment, part B and part D  Supporting text, paragraphs 3.178	For effectiveness, modification made to require Health Impact Assessments to be submitted at the planning stage.  For effectiveness addition of Part D made adding a clause to secure any measures identified within the HIA.  Clarification made to reference to guidance in supporting text.	The screening has identified that further assessment of modifications to Parts B and D are not considered necessary as the amendments to policy would not change the effects previously identified.
SD-MM-32	Thriving communities	Policy SC4 Promoting Social Value as well as deleting paragraphs 3.179-3.184 inclusive	Policy removed, not justified.	Further assessment of removal of Policy SC4 is not considered necessary as the removal of the policy would not change the effects previously identified. Policy SC4 has no effect against delivery of any 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.
SD-MM-33	Inclusive economy	<p>Policy B1 (modifications added to Parts B, C, D and E)</p> <p>Supporting text paragraphs 4.6, 4.8 and 4.9 and 4.14</p>	<p>Updated business floorspace need referenced and addition of appropriate references to relevant policies.</p> <p>Change to Part B and reference to efficient use of land introduced replacing reference to maximisation made for effectiveness/clarity.</p> <p>Update to Part E to clarify the Council's approach following amendments to the Use Classes Order.</p> <p>Updates to supporting text for effectiveness and to clarify approach following changes to Use Classes Order.</p>	<p>The updated business floorspace need figure has been added to part C for clarity and to provide context to the policy. No assessment necessary.</p> <p>The amendments to Parts B provide updated wording in relation to making an efficient use of land. This is not considered to change the effects of assessment already undertaken.</p> <p>The amendment to Part E introduces cross references to the relevant policy approaches to new industrial uses. These changes are considered in further assessments for policies B2, B3 and SP3.</p> <p>Updates to support not considered to change effects previously identified.</p>
SD-MM-34	Inclusive economy	<p>Policy B2 part A, C, D, E, F and G and supporting text new paragraphs and amendments to paragraphs 4.23, 4.24, 4.31</p>	<p>Modifications to Part A in relation to Use Classes Order changes. Other changes to Part A to be positively prepared and to cross-refer to other relevant policies related to business floorspace provision and the relevant spatial areas.</p> <p>Modifications to Part C updated to be positively prepared and justified, to cross-reference to other relevant policies as well as allow for co-location of offices and research and development uses.</p> <p>Reference added to research and development uses</p>	Screened in. Assessment required.

			<p>in the same context as office uses to ensure consistency with other modifications.</p> <p>New clause Part D provides a cross reference to other relevant policies to clarify approach to proposals for industrial uses with significant vehicle movements and air quality in LSIS. Additional paragraph added to supporting text.</p> <p>Updates to part E to reflect changes to the Use Classes Order and provide cross references to other relevant policies.</p> <p>New paragraphs after paragraph 4.17 and after paragraph 4.23 and amendments to supporting text to clarify the Council's approach following the 2020 amendments to the Use Classes Order and use of conditions to secure new light industrial floorspace.</p> <p>To clarify the policy approach to business floorspace design with the addition of words 'wherever possible' in paragraph 4.31 in relation to the list of design features.</p>	
SD-MM-35	Inclusive economy	Figure 4.1: Local Plan Business Designations	Update to reflect amended LSIS boundary	Further assessment is not considered necessary as the amendments do not change the policy requirements and would not change the effects previously assessed.
SD-MM-36	Inclusive economy	Policy B3 Part B, C and D	Update to part B (i) to add clarification on vacancy requirements. Addition of new criteria B (iii) to	Screened in. Assessment required.

		Supporting text, paragraphs 4.33 and 4.36	<p>provide an alternate route to redeveloping land to non-business floorspace.</p> <p>New Part C for effectiveness and for clarification.</p> <p>Amendment to Part D which splits the clause into two parts in relation to marketing for industrial uses inside and outside of LSISs. Modifications also made as a result of UCO changes.</p> <p>Updated office need figure added to paragraph 4.33 in line with modification to Policy B1, part C and updates to reflect changes in policy in paragraph 4.33 and 4.40.</p> <p>Change to paragraph 4.36 to reflect updates to Policy E4 in line with the London Plan.</p>	
SD-MM-37	Inclusive economy	Policy B4 Parts A, B, C, G and H Supporting text, paragraphs 4.44 - 4.51	Further modifications made to Policy B4 for effectiveness and to be justified to introduce higher policy thresholds for the affordable workspace requirements to be triggered in town centres outside Angel, LSIS and PELS in response to updated viability evidence. The thresholds and requirements remain the same for proposals within the CAZ, Bunhill and Clerkenwell AAP area, CAZ fringe Spatial Strategy areas (Angel and Upper Street; and Kings Cross and Pentonville Road). Clarity introduced for proposals over 10,000sqm where space will be sought in perpetuity.	Whilst some of the thresholds have been amended which could affect the number of circumstances in which affordable workspace is secured, it is not considered to change the effects already identified and further assessment is not considered necessary. It is noted that the threshold has not changed in the CAZ which is where significant levels of new office floorspace are expected to be delivered.



			<p>Further modification made to Policy B4 Part A changing the application of the policy from gross uplift in floorspace to net uplift in floorspace in response to refurbishment. Reference to 'at least 20 years' also removed.</p> <p>New part G added in relation to provide clarification in relation to viability assessments.</p> <p>New Part H added to clarify approach to financial contributions.</p> <p>Addition of new Part I which moves supporting text paragraph 4.48 into policy for effectiveness.</p> <p>Update in relation to UCO changes in Part A.</p> <p>Various amendments to the supporting to reflect the policy changes and changes to the use classes order as well as other clarifications.</p>	<p>The addition of Part I from the supporting text para 4.48 does not change the effects already identified and does not require an assessment.</p> <p>The addition of Part G and Part H do not change the effects already identified.</p>
SD-MM-38-39	Inclusive economy	Footnotes 25-26	Footnotes updates a clarification and to reflect changes to use classes order.	No further assessment required – modifications are not considered to change effects previously identified in relation to policy B4.
SD-MM-40	Inclusive economy	Affordable workspace contributions formula	Updates to reflect changes to Use Classes Order.	Factual update. No change in effects and no further assessment required.
SD-MM-41	Inclusive economy	Policy B5 Part A, B and C.	Modification made to Part A of policy to change threshold from 500sqm to 1,000sqm for non-residential uses only. Other uses threshold remain	The changes to are not considered to change the effects previously identified. No further assessment necessary.

			<p>same. Policy Parts A and B combined to avoid repetition.</p> <p>Update to Part B to be justified and effective, and consistency with Planning Obligations SPD. Clarification that Part B applies to all major developments.</p>	
SD-MM-42	Inclusive economy	Policy R1: Retail, leisure and services, culture and visitor accommodation and supporting text	<p>Changes made to Parts C, E and G clarifies the Council's approach following the 2020 amendments to the Use Classes Order.</p> <p>Modification to Part G for effectiveness and consistency with changes to other retail policies. Part G now includes reference to 'commercial units' as well as shops.</p> <p>Amendment made to Policy R1 part F for soundness which reflects a more positive approach to residential uses in town centres in respect to NPPF para 86. Wording has been changed to not discourage residential uses on upper floors in town centres and that this applies to the whole of town centres including the Primary Shopping Area.</p> <p>Update to Part H for effectiveness and consistency with policy R7 which clarifies the SSAs and adds reference to protecting retail use on upper floors in SSAs.</p>	<p>No further assessment necessary for Part C or E.</p> <p>No further IIA assessment is necessary for Policy R1 Part F. This policy change is considered in full against policy R3.</p> <p>No further assessment necessary for the modification to part G which does not change the approach and adds reference to 'commercial units' as well as 'retail units' in order to ensure small commercial units are promoted in light of the ability for retail units to change to other E uses. Related changes to supporting text are same. Part G's removal of reference to ancillary space is considered below against the same change made in Policy R3 and Policy R4.</p> <p>No further assessment necessary for Part H. The modification does not change the approach to protecting retail across all floors in the SSAs.</p>

			<p>Updates to part N for effectiveness to refer to policies map and for consistency to delete references to Archway as cultural quarter.</p> <p>Updates to supporting text for effectiveness, for consistency with other policy changes and to reflect changes to the Use Classes Order</p>	<p>No further assessment necessary for change to Part N because the amendment makes reference to the Policies Map for the boundaries of the Cultural Quarters but does not alter the approach.</p> <p>Further assessment for the removal of Archway cultural quarter is considered as part of assessment set out against Policy R10.</p> <p>No further assessment necessary for amendment to paragraph 4.64 which adds factual reference to figures for retail need figure and does not change the policy approach.</p> <p>Other changes to supporting text respond to the amendments to the Use Classes Order and updating referencing.</p>
SD-MM-43	Inclusive economy	Policy R2: Primary Shopping Areas and supporting text, paragraphs 4.86 – 4.91	<p>Modifications to clarify the Council’s approach following the amendments to the Use Classes Order and for effectiveness.</p> <p>Clarification at Part B of approach to new retail development in the PSA and how this will be secured.</p> <p>Modifications to parts D and E for soundness to clarify approach to for applications for change of use from conditioned E uses to other E uses and from E</p>	Screened in. Assessment required.

			<p>uses to other main town centre uses at ground floor in PSAs.</p> <p>Update to part F clarifies approach to change of use to residential.</p> <p>Updates to supporting text to clarify approach following changes to the Use Classes Order, for effectiveness and consistency with other policy changes.</p>	
SD-MM-44	Inclusive economy	Policy R3: Islington's Town Centres and supporting text	<p>Policy title updated for effectiveness. Related retail hierarchy headings also added through policy.</p> <p>Other updates to respond to changes to the Use Classes Order, for effectiveness, to be justified and positively prepared.</p> <p>Modification to Part B adds reference to Part F which focuses on edge of centre/out of centre locations for clarity and effectiveness so that Part B refers to the whole retail hierarchy in different parts of Policy R3.</p> <p>Modification removes reference to 'Class E uses' in Part C (ii). Part C criteria updated, in particular part i, vi and use of ancillary floorspace for effectiveness.</p> <p>Part D has been updated for effectiveness to make clear the priority development type in the CAZ and to reflect changes to the Use Classes Order.</p>	Screened in. Assessment required.

			<p>Modifications to Part F to reflect changes to the Use Classes Order and remove the word 'detailed' in for consistency.</p> <p>Update to part G to be positively prepared and effective in relation to residential development in town centres including criteria in relation to ancillary use and removal of vacancy criteria.</p> <p>Modification to Part H to more positively address housing not involving change of use of main town centre uses.</p> <p>Updates to paragraphs 4.92-4.96 and 4.100 to reflect changes to the 2020 amendments to the Use Classes Order</p> <p>New text at paragraph 4.97 in relation to impact assessments added for clarity and effectiveness.</p> <p>Updates to paragraphs 4.98 and 4.99 to be effective and positively prepared.</p>	
SD-MM-45	Inclusive economy	Policy R4: Local Shopping Areas and supporting text	<p>Modifications to clarify the Council's approach following the 2020 amendments to the Use Classes Order.</p> <p>Modification to add reference to policies map in Part A for clarity and effectiveness.</p> <p>Modification to add reference to Appendix 1 in Part B for clarity and effectiveness.</p>	Screened in. Assessment required.

			<p>Modification to Part C to reference relevant part of Policy R3 for clarity and brevity. Modification clarifies the approach in respect to use of impact assessments.</p> <p>Modification to Part D to be positively prepared in relation to residential uses. This includes removal of text relating to 'ancillary space' Part E(v).</p> <p>Update to part E to reflect changes to Use Classes Order.</p> <p>Updates to supporting text for effectiveness and to clarify the Council's approach following the 2020 amendments to the Use Classes Order.</p>	
SD-MM-46	Inclusive economy	Policy R5: Dispersed retail and leisure uses and supporting text	<p>Modifications to clarify the Council's approach following the 2020 amendments to the Use Classes Order</p> <p>Modifications amend reference to 'operational and ancillary space' and revises marketing criteria (Part A and B) for effectiveness. New part B added to clarify approach to conditioning new retail development to provide essential daily goods following changes to the Use Classes Order.</p> <p>Modification to part C revised to reflect a more positive approach to residential in dispersed locations in respect to NPPF paragraph 86.</p>	No further assessment necessary. The changes clarify the Council's approach following amendments to the Use Classes Order and the introduction of Class E but are not considered to change the effects previously assessed.

			Updates to supporting text to reflect changes to Use Classes Order.	
SD-MM-47	Inclusive economy	Policy R6 and supporting text	Modifications to clarify the Council's approach following the 2020 amendments to the Use Classes Order	No further assessment necessary. The changes clarify the Council's approach following amendments to the Use Classes Order and the introduction of Class E but are not considered to change the effects previously assessed.
SD-MM-48	Inclusive economy	Policy R7 and supporting text	<p>Modifications to clarify the Council's approach following the 2020 amendments to the Use Classes Order</p> <p>Modification adding a cross reference to marketing requirements set out in Appendix 1.</p> <p>Modification inserts new Part D to clarify approach to residential in each SSA.</p> <p>Updates to supporting text in response to changes to the Use Classes Order and to define the Specialist Shopping Areas for clarity and effectiveness.</p> <p>Modification to supporting text at paragraph 4.125 to reflect changes to the Use Classes Order include Camden Walk and Charlton Place into the Camden Passage SSA for clarity.</p> <p>Modification to supporting text which adds paragraph 4.126 to specifically define the extent of the SSAs for clarity and effectiveness.</p>	<p>No further assessment necessary in respect to amendments as a result of changes to the Use Classes Order and cross references.</p> <p>For Policy R7 the modification at Part D differs from the approach to residential use in the rest of the town centre because the requirements in SSAs also relate to all floors and ancillary space so the approach has not changed in SSAs therefore no further assessment is necessary.</p> <p>No further assessment needed in relation to the supporting text changes as the modification just corrects the names of the streets included in the SSAs. No further assessment needed as modification clarifies extent of the SSAs through addresses but does not change the approach.</p>

SD-MM-49	Inclusive economy	Policy R8	<p>Modification to remove reference to estate agents in Part A and reworded to make the policy positively prepared.</p> <p>Modifications to clarify the Council's approach following the 2020 amendments to the Use Classes Order</p>	<p>No assessment necessary as the removal of reference to estate agents does not have an effect.</p> <p>The proposed change that introduces reference to overconcentration of Class E uses is not considered to have sufficient effects to require an assessment</p>
SD-MM-50	Inclusive economy	Policy R9 and supporting text	Modifications to clarify the Council's approach following the 2020 amendments to the Use Classes Order and to cross reference relevant glossary definition.	No assessment necessary. The modifications provide updates as a result of the Use Classes Order 2020 amendments and cross references to relevant definitions in the glossary – they are not considered to change the previous assessment.
SD-MM-51	Inclusive economy	Policy R10 and supporting text	<p>Modifications to part A and B for effectiveness in relation to new cultural uses and for proposals outside of the CAZ and Town Centres.</p> <p>Update to part C to clarify expectations for marketing of cultural uses.</p> <p>Update to part D to reflect that fact that other policies consider amenity impacts.</p> <p>Modifications made to supporting text to reflect changes to the Use Classes Order, for effectiveness and consistency with other modifications. This includes a modification to delete reference in paragraph 4.144 to cultural quarter designation of Archway.</p>	Screened in. Assessment required.



SD-MM-52	Inclusive economy	Policy R11	<p>Modification to Part A for effectiveness.</p> <p>Modification clarifies marketing requirements for effectiveness.</p>	No further assessment necessary as the modifications clarify approach for effectiveness and are not considered to change the effects previously assessed.
SD-MM-53	Green infrastructure	Policy G1 and supporting text	Modification for effectiveness and consistency with the London Plan to exclude B2 general industry and B8 storage and distribution uses from the urban greening factor assessment requirement.	Overall the modification is not considered to affect the significant positive effect previously identified. No further assessment necessary.
SD-MM-54	Green infrastructure	Policy G2: Protecting Open Space and supporting text	<p>Modifications to Part A, first sentence, and Part D: to be positively prepared.</p> <p>The modification to Part A spans three policies in the Local Plan (SP2, BC4 and G2) and provides clarification on how proposals for moorings and facilities to support moorings should be approached.</p> <p>Updates to supporting text for consistency and effectiveness with changes to the policy.</p>	<p>The rephrasing to make positively prepared these are not considered to change the effects previously assessed.</p> <p>For the modifications in relation to moorings and associated facilities the effects of this have been assessed in related policies SP2 and BC4.</p> <p>The modification stating open space is both investigated and secured this is not considered to change the effects identified in the previous assessment of the policy.</p> <p>The modification ensures the supporting text reflects the Policy and ensures internal consistency – this does not affect the results of the previous assessment of the policy. ..</p>
SD-MM-55	Green infrastructure	Policy G4, parts B and H	Modification for effectiveness and to reflect London Plan and SINC hierarchy setting out the level of	Screened in. Assessment required

		and supporting text	<p>protection commensurate to the different SINC values and mitigation hierarchy.</p> <p>Update to part H For effectiveness to clarify when a financial contribution is required.</p> <p>Update to supporting text for effectiveness to provide clarity when a landscape design strategy will be required.</p> <p>Modification to remove the reference in paragraph 5.34 that larger extensions may be defined as less than 100sqm in relation to landscape design strategies.</p>	
SD-MM-56	Green infrastructure	Figure 5.2: Sites of Importance to Nature Conservation (SINC) designation	<p>Revision to correct an error and to improve accuracy of mapping. See Policies Map Changes for full explanation.</p> <p>To correct an inaccuracy and show Skinner Street Open Space as a Site In Nature Conservation (SINC) for effectiveness.</p>	The site boundary has been amended to reflect improved mapping that has been made available following completion of the development. This is a factual update and is does not require an assessment.
SD-MM-57	Green infrastructure	Policy G5: Green Infrastructure, supporting text, paragraphs 5.51 and 5.52	Modifications to clarify that intensive and semi-intensive green roofs are not always accessible as amenity space, and may be acceptable if they prioritise biodiversity.	No further assessment necessary, the screening does not consider the modification will change the effects to require an assessment, the policy and supporting text continue to prioritise biodiversity-based extensive green roofs.
SD-MM-58	Sustainable design	Policy S1: Delivering Sustainable	Modifications for effectiveness to clarify that gas CHP is no longer considered to be 'low carbon' and that the use of low-emission CHP systems will only	Screened in. Further assessment required.

		Design, supporting text, Paragraphs 6.9, 6.10, 6.11	be acceptable in exceptional circumstances to support the expansion of area-wide heat networks.	
SD-MM-59	Sustainable design	S2 Part D (iii) and insert supporting text after paragraph 6.19	<p>Amendment to add reference to legal agreement in line with policy S4 part G to clarify how the fee will be collected and ensure effectiveness.</p> <p>Numbering of bullet points also amended to correct error.</p> <p>Modification to add additional text to explain the application of the monitoring fee to ensure the policy is justified and effective.</p>	Further assessment is not considered necessary as the amendments do not change the policy requirements and would not change the effects previously assessed.
SD-MM-60	Sustainable design	Policy S5: Energy Infrastructure, part A, C and D and supporting text	<p>Modification for effectiveness to Part A and reference to the BEIS dataset instead of DUKES to ensure a development's future carbon emissions are captured.</p> <p>Modification for effectiveness to clarify the policy approach to larger minor new-build developments following amendments to Part D (formally Part C).</p> <p>Amendment to Part D for effectiveness to clarify that low carbon heating systems, including ASHPs, are prioritised over gas boilers for minor new-build developments with an individual heating system.</p> <p>Modifications to paragraphs 6.60 to 6.67 for effectiveness</p>	Screened in. Assessment required.

			<p>New paragraph 6.69 to clarify the requirements for minor new-build developments with an individual heating system following the amendments to Part D (formerly part C).</p> <p>New paragraph 6.70 to clarify when direct electric heating and ultra-low NOx gas boilers may be considered for individual heating systems.</p> <p>Amended wording to paragraph 6.73 (formerly 6.71) in line with change to S5 Part A which replaced reference to DUKES with BEIS energy projections for effectiveness.</p> <p>Update to paragraphs 6.77 and 6.78 (formerly 6.75) to ensure effectiveness in terms of whole life-cycle assessment to allow this to be effective prior to further guidance being published.</p> <p>Amended wording to paragraph 6.79 (formerly 6.76) to clarify that the 'cut-off point' referred to in this paragraph is in line with S5, Part G to ensure the policy is effective. This paragraph also amended to take account of lettering change due to addition of new Part C.</p> <p>Paragraph 6.80 (formerly 6.77) and the references to CIL updated to ensure effectiveness and to clarify the distinction between costs of connecting to a heat network and costs of heat network development.</p>	
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SD-MM-61	Sustainable design	S7 Part D and F and supporting text paragraphs 6.92 and 6.101	<p>Size thresholds for Air Quality Positive applications amended for consistency with London Plan.</p> <p>Modification adds reference to Part F regarding financial contributions to ensure the effectiveness of the policy. Further detail provided on financial contributions in paragraph 6.92 to ensure the effectiveness of the policy.</p> <p>Modification adds a cross reference in new paragraph 6.101 to Policy PLAN1 and the impacts of overshadowing of solar panels, particularly in terms of canal boats etc. to ensure the effectiveness of the policy.</p>	The modifications do not change the results of the original assessment and no further assessment is necessary.
SD-MM-62	Sustainable design	S8 Part D and paragraph 6.118	Modification to add reference to the Exception Test in Policy S8 Part D to ensure effectiveness and consistency with national policy.	This modification is a clarification and will not change the effects already identified. No further assessment necessary.
SD-MM-63	Sustainable design	S8 (including footnote 39) and supporting text paragraph 6.116	<p>Modification to update Table 6.4 Flood Risk Vulnerability Classification to ensure consistency with national policy following updates to the NPPF. Table 6.4 has been amended to reflect Annex 3 of the updated NPPF, pages 74-75.</p> <p>References in supporting text paragraph 6.116 updated to reflect updates to NPPF paragraphs 161 and 162 to take account of 'all sources of flood risk'.</p>	Modifications to policy and supporting text are clarification, do not change the effects already identified and do not require an assessment.

SD-MM-64	Sustainable design	Policy S9, Parts, C, G, O and supporting text paragraph 6.147	<p>Update to part C to clarify that direct and cumulative risk should be considered.</p> <p>Clarification to Part G for effectiveness to ensure major developments utilise opportunities to reduce run-off rates.</p> <p>Update to part O for effectiveness. Update to paragraph 6.147</p>	<p>Modifications to policy and supporting text are clarification, do not change the effects already identified and do not require an assessment.</p>
SD-MM-65	Public realm and transport	Policy T1, Parts B and D and supporting text	<p>To ensure policy is effective amendment of Criterion B requires design of development to include accessible parking provision, stating that private vehicle use relating to Blue Badge Holders will not be restricted.</p> <p>Reference to taxis removed from description of private motor vehicles to help the policy to be justified.</p> <p>Addition of paragraph to supporting text which provides details of the Islington Transport Strategy, including Low Traffic Neighbourhoods</p>	<p>The amendments to criterion do not change the effects already identified and do not require an assessment.</p> <p>The update to the supporting text in relation to the Islington Transport Strategy is factual and does not require an assessment.</p>
SD-MM-66	Public realm and transport	Policy T2, part A and supporting text former 7.11 (now 7.12),7.15 (now 7.16) and 7.17 (now 7.18)	<p>Amendment made to Part A amended for effectiveness, to include future planned sustainable transport infrastructure.</p>	<p>Modifications to policy and supporting text do not change the effects already identified and do not require an assessment.</p> <p>(Note: the modification to Policy B2 Part D in relation to air quality and industrial uses provides a cross reference to this policy and is assessed against Policy B2).</p>

SD-MM-67	Public realm and transport	Policy T3, Parts B, C, F and G and supporting text at paragraph 7.27 (now 7.28)	<p>Amendment to part B to be positively prepared and effective, ensuring essential drop-off and accessible parking is provided for new homes.</p> <p>Amendment to Part C wording to be positively prepared, to describe when parking will be allowed for non-residential development.</p> <p>Amendment to Part F to be positively prepared and effective.</p> <p>Amendment to Part G to clarify the use of financial contributions in accessible or sustainable transport initiatives where accessible parking spaces cannot be provided (formerly in supporting text). Clarifications made to paragraph 7.28.</p>	No further assessment necessary. The overall policy approach remains unchanged from and would not change the effects previously assessed
SD-MM-68	Public realm and transport	Policy T5, part A	Clarification made for soundness and consistency with the London Plan to require delivery and servicing plans to specify how safe, clean and efficient deliveries and servicing have been facilitated.	<p>Modifications are clarification, do not change the effects already identified and do not require an assessment.</p> <p>(Note: the modification to Policy B2 Part D in relation to air quality and industrial uses provides a cross reference to this policy and is assessed against Policy B2.)</p>
SD-MM-69	Design and heritage	Policy DH1, part C and removal of paragraph 8.5	<p>Change to Part C to clarify that protection or enhancement of a view will meet the policy objective.</p> <p>Separating clause C into two parts so that new Part D refers to protection of or enhancement of the settings of Local Landmarks.</p>	<p>The change resulting from the modification to Part C is not considered to be significant to change the overall effects in the assessment. No further assessment necessary.</p> <p>The separation of Part C into two parts reflects a change in approach to local</p>

			<p>Removal of supporting text for effectiveness as this content is covered by PLAN1</p>	<p>landmarks to reflect the fact they are not defined in the same way as protected views. The change resulting from the modification is not considered to be significant to change the overall effects in the assessment. This is related to the new Part K in Policy DH2 below.</p> <p>The removal of the supporting text at paragraph 8.5 will not change the policy requirements as the content is covered under PLAN1 therefore further assessment is not considered necessary as the amendments do not change the effects previously assessed.</p>
SD-MM-70	Design and heritage	Policy DH2 Heritage Assets Conservation Areas, Parts B and J and supporting text	<p>Changes for effectiveness to Part B ensure Policy DH2 is consistent with the duty in the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>Part J updated for effectiveness as views to Local Landmarks are not formally defined.</p> <p>New part K added for effectiveness, to clarify that development in proximity to Local Landmarks should protect or enhance their settings.</p> <p>Update to paragraph 8.34 for effectiveness as St John's Gate has been de-scheduled (as a historic monument). It remains a grade I listed building.</p> <p>Update to paragraph 8.35 for effectiveness.</p>	<p>The changes in relation to parts B and J are not considered to be significant to change the overall effects in the assessment. No further assessment necessary. For the policy change in relation to Local Landmarks, the modification is not considered to be significant to change the overall effects previously identified in the assessment. No further assessment necessary.</p> <p>The changes to paragraphs 8.34 and 8.35 are factual and do not require an assessment.</p>



SD-MM-71	Design and heritage	Policy DH3, Building Heights	<p>Changes to multiple parts of the policy for effectiveness and consistency with the London Plan which updates definition of tall buildings and changes related policy for buildings under 30m.</p> <p>Update to criteria to reflect that views to Local Landmarks have different level of protection to protected views.</p> <p>Updates to Part E for effectiveness with regard to protecting heritage in neighbouring boroughs and to reflect changes to policy in relation to protected views and local landmarks.</p> <p>Updates to supporting text for effectiveness.</p>	The most significant modification to DH3 is excluding buildings which are considered prominent in their context from application of the tall buildings criteria set out in part E however this is not considered to change the overall principle of a plan led approach to tall building locations and the modifications are not considered to change the overall effects in the assessment. No further assessment necessary.
SD-MM-72	Design and heritage	Policy DH5, Part D	Modifications to make the policy positively worded.	Further assessment is not considered necessary as the amendments do not change the policy requirements and would not change the effects previously assessed.
SD-MM-73	Strategic infrastructure	Paragraph 9.6	Two changes made in paragraph 9.6 for effectiveness. Amendment to remove reference to CIL 123 list to be effective and reference to infrastructure costs for school places to be sought through CIL added.	<p>The first modification is a factual update and does not require assessment.</p> <p>The second modification does not require an assessment as it will not change the effects already identified.</p>

SD-MM-74	Strategic infrastructure	Paragraph 9.11	A clarification for effectiveness in relation to identifying the safeguarded Hornsey Street Re-use and recycling centre on the Policies Map.	The clarification will not change the effects already identified so no further assessment is necessary.
SD-MM-75	Strategic infrastructure	Policy ST3: Telecommunications, communications and utilities equipment, Part C and supporting text	Updates for effectiveness.	The screening has identified that the modifications do not require an assessment and will not change the effects already identified.
SD-MM-76	Monitoring	Monitoring	Amendments which provides further clarification to monitoring and updates some of the monitoring indicators.	The screening has identified that the changes are clarification and do not change the effects already identified and does not require an assessment.
SD-MM-77	Monitoring	Monitoring	Amendment to provide further clarification about how the plan will be monitored.	The screening has identified that the changes are clarification and do not change the effects already identified and does not require an assessment.
SD-MM-78	Appendices	Appendix 1	For effectiveness a table summarising the marketing and vacancy requirements for the Local plan policies is introduced.  Amendments are to add further clarity on when the marketing without vacancy is applied within Class E in the retail hierarchy.	No further assessment required for the table as it repeats the requirements set out in policy. Where necessary these have been assessed (Policies B2, B3, R2, R3 and R4).
SD-MM-79	Appendices	Appendix 2: Noise and vibration	Appendix 2 sets out how noise impacts should be considered has been updated to reflect changes to the Use Classes Order. A clarification has been	The screening has identified that this clarification does not change the effects

			added in relation to the examples where assessments of internal sound transfer should be considered (for example gyms and nurseries where there is residential above. There is also a clarification about how impact generating uses are considered where there are likely to be noise issues which could impact upon residential properties (below or above). This helps to provide further clarification in relation to policy DH5.	already identified and does not require an assessment.
SD-MM-80		Appendix 3 – Table A3.1	Updated in response to changes to the Use Class Order	No further assessment required. The modification is not considered to change the positive effects previously identified.
SD-MM-81-83	Appendices	Appendix 3 Appendix 4 Table A4.1	<p>New supporting paragraph to clarify the requirement for transport assessment in premises larger than 750 sqm where Class E Use is unspecified.</p> <p>New supporting paragraphs to clarify application of minimum cycle parking standards to reflect changes to the Use Classes Order.</p> <p>Proposed changes to standards to clarify the application of cycle parking responding to Use Classes Order changes, with the introduction of a standard for general Class E</p>	No further assessment required. The modification is not considered to change the positive effects previously identified
SD-MM-84	Appendices	Appendix 5: Social Value self- assessment	Appendix 5 deleted for consistency with removal Policy SC4.	No further assessment necessary as set out under the related modification for policy SC4.
SD-MM-85	Appendices	Appendix 7 Location of public open	Updated Figure A7.1: Location of public open spaces; SINCs, historic green spaces and adventure playgrounds with high resolution map which includes	The site boundary has been amended to reflect improved mapping that has been made available following completion of the

		spaces; SINC, historic green spaces and adventure playgrounds	the amendment to the SINC for 351 Caledonian Road and showing Skinner Street Open Space as SINC. To ensure consistency with Policies Map changes and for legibility. Update to correct an inaccuracy and show Skinner Street Open Space as a Site In Nature Conservation (SINC) for effectiveness.	development. This is a factual update and is does not require an assessment.
SD-MM-86 - 98	Appendices	Appendix 9: Glossary and abbreviations	<ul style="list-style-type: none"> <li>• Updated definition of business space</li> <li>• Updated definition of hybrid space</li> <li>• Updated definition of industrial floorspace</li> <li>• Updated definition of LSIS</li> <li>• Updated definition of office led development</li> <li>• Additional definition of peppercorn rent added for effectiveness and clarity.</li> <li>• Updated definition Primary Shopping Area</li> <li>• Definition of Private Open Space added effectiveness, consistent with modifications to G2.</li> <li>• Updated definition of retail uses</li> <li>• Updated definition of leisure uses</li> <li>• Definition of low traffic neighbourhoods added.</li> <li>• The Glossary includes a new definition for a shop for effectiveness, and clarifies the definition in relation to retail.</li> <li>• The Glossary includes a new definition for non-motorised transport modes</li> </ul>	The screening has identified that the changes are clarification. The modifications to the glossary will assist with the implementation of policy that has been assessed for its effects and do not change the effects already identified and do not require an assessment.

SD-MM-99	Appendices	Add new appendix 10	New appendix which presents the housing trajectory	No assessment required as factual updates, updates to plan period taken into account in relevant modifications.
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**Table 4.2: Bunhill and Clerkenwell Area Action Plan Modifications screening**

Reference	Section/Paragraph/ Policy	Description	Screening Assessment
BC-MM-01	Paragraph 1.7	Change of the plan period from 2020/21-2035/36 to 2020/21-2036/37	The amendment will change the end of the plan period and this has been reflected in relevant parts of the plan which will be screened separately however this modification is not considered to have an effect and no further assessment is needed.
BC-MM-02	Figure 1.4 Open Space Map	To fix an inaccuracy and show Skinner Street Open Space as Site of Importance for Nature Conservation (SINC) for effectiveness.	No effects identified. Skinner Street SINC was never de-designated and this change corrects an inaccuracy in the map.
BC-MM-03	Policy BC1: Prioritising Office Use (including supporting text)	<p>Modifications to policy and supporting text following the 2020 amendments to the Use Classes Order and the introduction of Class E.</p> <p>Modification to add 'non-residential institutions' to the examples of uses which could be publicly funded uses in B1 Part D (iii).</p> <p>The modification changes one of the exceptions to Policy BC1 from applying to 'wholly' residential areas, to 'predominantly' residential areas in BC1 Part D (iv).</p>	No further assessment required. The modification is not considered to change the effects previously identified. The changes to Part D offer a degree of flexibility but this is not considered sufficient to affect the amount of either commercial floorspace that could be delivered or provide additional housing to change the effects previously identified.

Reference	Section/Paragraph/ Policy	Description	Screening Assessment
		New paragraph at 2.13 added clarifying the meaning of majority to mean more than 50%.	
BC-MM-04	Footnote 10:	Provides a definition of retail and leisure uses, so users will not have to refer to the Strategic and Development Management Policies document.	This is a clarification to include an existing definition from elsewhere in the Local Plan for ease of reference. It is not considered to effect the previous assessment of the policy.
BC-MM-05	BC2 Culture, retail and leisure uses and supporting text paragraphs 2.13, 2.18-2.19.	<p>Modifications to policy and supporting text following the 2020 amendments to the Use Classes Order and the introduction of Class E.</p> <p>Modification to clarify that cultural, retail, and leisure uses are appropriate in Local Shopping Areas.</p> <p>There are changes made in Part B which clarify the application of the approach to location of cultural uses and removes the sequential test for cultural uses so as not to unnecessarily constrain development of cultural uses in the CAZ.</p> <p>Modifications to improve clarity and readability.</p>	Screened in. Updated assessment required.
BC-MM-06	Policy BC3, part G and supporting text paragraphs 3.11 and 3.17-3.18 and 3.19.	<p>Rewording of Part G to make it positively prepared.</p> <p>Update to paragraph 3.11 to clarify the Council's approach following the 2020</p>	The modification to Part G is not considered to require a further assessment as the modification is not considered to change the effects previously identified.

Reference	Section/Paragraph/ Policy	Description	Screening Assessment
		<p>amendments to the Use Classes Order and the introduction of Class E.</p> <p>Modification to paragraph 3.17 to cross reference to the tall buildings study and to link to Policy DH3 in the Strategic and Development Management Policies.</p> <p>Modification to 3.19 which changes 'conserve and enhance' to 'conserve or enhance' to bring it in line with the statutory duty for protecting heritage assets.</p>	<p>Further assessment is not considered necessary as the amendments to para 3.11 and 3.17 do not change the policy requirements and would not change the effects previously assessed.</p> <p>The modification to paragraph 3.19 is not considered to result in a change to effects previously identified and no further assessment necessary.</p>
BC-MM-07	Figure 3.2 City Fringe Opportunity Area Spatial Strategy diagram	Replacement map to reflect the new boundary to BC10.	Further assessment is not considered necessary as the amendments are factual and do not change the policy requirements for the site allocations. See Site Allocation assessment for further details.
BC-MM-08	Policy BC4 and supporting text	<p>Modifications provide clarity on approach to boater facilities and moorings and the development of a water space strategy to provide a framework for different uses on the canal.</p> <p>A change to allow that development may have some impact on leisure provision, provided the impacts can be mitigated.</p>	Screened in. Updated assessment required.



Reference	Section/Paragraph/ Policy	Description	Screening Assessment
BC-MM-09	Policy BC5: Farringdon and supporting text	<p>Modifications to recognise the cultural quarter in the spatial strategy areas.</p> <p>Addition of missing text to aid readability of the policy.</p> <p>Change of policy references is to avoid confusion between BCAAP policies and site allocations.</p> <p>A modification to reflect that heritage value of the railway cuttings has not been established.</p> <p>The modification to paragraph 3.39 changes 'conserve and enhance' to 'conserve or enhance' to bring it in line with the statutory duty for protecting heritage assets, and to make consistent with policy DH2.</p>	The various modifications will not change the effects previously identified and no further assessment required.
BC-MM-10	Figure 3.4: Farringdon Spatial Strategy diagram	Correction to include spatial strategy boundary and also to include the Clerkenwell / Farringdon Cultural Quarter on the map necessary for effectiveness.	Further assessment is not considered necessary as the amendments are factual and do not change the policy requirements.
BC-MM-11	Policy BC6 part B, D and G and supporting text para 3.43	<p>Modifications at part B and paragraph 3.43 removes element of policy duplicated in policy R3 and R4.</p> <p>Modifications at part D: changes 'conserve and enhance' to 'conserve or enhance' to bring it in line with the statutory duty for protecting</p>	<p>For part B no effects are created as the removed text is addressed by policy R3 and R4.</p> <p>Change to part D is not considered to result in a change to the effects previously identified.</p> <p>For part G the identification of the cultural quarter does not alter the policy approach.</p>

Reference	Section/Paragraph/ Policy	Description	Screening Assessment
		<p>heritage assets, and to make consistent with policy DH2.</p> <p>Modifications at part G recognises the cultural quarter in the spatial strategy area, for consistency with other references within the Plan.</p>	<p>No further assessment necessary.</p>
BC-MM-12	Figure 3.5: Mount Pleasant and Exmouth Market Spatial Strategy diagram	<p>To add the boundary of the cultural quarter to the spatial strategy area map.</p> <p>To correct an inaccuracy and show Skinner Street Open Space as a Site In Nature Conservation (SINC) for effectiveness.</p>	<p>Further assessment is not considered necessary as the amendments are factual and do not change the policy requirements.</p>
BC-MM-13	Policy BC7 Central Finsbury and supporting text	<p>Amended policy references to avoid confusion between BCAAP policies and site allocations.</p> <p>Changes necessary for clarity and effectiveness in Part F to state that the sports and leisure function at the Finsbury Leisure Centre will be re-provided in accordance with Strategic and Development Management Policy SC1.</p> <p>Part of the modification states that part of the Farringdon / Smithfield Cultural Quarter is within this spatial strategy area and that the Cultural Quarter is the focus for cultural uses in the AAP area.</p>	<p>Further assessment is not considered necessary as the amendments are factual and do not change the policy requirements.</p> <p>No effects for new policy references.</p> <p>Screening of the link to policy SC1 and Finsbury Leisure Centre sports and leisure function is addressed in the site allocation screening table.</p> <p>For Part G the identification of the cultural quarter aids usability but does not alter the policy approach.</p> <p>The supporting text moved into the policy box relates to design, scale, definition of space, public realm, and pedestrian and cycle connections. Moving this into policy clarifies its status in the</p>

Reference	Section/Paragraph/ Policy	Description	Screening Assessment
		Modifications to move policy from supporting text into the policy box for Parts J, K and L and design criteria.	document. This policy also works alongside other policies within the plan, including in PLAN1 in the Strategic and Development Management Policies. It is not considered the modifications change the effects identified. Further assessment is not considered necessary.
BC-MM-15	Figure 3.6: Central Finsbury Spatial Strategy diagram	Central Finsbury Spatial Strategy diagram To add the boundary of the Cultural Quarter to the spatial strategy area map. Skinner Street SINC is also reinstated where previously omitted in error.	Further assessment is not considered necessary as the amendments are factual and do not change the policy requirements.
BC-MM-15	Policy BC8 Historic Clerkenwell including supporting text	<p>Changes to A, B, F, G, and H of policy text: necessary for consistency with legislation, to provide greater clarity to the policy.</p> <p>Modification to Part A removes the reference to 'limited' commercial development and moves supporting text to the policy in part B with associated deletion at paragraph 3.68.</p> <p>The modification to Part F and paragraph 3.71 changes 'conserve and enhance' to 'conserve or enhance' to bring it in line with the statutory duty for protecting heritage assets and Policy DH2.</p> <p>Addition of Part G which encourages conversion of carriageway and parking to pedestrian space.</p>	<p>The modification to part B clarifies the approach to commercial development and removes the requirement for it to be limited in scale. This is not considered to change the effects previously identified.</p> <p>The modification to Parts A and F brings the policy in line with the Statutory Duty and is not considered to result in a change to the effects previously identified for the conservation of heritage assets. No further assessment necessary.</p> <p>The modification to Part G will not change the effects already identified.</p> <p>With regard to Part H, the identification of the cultural quarter does not alter the policy approach.</p>

Reference	Section/Paragraph/ Policy	Description	Screening Assessment
		<p>Addition of part H which states that the spatial strategy area includes part of the Clerkenwell/Farringdon Cultural Quarter and that this is the focus for cultural uses in the AAP area.</p> <p>Supporting text changes: 3.66: factual update (removal of reference to a scheduled monument which has been de-designated).</p>	<p>For paragraph 3.66 no effects are identified as these are factual changes related to scheduled monuments.</p>
BC-MM-16	Figure 3.7 Historic Clerkenwell Spatial Strategy Diagram	Addition of the Clerkenwell / Farringdon Cultural Quarter.	The location of the Cultural Quarter is shown on Figure 2.2 of the Bunhill and Clerkenwell AAP. Addition of the Cultural Quarter boundary on the Farringdon Spatial Strategy diagram does not change the policy designation and has no effects .
BC-MM-17	Policy AAP1: Delivering development priorities and supporting text	<p>Modifications to clarify that AAP Plan 1 applies to site allocations within the Bunhill and Clerkenwell AAP area.</p> <p>Modifications to set out that when allocated uses which fall within a broader use class (i.e. office or retail uses which sit within use class E), they will be secured for the specific allocated use at planning stage.</p>	This clarification is in response to changes to the Use Classes Order. There are related policies where the impacts of class E and the need to secure specific use through condition to meet identified development needs have been assessed. No further assessment is considered necessary.
BC-MM-18	Figure 4.1 Bunhill and Clerkenwell AAP site allocations	Replacement map to include modified BC10 boundary.	The update to the map is not considered to have any effects. The modification to Site Allocation BC10 has been assessed separately.

Reference	Section/Paragraph/ Policy	Description	Screening Assessment
	(with Spatial Strategy areas identified for reference)		
BC-MM-19	Table 4.2 Site Capacity Assumptions	The table of site capacity assumptions for the Bunhill and Clerkenwell AAP area has been updated to include up to date figures following changes to the plan.	No effects are identified. The amount of floorspace provided is comparable at a strategic level.
BC-MM-20	Site Allocation BC3 Islington Boat Club	Changes to the development considerations stating that the community and sporting uses should be re-provided consistent with Strategic and Development Management Policy SC1, and residential uses may be developed where they do not harm the Islington Boat Club in accordance with the agent of change principal in Policy DH5 in the Strategic and Development Management Policies.	No effects identified. Further assessment is not considered necessary.
BC-MM-21	Site Allocation BC4 Finsbury Leisure Centre	Changes to the development considerations stating that: <ul style="list-style-type: none"> <li>• Development must be high quality contextual design in accordance with PLAN1 and protect the amenity of neighbouring residential properties, particularly those on Norman Street and at Burnhill House, Norman Street.</li> <li>• Development should ensure re-provision the sports pitches and facilities in accordance with Policy SC1 part D in the</li> </ul>	The cross references to other policies do not have additional effects and do alter the previous assessment of the policy. No further assessment necessary.

Reference	Section/Paragraph/Policy	Description	Screening Assessment
		Strategic and Development Management Policies.	
BC-MM-22	Site Allocation BC5: London College of Fashion, Golden Lane	The modification states that an additional set back storey on the roof of the retained building may be appropriate.	The modifications would not change the previous effects identified and the assessment remains appropriate for this allocation. No further assessment necessary.
BC-MM-23	Site Allocation BC6: Redbrick Estate	The allocation and justification has been expanded to reflect the planning permission on the site, which is currently under construction.	No effects identified. Further assessment is not considered necessary.
BC-MM-24	Site Allocation BC7: 198-208 Old Street (petrol station)	A modification to clarify that the current use may continue.	No effects identified. Further assessment is not considered necessary.
BC-MM-25	Site Allocation BC8: Old Street roundabout area	Modifications which set out how TfL is redeveloping Old Street with a public realm scheme and that proposals should improve conditions and safety for cycling.	No effects identified. Further assessment is not considered necessary.
BC-MM-26	Site Allocation BC10: 254-262 Old Street (east of roundabout)	Removal of a pub/bar from the site allocation.	Updated assessment required.
BC-MM-27	Site Allocation BC11: Longbow House, 14-20 Chiswell Street	<p>A modification to confirm that the existing building is over 30m.</p> <p>The modification changes 'preserve and enhance' to 'preserve or enhance' to bring it in line with the statutory duty for protecting heritage assets.</p> <p>The estimated timescale has been moved later in the plan period.</p>	No effects identified. Further assessment is not considered necessary.

Reference	Section/Paragraph/Policy	Description	Screening Assessment
BC-MM-28	Site Allocation BC12 Cass Business School, 106 Bunhill Row	A modification states that only a modest upwards extension is likely to be acceptable due to site and surrounding townscape constraints.	No effects identified. Further assessment is not considered necessary.
BC-MM-29	Site Allocation BC13: Car park at 11 Shire House, Whitbread Centre, Lamb's Passage	A modification to state that residential use and hotel uses are acceptable. Additional information stating the details of the extant permission.	Updated assessment required
BC-MM-30	Site Allocation BC15: Richard Cloudesley School, 99 Golden Lane	Update to planning history.	No effects identified. Further assessment is not considered necessary.
BC-MM-31	Site Allocation BC16 36-43 Great Sutton Street (Berry Street)	Identification of protected views in site constraints.	No effects identified. Further assessment is not considered necessary.
BC-MM-32	Site Allocation BC17 Caxton House, 2 Farringdon Road	New planning history information setting out that construction has started on site and that the building is above 30m in height. Updates to list the view corridors which affect this site.	No effects identified. Further assessment is not considered necessary.
BC-MM-33	Site Allocation BC18 Cardinal Tower, 2A, 4-12 Farringdon Road and 48-50 Cowcross Street	New planning history information setting out that construction has started on site and that the building is above 30m in height. Updates to list the view corridors which affect this site.	No effects identified. Further assessment is not considered necessary.
BC-MM-34	Site Allocation BC19 Farringdon Place, 20 Farringdon Road	Modifications to change descriptions of use following the 2020 amendments to the Use	No effects identified. Further assessment is not considered necessary.

Reference	Section/Paragraph/Policy	Description	Screening Assessment
		Classes Order and identification of protected views in site constraints.	
BC-MM-35	Site Allocation BC20 Lincoln Place, 50 Farringdon Road	Modification to descriptions of use following the 2020 amendments to the Use Classes Order and identification of protected views in site constraints.	Factual update. No effects identified.
BC-MM-36	Site Allocation BC21: 2, 4-10 Clerkenwell Road, 29-39 Goswell Road,& 1-4 Great Sutton Street	Modification to descriptions of use following the 2020 amendments to the Use Classes Order  The allocation has been amended to reflect the permission which is currently under construction. Details of the permission have been added.	Screened in. Refer to updated assessment.
BC-MM-37	Site Allocation BC22 Vine Street Bridge	Updates to policy references to avoid confusion between BCAAP policies and site allocations and identification of protected views in site constraints.	No effects identified. Further assessment is not considered necessary.
BC-MM-38	Site Allocation BC24 Clerkenwell Fire Station, 42-44 Rosebery Avenue	The allocation has been amended to from requiring some social and infrastructure use to encouraging active frontages at the ground floor for commercial, social infrastructure, or community use.  Development considerations amended from reference to 'conserve and enhance' heritage assets to 'conserve or enhance' heritage assets to make consistent with legislation.	Screened in. Refer to updated assessment.
BC-MM-39	Site Allocation BC25 Mount Pleasant	Updates to policy references to avoid confusion between BCAAP policies and site	No effects identified. Further assessment is not considered necessary.



Reference	Section/Paragraph/Policy	Description	Screening Assessment
	Post Office, 45 Rosebery Avenue	allocations and identification of protected views in site constraints.	
BC-MM-40	Site Allocation BC26 68-86 Farringdon Road (NCP carpark)	Updates to policy references to avoid confusion between BCAAP policies and site allocations and identification of protected views in site constraints.	No effects identified. Further assessment is not considered necessary.
BC-MM-41	Site Allocation BC27: Finsbury Health Centre and the Michael Palin Centre for Stammering	Modification to descriptions of use following the 2020 amendments to the Use Classes Order.  Updates to policy references to avoid confusion between BCAAP policies and site allocations.  Identification of protected views in site constraints.	No effects identified. Further assessment is not considered necessary.
BC-MM-42	Site Allocation BC28: Angel Gate, Goswell Road	Modification to ensure that a listed building on site must be retained.	Screened in. Refer to the updated assessment.
BC-MM-43	Site Allocation BC29: Taylor House, 88 Rosebery Avenue	Modification to descriptions of use following the 2020 amendments to the Use Classes Order. Updates to policy references to avoid confusion between BCAAP policies and site allocations.  Identification of protected views in site constraints.	No effects identified. Further assessment is not considered necessary.
BC-MM-44	Site Allocation BC32: Monmouth	New planning history information setting out that construction has started on site and that the building is above 30m in height.	No effects identified. Further assessment is not considered necessary.

Reference	Section/Paragraph/ Policy	Description	Screening Assessment
	House, 58-64 City Road		
BC-MM-45	Site Allocation BC33: Oliver House, 51-53 City Road	A modification that states commercial uses are allowed on the ground floor to provide greater clarity.	The effects of this modification are limited in the amount of floorspace affected and are not of a scale to change the positive effects previously identified. No further assessment needed.
BC-MM-46	Site Allocation BC34: 20 Ropemaker Street, 101-117 Finsbury Pavement, 10-12 Finsbury Street	Modifications to update planning history information setting out that site has permission for a building is above 30m in height.	No effects identified. Further assessment is not considered necessary.
BC-MM-47	Site Allocation BC35: Finsbury Tower, 103-105 Bunhill Row	A modification to state that the site has permission for a 28 storey tower to reflect that the permission being implemented on site is for a tall building.	No effects identified. Further assessment is not considered necessary.
BC-MM-48	Site Allocation BC36: London Metropolitan Archives and Finsbury Business Centre	A modification to clarify there are two sites and the relevant uses for each site: Office uses on the Finsbury Design Centre, Cultural use/visitor attraction on the Metropolitan Archive.	The clarification setting out where the office and cultural visitor attractor uses should be located does not change the assessment. No further assessment needed.
BC-MM-49	Site Allocation BC37: Triangle Estate, Goswell Road/Compton Street/Cyrus Street	New development considerations setting out that development must not lead to unacceptable impacts on residents, and should improve the security, function, accessibility, and appearance of public realm and open space on the estate.	Screened in. Refer to updated assessment.

Reference	Section/Paragraph/Policy	Description	Screening Assessment
BC-MM-50	Site Allocation BC38: Moorfields Eye Hospital	Removal of the reference to “legacy” eye clinic facility and change to clarify that social infrastructure is to be small scale.  Removal of the requirement that the open space must be located on Cayton Street.	The modifications do not change the positive effects previously identified. The change in relation to social infrastructure is not considered to change the positive effects previously identified. No further assessment needed.
BC-MM-51	Site Allocations BC40: The Pentagon, 48 Chiswell Street	The development considerations notes that the existing building is above 30m in height.	No effects identified. Further assessment is not considered necessary.
BC-MM-52	Site Allocation BC41: Central Foundation School, 15 Cowper Street, 63-67 Tabernacle Street and 19 & 21-23 Leonard Street	Changes to descriptions of use following the 2020 amendments to the Use Classes Order.  Amendment to the allocation to reflect quantum of floorspace agreed in permission P2017/1046/FUL.	Change in relation to Use Classes Order is a factual update, no further assessment.  The modification related to the quantum of floorspace has not been identified as changing the effects. Further assessment is not considered necessary.
BC-MM-53	Site Allocation BC43: easyHotel, 80-86 Old Street	Amendment of estimated delivery period.	No effects identified. Further assessment is not considered necessary.
BC-MM-54	Site Allocation BC44: Crown House, 108 Aldersgate Street	Changing superseded use classes to descriptions of use following the 2020 amendments to the Use Classes Order.	No effects identified. Further assessment is not considered necessary.
BC-MM-55	Site Allocation BC45: 27 Goswell Road	The development considerations notes that the existing building is above 30m in height.	No effects identified. Further assessment is not considered necessary.

Reference	Section/Paragraph/ Policy	Description	Screening Assessment
BC-MM-56	Site Allocation BC46: City, University of London, 10 Northampton Square	<p>A modification that identifies that permission has been granted for an extension above 30m in height.</p> <p>A modification that removes the statement that additional teaching facilities may be provided where in accordance with other planning policies as it is a redundant policy statement.</p>	<p>No effects identified. Further assessment is not considered necessary.</p> <p>The change in relation to existing teaching facilities is not identified as having any change in effects as this can be dealt with through other policies in the plan.</p>
BC-MM-57	Site Allocation BC47: Braithwaite House and Quaker Court	The modification identifies a particular podium space on the estate as contributing to open space and that development which affects this space must be considered against Policy G2.	BC47 was assessed to have no effects against the protection and provision of open space objective. It is considered that the cross reference to policy G2 does not change this, providing clarification about the application of strategic policy rather than a significant change in the overall policy approach.
BC-MM-58	Site Allocation BC49 Building adjacent to railway lines and opposite	<p>Changes to descriptions of use following the 2020 amendments to the Use Classes Order. Updates to policy references to avoid confusion between BCAAP policies and site allocations and identification of protected views in site constraints.</p> <p>An update to current use.</p> <p>An update to development considerations to state that redevelopment will be contingent on the electrical substation being integrated or relocated if still required.</p>	Screened in. Refer to updated assessment.

Reference	Section/Paragraph/Policy	Description	Screening Assessment
BC-MM-59	Site Allocation BC50: Queen Mary University, Charterhouse Square Campus	Changes to descriptions of use following the 2020 amendments to the Use Classes Order.  Modifications to clarify that student accommodation is acceptable on university campus sites.  The development considerations have been amended with regard to the pedestrian connection through the site.	No effects identified for UCO change. Further assessment is not considered necessary.  The modification in relation to student housing makes a cross reference to policy H6 which is being assessed separately. No further assessment required.  The allocation continues to encourage provision of the pedestrian link and there is no change in effects.
BC-MM-60	Site Allocation BC51: Italia Conti School, 23 Goswell Road	Deletion of the requirement to justify loss of D1 use as this has been established through the planning permission for the site.	Screened in. Refer to updated assessment.
BC-MM-61	Site Allocation Monitoring	Inclusion of monitoring indicators.	The inclusion of the monitoring indicators within the plan will improve the ability of policies within the plan to be effectively implemented however it is not considered to change the effects identified in relation to different policies.
BC-MM-62	Appendix 1, Scheduled Monuments	Removal of St John's gate as a scheduled monument to reflect current status.	No effects identified. The modification does not change the designation.
BC-MM-63	Appendix 1 Heritage Assets in Historic Clerkenwell, first paragraph.	The modification changes 'protect and enhance' to 'protect or enhance' to bring it in line with the statutory duty for protecting heritage assets.	This reflects a policy change in AAP8 which brings the policy in line with the Statutory Duty and is not considered to result in a change to the effects previously identified for the conservation of heritage assets. No further assessment necessary.

Reference	Section/Paragraph/ Policy	Description	Screening Assessment
BC-MM-64 to BC-MM-69	Glossary and Abbreviations Business, Entertainment, Industrial, Retail, Social and Community Infrastructure.	Updated definitions of these uses in the glossary to remove reference to superseded use classes and to define which uses are included.	The screening has identified that the changes are clarification. The modifications to the glossary will assist with the implementation of policy that has been assessed for its effects and do not change the effects already identified and do not require an assessment.

**Table 4.3: Site Allocations Modifications Screening**

Reference	Section	Paragraph/Policy	Description	Screening Assessment
SA-MM-01	Introduction	Paragraph 1.2	Amendment to plan period reflected in text.	This clarification is not considered to require further assessment.
SA-MM-02	Introduction	Figure 1.2: Islington Spatial Strategy areas and site allocations	Update to figure to reflect changes in site allocations and the boundary of the LSIS.	This is factual update of the map to reflect changes to site allocations and designations which have been separately screened for their impacts where relevant. No further assessment considered necessary.
SA-MM-03 and SA-MM-04	Introduction	Section 1, Policy SA1  New paragraph 1.17.  Paragraph 1.18 (formerly 1.17).	This modification updates policy SA1 and the supporting text in light of changes to the Use Classes Order to clarify the approach to allocations.	This clarification is in response to changes to the Use Classes Order. There are related policies where the impacts of Class E and the need to secure specific uses through condition to meet identified development needs have been assessed. No further assessment is considered necessary.
SA-MM-05	Introduction	Section 1, Table 1.1: List of strategic and non-strategic policies and allocations	List of strategic and non-strategic sites updated to reflect changes to site allocations and include the Barnsbury Estate as a strategic allocation due to the significant amount of housing growth it will provide. Gypsy and Traveller sites also added as the provision of Gypsy and Traveller Pitches is considered to be a strategic issue.	No further assessment considered necessary. The impacts of relevant site allocations, and strategic policies in relation to housing growth and meeting identified housing needs have been considered separately. The change in the categorisation of the allocations in Table 1.1 is in itself not considered to lead to any changes in effects.



SA-MM-06	Introduction	Section 1, Table 1.2: Site capacity assumptions	Table 1.2 amended to reflect changes made to capacity assumptions following the grant of planning permission for certain sites, as well as the addition of new site allocations and amendments to existing site allocations outlined in this schedule of modifications.	The assessment of effects of all site allocations is considered as part of the cumulative effects section. No further assessment considered necessary.
SA-MM-07	Introduction	Paragraph 1.32 (formerly paragraph 1.30)	Paragraph updated to reflect amended plan period, the housing requirement associated with that and the number of homes that need to be identified on sites of one hectare or less.	No further assessment is considered necessary to reflect clarification/factual update.
SA-MM-08	King's Cross and Pentonville Road	Table 2.1	Table 2.1 allocations in the King's Cross and Pentonville Road Spatial Strategy Area updated to include KC8: Bemerton Estate South	No further assessment necessary. This is a factual update to reflect a new site allocation the effects of which have been assessed separately.
SA-MM-09	King's Cross and Pentonville Road	Figure 2.1	Figure 2.1 showing Location of King's Cross and Pentonville Road Spatial Strategy area site allocations updated to reflect changes to site allocations.	This is factual update of the map to reflect changes to site allocations which have been separately screened for their impacts where relevant. No further assessment considered necessary.
SA-MM-10	King's Cross and Pentonville Road	Site KC1: King's Cross Triangle Site	Allocation updated to reflect changes to the Use Classes Order, specific protected view identified and reference to concrete batching plant added for effectiveness.	The modifications are not considered to affect the overall scoring of the original assessment. No further assessment necessary.
SA-MM-11	King's Cross and Pentonville Road	KC2: 176-178 York Way & 57-65 Randell's Road	Update to reflect planning permission, reflect changes to the Use Classes Order and add reference to concrete batching plant.	The modifications are not considered to change the existing assessment. No further assessment necessary.

SA-MM-12	King's Cross and Pentonville Road	KC3: Regents Wharf, 10, 12, 14, 16 and 18 All Saints Street	Updates to ownership details, to reflect changes to the Use Classes Order and planning permission, to identify specific neighbouring residential properties and remove reference to 'limited' in relation to intensification of business use.	The modification are not considered to change the existing assessment. The removal of the word 'limited' is not considered to change the overall effects identified. The previous wording already recognised that development should respect the amenity of neighbouring residential properties.
SA-MM-13	King's Cross and Pentonville Road	KC6: 8 All Saints Street	Allocation updated to identify the specific viewing corridor the site sits partially within.	The modification is not considered to affect the original assessment. Further assessment is unnecessary.
SA-MM-14	King's Cross and Pentonville Road	KC7: All Saints Triangle	Modification to add reference to development considerations to respect amenity of neighbouring residents.	Further assessment is not considered necessary as the addition to the development considerations, would not change the effects previously assessed.
SA-MM-15	King's Cross and Pentonville Road	KC8, Bemerton Estate South, Section 2	Allocation for infill residential development, including re-provision of community space and provision of new retail/commercial spaces along Caledonian Road. An updated reference to the sites location within a Source Protection Zone has been added.	New site allocation. Further assessment necessary.
SA-MM-16	Vale Royal/Brewery Road Locally Significant Industrial Site	Table 3.1	List of Vale Royal/Brewery Road Locally Significant Industrial Site Spatial Strategy area site allocations updated to reflect changes to site allocations.	No further assessment necessary. This is a factual update to reflect changes to site allocations which have been screened separately.
SA-MM-17	Vale Royal/Brewery Road Locally Significant Industrial Site	Figure 3.1	Location of Vale Royal/Brewery Road Locally Significant Industrial Site Spatial Strategy area site allocations updated to take into account changes to sites and the boundary of the LSIS.	This is factual update of the map to reflect changes to site allocations and designations which have been separately assessed for their impacts where relevant. No further assessment considered necessary.

SA-MM-18	Vale Royal/Brewery Road Locally Significant Industrial Site	VR1: Fayers Site, 202-228 York Way, Former Venus Printers, 22-23 Tileyard Road, adjacent 196-200 York Way	<p>Site Allocation updated to separate the site into two separate sites, with the allocation updated to reflect planning permissions on respective parts of the site.</p> <p>VR1 is now Fayers Site, 202-228 York Way, Former Venus Printers, 196-200 York Way N7 9AX, allocated for Intensification for a significant amount of B8 use alongside a small proportion of flexible office space, reflecting the extant permission.</p>	For completeness it is considered that updated assessments are required for both of the new allocations
SA-MM-19	Vale Royal/Brewery Road Locally Significant Industrial Site	VR2: 230-238 York Way, Allocation and justification	Allocation updated to provide for co-location of office and/or research and development use where there is an intensification of industrial use on the site and it can be demonstrated that its industrial function would remain. Cross references to other relevant policies added, as well as reference to the specific protected viewing corridor the site sits partially within. The development consideration specifying a maximum 5 storey building height has been removed. The uses have been updated to reflect changes to the Use Classes Order.	Screened in. Updated assessment required.

SA-MM-20	Vale Royal/Brewery Road Locally Significant Industrial Site	Section 3, VR3: Tileyard Studios, Tileyard Road, N7 9AH	Allocation updated to provide for intensification of studios and offices on the site to support the music industry and related supporting sectors where it is demonstrated the flexibility of the existing spaces for studio and hybrid uses would remain, with the full functionality of the studios and any workshops/light industrial units secured and continued provision of a range of unit sites, including those for SMEs. Reference to the specific protected viewing corridor the site sits partially within added. The development consideration specifying a maximum 5 storey building height has been removed.	Screened in. Updated assessment required.
SA-MM-21	Vale Royal/Brewery Road Locally Significant Industrial Site	VR4: 20 Tileyard Road,	Allocation updated to provide for co-location of office and/or research and development use where there is an intensification of industrial use on the site and it can be demonstrated that its industrial function would remain. Allocation updated to reflect changes to the Use Classes Order, provide a cross reference to other relevant policies, identify the specific protected viewing corridor the site sits within and remove reference to the development consideration specifying a maximum 5 storey building height.	Screened in. Updated assessment required.

SA-MM-22	Vale Royal/Brewery Road Locally Significant Industrial Site	VR5: 4 Brandon Road	New allocation for 22-23 Tileyard Road and part of 226-228 York Way to reflect amendment to VR1. This recognises the existing permission on the site and that should the site be subject to further amendments the co-location of office and/or research and development use should provide an intensification of industrial use on the site and it should be demonstrated that the continued industrial function of the LSIS would remain.	Screened in. Updated assessment required.
SA-MM-23	Vale Royal/Brewery Road Locally Significant Industrial Site	VR6: The Fitzpatrick Building, 188 York Way, Allocation and justification	The Fitzpatrick Building, 188 York Way proposed to be deleted.	Allocation of Fitzpatrick building proposed to be deleted because the site has been subject to a development that has now been completed. No further assessment required.
SA-MM-24	Vale Royal/Brewery Road Locally Significant Industrial Site	VR6: 4 Brandon Road  (formerly site reference VR5)	Allocation updated to provide for co-location of office and/or research and development use where there is an intensification of industrial use on the site and it can be demonstrated that its industrial function would remain. Allocation updated to reflect changes to the Use Classes Order, provide a cross reference to other relevant policies and remove reference to the development consideration specifying a maximum 5 storey building height.	Screened in. Updated assessment required.

SA-MM-25	Vale Royal/Brewery Road Locally Significant Industrial Site	VR7: 43-53 Brewery Road	Allocation updated to reflect planning history, changes to the Use Classes Order, provide a cross reference to other relevant policies, identify the specific protected viewing corridor the site sits partially within and remove reference to the development consideration specifying a maximum 5 storey building height.	Screened in. Updated assessment required.
SA-MM-26	Vale Royal/Brewery Road Locally Significant Industrial Site	VR8: 55-61 Brewery Road	Allocation updated to reflect changes to the use classes order, provide a cross reference to other relevant policies, identify the specific protected viewing corridor the site sits within and remove reference to the development consideration specifying a maximum 5 storey building height.	Screened in. Updated assessment required.
SA-MM-27	Vale Royal/Brewery Road Locally Significant Industrial Site	VR9: Rebond House, 98-124 Brewery Road	Allocation updated to reflect changes to the Use Classes Order, provide a cross reference to other relevant policies and remove reference to the development consideration specifying a maximum 5 storey building height.	Screened in. Updated assessment required.
SA-MM-28	Vale Royal/Brewery Road Locally Significant Industrial Site	VR10: 34 Brandon Road	Allocation updated to provide for co-location of office and/or research and development use where there is an intensification of industrial use on the site and it can be demonstrated that its industrial function would remain. Allocation updated to reflect changes to the Use Classes Order and to be specific to light industrial uses, provide a cross reference to other relevant policies, identify the specific protected viewing corridor the site sits within and remove reference to the development consideration specifying a maximum 5 storey building height.	Screened in. Updated assessment required.

SA-MM-29	Angel and Upper Street	Figure 4.1: Location of Angel and Upper Street Spatial Strategy area site allocations	Updated map of spatial strategy areas to take into account updates to site allocations.	This is factual update of the map to reflect changes to site allocations and designations which have been separately assessed for their impacts where relevant. No further assessment considered necessary.
SA-MM-30	Angel and Upper Street	AUS1 Royal Bank of Scotland	Allocation updated to reflect changes to the use classes order and identify the specific viewing corridor the site sits within.	The modifications are not considered to change the existing assessment. No further assessment necessary.
SA-MM-31	Angel and Upper Street	AUS2: Pride Court, 80-82 White Lion Street	Allocation amended to reflect changes to the use classes order. The planning history and allocation and justification have also been updated following a grant of planning permission.	The modifications are not considered to change the existing assessment. No further assessment necessary.
SA-MM-32	Angel and Upper Street	AUS5: 94 White Lion Street (BSG House)	Factual update to take into account changes to the Use Classes Order.	The modifications are not considered to change the existing assessment. No further assessment necessary.
SA-MM-33	Angel and Upper Street	AUS6: Sainsbury's, 31-41 Liverpool Road,	Allocation updated to identify the specific viewing corridor the site sits partially within.	The modifications are not considered to change the existing assessment. No further assessment necessary.
SA-MM-34	Angel and Upper Street	AUS7: 1-7 Torrens Street	Addition to the development considerations to recognise that future development should respect the amenity of adjacent residential properties, and an update to the site constraints to identify the specific viewing corridor the site sits within.	The modifications are not considered to affect the original assessment of the site allocation. No further assessment considered necessary.

SA-MM-35	Angel and Upper Street	AUS8: 161-169 Essex Road	<p>Update to take into account changes to the Use Classes Order.</p> <p>Changes to the allocation to recognise the opportunity for an element of residential to the rear of the site as well as a change to the allocation to recognise the use as a place of worship, whilst retaining the primary use of building for culture or assembly and leisure uses. Clarification added to development considerations in relation to marketing/vacancy evidence required.</p>	Screened in. Updated assessment required.
SA-MM-36	Angel and Upper Street	AUS9: 10-14 White Lion Street	<p>Update to reflect changes to the Use Classes Order.</p> <p>Update to planning history.</p>	The modifications are not considered to affect the original assessment of the site allocation. No further assessment necessary.
SA-MM-37	Angel and Upper Street	AUS10: 1-9 White Lion Street	Allocation updated to reflect changes to the Use Classes Order and identify the specific protected viewing corridor the site sits within.	The modifications are not considered to affect the original assessment of the site allocation. No further assessment necessary.
SA-MM-38	Angel and Upper Street	AUS12: Public Carriage Office, 15 Penton Street	Allocation updated to reflect changes to the Use Classes Order and identify the specific protected viewing corridor the site sits within.	The modifications are not considered to affect the original assessment of the site allocation. No further assessment necessary.
SA-MM-39	Angel and Upper Street	AUS13: N1 Centre, Parkfield Street	Allocation amended to identify the specific protected viewing corridor the site sits within.	The modification is not considered to affect the original assessment of the site allocation. No further assessment necessary.



SA-MM-40	Angel and Upper Street	AUS14: 46-52 Pentonville Road	Updated to current/previous use to reflect changes to the Use Classes Order.	The modification is not considered to affect the original assessment of the site allocation. No further assessment necessary.
SA-MM-41	Angel and Upper Street	AUS16: Angel Square	Allocation updated to reflect changes to the Use Classes Order and identify the specific protected viewing corridor the site sits within.	The modifications are not considered to affect the original assessment of the site allocation. No further assessment necessary.
SA-MM-42	Nag's Head and Holloway Road	Figure 5.1: Location of Nag's Head and Holloway Spatial Strategy area site allocations	Update to spatial strategy areas map to take into account changes to site allocations.	This is factual update of the map to reflect changes to site allocations and designations which have been separately assessed for their impacts where relevant. No further assessment considered necessary.
SA-MM-43	Nag's Head and Holloway Road	NH1: Morrison's supermarket and adjacent car park, 10 Hertslet Road, and 8-32 Seven Sisters Road, Allocation and justification	Modifications to increase proportion of residential on the site and clarify the use of active frontages for the site, to ensure a social and community use is protected and to ensure residential amenity is addressed. Timescales also updated.	Screened in. Updated assessment required.
SA-MM-44	Nag's Head and Holloway Road	NH2: 368-376 Holloway Road	Update to reflect changes to the Use Classes Order.	The modifications are not considered to affect the original assessment of the site allocation. No further assessment necessary.

SA-MM-45	Nag's Head and Holloway Road	NH3: 443-453 Holloway Road	Updates to reflect changes to the Use Classes Order.  Update to planning history and estimated timescales.	The modification is not considered to affect the original assessment of the site allocation. No further assessment necessary.
SA-MM-46	Nag's Head and Holloway Road	NH4: Territorial Army Centre, 65-69 Parkhurst Road	Update to planning history	The modifications are not considered to affect the original assessment of the site allocation. No further assessment necessary.
SA-MM-47	Nag's Head and Holloway Road	NH6: 11-13 Benwell Road	Update to reflect changes to the Use Classes Order.	The modifications are not considered to affect the original assessment of the site allocation. No further assessment necessary.
SA-MM-48	Nag's Head and Holloway Road	NH7: Holloway Prison, Parkhurst Road	Allocation amended to updated planning history details and identify the specific protected viewing corridors the western portion of the site falls within.	The modifications are not considered to affect the original assessment of the site allocation. No further assessment necessary.
SA-MM-49	Nag's Head and Holloway Road	NH8: 457-463 Holloway Road	Update to reflect changes to the Use Classes Order.	The modification is not considered to affect the original assessment of the site allocation. No further assessment necessary.
SA-MM-50	Nag's Head and Holloway Road	NH9: Islington Arts Factory, 2 and 2a Parkhurst Road	Update to reflect changes to the Use Classes Order.	The modification is not considered to affect the original assessment of the site allocation. No further assessment necessary.
SA-MM-51	Nag's Head and Holloway Road	NH10: 45 Hornsey Road and 252 Holloway Road	Allocation amended to identify the specific protected viewing corridor the site partially falls within.	The modification is not considered to change the original assessment of the site. No further assessment required.

SA-MM-52	Nag's Head and Holloway Road	NH11: Mamma Roma, 377 Holloway Road	<p>Update to reflect changes to the Use Classes Order.</p> <p>Clarification in relation to the site's location in the Primary Shopping Area added.</p> <p>Update to recognise opportunity for site assembly with neighbouring site.</p>	The modifications are not considered to change the original assessment of the site. No further assessment required.
SA-MM-53	Nag's Head and Holloway Road	NH12: 379-391 Camden Road and 341-345 Holloway Road	Update to ensure residential amenity is addressed.	The modification is not considered to change the original assessment of the site allocation. No further assessment required.
SA-MM-54	Nag's Head and Holloway Road	NH13: 166-220 Holloway Road, Current/previous use	Allocation amended to reflect changes to the Use Classes Order and proposed modifications to policy H6 on student accommodation, clarify the approach to active frontages and tall buildings, and identify the specific protected viewing corridor the site falls within.	Screened in. Updated assessment required.
SA-MM-55	Nag's Head and Holloway Road	NH14 236-250 Holloway Road and 29 Hornsey Road, Allocation and justification	Allocation amended to reflect changes to the Use Classes Order and the proposed modifications to policy H6 on student accommodation. In addition the specific protected viewing corridor the site falls partially within is identified and clarification added in relation to active frontages.	Screened in. Updated assessment required.

SA-MM-56	Finsbury Park	Figure 6.1: Location of Finsbury Park Spatial Strategy area site allocations	Update to spatial strategy map to reflect changes to site allocations.	This is factual update of the map to reflect changes to site allocations which have been separately assessed for their impacts where relevant. No further assessment considered necessary.
SA-MM-57	Finsbury Park	FP1: City North Islington Trading Estate, Fonthill Road and 8-10 Goodwin Street	Update to reflect changes to the Use Classes Order	The modification is not considered to affect the original assessment of the site allocation. No further assessment necessary.
SA-MM-58	Finsbury Park	FP2: Morris Place/Wells Terrace (including Clifton House)	Update to reflect changes to the Use Classes Order	The modification is not considered to affect the original assessment of the site allocation. No further assessment necessary.
SA-MM-59	Finsbury Park	FP3: Finsbury Park Station and Island, Seven Sisters Road,	Correction to error in site size and update to reflect changes to the Use Classes Order	The modification is not considered to affect the original assessment of the site allocation. No further assessment necessary.
SA-MM-60	Finsbury Park	FP4: 129-131 & 133 Fonthill Road & 13 Goodwin Street	Update to reflect changes to the Use Classes Order and update to planning history.  Allocation modified to recognise the potential for an element of residential use.	Screened in. Updated assessment required.
SA-MM-61	Finsbury Park	FP5: 1 Prah Road	Update to allocation to reflect residential use rather than business use, alongside removal of reference to public realm improvements.	Screened in. Updated assessment required.

SA-MM-62	Finsbury Park	FP7: Holloway Police Station, 284 Hornsey Road	Updated to identify the specific protected viewing corridor the site falls within. Reference to justifying the loss of social infrastructure removed from allocation.	The modification in relation to the loss of social infrastructure is not considered to affect the original assessment of the allocation which was based on a residential-led mixed use development. The updated reference to a specific viewing corridor is not considered to change the original assessment. No further assessment necessary.
SA-MM-63	Finsbury Park	FP8: 113-119 Fonthill Road	Update to reflect changes to the Use Classes Order	The modification is not considered to affect the original assessment of the site allocation. No further assessment necessary.
SA-MM-64	Finsbury Park	FP9: 221-233 Seven Sisters Road	Update to reflect changes to the Use Classes Order. Clarification in relation to how the comprehensive development of the site should be approached.	The modification to reflect changes to the Use Classes Order is not considered to affect the original assessment of the site allocation. The flexibility in relation to comprehensive development of the site is not considered to alter the original assessment of the allocation in relation to the objectives addressed and the effects identified. No further assessment is considered necessary.
SA-MM-65	Finsbury Park	FP10: Former George Robey Public House, 240 Seven Sisters Road	Allocation proposed to be deleted.	Allocation proposed to be deleted because the site has been subject to a development that has now been completed. No further assessment required.

SA-MM-66	Finsbury Park	FP10: 139-149 Fonthill Road  (formerly referenced FP11)	Planning history updated.	The modification is not considered to affect the original assessment of the site allocation. No further assessment necessary.
SA-MM-67	Finsbury Park	FP11: 179-199 Hornsey Road, N7 9RA  (formerly referenced FP12)	Allocation amended to reflect the site's planning permission and changes to the Use Classes Order, identify the specific protected view the site falls within.	The original assessment assessed the site for mixed use development including residential use alongside provision of some community use, this reflects the planning permission. No further assessment is considered necessary.
SA-MM-68	Finsbury Park	FP12: Tesco, 103-115 Stroud Green Road, N4 3PX  (formerly referenced FP13)	Update to reflect changes to the Use Classes Order	The modification is not considered to affect the original assessment of the site allocation. No further assessment necessary.
SA-MM-69	Finsbury Park	FP13: Andover Estate bounded by Durham Road, Moray Road, Andover Road, Hornsey Road, Newington Barrow Way and Seven Sisters Road, London N7  (formerly referenced FP14)	Allocation amended to identify the specific protected view the site falls within.	The modification to the viewing corridor is not considered to affect the original assessment. No further assessment is necessary.

SA-MM-70	Finsbury Park	FP14: 216-220 Seven Sisters Road  (formerly referenced FP15)	Update to phasing of the site.	The change to phasing is not considered to affect the original assessment of the site allocation. No further assessment necessary.
SA-MM-71	Archway	Figure 7.1: Location of Archway Spatial Strategy area site allocations	Update to spatial strategy area map to reflect changes to site allocations.	This is a factual update of the map to reflect changes to site allocations which have been separately assessed for their impacts where relevant. No further assessment considered necessary.
SA-MM-72	Archway	ARCH1: Vorley Road/Archway Bus Station	Update to allocation to include social infrastructure uses. Reference to cultural quarter removed.	Screened in. Updated assessment required.
SA-MM-73	Archway	ARCH2: 4-10 Junction Road	Update to reflect changes to the Use Classes Order. Reference to cultural quarter removed.	The change to the current/previous use to reflect the changes to the Use Classes Order is not considered to affect the original assessment of the site allocation. The removal of reference to the Archway Cultural Quarter from the development considerations is not considered to affect the previous assessment of the site – the impacts of the removal of that designation have been considered in relation to other policies. No further assessment required.

SA-MM-74	Archway	ARCH3: Archway Central Methodist Hall	Allocation amended to be for offices and retail and remove reference to the creation of a cultural hub. In addition updated site address, current/previous use updated, planning history details are provided and the specific viewing corridor the site falls within is identified. Reference to cultural quarter removed.	Screened in. Updated assessment required.
SA-MM-75	Archway	ARCH4: Whittington Hospital Ancillary Buildings	Update to correct error in phasing.	This is not considered to affect the original assessment of the site allocation. No further assessment required.
SA-MM-76	Archway	ARCH5: Archway Campus, Highgate Hill	Allocation updated to include increased flexibility and potential for an element of student accommodation alongside an additional clarification about the approach to active frontages. An update to the current/previous use is provided and the specific viewing corridor the site falls within is identified. Reference to policy SC1 removed. Reference to respecting amenity of neighbouring residential properties added.	Screened in. Updated assessment required.
SA-MM-77	Archway	ARCH6: Job Centre, 1 Elthorne Road	Updates to ownership and use. Phasing updated to reflect information from the landowner. Amendment to allocation changes the uses specified from business led to mixed use. Reference to cultural quarter removed.	Screened in. Updated assessment required.
SA-MM-78	Archway	ARCH7: 207A Junction Road	Allocation amended and identified as Site GT1.	An updated assessment of the amended site allocation GT1 has been carried out.



SA-MM-79	Archway	ARCH7: Brookstone House, 4-6 Elthorne Road  (formerly ARCH8)	Updated address. Updated use to reflect Use Classes Order. Reference to Cultural Quarter removed. Site reference updated.	The updates are not considered to affect the original assessment of the site allocation. The removal of reference to the Archway Cultural Quarter from the development considerations is not considered to affect the previous assessment of the site – the impacts of the removal of that designation have been considered in relation to other policies. No further assessment required.
SA-MM-80	Archway	ARCH8: 724 Holloway Road  (formerly ARCH9)	Update to reflect Use Classes Order. Planning history updated. Reference to cultural quarter removed. Site reference updated.	The updates are not considered to affect the original assessment of the site allocation. No further assessment required. The removal of reference to the Archway Cultural Quarter from the development considerations is not considered to affect the previous assessment of the site – the impacts of the removal of that designation have been considered in relation to other policies. No further assessment required.
SA-MM-81	Archway	ARCH9: Elthorne Estate  (formerly ARCH10)	Minor updates to reflect changes to Use Classes Order and planning history alongside updates to allocation and development considerations in relation to social infrastructure provision to reflect the extant permission on the site. Site reference updated.	The updates to the allocation reflect the social infrastructure provision associated with the extant permission on the site. Further assessment is not considered necessary as this addition would not change the effects previously identified. No further assessment considered necessary.

SA-MM-82	Archway	ARCH10: Dwell House, 619-639 Holloway Road  (formerly ARCH11)	Clarification that the site is partly within the town centre and that development should respect the amenity of neighbouring residential properties. Reference to cultural quarter removed. Site reference updated.	Further assessment is not considered necessary as the addition to the development considerations would not change the effects previously identified. The removal of reference to the Archway Cultural Quarter from the development considerations is not considered to affect the previous assessment of the site – the impacts of the removal of that designation have been considered in relation to other policies.
SA-MM-83	Archway	ARCH11: 798-804 Holloway Road  (formerly ARCH12)	Update to reflect Use Classes Order and planning history. Reference to cultural quarter removed. Site reference updated.	The updates are not considered to affect the original assessment of the site allocation. No further assessment required. The removal of reference to the Archway Cultural Quarter from the development considerations is not considered to affect the previous assessment of the site – the impacts of the removal of that designation have been considered in relation to other policies. No further assessment required.
SA-MM-84	Highbury Corner and Lower Holloway	HC1: 10, 12, 16-18, 20-22 and 24 Highbury Corner	Update to reflect Use Classes Order.	The modification is not considered to affect the original assessment of the site allocation. No further assessment necessary.
SA-MM-85	Highbury Corner and Lower Holloway	HC2: Spring House, 6-38 Holloway Road	Update to reflect Use Classes Order.	The modification is not considered to affect the original assessment of the site allocation. No further assessment necessary.

SA-MM-86	Highbury Corner and Lower Holloway	HC3: Highbury and Islington Station, Holloway Road	Update to reflect Use Classes Order. Update to clarify that a future decking scheme should be sensitively designed in relation to amenity impacts on residents.	The modification is not considered to affect the original assessment of the site allocation. No further assessment necessary.
SA-MM-87	Highbury Corner and Lower Holloway	HC4: Dixon Clark Court	Update to planning history.	The modification is not considered to affect the original assessment of the site allocation. No further assessment necessary.
SA-MM-88	Highbury Corner and Lower Holloway	HC5: 2 Holloway Road and 4 Highbury Crescent	Update to reflect Use Classes Order.	The modification is not considered to affect the original assessment of the site allocation. No further assessment necessary.
SA-MM-89	Other important sites	Figure 9.1: Location of site allocations outside Spatial Strategy areas	Update to spatial strategy map to reflect changes to site allocations.	This is a factual update of the map to reflect changes to site allocations which have been separately assessed for their impacts where relevant. No further assessment considered necessary.
SA-MM-90	Other important sites	OIS1: Leroy House, 436 Essex Road	Updates to planning history and to reflect Use Classes Order.	The modifications are not considered to affect the original assessment of the site allocation. No further assessment necessary.
SA-MM-91	Other important sites	OIS2: The Ivories, 6-8 Northampton Street	Update to reflect Use Classes Order	The modification is not considered to affect the original assessment of the site allocation. No further assessment necessary.
SA-MM-92	Other important sites	OIS4: 1 Kingsland Passage and the BT Telephone Exchange, Kingsland Green	Updates to the allocation to reflect the planning history to take into account that part of the site has planning permission and that the whole site is unlikely to come forward for comprehensive redevelopment. Site boundary, allocation text and development considerations amended to reflect this. Timescales updated.	No further assessment necessary. The modification does not impact on the uses proposed and is not considered to contribute to a change in the effects previously identified in the assessment.

SA-MM-93	Other important sites	OIS5: Bush Industrial Estate, Station Road	Updates to reflect changes to the Use Classes Order, updates to the site designation and constraints for accuracy as well as updates to the development considerations in relation to nearby uses and mitigation of potential impacts. Allocation updated to provide for co-location of office and/or research and development use where there is an intensification of industrial use on the site and it can be demonstrated that its industrial function would remain.	Updated assessment required. Screened in.
SA-MM-94	Other important sites	OIS6: Site of Harvist Under Fives, 100 Hornsey Road	Updates to allocation to reflect changes to the Use Classes Order alongside planning history. Allocation updated to remove the provision of a nursery.	The modification reflects the planning permission and reflects advice from the council's Early Years Service. The modification is not considered to affect the original assessment of the allocation. No further assessment is considered necessary.
SA-MM-95	Other important sites	OIS7: Highbury Delivery Office, 2 Hamilton Lane	Update to use to reflect the fact the site is now vacant.	No further assessment necessary. This is not considered to affect the original assessment of the allocation as the uses and considerations remain the same.
SA-MM-96	Other important sites	OIS8: Legard Works, 17a Legard Road	Update to reflect Use Classes Order	The modification is not considered to affect the original assessment of the site allocation. No further assessment necessary.
SA-MM-97	Other important sites	OIS9: Ladbroke House, 62-66 Highbury Grove	Site to be deleted.	Allocation proposed to be deleted because the site has been subject to a development that has now been completed. No further assessment required.

SA-MM-98	Other important sites	OIS9: Highbury Quadrant Congregational Church (formerly OIS 29).	New site allocation proposed to be included.	New site allocation. Assessment required.
SA-MM-99	Other important sites	OIS10: 500-502 Hornsey Road and Grenville Works, 2A Grenville Road,	Site allocation updated to reflect changes to the Use Classes Order, with planning history and allocation updated to reflect permission	Screened in. Further assessment required.
SA-MM-100	Other important sites	OIS12: 202-210 Fairbridge Road	Site allocation proposed to be deleted	Allocation proposed to be deleted because the site has been subject to a development that has now been completed. No further assessment required.
SA-MM-101	Other important sites	OIS12: New Orleans Estate (formerly reference OIS32)	New site allocation proposed to be included.	New site allocation. Assessment required.
SA-MM-102	Other important sites	OIS13: Highbury Roundhouse Community Centre, 71 Ronald's Road	Community centre to the rear of the site has been delivered and can be removed from the allocation. Part of the site has been included in site allocation GT3.	Site allocation GT3 has been assessed separately.

SA-MM-103	Other important sites	OIS14: Athenaeum Court, 94 Highbury New Park, N5 2DN  (formerly referenced OIS15)	Update to development considerations to reference the need to respect the amenity of neighbouring residential properties and how trees should be considered as part of landscaping plan. Update to site reference.	The reference to protecting amenity, is not considered to affect the original assessment. The reference to trees being carefully considered as part of a landscape plan is not considered to change the assessment as the effects of this are uncertain depending on what is proposed and this would be something that would be expected consistent with other Local Plan policies. No further assessment required.
SA-MM-104	Other important sites	OIS15: Harvist Estate Car Park  (formerly referenced OIS16)	Update to reflect planning permission. Update to site reference.	The modifications are not considered to affect the original assessment of the site allocation. No further assessment necessary.
SA-MM-105	Other important sites	OIS16: Hathersage and Besant Courts, Newington Green  (formerly referenced OIS17)	Update to reflect planning history and update to site reference.	The modifications are not considered to affect the original assessment of the site allocation. No further assessment necessary.
SA-MM-106	Other important sites	OIS18: 25-27 Horsell Road  (formerly referenced OIS19)	Update to reflect planning history. Update to site reference.	The modifications are not considered to affect the original assessment of the site allocation. No further assessment necessary.

SA-MM-107	Other important sites	OIS19: Vernon Square, Penton Rise  (formerly referenced OIS20)	Current use updated, viewing corridor specified and allocation updated to clarify that the loss of social infrastructure is subject to policy SC1. Updated site reference.	The previous assessment of the site assessed its potential for business-led development. The clarification in relation to the loss of social infrastructure use is not considered to affect the previous assessment. No further assessment required.
SA-MM-108	Other important sites	OIS20: Former Railway Sidings Adjacent to Caledonian Road Station  (formerly referenced OIS21)	Modifications to development considerations in relation to the heritage asset on the site. Updated site reference.	Updated assessment required. Screened in.
SA-MM-109	Other important sites	OIS22 1 Lowther Road, N7 8US  (formerly referenced OIS23)	Updated to reflect changes to the Use Classes Order, identify the specific protected viewing corridor the site falls within and amend the site reference (now OIS22).	The modifications are not considered to affect the original assessment. No further assessment is necessary.
SA-MM-110	Other important sites	OIS23: Pentonville Prison, Caledonian Road  (formerly referenced OIS24)	Site boundary and site size amended, viewing corridor specified and site reference updated (now OIS23).	The amendments to the site boundary are not considered to impact on the uses proposed or contribute to a change in the original assessment. No further assessment is required.

SA-MM-111	Other important sites	OIS24: Charles Simmons House  (formerly referenced OIS25)	Updated to identify the specific protected viewing corridor the site falls within and amend the site reference (now OIS24).	The modifications are not considered to affect the original assessment. No further assessment is necessary.
SA-MM-112	Other important sites	OIS25: Amwell Street Pumping Station  (formerly referenced OIS26)	Updated to identify the specific protected viewing corridors the site falls within and amend the site reference (now OIS25).	The modifications are not considered to affect the original assessment. No further assessment is necessary.
SA-MM-113	Other important sites	OIS26: York Way Estate  (formerly referenced OIS27)	New site allocation proposed to be included, site allocation updated to reflect planning permission.	New site allocation. Assessment required.
SA-MM-114	Other important sites	OIS27: Barnsbury Estate  (formerly referenced OIS28)	New site allocation proposed to be included.	New site allocation. Assessment required.
SA-MM-115	Other important sites	OIS28: Cluse Court (previously OIS30)	New site allocation proposed to be included.	New site allocation. Assessment required.
SA-MM-116	Other important sites	OIS29: Hillside Estate (formerly OIS31).	New site allocation proposed to be included.	New site allocation. Assessment required.



SA-MM-117	Other important sites	OIS30: Kerridge Court (formerly referenced OIS34)	New site allocation proposed to be included.	New site allocation. Assessment required.
SA-MM-118	Other important sites	OIS31: Drakeley Court and Aubert Court (formerly reference OIS33)	New site allocation proposed to be included.	New site allocation. Assessment required.
SA-MM-119	Gypsy and Traveller Sites	New paragraphs 11.1-11.3	New text added in relation to identified of sites for Gypsy and Traveller pitches.	No further assessment necessary. This text provides background in relation to other policies which have been assessed for their effects.
SA-MM-120	Gypsy and Traveller Sites	Figure 11.1: Location of Gypsy and Traveller site allocations	Map showing location of sites.	No further assessment necessary. This text provides background in relation to other policies which have been assessed for their effects.
SA-MM-121	Gypsy and Traveller Sites	GT1: 207A Junction Road	Allocation proposed to meet the need for Gypsy and Traveller pitches	Change in allocation, further assessment required.
SA-MM-122	Gypsy and Traveller Sites	GT2: 154 Junction Road	Allocation proposed to meet the need for Gypsy and Traveller pitches	New site allocation. Assessment required.
SA-MM-123	Gypsy and Traveller Sites	GT3: 71 Ronalds Road	Allocation proposed to meet the need for Gypsy and Traveller pitches	New site allocation. Assessment required.
SA-MM-124	Monitoring	Paragraph 10.4	Update to provide additional information on how the delivery of allocated sites will be monitored	The clarification of the approach to monitoring is not considered to require a further assessment.

SA-MM-125 - 132	Appendices	Appendix 2: Glossary and Abbreviations	<p>Updated definitions:</p> <ul style="list-style-type: none"> <li>• Business floorspace/buildings/development/uses</li> <li>• Hybrid space</li> <li>• Industrial floorspace/buildings/development/uses/land</li> <li>• Locally Significant Industrial Sites</li> <li>• Office-led development</li> <li>• Retail floorspace/buildings/development/uses</li> <li>• Social and community infrastructure</li> </ul> <p>New definition</p> <ul style="list-style-type: none"> <li>• Leisure uses</li> </ul>	<p>The modifications will assist with the implementation of policy that has been assessed for its effects. The changes are clarification and do not change the effects already identified. No further assessment required.</p>
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# a. Modifications assessments – Strategic and Development Management Policies modifications

## Policy SP2: King’s Cross and Pentonville Road

Table 4.4 Assessment of modifications to Policy SP2: King’s Cross and Pentonville Road

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	+	+	+	+	0	+	+	+	+	+	0	0	+
Submission policy with modifications	+	+	+	+	++	0	+	+	+	+	+	0	0	+
Commentary on assessment of likely significant effects	The modification to remove the knowledge quarter in Part B reduces the additional emphasis this placed on this aspect of employment development in this area reducing the promotion of the Knowledge Quarter. However, the policy itself alongside policy B2 and identified Priority Employment Location designations enables opportunities for development relevant to the knowledge quarter to come forward therefore development continues to be focused in the most appropriate areas so no effects are considered to occur as a result of this modification in relation to <b>objective 2</b> . For the													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	+	+	+	+	0	+	+	+	+	+	0	0	+
Submission policy with modifications	+	+	+	+	++	0	+	+	+	+	+	0	0	+
	<p>same reason no effects are considered to occur against <b>objective 8</b> economic growth. Overall effects remain positive against both objectives.</p> <p>The modifications will, subject to mitigation, allow improved boater facilities and infrastructure to be built along the canal corridor, improving the function and amenity of those living on and using the canal and could therefore contribute towards the efficient use of space. The modifications clarify the approach in terms of future operation of the canal for different uses through the development of a Waterspace Strategy for Islington's canal network which will help balance the competing demands on use of the canal. In particular the policy identifies how and where the identified need for boat dwellers will be met. Whilst it is considered there is some uncertainty around implementation of improved boater facilities the modifications are considered to have a minor positive effect against this objective because of the Waterspace Strategy but this is not considered to change the minor positive effect already identified overall for <b>objective 2</b>.</p> <p>The modifications, through clarifying the approach to the provision of boater facilities on the canal, have the potential to minor positive effects on <b>objective 4</b> promoting liveable neighbourhoods as boater facilities could include waste and recycling infrastructure which would improve amenity, and electricity infrastructure that will reduce reliance on diesel generators and improve air quality. On balance the policy does not require improvements therefore the effect would depend on implementation and is considered neutral. Overall the policy with modifications will continue to have minor positive effects.</p> <p>The modifications, through clarifying the approach to the provision of boater facilities on the canal, have the potential to have a minor positive effect against <b>objective 5</b> by improving the standard of accommodation for boaters. In particular the policy identifies how and where the identified need for boat dwellers will be met with the potential conversion of leisure moorings. The approach to the provision of residential moorings has been clarified with a wider Waterspace</p>													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	+	+	+	+	0	+	+	+	+	+	0	0	+
Submission policy with modifications	+	+	+	+	++	0	+	+	+	+	+	0	0	+
	<p>Strategy and clear focus on this spatial area. Therefore given the clear requirements on how housing needs will be met the effect is considered to be significant positive. In addition a clause is proposed as part of the modifications to clarify the role of residential development in the spatial strategy area and that this will come forward not only through sites allocated for housing, but also through smaller windfall developments. This could also contribute towards the supply of housing and affordable housing which will help to meet housing needs.</p> <p>The modifications provide clarification in relation to the consideration of moorings and boater facilities on the canal where parts of the towpath are designated as open space. The submission policy with modifications provides further clarity and states that development of boater facilities can only take place where there is no detrimental impact on nature conservation and biodiversity value, and the character and amenity of the waterway corridor and its function as public open space. Whilst this could have minor positive effects, this is not considered to change the minor positive effects already identified in relation to <b>objective 10</b>.</p> <p>The modifications provide clarification in relation to the consideration of moorings and boater facilities on the canal which is a Site of Importance for Nature conservation. No additional effects on <b>objective 11</b> and biodiversity have been identified as the policy states that development can only take place where there is no detrimental impact on nature conservation and biodiversity value, and the character and amenity of the waterway corridor and its function as public open space.</p> <p>The modifications, through clarifying the approach to the provision of boater facilities on the canal, have the potential to have a minor positive effect on <b>objective 12</b> reducing climate change by potentially introducing more electricity supply</p>													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	+	+	+	+	0	+	+	+	+	+	0	0	+
Submission policy with modifications	+	+	+	+	++	0	+	+	+	+	+	0	0	+
	<p>points shifting energy use of boats away from fossil fuels (diesel generators) on <b>objective 13</b> reducing waste by providing reuse and recycling facilities for boaters which will increase the proportion of household waste that is recycled and reduce the amount of waste going to landfill and on both <b>objective 7</b> and <b>objective 14</b> by improving air quality through supply of electricity to boats and shifting away from diesel generator use, and also on water by providing water and sewerage infrastructure is available to service boats. On balance the policy does not require improvements therefore the effect would depend on implementation and overall the effect is considered neutral.</p> <p>No other effects have been identified for the modifications.</p>													
Conclusions	<p>The modifications to the approach to the provision of residential moorings clarify how housing needs will be met which is considered to have a significant positive effect in relation to objective 5; the additional clause which clarifies the role of residential development in the spatial strategy area will also have positive effects through supporting additional housing resulting in an increase to significant positive effects for housing quality. No change in the assessment of effects is considered to occur with the removal of reference to the Knowledge Quarter given the other business related policies in the plan.</p>													

### Policy SP3: Vale Royal/Brewery Road Locally Significant Industrial Sites (LSIS)

Table 4.5: Assessment of Modifications to Policy SP3: Vale Royal/Brewery Road Locally Significant Industrial Sites (LSIS)

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	+	0	+	0	++	+	+	+	0	0	+	0	+
Submission policy with modifications	+	+	0	+	0	++	+	+	+	0	0	+	0	+
Commentary on assessment of likely significant effects	<p>The modifications could introduce more flexibility for buildings to be adaptable for evolving economic needs. However, this approach can have minor negative effects on the preservation of the industrial character of the LSIS through the introduction of building design features that could limit future industrial operations. Development including co-location of office with industrial could introduce positive design features such as improvements in the connectivity between buildings and public realm contributing to safer spaces. The LSIS has a distinctive industrial character. Significant intensification of non-industrial uses such as office could place further limitations on the capacity of industrial space in the area and affect the overall character of the area however the modifications are clear about the need to intensify industrial uses as part of co-location and to demonstrate the continued industrial function of the LSIS will remain which will help to mitigate the potential impacts that intensification of offices could have on character. Overall there remains a minor positive effect in relation to <b>objective 1</b>.</p> <p>As a higher density employment use, offices could result in an optimisation of existing employment floorspace and intensification of industrial floorspace. However, there is already a significant proportion of office buildings integrated within parts of the LSIS and if new development is likely to introduce a significant quantum of office, there is potential for the land use balance to shift to offices which could start to exclude industrial use. The modifications are clear though about the need to intensify industrial uses as part of co-location and to demonstrate that the continued industrial function of the LSIS will remain which will help to mitigate the potential impacts that intensification of offices could have. It is noted</p>													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	+	0	+	0	++	+	+	+	0	0	+	0	+
Submission policy with modifications	+	+	0	+	0	++	+	+	+	0	0	+	0	+
	<p>that there are other more appropriate locations promoted for office use across the borough but providing offices in the LSIS will also contribute to meeting the need at borough level for office floorspace. There are land use benefits from the co-location of offices with industrial, depending on the extent to which offices are intensified, which on balance is considered to have minor positive effects for the objective. The policy with modifications also removes the restriction on building heights which increases the contribution of the policy to optimising the use of land. There is some uncertainty over the introduction of the new class E which means that over 10,000sqm of light industrial floorspace in the LSIS is potentially at risk of being lost to other non-industrial use classes that attract higher values. Class E was introduced by the Government through legislation in September 2020 to amend and simplify the system of use classes in England and create one new broad 'Commercial, business and service' use class to allow for a mix of uses to reflect changing retail and business models. The modifications are not able to address this uncertainty. However the policy ensures that future light industrial Class E space is restricted to that use therefore creates a positive effect on focusing development in the right locations. Overall for the submission policy with modifications, whilst there are potential impacts in terms of opportunity for industrial intensification there are also positive effects and overall minor positive effects are considered on <b>objective 2</b> and the optimisation of land use and balancing the economic needs of the area.</p> <p>The effects of the modification and removal of restriction of the building heights may have potential effects against <b>objective 3</b> for the conservation of heritage assets and potentially on <b>objective 1</b> in terms of character. However, these effects are not considered to be significant to change the overall effects identified in the assessment. The potential effects are counterbalanced by policies PLAN1 and DH1, DH2 and DH3 so overall effects are considered to remain as neutral.</p> <p>The modifications to SP3 introduce an office co-location approach. As a higher density employment use, offices/research and development use could result in an optimisation of existing employment floorspace and some intensification of</p>													



IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	+	0	+	0	++	+	+	+	0	0	+	0	+
Submission policy with modifications	+	+	0	+	0	++	+	+	+	0	0	+	0	+
	<p>industrial floorspace albeit there is likely to be less opportunity to intensify industrial uses to the same extent. Opportunities within sectors which locate in the LSIS may offer more diverse ways of accessing employment through learning skills on the job for those who have low qualification levels or no qualifications, who often face more barriers to access work, this means that an increase in offices uses may not have the same level of positive benefits as office space and associated jobs can demand a higher level of skills which potentially increase barriers to employment. However, the proposed approach to co-location under the modifications could bring forward more intensification of industrial uses than would have happened otherwise which could counteract this depending on the extent to which the intensification and availability of premises for industrial uses could be accommodated in the longer term. Overall it is considered that there will still be investment in industrial floorspace from modified SP3 which is considered to still have significant positive effects overall on <b>objective 6</b>.</p> <p>For the modifications the principle remains that the primary economic function of the area will be protected however the modified policy could reduce the scope for intensification of industrial operations in the LSIS. It is also noted that there is no evidence to suggest that industrial uses have any more long term impacts on air quality compared to office uses or vice versa. Therefore allowing more office uses instead of industrial uses, would have no pronounced effect on health and wellbeing in the short and medium term however over time there is uncertainty that the evolving economic industrial needs of the area would be affected by office co-location and the extent to which this could limit the availability of premises suitable for industrial land uses. However there are positive effects from providing a range of employment spaces that are high quality and will support diverse jobs in different sectors, including SMEs, training opportunities and affordable workspace for local people can help provide for local job opportunities and can contribute to healthy, independent lifestyles which can improve health. Overall it is considered minor positive for the health effects on residents against <b>objective 7</b>.</p>													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	+	0	+	0	++	+	+	+	0	0	+	0	+
Submission policy with modifications	+	+	0	+	0	++	+	+	+	0	0	+	0	+
	<p>Similarly there are minor positive effects for <b>objectives 9, 12 and 14</b>. Co-location could potentially affect longer term scope for intensification of industrial operations in the LSIS. This could potentially increase vehicle mileage through Islington if industrial uses expand in Outer London, which risks increased congestion and emissions. Overall the protection given by demonstrating the continued industrial function mitigates the risk of displacement from office co-location on the Vale Royal Brewery Road LSIS cluster of industrial businesses. The modifications also require intensification of industrial uses and co-location could also bring forward more intensification of industrial uses than would have happened otherwise which could also counteract this longer term effect. Introducing office uses are likely to create more journeys to work than many industrial uses, and for this reason are usually supported in locations which are more accessible than the LSIS (which has low PTAL ratings along the western edge along York Way), such as town centres and CAZ where transport infrastructure better supports the intensity of journeys created. However accessibility is still reasonable in the LSIS. Overall there are land use benefits from the co-location of offices with industrial so depending on the extent to which offices are intensified, the approach on balance is considered to have minor positive effects for these three objectives.</p> <p>The modifications are considered a minor positive effect on <b>objective 8</b> economic growth. The intensification of new business floorspace as office space co-located with industrial will strengthen the local economy and provide a higher density of jobs by encouraging development of employment floorspace. Whilst there are other locations for housing and offices to be promoted in the borough, industrial uses are only sought in LSISs and therefore the scope for intensification of industrial uses is particularly important in this context. There is the potential for office uses to compete with industrial floorspace which could affect the extent to which industrial floorspace can be intensified. The scale of this effect would be dependent on the degree of the impact on the industrial function of the area caused by office development over time, and the scale of industrial activities lost, displaced and /or prevented from expansion in this location. The modifications are clear though about the need to intensify industrial uses as part of co-location and co-location could also bring forward more intensification of industrial uses than would have happened otherwise which could counteract this. The protection</p>													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	+	0	+	0	++	+	+	+	0	0	+	0	+
Submission policy with modifications	+	+	0	+	0	++	+	+	+	0	0	+	0	+
	<p>given by demonstrating the continued industrial function of the LSIS will also help to mitigate potential impacts that intensification of offices could have. It is noted that there are other more appropriate locations promoted for office use across the borough but providing offices in the LSIS will also contribute to meeting the need at borough level for office floorspace. There are land use benefits from the co-location of offices with industrial, depending on the extent to which offices are intensified, which on balance is considered to have minor positive effects for the objective. There is some uncertainty over the introduction of the new class E which means that over 10,000sqm of light industrial floorspace in the LSIS is potentially at risk of being lost to other non-industrial use classes that attract higher values. The modifications are not able to address this uncertainty although the policy modification that ensures future light industrial Class E space is restricted to that use creates a positive effect on focusing development in the right locations. Class E was introduced by the Government through legislation in September 2020 to amend and simplify the system of use classes in England and create one new broad 'Commercial, business and service' use class to allow for a mix of uses to reflect changing retail and business models.</p> <p>No other effects have been identified for the modifications.</p>													
<b>Conclusions</b>	<p>The modification that introduces office co-location on the one hand would bring additional jobs and opportunities for economic growth but on the other hand, depending on the extent to which offices are intensified, could reduce the capacity for industrial growth. The modifications are clear about the need to intensify industrial uses as part of co-location and co-location could also bring forward more intensification of industrial uses than would have happened otherwise. On balance this modification is considered positive given the policy requirements to intensify industrial use and demonstrate the continued industrial function of the LSIS. The modification to secure new light industrial floorspace for that particular use through condition will also have positive effects in relation to the economic function of the area. The modification to remove the policy clause that specified maximum building heights is not considered to be significant to change the overall</p>													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	+	0	+	0	++	+	+	+	0	0	+	0	+
Submission policy with modifications	+	+	0	+	0	++	+	+	+	0	0	+	0	+
	effects identified in the assessment. There are no changes to the overall assessment of effects identified as a result of the modifications.													

## Policy SP4 Angel and Upper Street Spatial Strategy Area

Table 4.6 Assessment of Policy SP4 Angel and Upper Street Spatial Strategy Area

IIA Objective	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELL BEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	+	+	+	0	0	0	+	+	0	0	0	0	0
Submission policy with modifications	+	+	+	+	+	0	0	+	+	0	0	0	0	0
Commentary on assessment of likely effects	<p>The assessment for <b>objective 4</b> is a minor positive for the modifications. The implementation of housing in the spatial strategy area could have benefits in improving connections between neighbourhoods within the spatial strategy area and facilities/amenities. For residential uses in the town centre there would be an increase in accessibility to services for some residents living within the town centre but this could limit the already constrained land supply to provide commercial, cultural and civic activity for all Islington residents. Overall this positive effect does not change the minor positive effect on <b>objective 4</b> already identified.</p> <p>The assessment for <b>objective 5</b> has been changed to a minor positive. The modifications to policy for housing in parts of the spatial strategy area will contribute towards the supply of housing and affordable housing which will help to meet housing needs. The development of housing in the strategy area will provide housing options for people wanting to locate in or near Islington's main town centre where benefits will be linked to access to high PTAL multi-modal transport networks.</p>													

IIA Objective	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELL BEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	+	+	+	0	0	0	+	+	0	0	0	0	0
Submission policy with modifications	+	+	+	+	+	0	0	+	+	0	0	0	0	0
	No other effects have been identified for the modifications.													
Conclusions	<ul style="list-style-type: none"> <li>The modifications add an additional clause which clarifies the role of residential development in the spatial strategy area which will have positive effects through supporting additional housing which will contribute towards the supply of housing and affordable housing which will help to meet housing needs.</li> <li>Objective 5 (housing quality) is now identified as a minor positive effect rather than a neutral because of the above change in respect to policy for housing and the spatial strategy area.</li> </ul>													

## Policy SP8 Highbury Corner and Lower Holloway

Table 4.7: Assessment of Policy SP8 Highbury Corner and Lower Holloway

IIA Objective	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	++	+	+	+	0	0	0	+	++	+	+	0	0	0
Submission policy with modifications	++	+	+	+	+	0	0	+	++	+	+	0	0	0
Commentary on assessment of likely effects	<p>For the modified policy the acknowledgement that housing will be appropriate on allocated sites and windfall sites will provide additional housing whilst carefully balancing the ability of the LSAs to provide a retail and service function through other parts of the policy. The approach will ensure access to services, facilities and amenities for residents and workers within the vicinity is maintained and allows for the expansion of such amenities to not be jeopardised to meet changing economic and social needs. Housing development will also contribute to the vibrancy of the area and enhance the commercial corridor between Angel Town Centre and Nag's Head Town Centre, improving connections, ensuring attractiveness for visitors and residents and enhancing an inviting public realm. Overall this positive effect does not change the minor positive effect on <b>objective 4</b> already identified</p> <p>The assessment for the submission policy with modifications has been changed to a minor positive for <b>objective 5</b>. The policy acknowledgement of residential uses on sites in the spatial strategy area will contribute to the supply of housing and affordable housing which will help to meet housing needs.</p>													

IIA Objective	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELL BEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	++	+	+	+	0	0	0	+	++	+	+	0	0	0
Submission policy with modifications	++	+	+	+	+	0	0	+	++	+	+	0	0	0
	No other effects have been identified for the modifications.													
Conclusions	<ul style="list-style-type: none"> <li>The modifications add an additional clause which clarifies the role of residential development in the spatial strategy area will have positive effects through supporting additional housing which will contribute towards the supply of housing and affordable housing and help to meet housing needs.</li> <li>Objective 5 for housing quality is now identified as a minor positive effect rather than a neutral because of the above change in respect to policy for housing and the spatial strategy area.</li> </ul>													



## Policy H2: New and existing conventional housing

Table 4.8: Assessment of Modifications to Policy H2: New and existing conventional housing

I/A Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	++	++	0	+	++	+	+	+	0	0	0	0	0	0
Submission policy with modifications	++	++	0	+	++	+	+	+	0	0	0	0	0	0
Commentary on assessment of likely significant effects	<p>The modification removes the aspect of policy H2 which prevents housing supply being wasted by ensuring new homes will be occupied. There is potential for a negative effect, as it would mean there is less certainty that units will be occupied and meet the boroughs housing need. Whilst this reduces the positive effect it is not considered to be sufficient to reduce the overall significant positive effects that policy has in terms of optimising the use of buildings/land and overall the policy with modifications will continue to have significant positive effect in respect of <b>objective 2</b>.</p> <p>The modification removes the guarantees on occupancy, so units could remain vacant which does not promote social cohesion. This modification is considered to have a minor negative effect but overall is not considered to change the effects on <b>objective 6</b> of the policy.</p> <p>No other effects have been identified for the modifications.</p>													
Conclusions	<ul style="list-style-type: none"> <li>The modification removes the clause which prevents housing supply being wasted by ensuring new homes will be occupied. This creates negative effects against the efficient use of land and social inclusion. When considered against the positive effects of the submission policy this is not considered to be sufficient to reduce the overall significant positive effects of the policy.</li> </ul>													

## Policy H6: Purpose Built Student Accommodation

Table 4.9: Assessment of Policy H6: Purpose Built Student Accommodation

I/A Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	0	-	0	+	-	+	-	+	0	0	0	0	-	0
Submission policy with modifications	0	-	0	0	0	0	-	0	0	0	0	0	-	0
Commentary on assessment of likely significant effects	<p>The policy as modified contains provisions to manage amenity impacts, but removing the restriction on change of use on a temporary basis to visitor accommodation and allowing the temporary use of existing student accommodation is likely to lead to increased noise impacts from the more frequent trips generated by a hotel use which may not always be possible to mitigate through a management plan. The effect of the modification is to change the assessment from minor positive to neutral for <b>objective 4</b>.</p> <p>The potential provision of Purpose Built Student Accommodation will contribute to housing supply which will have a positive effect on improving the diversity of housing in the borough. However additional student accommodation will not help to meet an identified need for affordable housing in the borough. In addition it is unclear whether affordable student accommodation would meet accommodation needs of Islington students and therefore a neutral effect has been identified overall for <b>objective 5</b>.</p> <p>The modification to remove the requirement for bursary contributions towards students leaving council care and students facing hardship does not help in reducing inequality. This will have a negative effect on <b>objective 6</b>. In addition a similar negative effect is identified against <b>objective 8</b> as the removal of the bursary reduces some of the support for local people to increase their employment opportunities through education. Overall this changes the effects from positive to neutral for <b>objectives 6 and 8</b>.</p>													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	0	-	0	+	-	+	-	+	0	0	0	0	-	0
Submission policy with modifications	0	-	0	0	0	0	-	0	0	0	0	0	-	0
	<p>The percentage of bedspaces to be adaptable has reduced from 10% to 5% of bedspaces. Whilst there is potential for short term effects from the modification as some bedspaces would be adaptable on completion rather than accessible, should the need arise the option to convert remains if a student were to seek accessible accommodation. Whilst this still has a positive effect, when taking into account the removal of bursaries overall the effect for objective 6 is considered to be neutral.</p> <p>No other effects have been identified for the modifications.</p>													
Conclusions	<ul style="list-style-type: none"> <li>The modifications make a number of changes to policy which creates negative effects. The removal of the requirement for bursary contributions creates negative effects in relation to social inclusion and economic development by reducing some of the support for local people to increase their employment opportunities through education. There is no mitigation for this effect as the policy proposal did not meet the relevant CIL tests for planning obligations. The additional flexibility to allow the temporary use of existing student accommodation as visitor accommodation is likely to lead to increased noise impacts from the more frequent trips generated by a hotel use which may not always be possible to mitigate through a management plan so the effect on objective 4 liveable neighbourhoods is negative.</li> <li>The modification which reduces the percentage for accessible accommodation from 10% to 5% and the change to adaptable on completion rather than accessible on completion reduces the positive effects but is still considered positive. Overall the effect for objective 6 is considered neutral because of the removal of the requirement for bursary contributions. There is a positive effect on objective 5 and housing supply however there are other uncertain effects which results in a change to neutral overall.</li> </ul>													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	0	-	0	+	-	+	-	+	0	0	0	0	-	0
Submission policy with modifications	0	-	0	0	0	0	-	0	0	0	0	0	-	0
	<ul style="list-style-type: none"> <li>The assessment of the policy overall results in four changes in assessment effects resulting from the modifications to objective 4 for liveable neighbourhoods, objective 5 for housing quality, objective 6 for social inclusion and objective 8 for economic growth. Objectives 4, 6 and 8 change from minor positive to neutral. Objective 5 changes from negative to neutral.</li> </ul>													

## Policy H12: Gypsy and Traveller Accommodation

Table 4.10: Assessment of Policy H12: Gypsy and Traveller Accommodation

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	0	0	0	0	+	+	0	0	0	0	0	0	0	0
Submission policy with modifications	0	0	0	0	++	++	0	0	0	0	0	0	0	0
Commentary on assessment of likely significant effects	<p>The modifications to Policy H12 are considered to have a positive effect on housing quality (<b>objective 5</b>) and meeting housing needs. The modification to change Part A which replaces exploring sites with the allocation of sites has amended the mechanism to achieve meeting need which provides more certainty about how need will be met and this is considered to increase the effects to significant positive. There are three site allocations (GT1, GT2 and GT3) identified in modifications and these have been assessed separately. The modification to reflect the London Plan approach for defining gypsy and traveller need reduces the potential provision overall but it is still considered positive as it seeks to meet needs for gypsy and travellers which will help to meet the diverse and changing needs of Islington. Overall the effect for the policy with modifications is considered significant positive for <b>objective 5</b>.</p> <p>Likewise a change in effects is considered to occur for <b>objective 6</b> to significant positive overall with the increase in certainty around how gypsy and traveller needs will be met through the identification of sites helping to promote social inclusion and improve opportunities for gypsies and travellers to have their accommodation needs met in Islington.</p> <p>No other effects have been identified for the modifications.</p>													
Conclusions	<ul style="list-style-type: none"> <li>The modifications make a number of changes to policy which creates positive effects in terms of how the defined needs of gypsies and travellers as set out in the Gypsy and Traveller Needs Assessment will be met through the provision of sites.</li> </ul>													

I/A Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	0	0	0	0	+	+	0	0	0	0	0	0	0	0
Submission policy with modifications	0	0	0	0	++	++	0	0	0	0	0	0	0	0
	<ul style="list-style-type: none"> <li>The assessment of the policy overall results in two changes in assessment effects resulting from the modifications: objective 5 for housing quality and objective 6 for social inclusion changing from minor positive to significant positive.</li> </ul>													

## Policy B2: New business floorspace

Table 4.11: Assessment of Policy B2: New business floorspace

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	0	+	0	+	+	++	++	0	0	+	0	+
Submission policy with modifications	+	++	0	+	0	+	+	++	++	0	0	+	0	+
Commentary on assessment of likely significant effects	<p>The modifications introduce office co-location with industrial uses in Locally Significant Industrial Sites (LSISs) in Part C which could introduce positive design features such as improvements in the connectivity between buildings and public realm contributing to safer spaces. However the modifications are clear about need for industrial uses to be intensified and the continued industrial function of the area, therefore on balance the effects for <b>objective 1</b> are still considered to continue to be minor positive.</p> <p>The modifications introduce a change which seeks new Class E development to be conditioned for office, research and development, or light industrial use for the various locations identified in the policy. This will have a positive effect by encouraging development which primarily supports the existing economic function of an area which will reinforce the economic sustainability of an area. The conditioning of specific business uses will assist in making the most efficient use of land by encouraging maximisation of business floorspace in locations which already have well-established employment hubs and suitable business clusters. The submission policy with modifications introduces office co-location with industrial in LSISs in Part C which, as a higher density employment use, could result in an optimisation of existing employment floorspace and some intensification of industrial floorspace. However, new development is likely to introduce a significant quantum of office, which has the potential for the land use balance to shift to offices which could start to exclude industrial use. But co-location could also bring forward more intensification of industrial uses than would have happened otherwise which could counteract this to some extent. The modifications are clear though about the need to intensify</p>													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	0	+	0	+	+	++	++	0	0	+	0	+
Submission policy with modifications	+	++	0	+	0	+	+	++	++	0	0	+	0	+
	<p>industrial uses as part of co-location and to demonstrate the continued industrial function of LSISs will remain which will help to mitigate some of the potential impacts that intensification of offices could have. It is noted that there are other more appropriate locations promoted for office use across the borough but providing office in the LSIS will also contribute to meeting the need at borough level for office floorspace. There are land use benefits from the co-location of offices with industrial, whilst it will depend on the extent to which offices are intensified and there are some uncertainties over this, on balance is considered to remain overall significant positive for <b>objective 2</b> given the other positive aspects of the policy.</p> <p>The modifications will secure new employment floorspace in the CAZ and town centres and PELs with use of conditions which will help support diversity in town centres and should benefit existing services in these locations. This will continue to have a minor positive effect on <b>objective 4</b>.</p> <p>The modifications that introduce co-location of offices with industrial space in part C could have effects on <b>objective 8</b>. Whilst the policy protects the industrial function of LSISs and seeks to intensify industrial uses, there are other locations in the borough where offices are sought and industrial uses are only sought in LSISs and therefore the scope for intensification of industrial uses is particularly important in this context. The scale of this effect would be dependent on the degree of the impact on the industrial function of the area over time with the potential for office uses to compete with industrial floorspace affecting the extent to which industrial floorspace can be intensified. Also there is some uncertainty over the introduction of the new class E which means that light industrial floorspace in LSISs is potentially at risk of being lost to other non-industrial use classes that attract higher values. Class E was introduced by the Government through legislation in September 2020 to amend and simplify the system of use classes in England and create one new broad 'Commercial, business and service' use class to allow for a mix of uses to reflect changing retail and business models. The submission policy is not able to address this uncertainty. The policy restriction that ensures future light industrial Class E space is restricted to that use therefore creates a positive effect on focusing development in the right locations.</p>													



IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	0	+	0	+	+	++	++	0	0	+	0	+
Submission policy with modifications	+	++	0	+	0	+	+	++	++	0	0	+	0	+
<p>Overall the modifications are clear about the need to intensify industrial uses as part of co-location and to demonstrate the continued industrial function of LSISs will remain which will help to mitigate some of the potential impacts that intensification of offices could have. It is noted that there are other more appropriate locations promoted for office use across the borough but providing office in the LSIS will also contribute to meeting the need at borough level for office floorspace. Co-location could also bring forward more intensification of industrial uses than would have happened otherwise which could counteract this to some extent. On balance with the other positive aspects of the policy it is considered to have significant positive effects overall for the objective.</p> <p>The modifications have introduced a new clause D which cross references to other policies where development proposed in LSIS would have a significant increase in vehicle movements and makes clear mitigation should be provided. This will also encourage sustainable transport choices. Co-location could affect the longer term sustainability of the LSIS as functional industrial areas because the capacity to which industrial floorspace can be intensified could be reduced. This could potentially increase vehicle mileage through Islington if existing industrial uses expand in Outer London, which risks increased congestion and emissions. Overall the protection given by demonstrating the continued industrial function mitigates the risk of displacement from office co-location on the Vale Royal Brewery Road LSIS cluster of industrial businesses. The modifications also require intensification of industrial uses and co-location could also bring forward more intensification of industrial uses than would have happened otherwise which could counteract this. Overall the policy as modified is still considered to have a sufficient positive effect to not change overall effects in relation to reducing harmful emissions for <b>objective 9</b> and climate change, <b>objective 12</b> and air quality, <b>objective 14</b> and natural resources through the positive effect of new clause dealing with industrial uses that create significant increases in vehicle movements.</p> <p>No other effects have been identified for the modifications.</p>														

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	0	+	0	+	+	++	++	0	0	+	0	+
Submission policy with modifications	+	++	0	+	0	+	+	++	++	0	0	+	0	+
Conclusions	<ul style="list-style-type: none"> <li>The change which introduces office co-location is considered on balance to be positive because the modifications are clear about the need to intensify industrial uses as part of co-location and demonstrate that the continued industrial function of the LSIS will remain. Also the approach could bring forward more intensification of industrial uses than would have happened otherwise. This will help to mitigate some of the potential impacts that intensification of offices could have in the LSIS. The second change relates to air quality which introduces policy to provide mitigation against development proposed in LSIS which would have significant increase in vehicle movements, these are also considered to have minor positive effects.</li> </ul>													

## Policy B3: Existing Business Floorspace

Table 4.12: Assessment of Policy B3: Existing business floorspace

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	0	+	0	+	0	+	+	+	+	0	0	+	0	+
Submission policy with modifications	0	+	0	+	0	+	+	+	+	0	0	+	0	+
Commentary on assessment of likely significant effects	<p>The modifications have positive effects with a new clause which deals with existing buildings that are no longer suitable for their existing business use and cannot reasonably be redeveloped for continued business use. This provides an alternate route to redeveloping land compared to the marketing route which requires 24 months marketing. It is uncertain how often the approach will be applied by landowners but it potentially supports an expedient alternative to 24 months marketing and therefore a positive effect on the objective of optimising the use of previously developed land. Also the submission policy with modifications has removed the vacancy requirement for the 24 month marketing period which is considered positive and will lead to optimising the use of buildings for alternate uses and intensifying their use. Overall the effects do not change the minor positive effects on <b>objective 2</b>.</p> <p>The modifications will have a positive effect on <b>objective 8</b>. The modifications have removed the 24 month vacancy test (retaining the 24 month marketing period but instead require vacancy to be demonstrated at the time of application) which reduces the potential short term negative impact the vacancy period could have on reduced footfall and impacts on neighbouring businesses and therefore potentially increases the short term positive effects in relation to objective 8. Removing the 24 month vacancy period may also encourage landowners to seek alternative uses through the planning system in the medium and long term rather than consider changing use within Class E. Using Class E could result in not intensifying an existing office use with floorspace to another Class E use.. Maintaining the marketing test limits the negative effects of loss of business floorspace. The modifications introduces a new clause which deals with existing buildings that are no longer suitable for their existing business use and cannot reasonably be redeveloped for continued business use. This provides a new and alternate route to redeveloping land compared to the marketing route which</p>													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	0	+	0	+	0	+	+	+	+	0	0	+	0	+
Submission policy with modifications	0	+	0	+	0	+	+	+	+	0	0	+	0	+
	<p>requires 24 months marketing. It is uncertain how often the approach will be applied by landowners but potentially supports an expedient alternative to 24 months marketing. Overall however this does not detract significantly from the positive effects of the submission policy with modifications, which is considered to have similar minor positive effects on <b>objective 8</b> as the submission policy and will foster sustainable economic growth and increase employment opportunities.</p> <p>No other effects have been identified for the modifications.</p>													
Conclusions	<ul style="list-style-type: none"> <li>There are a number of modifications to this policy. The main effects are felt by the changes which deal with the policy approaches to managing the release of business floorspace to alternative uses. In particular the marketing of business floorspace and the removal of vacancy test. The assessment considers the pros and cons of each but ultimately considers it to maintain the positive effects of the submission policy approach. The assessment also considers the further change which provides a new and alternate route to redeveloping land compared to the marketing route and considers the effects more uncertain.</li> </ul>													

## R2: Primary Shopping Areas

Table 4.13: Assessment of Policy R2: Primary Shopping Areas

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	0	++	0	0	+	++	+	0	0	0	0	0
Submission policy with modifications	+	++	0	+	0	0	+	++	+	0	0	0	0	0
Commentary on assessment of likely effects	<p>With respect to <b>objective 2</b> the modifications continue to focus and encourage retail development in the most appropriate Primary Shopping Areas (PSAs) locations. The inflexibility and related potential vacancy of a two-year vacancy and marketing period for change of use away from A1 (E(a)) in the PSA had potential to limit a range of main town centre uses therefore the modifications reducing this period is positive. The approach for Policy R2 is considered to have a positive effect in terms of directing appropriate new build Class E retail use and other Sui Generis and F.2 main town centre uses to the core of the town centres - the PSA. However the scope of uses available through Class E weakens the strength of the PSA and will result in uses establishing in the retail core that do not necessarily need the high PTAL location and would therefore not focus development in the most appropriate locations. This results in a minor positive effect for <b>objective 2</b>. It is noted that this is finely balanced and the take up Class E flexibility is uncertain and the approach for R2 will go some way to encouraging development to focus in the most appropriate locations in town centres and their primary shopping areas, overall the assessment for the modifications to <b>objective 2</b> is considered a significant positive effect</p> <p>It is noted that modifications in other policies accept residential uses on upper floors in the PSA which has the potential to reduce the floorspace in the commercial core of town centres for commercial uses where</p>													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	0	++	0	0	+	++	+	0	0	0	0	0
Submission policy with modifications	+	++	0	+	0	0	+	++	+	0	0	0	0	0
	<p>agglomeration benefits can be realised. The effects of this are considered in more detail in the assessment of Policy R3.</p> <p>The modifications will have positive effects on enabling town centres PSAs to continue to serve the needs and wellbeing of the local residents across different retail catchment areas by seeking to maintain a balance of retail, leisure and business uses. The approach is diminished by the introduction of Class E which creates uncertain impacts with the potential for E uses to not form active frontages, such as offices at ground floor in the retail core. Class E was introduced by the Government through legislation in September 2020 to amend and simplify the system of use classes in England and create one new broad ‘Commercial, business and service’ use class to allow for a mix of uses to reflect changing retail and business models. The scope of uses available through Class E weakens the strength of the PSA and will potentially result in non-retail Class E uses establishing in the retail core which would cumulatively and in specific locations individually, have a negative impact on the diversity and vibrancy and economic prosperity of town centres and the PSAs as retail centres reducing their ability to meet retail needs of residents. The ability to use conditions for new E class uses would mitigate this to some extent however the overall effect to <b>objective 4</b> is considered to be minor positive.</p> <p>The assessment of the submission policy with modifications for <b>objective 8</b> is considered a significant positive. Retaining the protection for retail on ground floors will continue to have a positive effect and enable space in the right locations for different types of businesses, maintaining support for local businesses and employment in retail. The scope of uses available through Class E weakens the strength of the PSA and will result in uses establishing in the retail core that do not necessarily need the high PTAL location and would therefore not focus</p>													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	0	++	0	0	+	++	+	0	0	0	0	0
Submission policy with modifications	+	++	0	+	0	0	+	++	+	0	0	0	0	0
	<p>development in the most appropriate locations. Whilst some Class E uses are potentially detrimental to the retail core the Class E uses that are not retail would still be likely to be commercial in focus and result in positive economic effects. It is noted that there is removal of the protection for upper floors which has the potential to limit the range of unit sizes and configurations to meet a variety of business's needs. The effects of this are considered in more detail in the assessment of Policy R3. Overall the changes in policy are considered to maintain a significant positive for economic growth.</p> <p>No other effects have been identified for the modifications.</p>													
Conclusions	<ul style="list-style-type: none"> <li>There are a number of modifications to the policy approach which has evolved in response to the flexibility introduced by Class E and which creates uncertain impacts however the policy principle remains that new development should contribute to the retail function of the PSA at ground floor level. Class E was introduced by the Government through legislation in September 2020 to amend and simplify the system of use classes in England and create one new broad 'Commercial, business and service' use class to allow for a mix of uses to reflect changing retail and business models. Despite the positive effects of the modifications the impact of Class E flexibility is considered to reduce the positive effects in relation to objective 4 and serving the needs and wellbeing of residents; however given the range of Class E commercial uses that can take advantage of locating in the retail core the significant positive effects on economic growth and efficient use of land are maintained. Overall the modifications are considered positive.</li> </ul>													

## Policy R3: Islington’s retail hierarchy

Table 4.14: Assessment of Modifications to Policy R3: Islington’s retail hierarchy

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	+	++	0	0	+	++	+	0	0	0	0	0
Submission policy with modifications	+	+	+	+	+	0	+	+	+	0	0	0	0	0
Commentary on assessment of likely significant effects	<p>Although Islington’s Town Centres are not devoid of any residential uses they are fundamentally commercial in character, particularly the Primary Shopping Areas. The more permissive approach to residential uses could erode the commercial character in the long term and limit the ability for the built environment to adapt to evolving commercial needs in the future. Policy R2 seeks to mitigate to some extent the development of ground floor in the PSA to maintain the retail function in the PSA. More residential use in Town Centres in particular in the PSA would also introduce potential for greater concerns for amenity considerations, which could further diminish the commercial function. Allowing increased residential on upper floors and more generally in town centres can create amenity impacts which will need to be mitigated and in the long term reduce the ability of cultural and leisure uses to operate effectively and expand. The agent of change principle will go some way in mitigating this negative impact however. The local character of town centres outside the PSA may also be eroded to some degree, however Policy R3 Part C considers impact on character whilst accepting mitigation of adverse impacts. Modifications to Part C therefore limits but does not avoid completely changes to the commercial character of Town Centres if residential uses start to cumulatively occupy sites that would be preferable to keep in commercial use. There may be a minor positive effect in certain circumstances in reducing crime or fear of crime through an increase in natural surveillance from residential uses. This may contribute to</p>													



IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	+	++	0	0	+	++	+	0	0	0	0	0
Submission policy with modifications	+	+	+	+	+	0	+	+	+	0	0	0	0	0
	<p>an increase in safety, especially in relation to the night time economy. Overall the changes are considered minor positive for <b>objective 1</b>.</p> <p>The assessment for <b>objective 2</b> has been changed to a minor positive for the submission policy with modifications. The modifications relaxes the approach to permit residential uses more widely across town centres and in the PSA, which could reduce opportunities to meet commercial, cultural and civic activity needs and associated agglomeration benefits which may not balance competing land uses optimally. Too much housing in town centres could detract from the ability of other land uses to take advantage of the commercial location. The impacts on the efficient use of land outside the PSA may be more profound given the specific protection for ground retail use within PSAs. Balancing the competing demand of land uses will be more challenging with a more permissive approach to residential uses on upper floors in the PSA. This is mitigated in part by R3 Part C and G which ensures that residential development would not cause adverse impacts on viability, vibrancy, vitality, character, and amenity. However, there may be specific opportunities for residential development on upper floors which are not attractive opportunities for commercial development, providing an opportunity for a greater mix of uses and efficient use of land. For example it is recognised that in some cases such as in Nag’s Head the development of underutilised upper floors for residential development could aid in the efficient use of buildings. The assessment considers a minor positive effect overall recognising there is a fine balance to be had between competing demands for land.</p> <p>The assessment of the modifications for <b>objective 4</b> overall is considered a minor positive effect. For residential uses in the town centre there would be an increase in accessibility to services for some residents</p>													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	+	++	0	0	+	++	+	0	0	0	0	0
Submission policy with modifications	+	+	+	+	+	0	+	+	+	0	0	0	0	0
	<p>living within the town centre which is positive but this could limit the already constrained land supply to provide commercial, cultural and civic activity for all Islington residents albeit the policy is considered to still enable residents and business needs to be met. Part C seeks to ensure adverse impacts on vibrancy, vitality, viability and character are fully mitigated as well as requiring engaging frontages and a good level of amenity for residents and businesses. This will go some way to ensuring a vibrant environment is achieved that supports sufficient access to a range of uses whilst respecting the needs and amenity of residential uses within town centre. The relaxation of policy restricting residential uses could reduce the ability of town Centre's to continue to serve the needs and wellbeing of the local residents across different retail catchment areas potentially reducing the optimum mix of main town centre uses albeit the policy is considered to still enable residents and business needs to be met. This effect would be felt more in the PSA with the removal of upper floor floorspace from the commercial market reducing the spaces for access to multi floor retail, upper floor offices for employment and the unfettered expansion of cultural and NTE uses. Overall there is considered to be a minor positive effect for <b>objective 4</b>.</p> <p>The assessment of the submission policy with modifications for <b>objective 5</b> is a minor positive effect because allowing residential uses across all of the town centre would increase land available for housing and therefore affordable housing, contributing to meeting housing need. Town centres are highly accessible locations with a wide range of services available for residents.</p> <p>The assessment for <b>objective 7</b> is a minor positive. The submission policy with modifications would go some way to maintaining retail in the face of changes to the Use Class Order; access to shops in particular is vital for</p>													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	+	++	0	0	+	++	+	0	0	0	0	0
Submission policy with modifications	+	+	+	+	+	0	+	+	+	0	0	0	0	0
	<p>health and wellbeing. Class E was introduced by the Government through legislation in September 2020 to amend and simplify the system of use classes in England and create one new broad ‘Commercial, business and service’ use class to allow for a mix of uses to reflect changing retail and business models. Overall whilst there could potentially be negative effects due to the loss of retail to other class E uses, it is not clear that this would bear out as an effect. Access to health and other services may increase for town centre residents however, the land available for health and wellbeing services that can often occupy upper floor town centre locations could be decreased. Health facilities do however benefit from Class E flexibility, allowing a wider range of ground floor and upper floor sites to support health facilities across the town centre as a whole. The cumulative introduction of residential uses in town centres may limit the range of unit sizes for health however, the magnitude of this effect is unknown. A minor positive effect overall for the submission policy with modifications is therefore still considered to be appropriate.</p> <p>The assessment for <b>objective 8</b> against the submission policy with modifications is considered a minor positive effect overall on the ability for town centres to foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes. The submission policy with modifications is more permissive to residential. Although residential uses can support the economic growth of town centres by creating a localised customer base, increasing footfall and contributing to the vibrancy of a place, this is far more profound in smaller towns and rural areas that have fewer external factors in the viability of their shopping cores. Islington has four town centres in good health, supported by a population of 236,000 residents and significant flows of workers and tourists travelling into Islington. The vitality of town centres in Islington is more reliant on commercial growth to take place than the need to entice people to the town centres. Class E also increases the commercial opportunities on all floors especially in the PSA but also across the wider town</p>													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	+	++	0	0	+	++	+	0	0	0	0	0
Submission policy with modifications	+	+	+	+	+	0	+	+	+	0	0	0	0	0
	<p>centre; residential use could inhibit this growth in the long term. The removal of specific consideration to the loss of ancillary space could have a negative effect of releasing parts of buildings that allow viable operation by a wide range of town centre uses, whether this be for store room functions, back office use or other ancillary needs. The removal of the two year marketing requirement may cause a negative impact because testing the viability of a main town centre use is one of the most effective indicators as to whether the market has demand for such a unit in a specific location. The removal of this requirement will likely result in the loss of commercially viable town centre units, where cumulatively this could have negative effects on the viability, vibrancy and vitality of the town centre as a whole. On the other hand the removal of the marketing requirement can be considered positive as it will lead to optimising the use of buildings for alternate uses and intensifying their use. Whilst the inclusion of additional housing across town centre sites could be considered to have a positive effect, in the context of Islington this aspect of the modified policy is considered to have a minor negative effect because it could stifle commercial growth opportunities and results in an overall minor positive effect for the policy with modifications.</p> <p>The assessment for <b>objective 9</b> has remained a minor positive. Increased support of residential uses across town centres would have a positive effect on minimising the need to travel to town centres for the people living there, but cumulatively and in the long term this approach could see an increase in the need for travel by limiting the ability for commercial growth in town centres, pushing this growth into areas with less sustainable connections. However, the effects that would materialise in relation to residential uses impacting on the retail hierarchy is uncertain. The impact of Class E could see impacts on efficient, sustainable travel with potential distortion of the retail hierarchy across all policies which could increase the need to travel. Class E was introduced by the Government through legislation in September 2020 to amend and simplify the system of use</p>													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	+	++	0	0	+	++	+	0	0	0	0	0
Submission policy with modifications	+	+	+	+	+	0	+	+	+	0	0	0	0	0
	<p>classes in England and create one new broad ‘Commercial, business and service’ use class to allow for a mix of uses to reflect changing retail and business models. High trip generating E uses located outside of town centres could see these uses not located in the most well served locations for public transport infrastructure specifically bus, tube and rail connections. The scale of this impact may be mitigated in part by application of the sequential test and impact assessments and ultimately there is considerable uncertainty over this possible effect. The assessment has therefore remained as a minor positive overall.</p> <p>No other effects have been identified for the modifications.</p>													
Conclusions	<ul style="list-style-type: none"> <li>• There are a number of modifications to the policy approach which has evolved in response to the flexibility introduced by Class E. The other main change of the modifications is a more permissive approach to residential removing marketing, protection at ground floor and ancillary space which does have effects notwithstanding that policy expects adverse impacts on vibrancy, vitality, viability and character of the centre are fully mitigated. On the one hand this has the potential to reduce the floorspace for commercial uses in town centres and reduces the ability of the town centres to meet resident’s needs albeit the policy is considered to still enable residents and business needs to be met, but on the other hand the approach provides additional land for housing to meet housing needs.</li> <li>• There are a number of changes in assessment of effects of the overall policy. There is a reduction in positive effects for objective 2 and efficient use of land, objective 4 and liveable neighbourhoods and objective 8 and economic growth, which all reduce from significant positive to minor positive because of the approach to residential in the town centre. Conversely there will be an increase in positive effects for</li> </ul>													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	+	++	0	0	+	++	+	0	0	0	0	0
Submission policy with modifications	+	+	+	+	+	0	+	+	+	0	0	0	0	0
	objective 5 and housing quality which change from neutral to minor positive because of the approach to residential.													

## R4: Local Shopping Areas

Table 4.15: Assessment of Modifications to Policy R4: Local Shopping Areas

IIA Objective	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELL BEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	+	0	++	0	0	+	+	+	0	0	0	0	0
Submission policy with modifications	+	+	0	++	0	0	+	+	+	0	0	0	0	0
Commentary on assessment of likely effects	<p>The modifications cross references to a requirement for impact assessments as referenced in Policy R3 Part E for development over 200sqm, which will be positive for promoting a sustainable built environment through assessing impacts on character and function. This also helps focus appropriately scaled development in line with the retail hierarchy. The modifications removes specific protection for ancillary space which may have minor negative effects, especially related to the conversion of commercial ancillary space to residential use because this limits the adaptability of buildings to meet future needs of main town centre uses in LSAs however overall this is not considered significant enough to change the overall assessment of minor positive for <b>objective 1</b>.</p> <p>The modifications have seen the removal of specific protection for ancillary space which may have minor negative effects in terms of balancing competing demands between land uses and providing the full range of</p>													

IIA Objective	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELL BEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	+	0	++	0	0	+	+	+	0	0	0	0	0
Submission policy with modifications	+	+	0	++	0	0	+	+	+	0	0	0	0	0
	<p>development needs of the area, because this could limit buildings ability to meet future needs of commercial uses in LSAs. On the other hand it is recognised that there may be circumstances where the re-use of ancillary space that is no longer required could have positive effects in relation to the efficient use of land. Overall this is not considered significant and the overall assessment is considered minor positive for <b>objective 2</b>.</p> <p>The modifications through removing the reference that residential use would be strongly resisted at ground floor and protecting ancillary floorspace may increase the ability for residential uses to establish at the rear of LSA units and add to housing supply and affordable housing contributions, albeit to a minimal degree and the effect is not considered certain enough to change the overall neutral effect on <b>objective 5</b>.</p> <p>The submission policy with modifications has been amended to reflect Class E and although the policy seeks to enable LSAs to continue to support a range of local businesses of different types and sizes, the advent of Class E may have potential negative effects on access to the right spaces in the right locations. Class E was introduced by the Government through legislation in September 2020 to amend and simplify the system of use classes in England and create one new broad ‘Commercial, business and service’ use class to allow for a mix of uses to reflect changing retail and business models. The requirement for impact assessments as referenced</p>													



IIA Objective	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELL BEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	+	0	++	0	0	+	+	+	0	0	0	0	0
Submission policy with modifications	+	+	0	++	0	0	+	+	+	0	0	0	0	0
	<p>in Policy R3 Part E will help to focus appropriately scaled development in line with the retail hierarchy with Policy R4 having a threshold of 200sqm which will help to guide development to the most appropriate locations. The modifications which remove specific protection for ancillary space may have minor negative effects in terms of balancing competing demands between land uses and providing the full range of development needs of the area, especially where related to the conversion of commercial ancillary space to residential use because this could limit the ability of buildings to meet future needs of commercial uses in LSAs albeit the policy is considered to still enable residents and business needs to be met; however, this negative effect would not be significant enough to change the submission policy assessment. Also there may be different localised effects depending on the LSA, its size, location and function with some LSAs more susceptible to erosion of commercial space than others however this is hard to determine with certainty and whilst at a borough level there could be a cumulative effect on commercial ancillary space within LSA this is not considered certain enough to merit a significant enough effect to change the overall minor positive effect on <b>objective 8</b>.</p> <p>The submission policy with modifications requirement for impact assessments as cross referenced to in Policy R3 Part E will help to focus appropriately scaled development in line with the retail hierarchy so that developments of a significant scale are not putting unnecessary pressure on transport systems. The</p>													

IIA Objective	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELL BEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	+	0	++	0	0	+	+	+	0	0	0	0	0
Submission policy with modifications	+	+	0	++	0	0	+	+	+	0	0	0	0	0
	<p>introduction of Class E may create the potential for an uncontrolled decrease in retail units to provide essential daily goods, and this could increase the need for people to travel further for these goods. However, with a comprehensive spread of LSAs and Town Centres in the borough this impact is both uncertain and unlikely to be significant and will not affect the positive effect. Overall the effects for the submission policy with modifications are minor positive against <b>objective 9</b>.</p> <p>No other effects have been identified for the modifications.</p>													
Conclusions	<ul style="list-style-type: none"> <li>• Modifications which address the Use Classes Order (UCO) changes have not changed the fundamental policy approach for LSAs. The UCO changes refer to Class E which was introduced by the Government through legislation in September 2020 to amend and simplify the system of use classes in England and create one new broad 'Commercial, business and service' use class to allow for a mix of uses to reflect changing retail and business models.</li> <li>• Many of the UCO changes are beyond the scope of Local Plan policy and the overall effects remain positive. The other significant modification is the removal of specific protection for ancillary space and reference to ground floor residential. This may have minor negative effects in terms of balancing competing demands between land uses and providing the full range of development needs of the area,</li> </ul>													

IIA Objective	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELL BEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	+	0	++	0	0	+	+	+	0	0	0	0	0
Submission policy with modifications	+	+	0	++	0	0	+	+	+	0	0	0	0	0
	albeit the policy is considered to still enable residents and business needs to be met. There is the potential for cumulative affects at a borough level although these are not considered significant enough to change the scoring. It may also have positive effects by adding housing supply and affordable housing contributions, albeit this is less certain. Overall the effects for LSAs have not changed compared to other retail policies however the commentary demonstrates the consideration of effects for the modifications sufficient to warrant completing the assessment.													

## Policy R10: Culture and the Night Time Economy

Table 4.16: Assessment of modifications to Policy R10: Culture and the Night Time Economy

IIA Objective	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELL BEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	0	++	0	+	+	++	+	0	0	0	0	0
Submission policy with modifications	+	++	0	++	0	+	+	++	+	0	0	0	0	0
Commentary on assessment of likely effects	<p>The modifications have a positive effect on <b>objective 2</b>. To some extent compared to the submission policy the modifications have relaxed the locational aspect and there is more opportunity that cultural uses could potentially develop outside the town centres which may have benefits in making use of existing buildings/sites in other parts of the borough for communities and helps to ensure development is flexible and adaptable to changing economic and social needs. However Policy R10 still encourages cultural development to take place primarily in Town Centres and the CAZ so remains a positive effect for this reason. Overall the effect of policy is considered significant positive on <b>objective 2</b>.</p> <p>The modifications will have a positive effect in relation to <b>objective 4</b>, due to cultural uses being promoted specifically in town centre and CAZ locations although enhancing the cultural offer outside of town centres and</p>													

IIA Objective	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELL BEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	0	++	0	+	+	++	+	0	0	0	0	0
Submission policy with modifications	+	++	0	++	0	+	+	++	+	0	0	0	0	0
	<p>the CAZ, has benefits for the neighbourhoods those uses are located in. Noise impacts especially, are likely to be greater where residential character is more prominent and where background noise levels are generally lower than in town centres or the CAZ where introducing a cultural venue could have a greater effect on amenity. However, this does depend on the nature of the cultural use and Part B requires the mitigation of adverse impacts such as noise. The omission of the cultural quarter in Archway is not considered significant enough to affect the assessment, there will be reduced policy support for cultural provision in Archway although cultural uses will still be supported in Archway. Overall the effect of policy is considered significant positive on <b>objective 4</b>.</p> <p>The modifications provide some additional flexibility for cultural development outside of the CAZ and town centres which could reduce the supporting effect on the function and viability of CAZ and town centres although the policy still strongly directs development to these locations and could also support localised economies elsewhere. The omission of the Archway Cultural Quarter has removed specific policy support for a cultural quarter in this location although the policy approach still supports cultural uses locating in town centres. The policy with modifications overall is considered to have significant positive effects for <b>objective 8</b>.</p>													

IIA Objective	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELL BEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	0	++	0	+	+	++	+	0	0	0	0	0
Submission policy with modifications	+	++	0	++	0	+	+	++	+	0	0	0	0	0
	No other effects have been identified for the modifications.													
<b>Conclusions</b>	<ul style="list-style-type: none"> <li>Modifications have relaxed to some extent the locational requirement for cultural uses which on the one hand could provide for more cultural uses outside of town centres and cultural quarters but on the other hand may lead to more amenity impacts where cultural uses locate in areas where residential character is more prominent and where background noise levels are generally lower than in town centres or the CAZ. This is in part mitigated by Part B of the policy though. The modification could also reduce the support cultural uses have on the economy in town centres or the CAZ although they could also support local economies elsewhere. The omission of the Archway Cultural Quarter has removed policy support for this specific location although the policy approach still supports cultural uses locating in town centres. Overall the effects for Policy R10 have not changed compared to other retail policies however the commentary demonstrates the consideration of the effects for the modifications is sufficient to warrant completing the assessment.</li> </ul>													

## Policy G4: Biodiversity, landscape design and trees

Table 4.17: Assessment of G4: Biodiversity, landscape design and trees

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	++	+	0	+	0	+	+	0	+	++	++	+	0	0
Submission policy with modifications	++	+	0	+	0	+	+	0	+	++	++	+	0	0
Commentary on assessment of likely effects	<p>The submission policy with modifications is assessed positively against the biodiversity objective. A key aim of the policy is to minimise impacts and damage to existing trees, hedges, shrubs and other significant vegetation, so the modifications which clarify the approach to trees will help achieve this objective. The modifications also clarifies the level of protection is commensurate with the status of a SINC which could be considered to reduce the protection most for lower category SINC's i.e. local SINC's. However, it is considered that the mitigation measures set out in the modification alongside these other measures in the policy mean that overall there continues to be a significant positive effect on <b>objective 11</b> with a strong emphasis on maintaining biodiversity. There is more potential however for a reduction in biodiversity to occur with the introduction of planning benefits included in the modifications. There are compensation criteria in the policy which are applied where harm is unavoidable. These seek to avoid impacts to the most significant ecological features, then minimise overall spatial impacts or make improvements to management of a SINC and deliver off-site compensation. Whilst all the criteria may reduce biodiversity overall the last criteria could reduce the positive effects of the policy by reducing access to nature if that compensation were not delivered proximate to the affected SINC. Overall though the aim is to minimise development impacts and a strong emphasis remains on maintaining biodiversity and the potential reduction in positive effects are not considered to change the overall score and the effect of the policy with modifications is considered to be significant positive.</p> <p>No other effects have been identified for the modifications.</p>													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	++	+	0	+	0	+	+	0	+	++	++	+	0	0
Submission policy with modifications	++	+	0	+	0	+	+	0	+	++	++	+	0	0
<b>Conclusions</b>	<ul style="list-style-type: none"> <li>The modifications have revised the policy in respect to SINCs being protected commensurate with their classification. The assessment considers that although the modifications have the potential to reduce the positive affects the mitigation measures set out in the policy modification alongside other measures in the policy mean that overall there is no change in effects with a strong emphasis on maintaining biodiversity.</li> </ul>													



## Policy S1: Delivering Sustainable Design and Policy S5: Energy Infrastructure

Table 4.18: Assessment of modifications to Policy S1: Delivering Sustainable Design and Policy S5: Energy Infrastructure

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy S1/S5	++/+	+	0	+/0	++	+	++	+	0	0	0	++	++/+	+/0
Submission policy S1/S5 with modifications	++/+	+	0	+/0	++	+	++	+	0	0	0	++	++/+	+/0
Commentary on assessment of likely significant effects	<p>The modifications will have a minor positive effect on <b>objective 1</b> because they set out requirements for minimising greenhouse gas emissions and prioritising low and zero carbon heat sources for all development. This will contribute towards a more sustainable built environment and help to create buildings that are adaptable and can respond to change over their life. There is no change in effects to the overall assessment of the policy.</p> <p>The changes introduced through modifications to both S1 and S5 take a step further towards eliminating air pollution from heat and energy sources. The changes to Policy S1 will ensure that gas CHP will only be allowed in exceptional cases where CHP is essential for the creation of a strategic heat network. As a result, the modifications will have a minor positive effect on objective 4. The proposed change to Policy S5 will limit the use of gas boilers in minor developments resulting in fewer instances where gas boilers will be acceptable. The proposed change to Paragraph 6.67 of S5 will also prevent the use of ultra-low NOx gas boilers as the sole heat source for the communal heating system of major and larger minor developments. There will, however, continue to be a limited number of situations where gas powered CHP and ultra-low NOx gas boilers may be acceptable and the changes to policy S5 are more positive and will have an overall neutral effect on the promotion of liveable neighbourhoods – <b>objective 4</b>.</p>													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy S1/S5	++/+	+	0	+/0	++	+	++	+	0	0	0	++	++/+	+/0
Submission policy S1/S5 with modifications	++/+	+	0	+/0	++	+	++	+	0	0	0	++	++/+	+/0
	<p>The proposed changes to Policy S1 and S5 will limit the use of gas powered heating systems. The policy changes to both S1 and S5 take a step further towards eliminating air pollution from heat and energy sources. There will, however, continue to be a limited number of situations where gas powered CHP and ultra-low NOx gas boilers may be acceptable and therefore will still contribute to existing poor air quality. As a result, these policy changes will have a positive effect on improving health and wellbeing and <b>objective 7</b>. Likewise the same positive effect against <b>objective 14</b> is identified for the same reasons in respect to reducing air pollution. Overall there will be no change in effects to the assessment of the policy for these objectives.</p> <p>The modifications to both policies S1 and S5 will have a significant positive effect on <b>objective 12</b> and reducing the borough's contribution to climate change because it will reduce carbon emissions by ensuring that gas CHP will only be allowed in exceptional cases where CHP is essential for the creation of a strategic heat network as part of the transition to the use of secondary sources to power heat networks. The proposed change to policy S5 will have a significant positive effect on reducing the borough's contribution to climate change because it will reduce carbon emissions by prioritising low carbon heating systems, in particular ASHPs, over gas boilers as the power source for minor developments with an individual heating system. The policy change to require a high standard of fabric energy efficiency for such developments will also contribute to reducing carbon emissions by reducing energy demand. The proposed change to Paragraph 6.67 of S5 will prevent the use of ultra-low NOx gas boilers as the sole heat source for the communal heating system of major and larger minor developments, which will have a positive effect on reducing carbon emissions. The modifications to paragraphs 6.79 and 6.80 provides clarification and does not change the policy requirement in terms of the cut-off point in relation to connection to a heat network. Overall the effect of the policy with modifications is considered to be significant positive on <b>objective 12</b>.</p>													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy S1/S5	++/+	+	0	+/0	++	+	++	+	0	0	0	++	++/+	+/0
Submission policy S1/S5 with modifications	++/+	+	0	+/0	++	+	++	+	0	0	0	++	++/+	+/0
	<p>The modifications to policies S1 and S5 will help to minimise the use of non-renewable energy sources by limiting the use of gas CHP and gas boilers. The change to policy S5 will also promote the use of ASHPs which are a renewable sustainable energy source. The modification to paragraph 6.75 does not change the requirement for the feasibility assessment to use a whole life-cycle assessment methodology, the modification provides additional detail on this requirement so does not change the affects. The modifications will have minor positive effects on <b>objective 13</b> and overall the effects of the assessment will not change for the policy.</p> <p>No other effects have been identified for the modifications.</p>													
Conclusions	<ul style="list-style-type: none"> <li>The modifications to policy respond to technological evolution and will help to minimise carbon emissions from heating systems and promote sustainable energy infrastructure. The main positive effect of the modifications is their contribution to the decarbonisation of heat and the reduction of carbon emissions and helping reduce air pollution. There are no change in effects to the overall assessment of the policy.</li> </ul>													

## b. Modifications policy assessments – Bunhill and Clerkenwell Area Action Plan modifications

### Policy BC2: Culture, retail and leisure uses

Table 4.19: Assessment of modifications to Policy BC2: Culture, retail and leisure uses

I/A Objective	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	0	+	0	+	0	0	+	++	+	0	0	0	0	0
Submission policy with modifications	0	+	0	+	0	0	+	++	+	0	0	0	0	0
Commentary on assessment	The modification in relation to the locations for cultural uses and removal of sequential test may mean that there will be more cultural uses across the AAP area, however the policy still seeks to focus such uses within the Clerkenwell/Farringdon Cultural Quarter, with retail and leisure uses encouraged within Local Shopping													

IIA Objective	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	0	+	0	+	0	0	+	++	+	0	0	0	0	0
Submission policy with modifications	0	+	0	+	0	0	+	++	+	0	0	0	0	0
of likely effects	<p>Areas. Such uses will still have to meet policies, including in part D, which will help avoid harmful impacts on amenity. The modifications are therefore considered to have a positive effect on <b>objective 2</b>.</p> <p>The modifications through the removal of the sequential test may mean that there will be more cultural uses across the AAP area which could have a positive impact on economic growth. The policy now encourages retail and leisure uses within the four Local Shopping Areas in the AAP area but they can be provided elsewhere too in line with other policies. Whilst the modifications could result in a slightly more positive framework for retail, cultural and leisure uses which can help support economic growth and a significant positive effect on <b>objective 8</b> overall the effect of the policy with modifications is considered to be significant positive.</p> <p>No other effects have been identified for the modifications.</p>													
Conclusions	<ul style="list-style-type: none"> <li>The modification in relation to the locations for cultural uses and removal of sequential test may mean that there will be more cultural uses across the AAP area, however the policy still seeks to focus such uses within the Clerkenwell/Farringdon Cultural Quarter, with retail and leisure uses encouraged within Local Shopping Areas. Cultural uses will still have to meet policies to protect amenity, including in part D of BC2. The removal of the sequential approach could help support economic growth across the AAP area more and result in a slightly more positive effects although significant positive effects are already identified.</li> </ul>													

## Policy BC4: City Road

Table 4.20: Assessment of Policy BC4: City Road

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	+	+	+	+	0	+	+	+	+	+	+	0	0
Submission policy with modifications	+	+	+	+	+	0	+	+	+	+	+	+	0	0
Commentary on assessment of likely effects	<p>The modifications clarify the approach in terms of future operation of the canal for different uses through the development of a Waterspace Strategy for Islington’s canal network which will help balance the competing demands on use of the canal. Whilst it is considered there is some uncertainty around implementation of improved boater facilities the modifications are considered to have a minor positive effect against this objective because of the Waterspace Strategy but this is not considered to change the minor positive effect already identified overall for <b>objective 2</b>.</p> <p>The modifications, through clarifying the approach to the provision of boater facilities on the canal, have the potential to have a minor positive effect against <b>objective 5</b> by improving the standard of accommodation for boaters. The modifications clarify the role of policies in relation to the open space policy but are not considered to have any additional effects in relation to the provision of moorings. Spatial Policy SP2 also provides further detail on this. On balance the overall effect is considered to remain as minor positive.</p> <p>The modifications, through clarifying the approach to the provision of boater facilities on the canal, have the potential to have positive effects on <b>objective 7</b> health and wellbeing by improving the air quality. This could be achieved by</p>													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	+	+	+	+	0	+	+	+	+	+	+	0	0
Submission policy with modifications	+	+	+	+	+	0	+	+	+	+	+	+	0	0
	<p>installation of power supply to more moorings reducing reliance on diesel generators. On balance the policy does not require improvements therefore the effect would depend on implementation and is considered neutral. Overall the effect on <b>objective 7</b> therefore continues to be minor positive.</p> <p>The modifications make reference to educational and training uses as well as other uses that are appropriate to the function of the open space at City Road Basin in relation to the Waterspace Strategy, which may provide benefits to residents and are considered minor positive effect for <b>objective 8</b> and overall the effect of the policy with modifications is considered to be minor positive.</p> <p>The modifications provide clarification in relation to the consideration of moorings and boater facilities on the canal, where parts of the tow path are designated as open space. The criteria ensure that moorings do not harm the open space and have a minor positive effect. No additional effects on <b>objective 10</b> for open space have been identified as a result of the modifications.</p> <p>The modifications provide clarification in relation to the consideration of moorings and boater facilities on the canal, which is an SINC. No additional effects on <b>objective 11</b> and biodiversity have been identified as the policy states that development can only take place where it there is no detrimental impact on nature conservation and biodiversity value, and the character and amenity of the waterway corridor and its function as public open space therefore it is considered neutral. Overall a minor positive effect continues to be appropriate.</p>													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	+	+	+	+	0	+	+	+	+	+	+	0	0
Submission policy with modifications	+	+	+	+	+	0	+	+	+	+	+	+	0	0
	<p>The modifications, through clarifying the approach to the provision of boater facilities on the canal, have the potential to have minor positive effects on <b>objective 4</b> promoting liveable neighbourhoods as boater facilities could include waste and recycling infrastructure which would improve amenity, and electricity infrastructure that will reduce reliance on diesel generators and improve air quality; on <b>objective 12</b> reducing climate change by potentially introducing more electricity supply points shifting energy use of boats away from fossil fuels (diesel generators) on <b>objective 13</b> reducing waste by providing reuse and recycling facilities for boaters which will increase the proportion of household waste that is recycled and reduce the amount of waste going to landfill and on <b>objective 14</b> and protecting natural resources by improving air quality through supply of electricity to boats and shifting away from diesel generator use, and also on water by providing water and sewerage infrastructure is available to service boats. On balance the policy does not require improvements therefore the effect would depend on implementation and is considered neutral. Overall a minor positive effect continues to be appropriate.</p> <p>No other effects have been identified for the modifications.</p>													
Conclusion	<ul style="list-style-type: none"> <li>The modifications will have mainly neutral effects for providing a framework for improved boater facilities and infrastructure along the canal corridor because of uncertainty around implementation, with positive effects dependant on implementation which could improve the function and amenity of those living on and using the canal. The modifications also clarify the approach in terms of future operation of the canal for different uses to develop a Waterspace Strategy for Islington’s canal network which will help balance the competing demands on use of the canal. However overall the positive effects for Policy BC4 have not changed and whilst the positive</li> </ul>													



IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	+	+	+	+	0	+	+	+	+	+	+	0	0
Submission policy with modifications	+	+	+	+	+	0	+	+	+	+	+	+	0	0
	effects have not changed the results of the assessment the commentary demonstrates the consideration of the effects for the modifications sufficient to warrant completing the assessment.													

## Site Allocation BC10: 254-262 Old Street (east of roundabout)

An assessment for BC10 was omitted from the IIA Examination Addendum, the assessment below is provided to correct this.

Table 4.21: Assessment of Site Allocation BC10: 254-262 Old Street (east of roundabout)

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Effect of site allocation	+	++	0	+	0	+	0	++	0	0	0	0	0	0
Commentary on assessment of likely effects	<p>This allocation will have significant positive effects on <b>objective 8</b> and economic growth by providing employment (office) floorspace. Lack of office floorspace is a barrier to economic growth in the area. The Local Plan strategy is that new business floorspace will be focused in the CAZ, Bunhill and Clerkenwell AAP area, the CAZ Fringe Spatial Strategy Areas and the Locally Strategic Industrial Sites. Given land constraints demand will not be met without prioritising business space in these areas, including the BCAAP area.</p> <p>The location of Bunhill and Clerkenwell is particularly suited to development of employment uses, with easy access to the major centres of employment and business of the London's West End, the City of London, Canary Wharf, as well as the emerging clusters of the City Fringe, Tech City, King's Cross and the Knowledge Quarter. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to <b>objective 6</b> for social inclusion. The designation of this site as potentially suitable for tall buildings will assist in achieving the significant positive effects by provision of a substantial quantum of floorspace, and will lead to significant positive effects against <b>objective 2</b> for the efficient use of land.</p>													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	Minor positive effects are identified against the <b>objectives 1 and 4</b> for a high quality environment and liveable neighbourhoods as refurbishment or redevelopment presents an opportunity to substantially improve the quality of the local environment and may provide local services or facilities at ground floor. The building at present does not offer a quality and attractive active frontage at street level, part of which is used for car parking.													
Reasonable alternative: mixed use	+	+	0	+	+	+	0	--	-	0	0	0	0	0
Commentary on assessment of likely effects	<p>This alternative is where this site allocation would be amended to allow more housing to be developed, allowing up to 50% of the uplift to be provided as housing with the other 50% office use, in addition to retail and leisure use on the ground floor.</p> <p>The alternative would have significant negative effects on economic growth. The additional housing would displace office floorspace, which is needed to meet demand from businesses, grow the economy, and provide employment and training opportunities. This site is particularly suitable for office development as it is located within the City Fringe Opportunity Area, very close to the Old Street roundabout and Old Street Station. This highly prominent location is valuable for an office use. The additional office floorspace would have positive effects on <b>objective 6</b> for social inclusion through provision of a range of job opportunities, but less than an all office scheme.</p> <p>The alternative would have minor negative impacts on <b>objective 9</b> and reducing the need to travel by locating residential in the CAZ, rather than high trip generating office uses which can take advantage of the high accessibility by public transport and active travel, reducing trips by car. It has been assessed as minor positive against <b>objective 2</b> for the efficient use of land as development would still lead to more intensive use of the land but is a less optimum use than an all office scheme.</p>													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	<p>While there are residential uses fronting Old Street, the area suffers from high levels of noise and pollution which make providing an adequate level of amenity problematic, although these issues will decrease following public realm improvements in this area. There is some uncertainty about the likelihood of these impacts as good design may be able to overcome the limitations of the site for residential development which is why the assessment has minor positive effects against <b>objective 5</b> for housing quality, nevertheless this is a constrained location for residential development.</p> <p>As with the preferred approach minor positive effects are identified against <b>objective 1</b> for a high quality environment and minor positive effects are identified against <b>objective 4</b> for liveable neighbourhoods as refurbishment or redevelopment presents an opportunity to substantially improve the quality of the local environment. The building at present does not offer a quality and attractive active frontage at street level, part of which is used for car parking.</p> <p>No other effects have been identified for the modifications.</p>													
<b>Conclusion</b>	<ul style="list-style-type: none"> <li>The submission policy will support economic development by locating offices in the optimum location. The alternative allows more housing in this location in place of offices which will have negative effects on economic growth, the efficient use of land, and transport. While this additional housing has positive effects it is considered on balance the site is considered more appropriate for offices with active uses at the ground floor given its current use, its location within the City Fringe Opportunity Area, it's location on Old Street, proximity to Tech City and access to the Old Street Station.</li> </ul>													

## Site Allocation BC13: Car park at 11 Shire House, Whitbread Centre, Lamb's Passage

Table 4.22: Site Assessment BC13: Car park at 11 Shire House, Whitbread Centre, Lamb's Passage

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	0	0	0	+	0	++	+	0	0	+	0	+
Submission policy with modifications	+	++	0	0	+	+	0	+	+	0	0	+	0	+
Commentary on assessment of likely significant effects	<p>The provision of significant office space, would have a positive effect in relation to economic growth and <b>objective 8</b> and on social inclusion <b>objective 6</b> through provision of a range of job opportunities. However it is considered that the modifications will reduce the effect for objective 8, given the potential for residential floorspace to reduce the overall amount of employment floorspace delivered. The assessment for economic growth has therefore been changed from a significant positive to a minor positive. The addition of housing will have a positive effect in relation to <b>objective 5</b>, and could also have positive effects on social inclusion. The introduction of hotel use in the submission allocation with modifications could reduce the availability of land to meet other development needs, in this case either housing or employment floorspace and it could potentially not as effectively balance competing demands on land but overall this affect is considered uncertain and overall this would not change the minor positives for objectives 5 and 8.</p> <p>No other effects have been identified for the modifications.</p>													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	0	0	0	+	0	++	+	0	0	+	0	+
Submission policy with modifications	+	++	0	0	+	+	0	+	+	0	0	+	0	+
Conclusion	<ul style="list-style-type: none"> <li>The modifications are considered to have a positive effect in relation to housing delivery but may reduce the amount of employment floorspace delivered.</li> <li>Objective 5 and housing quality is now identified as a minor positive effect, as the delivery of additional housing will contribute towards Islington's significant housing need, and provide much needed affordable housing. Objective 8 and economic growth has been changed from a significant positive to a minor positive as the introduction of housing to the site may reduce the overall delivery of employment floorspace.</li> </ul>													

**Site Allocation BC21: 2, 4-10 Clerkenwell Road, 29-39 Goswell Road & 1-4 Great Sutton Street**

Table 4.23: Assessment of Site Allocation BC21: 2, 4-10 Clerkenwell Road, 29-39 Goswell Road & 1-4 Great Sutton Street

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	0	0	0	+	0	++	+	0	0	+	0	+
Submission policy with modifications	+	++	0	0	0	0	0	+	+	0	0	+	0	+
Commentary on assessment of likely significant effects	The policy with modifications is now allocated for hotel led mixed use development with retail and leisure uses. The modification to the allocation will reduce to minor positive effects for <b>objective 8</b> for economic growth by providing hotel use, retail and leisure floorspace, as there is a reduction in business floorspace from the submission allocation for an office development. With the office use no longer included there are no longer positive effects recorded against <b>objective 6</b> for social inclusion as the proposed hotel use is not considered to support the same range and types of employment opportunities that can reduce barriers to employment. No other effects have been identified for the modifications.													
Conclusion	<ul style="list-style-type: none"> <li>The modified allocation is for hotel use which will support economic growth and employment, however the previous allocation for office development would have greater benefits for economic growth supporting the central activities zone office function and greater employment densities. Offices also provide a greater range of employment opportunities with positive effects with social inclusion when compared to hotels.</li> <li>The assessment against objective 8 for economic development has therefore been amended from significant positive effects down to minor positive effects. Effects on objective 6 for social inclusion has been moved from minor positive to neutral effects.</li> </ul>													

## Site Allocation BC24 Clerkenwell Fire Station, 42-44 Rosebery Avenue

Table 4.24: Assessment of Site Allocation BC24 Clerkenwell Fire Station, 42-44 Rosebery Avenue

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	++	+	++	+	0	0	0	0	0	0	0	0
Submission policy with modifications	+	++	++	+	++	+	0	+/0	0	0	0	0	0	0
Commentary on assessment of likely significant effects	<p>The modified site allocation seeks to clarify and expand other uses on the ground floor, to include commercial or community uses. As commercial uses have the potential to be located at ground floor a minor positive/neutral effects have been identified for <b>objective 8</b> to reflect the potential economic benefits of this whilst also recognising the uncertainty about which uses could be provided given the overall flexibility. In relation to liveable neighbourhoods, whilst the modified wording provides additional flexibility and may not result in the provision of social infrastructure use on the site, the other uses identified could also still contribute positively to the provision of liveable neighbourhoods and therefore no change in effect has been identified. No other effects have been identified for the modifications.</p>													
Conclusion	<ul style="list-style-type: none"> <li>The modification allows commercial uses on the ground floor which could have benefits for economic development.</li> <li>The assessment has been amended against objective 8 for economic growth from neutral for the submission policy compared to neutral/minor positive for the modifications.</li> </ul>													



## Site Allocation BC28: Angel Gate, Goswell Road

Table 4.25: Assessment of Site Allocation BC28: Angel Gate, Goswell Road

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	0	0	0	+	0	++	0	0	0	0	0	0
Submission policy with modifications	+	++	+	0	0	+	0	++	0	0	0	0	0	0
Commentary on assessment of likely effects	For the allocation with modifications whilst protection for the listed buildings on the site exists under Strategic and Development Management Policy DH2 which states that loss of a listed building will be strongly resisted, the clarification that these particular buildings should be retained strengthens this policy and results in minor positive effects against the heritage objective. No other effects have been identified for the modifications.													
Conclusion	<ul style="list-style-type: none"> <li>The modification states that a listed building on the site should be retained which will protect the historic environment.</li> <li>A minor positive effect has been recorded against objective 3 for heritage.</li> </ul>													

## Site Allocation BC37: Triangle Estate, Goswell Road/Compton Street/Cyrus Street

Table 4.26: Assessment of Site Allocation BC37: Triangle Estate, Goswell Road/Compton Street/Cyrus Street

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	+	0	0	++	+	0	0	0	0	0	0	0	0
Submission policy with modifications	+	+	0	0	++	+	+	0	0	+	0	0	0	0
Commentary on assessment of likely effects	The site allocation with modifications will have positive effects on residential amenity and open space. New minor positive effects have been identified against the <b>objectives 7 and 10</b> for health and wellbeing and open space, resulting from the modifications due to the improvements on open space and public realm on the estate and the positive amenity and open space benefits for those living on the estate. No other effects have been identified for the modifications.													
Conclusion	<ul style="list-style-type: none"> <li>The modification will benefit residents by ensuring that impacts on them are minimised and that development improves the security, function, accessibility, and appearance of public realm and open space on the estate.</li> <li>The assessment has been assessed to result in additional minor positive effects in relation to objectives 7 for health and well-being and objective 10 for open space.</li> </ul>													

## Site Allocation BC49: Building adjacent to railway lines and opposite

Table 4.27 Assessment of Site Allocation BC49: Building adjacent to railway lines and opposite 18-20 Farringdon Lane

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	+	0	0	0	0	0	++	0	0	0	0	0	0
Submission policy with modifications	+	+	0	0	0	0	0	+	0	0	0	0	0	0
Commentary on assessment of likely effects	For the allocation with modifications, the additional development consideration related to the electrical substation could potentially reduce the overall quantum of floorspace provided if the substation is re-provided on site. The potential re-provision of the substation could result in a lower quantum of development for office uses resulting in a minor positive effect for <b>objective 8</b> and economic development. The other effects identified previously remain unchanged. No other effects have been identified for the modifications.													
Conclusion	<ul style="list-style-type: none"> <li>The modification states that the development should integrate or relocate the electricity substation on the site if this is still required, which may reduce the development capacity of the site.</li> <li>As a result of the modifications the effect for objective 8 for economic growth has been reduced from a significant positive and a minor positive.</li> </ul>													

## Site Allocation BC51: Italia Conti School, 23 Goswell Road

Table 4.28: Assessment of Site Allocation BC51: Italia Conti School, 23 Goswell Road

IIA Objective	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC DEVELOPMENT	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCES	14. NATURAL RESOURCES
Submission policy	+	0	0	0/+	0	0/+	0	0/+	0	0	0	0	0	0
Submission policy with modifications	+	0	0	0	0	+	0	+	0	0	0	0	0	0
Commentary on assessment of likely effects	<p>The modified allocation is for office development which shows minor positive effects against <b>objective 8</b> and <b>objective 6</b> as the additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment.</p> <p>The site is no longer allocated for social infrastructure, the assessment has been amended for neutral effects against the liveable neighbourhoods <b>objective 4</b>.</p> <p>No other effects have been identified for the modifications.</p>													
Conclusion	<ul style="list-style-type: none"> <li>The modification changes the allocation to office development which will support the economy and a range of employment types and opportunities in the borough and reduce barriers to employment leading to positive effects for <b>objective 8</b> for economic development and <b>objective 6</b> for social inclusion through providing job opportunities. The requirement for retention of D1 has been removed and so no positive effects are assessed for <b>objective 4</b> for liveable neighbourhoods through provision of education use.</li> </ul>													

IIA Objective	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF RESOURCES	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCES	14. NATURAL RESOURCES
	<ul style="list-style-type: none"> <li>The site allocation as amended would result in minor positive effects in relation to <b>objective 8</b> for economic growth and <b>objective 6</b> for social inclusion, while a neutral effect has now been identified in relation to liveable neighbourhoods.</li> </ul>													

## c. Modifications policy assessments – Site Allocations

This section sets out the assessment of site allocations and where relevant the alternatives to those site allocations. The presentation of the site assessment has been revised and includes assessment against the full set of appraisal objectives as requested by the Inspectors. Reasonable alternatives are considered alongside site assessments where relevant or explanations of where there are no alternatives.

Table 4.29: Site Assessment KC8: Bemerton Estate

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Submission policy with modifications	+	+	0	+	++	+	0	0	0	0	0	0	0	0
Commentary on assessment of likely significant effects	The allocation aims to optimise the use of land in a residential area, offering the opportunity to deliver quality housing in an appropriate location, positive for <b>objective 2</b> . Affordable housing would be provided as part of the development of the site, contributing towards meeting Islington's housing need, positive for <b>objective 5</b> as well as addressing objectives relating to <b>objective 6</b> for social inclusion. The allocation requires public realm improvements which will benefit the quality of the built environment, creating a safer and more inclusive environment, positive for <b>objective 1</b> as well as the													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Submission policy with modifications	+	+	0	+	++	+	0	0	0	0	0	0	0	0
	re-provision of community and commercial space that will promote more liveable neighbourhoods, positive for <b>objective 4</b> .													
Conclusion	<ul style="list-style-type: none"> <li>The proposed allocation is for infill residential development, which will contribute towards Islington’s housing delivery and provide much needed affordable housing. The allocation should also deliver public realm improvements and re-provide commercial and community space, providing benefits in terms of a high quality environment, liveable neighbourhoods and social inclusion.</li> <li>Objective 5 for housing quality is identified as a significant positive effect, with minor positive effects identified for objective 1 for high quality environment, objective 2 for efficient use of land, objective 4 for liveable neighbourhoods and objective 6 for social inclusion.</li> </ul>													

**Site Allocation VR1: Fayers Site, 202-228 York Way, Former Venus Printers, 196-200 York Way**

Table 4.30: Site Assessment VR1: Fayers Site, 202-228 York Way, Former Venus Printers, 196-200 York Way

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	+	0	0	+	0	++	0	0	0	0	0	0
Submission policy with modifications	+	++	0	0	0	+	0	++	0	0	0	0	0	0
Commentary on assessment of likely significant effects	<p>Following the decision to separate the submission VR1 site allocation into two allocations, the submission allocation with modifications VR1 allocation is for 'intensification for a significant amount of B8 use alongside a small proportion of flexible office space' reflecting the extant planning permission for the site. The 5-storey limit on building heights previously included in the allocation has been removed. The removal of the height limit will not necessarily result in a negative impact on the local view as that impact will be determined by the design of any proposed building, and will also be considered through other relevant policies (e.g. DH2) therefore the effect on <b>objective 3</b> is changed to neutral.</p> <p>No other effects have been identified for the modifications</p>													
Conclusion	<ul style="list-style-type: none"> <li>The removal of the 5-storey height limit from the allocation has been identified as changing the effect on objective 3 (heritage) to neutral. The impact on the local view will be determined by the design of any proposed building, and will also be considered through other relevant policies (e.g. DH2).</li> </ul>													



## Site Allocation VR2: 230-238 York Way

Table 4.31: Site Assessment VR2: 230-238 York Way

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	+	0	0	+	0	++	0	0	0	0	0	0
Submission policy with modifications	+	+	0	0	0	+	0	+	0	0	0	0	0	0
Commentary on assessment of likely effects	<p>As a higher density employment use, offices/research and development use could result in an optimisation of existing employment floorspace and some intensification of industrial floorspace at the site, albeit there is likely to be less opportunity to intensify industrial uses to the same extent. As a result it is considered that the amended allocation is not likely to have the same benefits previously identified in terms of increasing industrial provision within the LSIS (an appropriate location for such development) and may bring a different balance to competing demands between land uses. Whilst there are land use benefits from the co-location of offices/research and development with industrial, depending on the extent they are intensified, there are also potential impacts that could arise from less intensification for industrial uses, given that office needs are prioritised for delivery elsewhere in the borough. Whilst it is finely balanced it is considered that overall there is likely to be a change in effect in relation to <b>objective 2</b> for the efficient use of land from a significant positive, to a minor positive.</p> <p>The amended allocation is considered to have a minor positive effect on <b>objective 8</b> economic growth. Office development would bring higher-density employment to the site and co-locating office/research and development space with intensification of industrial could strengthen the local economy through the intensification of employment floorspace.</p>													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	+	0	0	+	0	++	0	0	0	0	0	0
Submission policy with modifications	+	+	0	0	0	+	0	+	0	0	0	0	0	0
	<p>The additional text added in terms of the industrial function of the LSIS remaining will help to address some of the potential longer term and cumulative effects relating to the impacts of offices on the wider industrial function of the LSIS. However, given the difference in values between office and industrial uses, it is recognised that the revised policy could result in less intensification for industrial uses overall. The LSIS has a strategic position in relation to the CAZ. It is one of the last remaining industrial clusters within close proximity to the CAZ and supports Central London's economy through the provision of 'last mile' distribution/logistics and 'just in time' servicing. Given offices/research and development uses are sought elsewhere in the borough and industrial uses are specifically sought within the LSIS and this is the key location for their intensification a reduction in the positive effect for <b>objective 8</b> has been identified, although it is recognised that this judgement is finely balanced. The modified allocation would continue to have a positive effect on social inclusion by providing opportunities for residents to access employment in the borough in line with the social inclusion objective. Industrial sectors provide job opportunities for the resident population. Opportunities within these sectors may offer more diverse ways of accessing employment through learning skills on the job for those who have low qualification levels or no qualifications, who often face more barriers to access work. If these sectors are lost in the local area, residents dependent on these jobs may be at risk of unemployment. Through providing for industrial intensification alongside office uses, a minor positive in relation to <b>objective 6</b> and social inclusion is considered to still be justified.</p> <p>The site is partially within a protected viewing corridor. The removal of the height limit will not necessarily result in a negative impact on the local view as that impact will be determined by the design of any proposed building, and will also be considered through other relevant policies (e.g. DH2) therefore the effect on <b>objective 3</b> is changed to neutral.</p>													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	+	0	0	+	0	++	0	0	0	0	0	0
Submission policy with modifications	+	+	0	0	0	+	0	+	0	0	0	0	0	0
Conclusion	<ul style="list-style-type: none"> <li>The assessment considers there is likely to be less opportunity to intensify industrial uses to the extent envisaged in the original allocation and as a result it is considered that the amended allocation is unlikely to have the same benefits previously identified in terms of increasing industrial provision within the LSIS.</li> <li><b>Objectives 2</b> the efficient use of land and <b>objective 8</b> for economic growth are now identified as minor positives rather than significant positives, recognising that whilst co-location can have some positive effects in relation to the overall intensification of employment uses, there could also be less intensification of industrial uses in a priority industrial location, although it is accepted that judgements on both are finely balanced. The removal of the 5-storey height limit from the allocation has been identified as changing the effect on <b>objective 3</b> for heritage to neutral. The impact on the local view will be determined by the design of any proposed building, and will also be considered through other relevant policies (e.g. DH2).</li> </ul>													

## Site Allocation VR3: Tileyard Studios, Tileyard Road, N7 9AH

Table 4.32: Site Assessment VR3: Tileyard Studios, Tileyard Road, N7 9AH

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	+	0	0	+	0	++	0	0	0	0	0	0
Submission policy with modifications	0	+	0	0	0	+	0	++	0	0	0	0	0	0
Commentary on assessment of likely significant effects	<p>Under the modified wording of the allocation, there is likely to be less opportunity to intensify industrial uses to the same extent. As a result it is considered that it is not likely to have the same extent of benefits previously identified in terms of increasing industrial provision within the LSIS (an appropriate location for such development), although it is recognised that the allocation seeks to retain the functionality of workshops and light industrial units. Whilst there are land use benefits from the intensification of studios and offices on the site, there are potential impacts that could arise from less intensification for industrial uses and given that office needs are prioritised for delivery elsewhere in the borough. Whilst it is finely balanced it is considered that overall there is likely to be a change in effect in relation to <b>objective 2</b> the efficient use of land from a significant positive, to a minor positive.</p> <p>Despite the change in focus from industrial intensification to the co-location of office and industrial uses, the amended allocation is considered to retain potential to have a significant positive effect in relation to economic growth. The ability to secure a range of unit sizes through condition should support the creation of small and micro businesses of the kind already accommodated within the site, and facilitate their growth. In addition, the allocation seeks to retain the flexibility of existing spaces for studio/hybrid uses.</p>													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	+	0	0	+	0	++	0	0	0	0	0	0
Submission policy with modifications	0	+	0	0	0	+	0	++	0	0	0	0	0	0
	<p>To reflect the removal of the height limit from the development considerations the assessment for <b>objective 3</b> for heritage and <b>objective 1</b> for high quality environment have been changed to neutral. Any impacts on heritage and the built environment will be determined by the design of any proposed development and assessed through other relevant policies (e.g. DH2).</p> <p>No other effects have been identified for the modifications.</p>													
Conclusion	<ul style="list-style-type: none"> <li>The assessment considers there is likely to be less opportunity to intensify industrial uses to the extent envisaged in the submission allocation and as a result it is considered that the amended allocation is unlikely to have the same benefits previously identified in terms of increasing industrial provision within the LSIS.</li> <li><b>Objective 2</b> for the efficient use of land is now identified as a minor positive rather than a significant positive, as whilst there may be benefits arising from the intensification of studios and offices on the site, there may also be impacts due to there being less intensification for industrial uses, although it is accepted this is a finely balanced judgement. <b>Objectives 1</b> for high-quality environment and <b>objective 3</b> for heritage have been changed from a minor positive to neutral, as there is no longer specific text in relation to building heights. However no negative effects have been identified and other relevant policies will be applied in relation to design and heritage.</li> </ul>													

## Site Allocation VR4: 20 Tileyard Road

Table 4.33: Site Assessment VR4: 20 Tileyard Road

IIA Objective	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	+	0	0	+	0	++	0	0	0	0	0	0
Submission policy with modifications	0	+	0	0	0	+	0	+	0	0	0	0	0	0
Commentary on assessment of likely significant effects	<p>As a higher density employment use, office/research and development uses could result in an optimisation of existing employment floorspace and some intensification of industrial floorspace, albeit there is likely to be less opportunity to intensify industrial uses to the same extent. As a result it is considered that the amended allocation is not likely to have the same benefits previously identified in terms of increasing industrial provision within the LSIS (an appropriate location for such development), bringing a different balance to the competing demands between land uses. Whilst there are land use benefits from the co-location of offices/research and development with industrial, depending on the extent to which offices are intensified, there are potential impacts that could arise from less intensification for industrial uses and given that office needs are prioritised for delivery elsewhere in the borough. Whilst it is finely balanced it is considered that overall there is likely to be a change in effect in relation to <b>objective 2</b> for the efficient use of land from a significant positive, to a minor positive.</p> <p>The submission allocation with modifications is considered to have a minor positive effect on economic growth and social inclusion. Office/research and development uses would bring higher-density employment to the site and co-locating office/research and development space with intensification of industrial could strengthen the local economy through the</p>													

IIA Objective	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	+	0	0	+	0	++	0	0	0	0	0	0
Submission policy with modifications	0	+	0	0	0	+	0	+	0	0	0	0	0	0
	<p>intensification of employment floorspace. The additional text added in terms of the industrial function of the LSIS remaining will help to address some of the potential longer term and cumulative effects relating to the impacts of offices on the wider industrial function of the LSIS. However, given the difference in values between office and industrial uses, it is recognised that the revised policy could result in less intensification for industrial uses overall. The LSIS has a strategic position in relation to the CAZ. It is one of the last remaining industrial clusters within close proximity to the CAZ and supports Central London's economy through the provision of 'last mile' distribution/logistics and 'just in time' servicing. Given office uses are sought elsewhere in the borough and industrial uses are specifically sought within the LSIS and this is the key location for their intensification a reduction in the positive effect has been identified, although it is recognised that this judgement is finely balanced. The modified allocation would continue to have a positive effect on social inclusion by providing opportunities for residents to access employment in the borough in line with the social inclusion objective. Industrial sectors provide job opportunities for the resident population. Opportunities within these sectors may offer more diverse ways of accessing employment through learning skills on the job for those who have low qualification levels or no qualifications, who often face more barriers to access work. If these sectors are lost in the local area, residents dependent on these jobs may be at risk of unemployment. Through providing for industrial intensification, alongside offices, a minor positive in relation to <b>objective 6</b> is considered to still be justified.</p> <p>The site is within a protected viewing corridor. The removal of the height limit will not necessarily result in a negative impact on the local view as that impact will be determined by the design of any proposed building, and will also be considered through other relevant policies (e.g. DH2) therefore the effect on <b>objective 3</b> is changed to neutral.</p>													

IIA Objective	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	+	0	0	+	0	++	0	0	0	0	0	0
Submission policy with modifications	0	+	0	0	0	+	0	+	0	0	0	0	0	0
	No other effects have been identified for the modifications.													
Conclusion	<ul style="list-style-type: none"> <li>The assessment considers there is likely to be less opportunity to intensify industrial uses to the extent envisaged in the original allocation and as a result it is considered that the amended allocation is unlikely to have the same benefits previously identified in terms of increasing industrial provision within the LSIS.</li> <li><b>Objective 2</b> for the efficient use of land and <b>objective 8</b> for economic growth are now identified as minor positives rather than significant positives, recognising that whilst co-location can have some positive effects in relation to the overall intensification of employment uses, there could also be less intensification of industrial uses in a priority industrial location, although it is accepted that judgements on both are finely balanced. <b>Objective 1</b> for high-quality environment and <b>objective 3</b> for heritage have been changed from a minor positive to neutral, as there is no longer specific text in relation to building heights. However no negative effects have been identified and other relevant policies will be applied in relation to design and heritage.</li> </ul>													



## Site Allocation VR5: 22-23 Tileyard Road and part of 226-228 York Way

Table 4.34: Site Assessment VR5: 22-23 Tileyard Road and part of 226-228 York Way

I/A Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	+	0	0	+	0	++	0	0	0	0	0	0
Submission policy with modifications	+	+	0	0	0	+	0	+	0	0	0	0	0	0
Commentary on assessment of likely significant effects	<p>The site is partially within a protected viewing corridor. The removal of the height limit will not necessarily result in a negative impact on the local view as that impact will be determined by the design of any proposed building, and will also be considered through other relevant policies (e.g. DH2) therefore the effect on <b>objective 3</b> for heritage is changed to neutral.</p> <p>Although not subject to a modification the minor positive in relation to high quality design in <b>objective 1</b> remains given the retention of a specific criterion within the development considerations regarding the prominent corner location of the site warranting a high-quality, well-designed building.</p> <p>Flexible business uses could include office use which is a higher density employment use and could result in an optimisation of existing employment floorspace, alongside the provision of light industrial use. The allocation also now recognises that other future proposals on the site would be required to provide for co-location. Within this amended policy context there is likely to be less opportunity to intensify industrial uses to the same extent. As a result it is considered that the allocation is not likely to have the same extent of benefits previously identified, bringing a different</p>													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	+	0	0	+	0	++	0	0	0	0	0	0
Submission policy with modifications	+	+	0	0	0	+	0	+	0	0	0	0	0	0
	<p>balance to competing demands between land uses. Whilst there are benefits from the provision of flexible business floorspace alongside light industrial use (as well as co-location), depending on the extent to which higher density employment uses are intensified, there are potential impacts that could arise from less intensification for industrial uses, given that office needs are prioritised for delivery elsewhere in the borough. Whilst it is finely balanced it is considered that overall there is likely to be a change in effect in relation to <b>objective 2</b> for the efficient use of land from a significant positive to a minor positive.</p> <p>The submission allocation with modifications is considered to have a minor positive effect on economic growth and social inclusion as it has the potential to bring higher-density employment to the site, which could strengthen the local economy through the intensification of employment floorspace. However, it is recognised that the revised policy could result in less intensification for industrial uses overall. The LSIS has a strategic position in relation to the CAZ. It is one of the last remaining industrial clusters within close proximity to the CAZ and supports Central London's economy through the provision of 'last mile' distribution/logistics and 'just in time' servicing. Given flexible business uses are sought elsewhere in the borough and industrial uses are specifically sought within the LSIS and this is the key location for their intensification a reduction in the positive effect has been identified, although it is recognised that this judgement is finely balanced. The revised allocation would continue to have a positive effect on social inclusion by providing opportunities for residents to access employment in the borough in line with the social inclusion objective. Industrial sectors provide job opportunities for the resident population. Opportunities within these sectors may offer more diverse ways of accessing employment through learning skills on the job for those who have low qualification levels or no qualifications, who often face more barriers to access work. If these sectors are lost in the local area, residents dependent on these jobs may be</p>													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	+	0	0	+	0	++	0	0	0	0	0	0
Submission policy with modifications	+	+	0	0	0	+	0	+	0	0	0	0	0	0
	<p>at risk of unemployment. Through providing for light industrial uses, alongside flexible business space (and potentially co-location) a minor positive in relation to <b>objective 6</b> is considered to still be justified.</p> <p>No other effects have been identified for the modifications.</p>													
Conclusion	<ul style="list-style-type: none"> <li>The assessment considers there is likely to be less opportunity to intensify industrial uses to the extent envisaged in the original allocation and as a result it is considered that the amended allocation is unlikely to have the same benefits previously identified in terms of increasing industrial provision within the LSIS.</li> <li><b>Objective 2</b> for the efficient use of land and <b>objective 8</b> for economic growth are now identified as minor positives rather than significant positives, recognising that whilst the allocation may have some positive effects in relation to the overall intensification of employment uses, there could also be less intensification of industrial uses, although it is accepted that judgements on both are finely balanced. The removal of the 5-storey height limit from the allocation has been identified as changing the effect on <b>objective 3</b> for heritage to neutral. The impact on the local view will be determined by the design of any proposed building, and will also be considered through other relevant policies (e.g. DH2).</li> </ul>													

## Site Assessment VR6: 4 Brandon Road (formerly site reference VR5)

Table 4.35: Site Assessment VR6: 4 Brandon Road (formerly site reference VR5)

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	+	0	0	+	0	++	0	0	0	0	0	0
Submission policy with modifications	0	+	0	0	0	+	0	+	0	0	0	0	0	0
Commentary on assessment of likely significant effects	<p>As a higher density employment use, offices/research and development uses could result in an optimisation of existing employment floorspace and some intensification of industrial floorspace, albeit there is likely to be less opportunity to intensify industrial uses to the same extent. As a result it is considered that it is not likely to have the same extent of benefits previously identified in terms of increasing industrial provision within the LSIS (an appropriate location for such development), bringing a different balance to the competing demands between land uses. Whilst there are land use benefits from the co-location of offices/research and development with industrial, depending on the extent to which offices are intensified, there are potential impacts that could arise from less intensification for industrial uses, given that office needs are prioritised for delivery elsewhere in the borough. Whilst it is finely balanced it is considered that overall there is likely to be a change in effect in relation to <b>objective 2</b> for the efficient use of land from a significant positive, to a minor positive.</p> <p>The submission allocation with modifications is considered to have a minor positive effect on <b>objective 8</b> for economic growth. Office/research and development uses would bring higher-density employment to the site and co-locating office/research and development space with intensification of industrial could strengthen the local economy through the</p>													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	+	0	0	+	0	++	0	0	0	0	0	0
Submission policy with modifications	0	+	0	0	0	+	0	+	0	0	0	0	0	0
	<p>intensification of employment floorspace. The additional text added in terms of the industrial function of the LSIS remaining will help to address some of the potential longer term and cumulative effects relating to the impacts of offices on the wider industrial function of the LSIS. However, given the difference in values between office and industrial uses, it is recognised that the revised policy could result in less intensification for industrial uses overall. The LSIS has a strategic position in relation to the CAZ. It is one of the last remaining industrial clusters within close proximity of the CAZ and supports Central London's economy through the provision of 'last mile' distribution/logistics and 'just in time' servicing. Given office uses are sought elsewhere in the borough and industrial uses are specifically sought within the LSIS and this is the key location for their intensification a reduction in the positive effect has been identified for <b>objective 8</b>, although it is recognised that this judgement is finely balanced. The revised allocation would continue to have a positive effect on social inclusion by providing opportunities for residents to access employment in the borough in line with the social inclusion objective. Industrial sectors provide job opportunities for the resident population. Opportunities within these sectors may offer more diverse ways of accessing employment through learning skills on the job for those who have low qualification levels or no qualifications, who often face more barriers to access work. If these sectors are lost in the local area, residents dependent on these jobs may be at risk of unemployment. Through providing for industrial intensification, alongside offices, a minor positive in relation to <b>objective 6</b> is considered to still be justified.</p> <p>The removal of the height limit will not necessarily result in a negative impact on the local view as that impact will be determined by the design of a proposed building, and will also be considered through other relevant policies (e.g. DH2) therefore the effect on <b>objective 3</b> is changed to neutral. The minor positive in relation to <b>objective 1</b> has been amended to neutral, as whilst there is no site-specific criteria guiding location sensitive design, this will be considered through the</p>													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	+	0	0	+	0	++	0	0	0	0	0	0
Submission policy with modifications	0	+	0	0	0	+	0	+	0	0	0	0	0	0
	<p>application of other plan policies. Removing the height restriction may result in a marginally higher building coming forward, although that is uncertain as it will be determined by the design of any proposed development.</p> <p>No other effects have been identified for the modifications.</p>													
Conclusion	<ul style="list-style-type: none"> <li>The assessment considers there is likely to be less opportunity to intensify industrial uses to the extent envisaged in the original allocation and as a result it is considered that the amended allocation is unlikely to have the same benefits previously identified in terms of increasing industrial provision within the LSIS.</li> <li><b>Objective 2</b> for the efficient use of land and <b>objective 8</b> for economic growth are now identified as minor positives rather than significant positives, recognising that whilst co-location can have some positive effects in relation to the overall intensification of employment uses, there could also be less intensification of industrial uses in a priority industrial location, although it is accepted that judgements on both are finely balanced. <b>Objective 1</b> for high-quality environment and <b>objective 3</b> for heritage have been changed from a minor positive to neutral, as there is no longer specific text in relation to building heights. However no negative effects have been identified and other relevant policies will be applied in relation to design and heritage.</li> </ul>													

## Site Allocation VR7: 43-53 Brewery Road

Table 4.36: Site Assessment VR7: 43-53 Brewery Road

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	+	0	0	+	0	++	0	0	0	0	0	0
Submission policy with modifications	0	++	0	0	0	+	0	++	0	0	0	0	0	0
Commentary on assessment of likely significant effects	<p>The submission allocation with modifications to remove the height limit will not necessarily result in a negative impact on local views as that impact will be determined by the design of any proposed building, and will also be considered through other relevant policies (e.g. DH2). The effect on <b>objective 3</b> for heritage has therefore been changed to neutral. The minor positive in relation to <b>objective 1</b> for high quality environment has been amended to neutral, as whilst there is not site-specific criteria guiding location sensitive design, this will be considered through the application of other plan policies.</p> <p>Removing the height restriction may result in a marginally higher building coming forward, although that is uncertain as it will be determined by the design of any proposed development, therefore there is no change to the assessment of <b>objective 2</b>.</p> <p>No other effects have been identified for the modifications.</p>													
Conclusion	<ul style="list-style-type: none"> <li>The proposed modification to remove the limit on building heights will not necessarily result in a negative impact on heritage assets but could be considered to offer less protection than the originally allocation.</li> </ul>													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	+	0	0	+	0	++	0	0	0	0	0	0
Submission policy with modifications	0	++	0	0	0	+	0	++	0	0	0	0	0	0
	<ul style="list-style-type: none"> <li>Objective 1 for high-quality environment and objective 3 heritage have been changed from minor positives to neutral, as there is no longer specific text in relation to building heights. However no negative effects have been identified and other relevant policies will be applied in relation to design and heritage. The rest of the assessment remains unchanged.</li> </ul>													

#### Site Allocation VR8: 55-61 Brewery Road

Table 4.37: Site Assessment VR8: 55-61 Brewery Road

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	+	0	0	+	0	++	0	0	0	0	0	0
Submission policy with modifications	0	++	0	0	0	+	0	++	0	0	0	0	0	0



IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>Commentary on assessment of likely significant effects</b>	<p>The site sits within a protected viewing corridor The removal of the height limit will not necessarily result in a negative impact on local views as that impact will be determined by the design of any proposed development, and will also be considered through other relevant policies (e.g. DH2). The effect on <b>objective 3</b> for heritage has therefore been changed to neutral. The minor positive in relation to <b>objective 1</b> for high quality environment has been amended to neutral, as although there is not site-specific criteria guiding location sensitive design, this will be considered through the application of other plan policies.</p> <p>Removing the height restriction may result in a marginally higher building coming forward, although that is uncertain as it will be determined by the design of any proposed building, therefore there is no change to the assessment of <b>objective 2</b> for the efficient use of land.</p> <p>No other effects have been identified for the modifications.</p>													
<b>Conclusion</b>	<ul style="list-style-type: none"> <li>• The proposed modification to remove the limit on building heights will not necessarily result in a negative impact on heritage assets but could be considered to provide less protection than the original allocation.</li> <li>• <b>Objective 1</b> for high-quality environment and <b>objective 3</b> heritage have been changed from minor positives to neutral, as there is no longer specific text in relation to building heights. However no negative effects have been identified and other relevant policies will be applied in relation to design and heritage. The rest of the assessment remains unchanged.</li> </ul>													

## Site Allocation VR9: Rebond House, 98-124 Brewery Road

Table 4.38: Site Assessment VR9: Rebond House, 98-124 Brewery Road

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	0	0	0	+	0	++	0	0	0	0	0	0
Submission policy with modifications	0	++	0	0	0	+	0	++	0	0	0	0	0	0
Commentary on assessment of likely significant effects	<p>The removal of the height limit will not necessarily result in a negative impact on local views as that impact will be determined by the design of any proposed development, and will also be considered through other relevant policies (e.g. DH2). The effect on <b>objective 3</b> for heritage has therefore been changed to neutral. The minor positive in relation to <b>objective 1</b> for high quality environment has been amended to neutral, as although there is not site-specific criteria guiding location sensitive design, this will be considered through the application of other plan policies.</p> <p>Removing the height restriction may result in a marginally higher building coming forward, although that is uncertain as it will be determined by the design of any proposed building, therefore there is no change to the assessment of <b>objective 2</b> for the efficient use of land.</p> <p>No other effects have been identified for the modifications.</p>													
Conclusion	<ul style="list-style-type: none"> <li>The proposed modification to remove the limit on building heights will not necessarily result in a negative impact on heritage assets but does offer less protection than originally envisioned in the allocation.</li> </ul>													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	0	0	0	+	0	++	0	0	0	0	0	0
Submission policy with modifications	0	++	0	0	0	+	0	++	0	0	0	0	0	0
	<ul style="list-style-type: none"> <li>• <b>Objective 1</b> for high-quality environment and <b>objective 3</b> for heritage have been changed from minor positives to neutral, as there is no longer specific text in relation to building heights. However no negative effects have been identified and other relevant policies will be applied in relation to design and heritage. The rest of the assessment remains unchanged.</li> </ul>													

**Site Allocation VR10: 34 Brandon Road**

Table 4.39: Site Assessment VR10: 34 Brandon Road

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	0	0	0	+	0	++	0	0	0	0	0	0
Submission policy with modifications	0	+	0	0	0	+	0	+	0	0	0	0	0	0
Commentary on assessment of likely significant effects	<p>The site sits within a protected viewing corridor The removal of the height limit will not necessarily result in a negative impact on local views as that impact will be determined by the design of any proposed development, and will also be considered through other relevant policies (e.g. DH2). The minor positive in relation to <b>objective 1</b> for high quality environment has been amended to neutral, as although there is no longer site-specific criteria guiding location sensitive design, this will be considered through the application of other plan policies.</p> <p>As a higher density employment use, co-location of offices/research and development uses could result in an optimisation of existing employment floorspace and some intensification of light industrial floorspace, albeit there is likely to be less opportunity to intensify industrial uses to the same extent. As a result it is considered that it is not likely to have the same extent of benefits previously identified in terms of increasing industrial provision within the LSIS (an appropriate location for such development), bringing a different balance to the competing demands between land uses. Whilst there are land use benefits from the co-location of offices with light industrial, depending on the extent to which offices are intensified, there are potential impacts that could arise from less intensification for industrial uses, given that office needs are</p>													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	0	0	0	+	0	++	0	0	0	0	0	0
Submission policy with modifications	0	+	0	0	0	+	0	+	0	0	0	0	0	0
	<p>prioritised for delivery elsewhere in the borough. Whilst it is finely balanced it is considered that overall there is likely to be a change in effect in relation to <b>objective 2</b> for the efficient use of land from a significant positive to a minor positive.</p> <p>The submission allocation with modifications is considered to have a minor positive effect on <b>objective 8</b> for economic growth. Office/research and development uses would bring higher-density employment to the site and co-locating office space/research and development with the intensification of industrial uses could strengthen the local economy through the intensification of employment floorspace. The additional text added in terms of the industrial function of the LSIS remaining will help to address some of the potential longer term and cumulative effects relating to the impacts of offices on the wider industrial function of the LSIS. However, given the difference in values between office and industrial uses, it is recognised that the revised policy could result in less intensification for industrial uses overall. The LSIS has a strategic position in relation to the CAZ. It is one of the last remaining industrial clusters within close proximity of the CAZ and supports Central London's economy through the provision of 'last mile' distribution/logistics and 'just in time' servicing. Given offices uses are sought elsewhere in the borough and industrial uses are specifically sought within the LSIS and this is the key location for their intensification a reduction in the positive effect has been identified, although it is recognised that this judgement is finely balanced. The revised allocation would continue to have a positive effect on <b>objective 6</b> for social inclusion by providing opportunities for residents to access employment in the borough in line with the social inclusion objective. Industrial sectors provide job opportunities for the resident population. Opportunities within these sectors may offer more diverse ways of accessing employment through learning skills on the job for those who have low qualification levels or no qualifications, who often face more barriers to access work. If these sectors are lost in the local area, residents dependent on these jobs may be at risk of unemployment. Through providing for industrial intensification, alongside offices, a minor positive in relation to <b>objective 6</b> is considered to still be justified.</p>													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	0	0	0	+	0	++	0	0	0	0	0	0
Submission policy with modifications	0	+	0	0	0	+	0	+	0	0	0	0	0	0
	No other effects have been identified for the modifications.													
Conclusion	<ul style="list-style-type: none"> <li>The assessment considers there is likely to be less opportunity to intensify industrial uses to the extent envisaged in the original allocation and as a result it is considered that the amended allocation is unlikely to have the same benefits previously identified in terms of increasing industrial provision within the LSIS.</li> <li><b>Objective 2</b> for the efficient use of land and <b>objective 8</b> for economic growth are now identified as minor positives rather than significant positives, recognising that whilst co-location can have some positive effects in relation to the overall intensification of employment uses, there could also be less intensification of industrial uses in a priority industrial location, although it is accepted that judgements on both are finely balanced. <b>Objective 1</b> for high-quality environment has been changed from minor positive to neutral, as there is no longer specific text in relation to building heights. However no negative effects have been identified and other relevant policies will be applied in relation to design. The rest of the assessment remains unchanged</li> </ul>													

## Site Allocation AUS8: 161-169 Essex Road

Table 4.40 Site Assessment AUS8: 161-169 Essex Road

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	+	++	++	0	+	0	+	+	0	0	+	0	+
Submission policy with modifications	+	+	++	++	+	+	0	+	0	0	0	+	0	+
Commentary on assessment of likely significant effects	<p>For the allocation with modifications, the development of the car park for residential use would help to meet the need for additional housing in the area including affordable housing, leading to a minor positive for <b>objective 5</b>. Whilst the change from business use to residential could have an effect in relation to economic growth, the site would still provide relevant town centre uses which would continue to provide for positive economic growth effects albeit less positive. However, overall minor positive in relation to <b>objective 8</b> continues to be appropriate.</p> <p>No other effects have been identified for the modifications.</p>													
Conclusion	<ul style="list-style-type: none"> <li>The modification changes the focus of uses on the car park to the rear of the site, from business uses being prioritised to recognising residential use could be appropriate, this will be positive effects in terms of meeting housing needs. Whilst the change away from business use could have an effect in relation to economic growth, the site allocation with modifications still provides for town centre uses which would continue to provide for positive economic growth effects.</li> </ul>													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	+	++	++	0	+	0	+	+	0	0	+	0	+
Submission policy with modifications	+	+	++	++	+	+	0	+	0	0	0	+	0	+
	<ul style="list-style-type: none"> <li>The submission allocation with modifications would lead to an additional minor positive effect in relation to <b>objective 5</b> for housing quality. No other changes in effects have been identified.</li> </ul>													



## Site Allocation NH1: Morrison’s supermarket and adjacent car park, 10 Hertslet Road, and 8-32 Seven Sisters Road

Table 4.41: Site Assessment NH1: Morrison’s supermarket and adjacent car park, 10 Hertslet Road, and 8-32 Seven Sisters Road

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	++	++	0	++	+	+	+	++	0	+	0	0	0	0
Submission policy with modifications	++	++	0	++	++	+	+	++	0	+	0	0	0	0
Commentary on assessment of likely significant effects	<p>The submission allocation with modifications no longer seeks to increase in retail floorspace and seeks retention and improvements to existing floorspace. Whilst slightly less positive this will still help meet resident’s needs, maintain access to town centre uses and foster economic growth and is not considered to change the positive assessments overall for objectives <b>4, and 8</b>.</p> <p>The modification which changes the emphasis and seeks a large quantum of residential will have positive effects in relation to <b>objective 5</b>, which will change the effects to significant positive effects overall. It is considered the additional modifications in relation to active frontages, social inclusion and residential amenity, whilst positive, do not affect the overall assessment</p> <p>No other effects have been identified for the modifications.</p>													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>Submission policy</b>	++	++	0	++	+	+	+	++	0	+	0	0	0	0
<b>Submission policy with modifications</b>	++	++	0	++	++	+	+	++	0	+	0	0	0	0
<b>Conclusion</b>	<ul style="list-style-type: none"> <li>The only change in effects has been identified for the submission policy as modified from the change in emphasis on land uses the site is for a significant positive effect on meeting housing needs. The allocation will still contribute towards the delivery of economic growth.</li> </ul>													

## Site Allocation NH13: 166-220 Holloway Road

Table 4.42: Site Assessment NH13: 166-220 Holloway Road

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	0	++	0	+	0	+	0	0	0	0	0	0
Submission policy with modifications	+	++	0	++	0	+	0	+	0	0	0	0	0	0
Commentary on assessment of likely effects	<p>The submission allocation with modifications allows for an element of student accommodation in accordance with the modification to SDMP Policy H6 part A(iii). The amendment permits the provision of purpose-built student accommodation on university campuses as part of a master-planned reconfiguration of educational floorspace where it would result in the consolidation of social infrastructure in compliance with Policy SC1 part D(iii). Whilst student accommodation is not considered to deliver flexible and adaptable buildings to meet evolving social and economic needs compared to other types of development, overall this does not outweigh the positive effect that has already been identified as the consolidation of existing uses alongside some student accommodation is an efficient use of land. A significant positive effect in relation to <b>objective 2</b> for the efficient use of land therefore continues to be appropriate.</p> <p>The submission allocation with modifications could be argued to have positive effects in relation to <b>objective 5</b> as it will contribute towards housing supply, however the provision and quantum of such accommodation is uncertain and It is unclear whether affordable student accommodation would meet the accommodation needs of Islington students, therefore a neutral effect has continued to be identified.</p>													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	0	++	0	+	0	+	0	0	0	0	0	0
Submission policy with modifications	+	++	0	++	0	+	0	+	0	0	0	0	0	0
	<p>The references to active frontages are not considered to change the effects of the original assessment which already identifies a minor positive in relation to <b>objective 1</b> for high quality environment and a significant positive for <b>objective 4</b> for liveable neighbourhoods. The additional reference to tall buildings is not considered to alter the original assessment, which accounted for this.</p> <p>No other effects have been identified for the modifications.</p>													
Conclusion	<ul style="list-style-type: none"> <li>Whilst student accommodation is not considered to deliver flexible and adaptable buildings to meet evolving social and economic needs compared to other types of development and the contribution it might make towards housing supply is uncertain overall the modifications do not change the outcome of the assessment for efficient use of land and housing quality.</li> <li>Whilst the modifications impact on the commentary about some of the effects, no change in effects has been identified.</li> </ul>													

## Site Allocation NH14: 236-250 Holloway Road and 29 Hornsey Road

Table 4.43: Site Assessment NH14: 236-250 Holloway Road and 29 Hornsey Road

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	+	0	++	0	+	0	+	0	0	0	0	0	0
Submission policy with modifications	+	+	0	++	0	+	0	+	0	0	0	0	0	0
Commentary on assessment of likely significant effects	<p>The submission allocation with modifications will allow for an element of student accommodation in accordance with the modification to SDMP Policy H6 part A(iii). The amendment permits the provision of purpose-built student accommodation on university campuses as part of a master-planned reconfiguration of educational floorspace where it would result in the consolidation of social infrastructure in compliance with Policy SC1 part D(iii). The allocation will continue to have a minor positive effect in optimising the use of previously developed land and buildings. Whilst student accommodation is not considered to deliver flexible and adaptable buildings to meet evolving social and economic needs compared to other types of development, overall this does not outweigh the minor positive that has already been identified as the consolidation of existing uses alongside some student accommodation is an efficient use of land. A minor positive effect in relation to <b>objective 2</b> for efficient use of land therefore continues to be appropriate.</p> <p>Whilst the submission allocation with modifications could be argued to have positive effects in relation to <b>objective 5</b> as it will contribute towards housing supply, the provision and quantum of such accommodation is</p>													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	<p>uncertain and It is unclear whether affordable student accommodation would meet the accommodation needs of Islington students, therefore a neutral effect has continued to be identified.</p> <p>The references to active frontages are not considered to affect the original assessment which already identifies a minor positive in relation to <b>objective 1</b> for high quality environment and a significant positive <b>for objective 4</b> for liveable neighbourhoods. The updates to the Use Classes Order and viewing corridor are not considered to affect the original assessment.</p> <p>No other effects have been identified for the modifications.</p>													
<b>Conclusion</b>	<ul style="list-style-type: none"> <li>• Whilst student accommodation is not considered to deliver flexible and adaptable buildings to meet evolving social and economic needs compared to other types of development and the contribution it might make towards housing supply is uncertain overall the modifications do not change the outcome of the assessment for efficient use of land and housing quality. It is recognised however that the allocation requires consolidation and improvement of the existing education use which will have benefits in terms of liveable neighbourhoods, economic growth and social inclusion.</li> <li>• Whilst the modifications impact on the discussion about some of the effects, no change in effects has been identified.</li> </ul>													

## Site Allocation FP4: 129-131 & 133 Fonthill Road & 13 Goodwin Street

Table 4.44: Site Assessment FP4: 129-131 & 133 Fonthill Road & 13 Goodwin Street

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	+	0	+	0	+	0	++	0	0	0	0	0	0
Submission policy with modifications	+	+	0	+	+	+	0	+	0	0	0	0	0	0
Commentary on assessment of likely significant effects	<p>The submission allocation with modifications to allow for an element of residential use at the site would have a positive effect in terms of housing quality and <b>objective 5</b>. Good quality housing, including the provision of affordable housing to meet identified need, would be required in line with other Plan policies.</p> <p>The submission allocation with modifications would still help to foster economic growth but perhaps not to same extent given the provision of an element of residential use. In recognition of this the significant positive effect has been reduced to a minor positive effect <b>for objective 8</b>.</p> <p>No other effects have been identified for the modifications.</p>													
Conclusion	<ul style="list-style-type: none"> <li>The submission allocation with modifications allows for an element of residential use at the site, whilst continuing to promote a retail-led mixed use development. The submission allocation with modifications will still foster economic growth, but perhaps not to the same extent. The delivery of housing would</li> </ul>													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	+	0	+	0	+	0	++	0	0	0	0	0	0
Submission policy with modifications	+	+	0	+	+	+	0	+	0	0	0	0	0	0
	<p>however contribute towards the borough's significant housing need and provide much needed affordable housing.</p> <ul style="list-style-type: none"> <li>The introduction of an element of residential use results in an additional minor positive in relation to affordable housing <b>objective 5</b>. However, a minor positive rather than a significant positive effect has been identified in relation to <b>objective 8</b> for economic growth as the overall delivery of retail and business floorspace in an appropriate location may be reduced due to the inclusion of residential use.</li> </ul>													



## Site Allocation FP5: 1 Prah Road

Table 4.45: Site Assessment FP5: 1 Prah Road

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	++	+	0	0	0	+	0	++	0	0	0	0	0	0
Submission policy with modifications	++	+	0	+	++	+	0	0	0	0	0	0	0	0
Commentary on assessment of likely significant effects	<p>The submission allocation with modifications is considered to have a significant positive effect with regards to <b>objective 5</b> for housing quality as affordable housing would be required as part of any residential development to contribute towards the borough's evidenced housing need. However the removal of business floorspace from the allocation, including SME workspace would result in in a change in effect for <b>objective 8</b> for economic development from significant positive to neutral.</p> <p>For the submission allocation with modifications, as the site is within the town centre, it would provide future residents with good access to facilities and amenities in accordance with <b>objective 4</b> and liveable neighbourhoods.</p> <p>For the submission allocation with modifications, the removal of the reference to public realm improvements from the allocation is not considered to have altered the initial assessment for a residential development in this location. Although the allocation no longer makes explicit reference to public realm improvements, the need for</p>													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	++	+	0	0	0	+	0	++	0	0	0	0	0	0
Submission policy with modifications	++	+	0	+	++	+	0	0	0	0	0	0	0	0
	<p>new development to make improvements to the public realm will be dealt with through other Plan policies where appropriate.</p> <p>No other effects have been identified for the modifications.</p>													
Conclusion	<ul style="list-style-type: none"> <li>For submission allocation with modifications, the change in the land use would provide benefits in relation to meeting housing needs and would also contribute toward liveable neighbourhoods, however the change from business use would reduce the positive effects previously identified in relation to economic growth.</li> <li><b>Objective 5</b> for housing quality is now identified as a significant positive as the submission allocation with modification would contribute towards meeting housing need. The provision of housing on the side would also lead to a minor positive effect in relation to liveable neighbourhoods. However the change from business use results in the significant positive for <b>objective 8</b> for economic growth is reduced to a neutral effect.</li> </ul>													

## Site Allocation ARCH1: Vorley Road/Archway Bus Station, N19

Table 1.46: Site Assessment ARCH1: Vorley Road/Archway Bus Station, N19

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	++	++	0	+	++	+	+	+	0	0	0	0	0	0
Submission policy with modifications	++	++	0	+	++	+	+	+/0	0	0	0	0	0	0
Commentary on assessment of likely significant effects	<p>The provision of social and community infrastructure is likely to have a positive effect on <b>objective 4</b> for liveable neighbourhoods, <b>objective 6</b> for social inclusion and <b>objective 7</b> for health and wellbeing but does not change the minor positive effects already identified for these objectives.</p> <p>The modification requires the site to accommodate social and community infrastructure. As a result the assessment of the effect on economic growth has changed slightly from a minor positive to a neutral/minor positive for <b>objective 8</b>. This means the previous requirement for an element of business floorspace including affordable workspace and space suitable for SMEs has been slightly downgraded, although the potential for such provision is still acknowledged.</p> <p>No other effects have been identified for the modifications.</p>													
Conclusion	<ul style="list-style-type: none"> <li>The submission allocation with modifications promotes residential development with an additional requirement for social and community infrastructure and suggests there may be potential for an element of business floorspace. The introduction of social and community uses will have positive effects in relation to liveable neighbourhoods and</li> </ul>													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	++	++	0	+	++	+	+	+	0	0	0	0	0	0
Submission policy with modifications	++	++	0	+	++	+	+	+/0	0	0	0	0	0	0
	<p>social inclusion. The effect of the change in emphasis regarding business floorspace is less certain, and has been reflected in the assessment.</p> <ul style="list-style-type: none"> <li>• <b>Objective 8</b> for economic growth is now identified as a neutral/minor positive rather than a minor positive, as the requirement for the site to provide social and community infrastructure may affect the delivery of business floorspace. The assessment remains unchanged in other respects.</li> </ul>													

## Site Allocation ARCH3: Archway Central Methodist Hall

Table 4.47: Site Assessment ARCH3: Archway Central Methodist Hall

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	+	+	+	0	0	0	+	0	0	0	0	+	0
Submission policy with modifications	+	+	+	+	0	0	0	+	0	0	0	0	+	0
Commentary on assessment of likely significant effects	<p>Although support for cultural provision has been removed from the submission allocation with modifications it is considered that a mixed-use development including retail could also improve access to essential services and promote an economically thriving town centre and therefore the minor positive effect for <b>objective 4</b> and liveable neighbourhoods remains appropriate.</p> <p>The new emphasis in the allocation on mixed-use development including offices and retail will also provide employment opportunities and provide space in an accessible location for business use and therefore a minor positive effect in relation to <b>objective 8</b> remains appropriate.</p> <p>The modifications in relation to the site address, current and/or previous use, planning history and viewing corridor are not considered to affect the original assessment.</p> <p>No other effects have been identified for the modifications.</p>													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Conclusion	<ul style="list-style-type: none"> <li>Although the modified allocation has a more commercial focus, it is considered that on balance this will also boost the local economy, improve the vitality of the town centre and deliver essential services that support liveable neighbourhoods with positive effects identified in relation to <b>objectives 4 and 8</b>, however overall no change in effects has been identified as a result of the modifications to the allocation.</li> </ul>													

## Site Allocation ARCH5: Archway Campus, Highgate Hill, N19

Table 4.48: Site Assessment ARCH5: Archway Campus, Highgate Hill, N19

IIA Objective	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCES	14. NATURAL RESOURCES
Submission policy	+	++	0	+	++	+	0	0	0	0	0	0	0	0
Submission policy with modifications	+	++	0	+	++	+	0	+	0	0	0	0	0	0
Commentary on assessment of likely significant effects	<p>The introduction of some commercial use to the submission allocation with modifications may have a minor positive effect in relation to <b>objective 8</b> economic growth, with both commercial use and community and social infrastructure use also contributing to the liveable neighbourhoods objective by providing accessible services.</p> <p>The introduction of an element of student housing has the potential to make less efficient use of the land against <b>objective 1</b> and for priority land uses, however the allocation text is clear that student accommodation may be provided where it is not considered to impact negatively on the provision of priority conventional housing on-site.</p> <p>No other effects have been identified for the modifications.</p>													
Conclusion	<ul style="list-style-type: none"> <li>The strong positive benefits identified in the original assessment in relation to housing and the efficient use of land are unchanged, as although student accommodation is not considered to be the most efficient use of land, the allocation text is clear that it should not be delivered at the expense of conventional residential use. The most significant change to the assessment relates to the introduction of an element of commercial use, which is considered likely to have a minor positive effect on economic growth.</li> </ul>													

## Site Allocation ARCH6: Job Centre, 1 Elthorne Road

Table 4.49: Site Assessment ARCH6: Job Centre, 1 Elthorne Road

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	0	+	+	+	0	++	0	0	0	0	0	0
Submission policy with modifications	+	+	0	+	++	+	0	+	0	0	0	0	0	0
Commentary on assessment of likely significant effects	<p>The modification changes the allocation from being business-led to mixed use development. The change in the potential balance of uses on the site could lead to a more significant positive effect with regards to housing quality if more housing, and specifically more affordable housing, is delivered on the site. A significant positive effect has therefore been identified as a result of the modification in relation to <b>objective 5</b>. For the residential use there would be an increase in accessibility to services in Archway for the residents on the site although it is not considered that this is significant enough to change in overall minor positive effect on <b>objective 4</b> liveable neighbourhoods.</p> <p>Conversely, the submission allocation with modifications may have a more limited positive effect with regards to <b>objective 2</b> and the efficient use of land and economic growth for <b>objective 8</b> than the original business-led allocation if less business floorspace, including SME space, is delivered. The site is located in Archway Town Centre where competing demands for land have to be carefully balanced, and non-residential uses are likely to be necessary to meet the needs of residents for services and facilities and promote diverse, vibrant and economically thriving town centres. Whilst residential development could bring more residents into the town</p>													



IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	0	+	+	+	0	++	0	0	0	0	0	0
Submission policy with modifications	+	+	0	+	++	+	0	+	0	0	0	0	0	0
	<p>centre, potentially improving footfall for local businesses, the site itself would not make as significant a contribution towards the borough's economy. Therefore whilst the mix of uses within the allocation is appropriate, the mixed use allocation does not prioritise either an employment or retail led use of land which given the town centre location is not the most efficient use of the land possible and results in an overall minor positive effect.</p> <p>The factual update to the ownership and use of the building and update to phasing do not affect the original assessment and the removal of reference to the Archway Cultural Quarter from the development considerations is also not considered to affect the previous assessment of the site.</p> <p>No other effects have been identified for the modifications.</p>													
Conclusion	<ul style="list-style-type: none"> <li>It is considered the more flexible approach to residential use will have a significant positive effect on housing delivery and the provision of much needed affordable housing. However, there could also be a reduction in the amount of business floorspace secured in what is an appropriate town centre location due to the change in the approach to housing.</li> <li><b>Objectives 2</b> for efficient use of land and <b>objective 8</b> for economic growth are now identified as minor positive instead of significant positive effects, as although the uses identified in the allocation are appropriate they are not considered to optimise the use of the land to the same extent or provide as much opportunity for economic growth and employment generation. <b>Objective 5</b> for housing quality is</li> </ul>													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	0	+	+	+	0	++	0	0	0	0	0	0
Submission policy with modifications	+	+	0	+	++	+	0	+	0	0	0	0	0	0
	now identified as a significant positive effect instead of a minor positive due to the stronger support for residential use in the allocation.													

## Site Allocation OIS5: Bush Industrial Estate, Station Road

Table 4.50: Site Assessment OIS5: Bush Industrial Estate, Station Road

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	0	+	0	0	0	+	0	++	0	0	0	0	0	0
Submission policy with modifications	0	+	0	+	0	+	0	+	0	0	0	0	0	0
Commentary on assessment of likely significant effects	<p>As a higher density employment use, co-locating office/research and development uses with industrial uses could result in an optimisation of existing employment floorspace, although there is likely to be less opportunity to intensify industrial uses to the extent envisaged in the original allocation. As a result it is considered that the submission allocation with modifications is unlikely to have the same benefits previously identified in terms of increasing industrial provision within the LSIS, an appropriate location for such development, but there are likely to be benefits in terms of intensifying overall employment floorspace. Whilst it is a finely balanced judgement, particularly given that the need for office floorspace are prioritised for delivery elsewhere in the borough, it is considered that overall the amended allocation continues to make an efficient use of previously developed land and buildings and there will continue to be a minor positive effect in relation to <b>objective 2</b> and the efficient use of land.</p> <p>The modifications add development considerations to ensure potential impact on the school and residential uses amenity are considered and are mitigated for which has a minor positive effect on <b>objective 4</b> for liveable neighbourhoods by reducing impacts of noise, vibration or pollution.</p>													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	<p>The submission allocation with modifications is considered to have a minor positive effect on <b>objective 8</b> for economic growth. Office/research and development uses would bring higher-density employment to the site and co-locating office/research and development space with intensification of industrial could strengthen the local economy through the intensification of employment floorspace. The additional text added in terms of retaining the industrial function of the LSIS will help to address some of the potential longer term and cumulative effects relating to the impacts of offices on the wider industrial function of the LSIS. However, given the difference in values between office and industrial uses, it is recognised that the revised policy could result in less intensification of industrial uses overall. As office uses are sought elsewhere in the borough and industrial uses are specifically sought within the LSIS, which is a key location for their intensification, a reduction in the positive effect in economic growth (objective 8) has been identified, although it is recognised that this judgement is finely balanced.</p> <p>The submission allocation with modifications would continue to have a positive effect on <b>objective 6</b> for social inclusion by providing opportunities for residents to access employment in the borough in line with the social inclusion objective. Industrial sectors provide job opportunities for the resident population. Opportunities within these sectors may offer more diverse ways of accessing employment through learning skills on the job for those who have low qualification levels or no qualifications, who often face more barriers to access work. If these sectors are lost in the local area, residents dependent on these jobs may be at risk of unemployment. Through providing for industrial intensification, alongside offices, a minor positive in relation to is considered to still be justified.</p> <p>No other effects have been identified for the modifications.</p>													
Conclusion	<ul style="list-style-type: none"> <li>As a higher density employment use, co-locating office/research and development uses with industrial uses could result in an optimisation of existing employment floorspace, although there is likely to be less opportunity to intensify industrial uses to the extent envisaged in the original allocation. As a result it is</li> </ul>													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	<p>considered that the amended allocation is unlikely to have the same benefits previously identified in terms of increasing industrial provision within the LSIS.</p> <ul style="list-style-type: none"> <li>• <b>Objectives 8</b> for economic growth is now identified as a minor positive effect rather than a significant positive, recognising that whilst co-location may have some positive effects in relation to the overall intensification of employment uses, there could also be less intensification of industrial uses in a priority industrial location, although it is accepted that the judgement is finely balanced. <b>Objective 4</b> is also identified as a minor positive through addressing the need to consider amenity impacts for neighbouring sensitive uses.</li> </ul>													

**Site Allocation OIS9 (formerly site reference OIS29): Highbury Quadrant Congregational Church**

Table 4.51: Site Assessment OIS9: Highbury Quadrant Congregational Church

IIA Objective	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE	14. NATURAL RESOURCE
Submission policy	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Submission policy with modifications	+	++	0	++	+	+	+	0	0	0	0	0	0	0
Commentary on assessment of likely significant effects	<p>The co-location of social and community infrastructure uses with housing at the site is considered to be an efficient use of the site which is positive for <b>objective 2</b>. The existing buildings on site are currently in a state of disrepair and development should have a positive effect on the built environment for <b>objective 1</b>. This would support the delivery of much needed affordable housing on the site and is positive for <b>objective 5</b>, bring back underused social and community infrastructure into more productive use which is positive for <b>objectives 6 and 7</b>. This would have significant positive effects for local residents by encouraging social interaction and providing community and faith facilities, alongside the benefits brought by new good quality housing. This supports the liveable neighbourhoods, social inclusion and health objectives.</p> <p>No other effects have been identified for the modifications.</p>													
Conclusion	<ul style="list-style-type: none"> <li>The proposed allocation allows for re-provision of the Church and community space alongside residential development. This will contribute towards Islington’s housing delivery and provide much needed affordable housing, as well as helping to address social inclusion, liveable neighbourhoods and health and wellbeing objectives.</li> <li><b>Objective 2</b> for efficient use of land and <b>objective 4</b> for liveable neighbourhoods are identified as significant positive effects, with minor positive effects identified for <b>objective 1</b> for high quality environment, <b>objective 5</b> for housing quality, <b>objective 6</b> for social inclusion and <b>objective 7</b> for health and wellbeing.</li> </ul>													

## Site Allocation OIS10: Hornsey Road and Grenville Works, 2A Grenville Road

Table 4.52: Site Assessment OIS10: Hornsey Road and Grenville Works, 2A Grenville Road

IIA Objective	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCES	14. NATURAL RESOURCES
Submission policy	+	+	0	0	0	+	0	+	0	0	0	0	0	0
Submission policy with modifications	+	+	0	0	+	+	0	-/0	0	0	0	0	0	0
Commentary on assessment of likely significant effects	<p>The submission allocation with modifications is considered to make an efficient use of land as it will provide office floorspace in a Priority Employment Location (PEL), albeit given the need to balance land uses this is less positive than the submission allocation because the residential floorspace is not focusing appropriate development in the right location - a priority employment location. However, on balance the modifications are still considered minor positive in relation to <b>objective 2</b>.</p> <p>For the submission allocation with modifications, given the employment use of the site and its location within the Hornsey Road/Marlborough Road Priority Employment Location (PEL), a mixed use development could lead to the loss of existing business floorspace resulting in negative impacts on economic growth. However the provision of some office development would contribute towards employment objectives and help to mitigate the impacts of this to some extent, meaning that a neutral/minor negative effect in relation to economic growth has been identified for <b>objective 8</b>.</p> <p>For the submission allocation with modifications, the site would provide affordable housing as part of any residential element, contributing towards meeting Islington's housing need and which is positive for <b>objective 5</b> as well as addressing objectives relating to <b>objective 6</b> for social inclusion. There is some potential for conflict between residents and existing commercial occupiers in the PEL, resulting from noise from vehicle movements associated with business</p>													

IIA Objective	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCES	14. NATURAL RESOURCES
	<p>operating hours and delivery and servicing requirements. The development considerations recognise this potential impact and expect no harm to neighbouring amenity from service and delivery arrangements therefore no changes to the effects on <b>objective 4</b> are identified and they remain neutral.</p> <p>No other effects have been identified for the modifications.</p>													
<b>Conclusion</b>	<ul style="list-style-type: none"> <li>The submission allocation with modifications for mixed-use office and residential development reflects the extant planning permission for the site. Whilst this could have a minor negative effect on economic growth given the previous employment use of the site and its location within a PEL, the provision of some office development would contribute towards employment objectives and help to mitigate the impacts of this to some extent. The modified allocation would have positive effects on housing delivery and the provision of much needed affordable housing.</li> <li><b>Objective 5</b> for housing quality is now identified as a minor positive effect, following the amendment to the allocation to include residential use. <b>Objective 8</b> for economic growth is now identified as a neutral/minor negative rather than a minor positive, as the change in emphasis away from business-led redevelopment may have negative impacts on the local economy, although it is recognised this may be mitigated, at least partially, by some office use of the site.</li> </ul>													



**Site Allocation OIS12 (formerly site reference OIS32): New Orleans Estate**

Table 4.53: Site Assessment OIS12: New Orleans Estate

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>Submission policy</b>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>Submission policy with modifications</b>	+	+	0	+	++	+	0	0	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects</b>	The allocation aims to optimise the use of land in a residential area which is positive for <b>objective 2</b> , offering the opportunity to deliver quality housing in an appropriate location which is positive for <b>objective 5</b> . Affordable housing would be provided as part of the development of the site, contributing towards meeting Islington’s housing need as well as addressing objectives relating to social inclusion which is positive for <b>objective 6</b> . The allocation requires public realm improvements that will benefit the quality of the built environment which is positive for <b>objective 1</b> , creating a safer and more inclusive environment that will promote more liveable neighbourhoods which is positive for <b>objective 4</b> .													
<b>Conclusion</b>	<ul style="list-style-type: none"> <li>The proposed allocation is for residential development, which will contribute towards Islington’s housing delivery and provide much needed affordable housing, helping to address social inclusion objectives. Improvements to play space, amenity space and landscaping are also required, providing benefits in terms of a high quality environment and liveable neighbourhoods.</li> <li><b>Objective 5</b> for housing quality is identified as a significant positive effect, with minor positive effects identified for <b>objective 1</b> high quality environment, <b>objective 2</b> for efficient use of land, <b>objective 4</b> for liveable neighbourhoods and <b>objective 6</b> for social inclusion.</li> </ul>													

## Site Allocation OIS20: Former Railway Sidings Adjacent to Caledonian Road Station

Table 4.54: Site Assessment OIS20: Former Railway Sidings Adjacent to Caledonian Road Station

IIA Objective	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	+	++	-	0	+	+	+	+	0	0	-/0	0	0	0
Submission policy with modifications	+	++	-/0	0	+	+	+	+	0	0	-/0	0	0	0
Commentary on assessment of likely effects	<p>The submission allocation with modifications have added additional criteria to the development considerations aimed at mitigating the impacts of future development on the heritage of the site. Applicants will be required to prepare a heritage statement responding to the potential impacts of development on the site's heritage, and considering opportunities for improvement. Whilst the additional development considerations are necessary to emphasise the importance of a careful and sensitive approach to the site's heritage, and appropriate mitigation could be achieved, the potential for development to have a negative impact on heritage and biodiversity remains. The assessment in relation to <b>objective 3</b> for heritage has been amended slightly with this in mind, to a minor negative/neutral. The submission allocation with modifications are not considered to affect the assessment of the allocation in relation to the other objectives.</p> <p>No other effects have been identified for the modifications.</p>													
Conclusion	<ul style="list-style-type: none"> <li>The submission allocation with modifications adds additional criteria to the development considerations with the intention of mitigating the impacts of future development on the site's heritage. It is considered that mitigation could be achieved but there also remains potential for development to harm the site's heritage if it is not designed carefully and sympathetically.</li> </ul>													

IIA Objective	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	<ul style="list-style-type: none"> <li>• <b>Objective 3</b> for heritage is now identified as a neutral/minor negative effect following the inclusion of development considerations aimed at mitigating potential impacts of development on heritage. The rest of the assessment remains unchanged following the modification.</li> </ul>													

## Site Allocation OIS26: York Way Estate

Table 4.55: Site Assessment OIS26: York Way Estate

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Submission policy with modifications	+	+	0	+	++	+	0	0	0	0	0	0	0	0
Commentary on assessment of likely significant effects	<p>The allocation aims to optimise the use of land in a residential area, which is positive for <b>objective 2</b>, offering the opportunity to deliver quality housing in an appropriate location which is positive for <b>objective 5</b>. Affordable housing would be provided as part of the development of the site, contributing towards meeting Islington’s housing need as well as addressing objectives relating to social inclusion, which is positive for <b>objective 6</b>. The allocation requires improvements to play space and communal facilities which will benefit the quality of the built environment, creating a safer and more inclusive environment and is positive for <b>objective 1</b> and promoting a more liveable neighbourhood, which is positive for <b>objective 4</b>.</p>													
Conclusion	<ul style="list-style-type: none"> <li>The proposed allocation is for infill residential development, which will contribute towards Islington’s housing delivery and provide much needed affordable housing, helping to address social inclusion objectives. Improvements to play space, communal facilities and landscaping are also required, providing benefits in terms of a high quality environment and liveable neighbourhoods.</li> <li><b>Objective 5</b> for housing quality is identified as a significant positive effect, with minor positive effects identified for <b>objective 1</b> high quality environment, <b>objective 2</b> for efficient use of land, <b>objective 4</b> for liveable neighbourhoods and <b>objective 6</b> for social inclusion.</li> </ul>													

## Site Allocation OIS27: Barnsbury Estate

Table 4.56: Site Assessment OIS27: Barnsbury Estate

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Submission policy with modifications	+	+	0	+	++	+	0	0	0	+	0	0	0	0
Commentary on assessment of likely significant effects	<p>The allocation aims to optimise the use of land in a residential area, which is positive for <b>objective 2</b>, offering the opportunity to deliver quality housing in an appropriate location and is positive for <b>objective 5</b>. Affordable housing would be provided as part of the development of the site, contributing towards meeting Islington’s housing need as well as addressing objectives relating to social inclusion which is positive for <b>objective 6</b>. The allocation requires extensive improvements to communal facilities, including play spaces, a new community centre and improved routes through the estate, which will benefit the quality of the built environment, create a safer and more inclusive environment and promote a more liveable neighbourhood addressing <b>objectives 1 and 4</b>. New publicly accessible open spaces should be provided, contributing towards the increasing need for open space in the borough and is positive for <b>objective 10</b>.</p>													
Conclusion	<ul style="list-style-type: none"> <li>The proposed allocation is for residential development, which will contribute towards Islington’s housing delivery and provide much needed affordable housing, helping to address social inclusion objectives. Improvements to open spaces, social and community infrastructure, security measures and landscaping are also required, providing benefits in terms of a high quality environment and liveable neighbourhoods.</li> <li><b>Objective 5</b> for housing quality is identified as a significant positive effect, with minor positive effects identified for <b>objective 1</b> high quality environment, <b>objective 2</b> for efficient use of land, <b>objective 4</b> for liveable neighbourhoods and <b>objective 6</b> for social inclusion.</li> </ul>													

## Site Allocation OIS28: Cluse Court

Table 4.57: Site Assessment OIS28: Cluse Court

IIA Objective	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE	14. NATURAL RESOURCE
Submission policy	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Submission policy with modifications	+	+	0	+	++	+	0	0	0	0	0	0	0	0
Commentary on assessment of likely significant effects	The allocation aims to optimise the use of land in a residential area and is positive for <b>objective 2</b> , offering the opportunity to deliver quality housing in an appropriate location which is positive for <b>objective 5</b> . Affordable housing would be provided as part of the development of the site, contributing towards meeting Islington’s housing need as well as addressing objectives relating to social inclusion and is positive for <b>objective 6</b> . The allocation requires public realm improvements that will benefit the quality of the built environment which is positive for <b>objective 1</b> , creating a safer and more inclusive environment that will promote more liveable neighbourhoods and is positive for <b>objective 4</b> .													
Conclusion	<ul style="list-style-type: none"> <li>The proposed allocation is for residential development, which will contribute towards Islington’s housing delivery and provide much needed affordable housing, helping to address social inclusion objectives. Improvements to play space, amenity space and landscaping are also required, providing benefits in terms of a high quality environment and liveable neighbourhoods.</li> <li><b>Objective 5</b> for housing quality is identified as a significant positive effect, with minor positive effects identified for <b>objective 1</b> high quality environment, <b>objective 2</b> for efficient use of land, <b>objective 4</b> for liveable neighbourhoods and <b>objective 6</b> for social inclusion.</li> </ul>													

## Site Allocation OIS29: Hillside Estate

Table 4.58: Site Assessment OIS29: Hillside Estate

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Submission policy with modifications	+	+	0	-/0	++	0/-	0	0	0	0	0	0	0	0
Commentary on assessment of likely significant effects	<p>The allocation aims to optimise the use of land in a residential area which is positive for <b>objective 2</b>, offering the opportunity to deliver quality housing in an appropriate location, which is positive for <b>objective 5</b>. Affordable housing would be provided as part of the development of the site, contributing towards meeting Islington’s housing need as well as addressing objectives relating to social inclusion and <b>objective 6</b>. The allocation requires public realm improvements which will benefit the quality of the built environment, creating a safer and more inclusive environment which is positive for <b>objective 1</b>. There is the potential for existing community facilities to be lost as a result of development of this site. Unless this can be robustly justified in accordance with policy SC1, it could have a negative effect on liveable neighbourhoods for <b>objective 4</b> and social inclusion by reducing residents’ access to essential services and opportunities for people to connect with their community.</p>													
Conclusion	<ul style="list-style-type: none"> <li>The proposed allocation is for residential development, which will contribute towards Islington’s housing delivery and provide much needed affordable housing. There is existing social and community infrastructure on the site, any loss of which would need to be robustly justified against the requirements of policy SC1.</li> <li><b>Objective 5</b> for housing quality is identified as a significant positive effect, with minor positive effects identified for <b>objective 1</b> for high quality environment and <b>objective 2</b> for efficient use of land. Due to the potential for community facilities to be lost, neutral/minor negative effects have been identified in relation to <b>objectives 4</b> for</li> </ul>													

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	liveable neighbourhoods and for <b>objective 6</b> for social inclusion. The application of policy SC1 should mitigate the risk of valued facilities being lost to the community.													



## Site Allocation OIS30: Kerridge Court

Table 4.59: Site Assessment OIS30: Kerridge Court

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Submission policy with modifications	+	+	0	+	++	+	0	0	0	+	0	0	0	0
Commentary on assessment of likely significant effects	<p>The allocation aims to optimise the use of land in a residential area which is positive for <b>objective 2</b>, offering the opportunity to deliver quality housing in an appropriate location and is positive for <b>objective 5</b>. Affordable housing would be provided as part of the development of the site, contributing towards meeting Islington’s housing need as well as addressing objectives relating to social inclusion which is positive for <b>objective 6</b>. The allocation requires public realm improvements that will benefit the quality of the built environment, which is positive for <b>objective 1</b>, creating a safer and more inclusive environment and promoting more liveable neighbourhoods, which is positive for <b>objective 4</b>. The new public space will contribute towards the increasing need for open space in the borough which is positive for <b>objective 10</b>.</p>													
Conclusion	<ul style="list-style-type: none"> <li>The proposed allocation is for residential development, which will contribute towards Islington’s housing delivery and provide much needed affordable housing, helping to address social inclusion objectives. Re-provision of the multi-use games area alongside improvements to play and amenity space, and the creation of a new public square will provide benefits in terms of the high quality environment, liveable neighbourhoods and open space objectives.</li> <li><b>Objective 5</b> for housing quality is identified as a significant positive effect, with minor positive effects identified for <b>objective 1</b> high quality environment, <b>objective 2</b> for efficient use of land, <b>objective 4</b> for liveable neighbourhoods and <b>objective 6</b> for social inclusion and <b>objective 10</b> for open space.</li> </ul>													

## Site Allocation OIS31: Drakeley Court and Aubert Court

Table 4.60: Site Assessment OIS31: Drakeley Court and Aubert Court

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Submission policy with modifications	+	+	0	+	++	+	0	0	0	+	0	0	0	0
Commentary on assessment of likely significant effects	<p>The allocation aims to optimise the use of land in a residential area which is positive for <b>objective 2</b>, offering the opportunity to deliver quality housing in an appropriate location which is positive for <b>objective 5</b>. Affordable housing would be provided as part of the development of the site, contributing towards meeting Islington’s housing need as well as addressing objectives relating to <b>objective 6</b> for social inclusion. The allocation requires public realm improvements that will benefit the quality of the built environment for <b>objective 1</b>, creating a safer and more inclusive environment and promoting more liveable neighbourhoods which is positive for <b>objective 4</b>. The new green square will contribute towards the increasing need for open space in the borough, positive for <b>objective 10</b>.</p>													
Conclusion	<ul style="list-style-type: none"> <li>The proposed allocation is for residential development, which will contribute towards Islington’s housing delivery and provide much needed affordable housing, helping to address social inclusion objectives. Relocation of the community centre alongside improvements to play space, security measures and the creation of a new green square will provide benefits in terms of a high quality environment and liveable neighbourhoods.</li> <li><b>Objective 5</b> for housing quality is identified as a significant positive effect, with minor positive effects identified for <b>objective 1</b> high quality environment, <b>objective 2</b> for efficient use of land, <b>objective 4</b> for liveable neighbourhoods and <b>objective 6</b> for social inclusion and <b>objective 10</b> for open space.</li> </ul>													

## Site Allocation GT1: 207A Junction Road

Table 4.61: Site Assessment GT1: 207A Junction Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Gypsy and Traveller site	+	+	0	0	++	++	0	0	0	0	0	0	0	+
Commentary on assessment of likely effects	<p>The allocation is for a 'Gypsy and Traveller site for provision of up to 3 permanent pitches to meet identified Gypsy and Traveller need'.</p> <p>In terms of promoting a high-quality environment for <b>objective 1</b> the development considerations are assessed to have a minor positive effect as they are location sensitive with reference to the adjacent railway. They consider the potential impacts of noise and vibration from the railway on residents of the site and require mitigation of such impacts. In addition mitigation of the site through screening and/or landscaping to secure a good level of residential amenity for neighbours is required, contributing towards a high-quality environment.</p> <p>Allocating the site for Gypsy and Traveller use seeks to balance competing demands between land uses to provide for the borough's full range of development needs. The allocation makes efficient use of previously developed land and buildings and contributes towards the provision of housing to meet the identified needs of Gypsies and Travellers in the borough, in line with <b>objective 2</b> for the efficient use of land and <b>objective 5</b> for housing quality. However, it is considered that the allocation is likely to provide a lower amount of housing than if the site was developed for conventional housing, resulting in a minor positive effect in relation to the efficient use of land. The allocation is considered to have a significant positive effect however in relation to housing quality, helping to improve the diversity of housing types and providing for housing that meets the diverse needs of Islington's communities.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	The allocation seeks to re-locate the existing community use on the site and re-provide this in the local area, which is considered to have a neutral effect with regards to the liveable neighbourhoods for <b>objective 4</b> . By providing accommodation for people who may possess a protected characteristic the allocation is considered to have a significant positive effect in relation to <b>objective 6</b> for social inclusion. The draft allocation requires the provision of infrastructure to support development which will have a minor positive effect against the natural resources for <b>objective 14</b> , ensuring the necessary water and sewerage infrastructure is available.													
IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Alternative 1: Residential development	+	++	0	+	+	0	0	0	0	0	0	0	0	0
Commentary on assessment of likely significant effects of Alternative 1	<p>Allocating the site for residential development optimises the use of previously developed land and contributes to the provision of housing in the borough. The site would provide affordable housing as part of any residential element, but careful consideration must be given to the close proximity of railway infrastructure and the need to mitigate any noise and vibration from the railway to ensure future residential amenity is not negatively affected. The submission allocation for this site (referenced ARCH7) also suggested the existing D2 use of the site may be re-provided, which could positively contribute to the vitality of the area and increase cultural provision, with a minor positive effect on <b>objective 4</b> for liveable neighbourhoods.</p> <p>The assessment of the submission allocation identified that development of the site could help to enhance local character and contribute to <b>objective 1</b> and a high-quality environment, although this has been revised as the</p>													

	<p>backland location of the site means any development would not be clearly visible from Junction Road. Nevertheless, there is still considered to be a minor positive effect in relation to <b>objective 1</b> as the development considerations are location sensitive with reference to the requirement to mitigate noise and vibration associated with the adjacent railway.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Alternative 2: Mixed-use development	+	+	0	-	+	+	0	+	0	0	0	0	0	0
<p><b>Commentary on assessment of likely significant effects of Alternative 2</b></p>	<p>This alternative is where the site allocation would be amended to be for mixed-use development (including residential and commercial uses). Development of the site can help to enhance the local character of the area and promote a high-quality built environment that helps make efficient use of the site. Mixed-use development would have a positive effect in terms of the efficient use of land and buildings. It is however noted that there is potential with mixed-use allocations for higher-value residential uses to be chosen at the expense of delivering the employment floorspace needed to support Islington’s projected economic growth.</p> <p>Some housing would be delivered as part of mixed-use development, leading to a minor positive effect with regards to <b>objective 5</b> and housing quality. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion for <b>objective 6</b>.</p> <p>Some commercial uses on the site are likely to have a minor positive effect in relation to economic growth and <b>objective 8</b>. This would help to create employment opportunities that would also support social inclusion objectives.</p> <p>Mixed-use development could lead to the loss of the existing D2 use, however any loss would have to be justified in accordance with SDMP Policy SC1 and therefore this is considered to have a neutral effect in relation to <b>objective 4</b> for liveable neighbourhoods. In addition the other reasonable alternatives assumed the social</p>													

	infrastructure use would be relocated to a suitable site within the local area which could also be achieved under this scenario.													
<b>Alternative 3: Business-led development</b>	+	+	0	-	0	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 3</b>	This alternative is for business-led development. The intensification of the site would help to optimise use of the site for employment use, giving a minor positive effect in terms of the efficient use of land for <b>objective 2</b> . Development of the site can help to enhance the local character of the area and promote a high-quality built environment for <b>objective 1</b> . Business-led development would have a positive effect on economic growth <b>objective 8</b> . This would help create employment opportunities that could support social inclusion objectives <b>objective 6</b> . Any loss of the existing D2 use would have to be assessed against SDMP policy SC1, and is considered to have a neutral effect in relation to liveable neighbourhoods <b>objective 4</b> .													
<b>Conclusions</b>	Three reasonable alternatives to the Gypsy and Traveller sites allocation for GT1 were identified: residential-led development, mixed-use development and business-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough’s identified development needs, and business-led development could have positive effects in terms of supporting economic growth (objective 8), the site is considered to provide an opportunity to deliver a Gypsy and Traveller site which would contribute towards meeting Islington’s identified need in an appropriate location. In relation to the provision of residential development on the site, the proposed use of the site for Gypsy and Traveller pitches would arguably provide a less efficient use of land <b>objective 2</b> , in terms of the number of dwellings that can be provided, than conventional residential use. The re-provision of the existing community use in a suitable location off-site but within the local area is considered to have a neutral effect in relation to <b>objective 4</b> for liveable neighbourhoods. The modification is considered to have a significant positive effect in relation to <b>objective 5</b> housing in terms of meeting diverse needs as well as a positive effect in relation to social inclusion. It is recognised that the effects are finely balanced between a residential allocation and an allocation for Gypsy and Traveller Pitches.													

Site Allocation GT2: 154 Junction Road

Table 4.62 Site Assessment GT2: 154 Junction Road

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Gypsy and Traveller site	+	+	0	0	++	++	0	0	0	0	0	0	0	+
Commentary on assessment of likely effects	<p>The site is allocated as a ‘Gypsy and Traveller site for the provision of 1 permanent pitch to meet identified Gypsy and Traveller need’.</p> <p>In terms of promoting a high-quality environment for <b>objective 1</b> the development considerations are assessed to have a minor positive effect as they are location sensitive with reference to the adjacent railway. They consider the potential impacts of noise and vibration from the railway on residents of the site and require mitigation of such impacts. In addition mitigation of the site through screening and/or landscaping to secure a good level of residential amenity for nearby residential properties helps contribute towards a high-quality environment.</p> <p>Allocating the site for Gypsy and Traveller use seeks to balance competing demands between land uses to provide for the borough’s full range of development needs. The allocation makes efficient use of previously developed land and buildings and contributes towards the provision of housing to meet the identified needs of Gypsies and Travellers in the borough, in line with <b>objectives 2</b> for efficient use of land and <b>objective 5</b> for housing quality. However, it is considered that the allocation is likely to provide a lower amount of housing than if the site was developed for conventional housing, resulting in a minor positive effect in relation to the efficient use of land. The allocation is considered to have a significant positive effect in relation to housing quality, helping to</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	<p>improve the diversity of housing types and providing for housing that meets the diverse needs of Islington's communities.</p> <p>By providing accommodation for people who may possess a protected characteristic the allocation is considered to have a significant positive effect in relation to <b>objective 6</b> the social inclusion objective.</p> <p>There are existing trees on the site which will need to be taken into careful consideration. The allocation highlights that development should minimise impacts on trees and protect those trees with Tree Preservation Orders, however the impacts are uncertain and therefore there is a neutral assessment in relation to biodiversity overall.</p> <p>The draft allocation requires the provision of infrastructure to support development which will have a minor positive effect against natural resources <b>objective 14</b> by ensuring necessary water and sewerage infrastructure is available.</p>													
Alternative 1: residential development	+	+	0	0	+	0	0	0	0	0	0	0	0	0
Commentary on assessment of likely significant	<p>Allocating the site for residential development optimises the use of previously developed land for <b>objective 1</b>, and contributes to the provision of housing in the borough for <b>objective 5</b>. The site would provide affordable housing as part of any residential element, and the development considerations would require careful consideration to be given to the close proximity of railway infrastructure and the need to mitigate any noise and vibration from the railway to ensure future residential amenity is not negatively affected, resulting in a minor positive effect against</p>													



IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>effects of Alternative 1</b>	the built environment <b>objective 1</b> . There would be a positive effect from any residential development at the site which would provide affordable housing and contribute towards meeting Islington’s housing need. The allocation would also make more efficient use of the site. There are existing trees on the site which would need to be taken into careful consideration. Development should minimise impacts on trees and protect the trees with Tree Preservation Orders, however the impacts of development are uncertain and therefore there is a neutral effect in relation to <b>objective 11</b> for biodiversity overall.													
<b>Conclusion</b>	One reasonable alternative to the Gypsy and Traveller site allocation at 154 Junction Road was identified: residential-led development. The site is considered to provide an opportunity to deliver a Gypsy and Traveller site which would contribute towards meeting Islington’s identified need in an appropriate location. In relation to the provision of residential development on the site, the proposed use of the site for Gypsy and Traveller pitches would arguably provide a less efficient use of land in terms of the number of dwellings provided than conventional residential use. The allocation is considered to have a significant positive effect in relation to housing in terms of meeting diverse needs as well a positive effect in relation to social inclusion. It is recognised that the effects are finely balanced between a residential allocation and an allocation for Gypsy and Traveller Pitches.													

## Site Allocation GT3: Ronald's Road

Table 4.63 Site Assessment GT3: Ronald's Road

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Gypsy and Traveller site	+	+	0	0	++	++	0	0	0	0	0	0	0	+
Commentary on assessment of likely significant effects	<p>The allocation is for a 'Gypsy and Traveller site for provision of up to 3 permanent pitches to meet identified Gypsy and Traveller need'.</p> <p>In terms of promoting a high-quality environment for <b>objective 1</b> the development considerations are assessed to have a minor positive effect as they are location sensitive with reference to the railway tunnel beneath the site. They consider the potential impacts of noise and vibration from the railway on residents of the site and require mitigation of such impacts. In addition mitigation of the site through screening and/or landscaping to secure a good level of residential amenity for surrounding residential properties is required and contributes towards a high-quality environment.</p> <p>Allocating the site for Gypsy and Traveller use seeks to balance competing demands between land uses to provide for the borough's full range of development needs. The allocation makes efficient use of previously developed land and buildings and contributes towards the provision of housing to meet the identified needs of Gypsies and Travellers in the borough, in line with <b>objective 2</b> for the efficient use of land and <b>objective 5</b> for housing quality. However, it is considered that the allocation is likely to provide a lower amount of housing than if the site was developed for conventional housing, resulting in a minor positive effect in relation to the efficient use of land. The allocation is considered to have a significant positive effect in relation to housing quality, helping to</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	<p>improve the diversity of housing types and providing for housing that meets the diverse needs of Islington's communities.</p> <p>By providing accommodation for people who may possess a protected characteristic the allocation is considered to have a significant positive effect in relation to <b>objective 6</b> for social inclusion objective.</p> <p>There are existing trees on the site which will need to be taken into careful consideration, the allocation highlights that development should minimise impacts on trees, however the impacts are uncertain and therefore there is a neutral effect in relation to biodiversity and <b>objective 11</b> overall.</p> <p>The draft allocation requires the provision of infrastructure to support development which will have a minor positive effect against <b>objective 14</b> for natural resources, ensuring that the necessary water and sewerage infrastructure is available.</p>													
Alternative 1: residential development	+	+	0	0	+	0	0	0	0	0	0	0	0	0
Commentary on assessment of likely significant	<p>Allocating the site for residential development optimises the use of previously developed land for <b>objective 1</b>, and contributes to the provision of housing in the borough for <b>objective 5</b>. The site would provide affordable housing as part of any residential element, and the development considerations would require careful consideration to be given to the close proximity of railway infrastructure and the need to mitigate any noise and vibration from the</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
effects Alternative 1	<p>railway to ensure future residential amenity is not negatively affected, resulting in a minor positive effect against <b>objective 1</b> the built environment objective.</p> <p>There would be a positive effect from any residential development at the site which would provide affordable housing and contribute towards meeting Islington’s housing need. The allocation will also make more efficient use of the site.</p> <p>There are existing trees on the site which would need to be taken into careful consideration. Development should minimise impacts on trees, however the impacts of development are uncertain and therefore there is a neutral effect in relation to <b>objective 11</b> and biodiversity overall.</p>													
Conclusion	<p>One reasonable alternative to the Gypsy and Traveller site allocation at Ronalds Road was identified: residential-led development. The site is considered to provide an opportunity to deliver a Gypsy and Traveller site which would contribute towards meeting Islington’s identified need in an appropriate location. In relation to the provision of residential development on the site, the proposed use of the site for Gypsy and Traveller pitches would arguably provide a less efficient use of land in terms of the number of dwellings that can be provided than conventional residential use. The allocation is considered to have a significant positive effect in relation to housing in terms of meeting diverse needs as well a positive effect in relation to social inclusion. It is recognised that the effects are finely balanced between a residential allocation and an allocation for Gypsy and Traveller Pitches.</p>													

# 5 Post modifications assessment

Following receipt of the Inspectors Report on 5 July 2023 this consolidated IIA addendum September 2023 considers any further amendments made to the plan. The modifications made to the plan that were consulted on are considered by the IIA in section 4 of this document. In their report the Inspectors have amended some of the detailed wording and/or added consequential modifications where necessary to the modifications set out in the schedules appended to their report. The Inspectors consider that none of the amendments significantly alters the content of the modifications as published for consultation or undermines the participatory processes. Nonetheless for completeness these amendments are considered by the IIA.

The amendments relate to the three Development Plan documents – Strategic and Development Management Policies, the Bunhill and Clerkenwell Area Action Plan and Site Allocations.

All the further amendments made to the main modifications made to the draft Local Plan have been screened to consider if any changes need to be assessed in the tables below. Minor modifications are automatically screened out because by their nature they cannot make a material change to the plan’s policies and therefore would not change any effects identified in the assessment.

Table 5.1 Screening of further amendments to modifications made to Strategic and Development Management Policies

Modification ref	Policy	Change	Summary	IIA/EqIA implications
SDMM20	Policy H1, Part V	<del>V. — New development in Islington should maximise social value, beyond what the Council would expect as a standard level of social value on a scheme (resulting from compliance with all relevant policy requirements).</del>	Update modification to remove reference to policy SC4 which was deleted.	Screened out. Not considered to affect previous analysis.

Modification ref	Policy	Change	Summary	IIA/EqIA implications
SDMM21	H2, part A	A. <b>The overall housing target for the plan period from 2020/21 to 2036/37 is <u>a minimum of 13,175 homes.</u></b>	Additional wording added to clarify that the housing target over the plan period is a minimum.	Screened out. Not considered to affect previous analysis. Part A was already clear that the aim was to meet and exceed the target.
SDMM23	H3, part H and paragraph 3.48	<p>H. Site-specific viability information will only be accepted in exceptional cases <del>determined by the Council.</del> <b><u>The following exceptional</u></b> <b><u>This could include circumstances may be considered:</u></b></p> <p>3.48 Any proposal which does not provide the minimum required amount of affordable housing – in line with relevant policy requirements – will be refused. These levels of affordable housing have been informed by detailed viability evidence which demonstrates that these levels are viable and will not preclude development from coming forward. On a limited number of sites, there may be genuine exceptional circumstances which necessitate provision of site-specific viability information; the Council will consider this on a case-by-case basis. <del>but</del> The expectation is that such circumstances would usually only <del>relate to a significant shift in macro-economic conditions.</del> <b><u>include those</u></b></p>	Amended part H and para 3.48 with regard to list of circumstances in which site specific viability assessments may be justified to make clear that there could be other occasions/factors where site specific viability assessment may be justified.	Screened out. This is not considered to change the effects previously assessed. The list of key considerations in relation to use of viability assessments remains and the supporting text as amended is clear that where other factors are considered this will be in rare cases and the applicant will need to demonstrate such exceptional circumstances.

Modification ref	Policy	Change	Summary	IIA/EqIA implications
		<p><b>set out in Part H of Policy H3, but in rare cases could include other factors and it would be for the applicant to demonstrate such exceptional circumstances.</b> The amount paid for land is not considered to be an exceptional reason to justify provision of site-specific viability, in line with Government guidance. The Council will not entertain a viability assessment if it is considered that there are no exceptional circumstances which justify doing so.</p>		
SDMM23	Policy H4: Delivering high quality housing and supporting text	<p><b>C. The Council may, in limited circumstances, accept a S106 contribution in lieu of Category M4(3) units on site, where there is definitive local evidence (produced by the Council) of a supply/demand imbalance for wheelchair accessible units. This contribution will be used to finance the development of new and adapted wheelchair accessible units elsewhere in the borough where demand is more acute. Any units where the Council accepts a</b></p>	<p>The text in the Inspectors report refers to the supporting text at paragraph 3.74 as setting out Policy on this matter and for the Policy to be effective, SDMM23 is required to move this into the Policy itself.</p> <p>Factual corrections made to refer to correct part of building regulations for M4(3) dwellings. This amends the</p>	Screened out. Not considered to affect previous analysis as change already reflects supporting text.

Modification ref	Policy	Change	Summary	IIA/EqIA implications
		<p><b>contribution in lieu must be designed to Category M4(2) standard, instead of M4(3). The process for securing this contribution, and the amount required, will be set out in a revised Inclusive Design SPD.</b></p> <p>3.71 Approved Document M of the Building Regulations sets out standards for 'Accessible and Adaptable' – known as Category M4(2) – and 'Wheelchair user dwellings' – known as Category M4(3). <b>Category M4(3) consists of two sub-categories; 'Wheelchair Adaptable' Category M4(3)(2)(a) - which requires the dwelling to be constructed with the potential to be adapted for occupation by a wheelchair user - and 'Wheelchair Accessible' Category M4(3)(2)(b) - which requires the dwelling to be suitable for immediate occupation by a wheelchair user.</b> <del>Policy H4 requires 90% of dwellings to be built to Category M4(2) 'Accessible and Adaptable' standard; and the remaining 10% of dwellings to be built to Category M4(3) 'Wheelchair user dwellings' standard.</del></p>	<p>supporting text to insert '(2)' within both wheelchair adaptable and accessible Category M references. Amendment needed to address a factual error regarding referencing, M4(3)(2)(a) and M4(3)(2)(b) are the correct respective references as per the definition section of Part M Volume 1., p.53.</p> <p>Also missing text from the modification has been identified at the end of paragraph 3.71 added - this is proposed to be deleted as it repeats policy.</p>	



Modification ref	Policy	Change	Summary	IIA/EqIA implications
SDMM28	Policy H12	<p>Multiple changes to policy to reflect Inspectors letter (ref INS18) and Councils response (ref LBI32).</p> <p>Associated changes to site allocations GT1, GT2 and GT3 addressed below.</p>	<p>Changes to policy to reinstate need for 10 pitches following Court of Appeal case which found PPTS definition of Gypsy and Travellers discriminatory.</p> <p>Additional policy wording added for immediate focused review of all gypsy and traveller matters following the adoption of the Plan, and removes the text that is no longer relevant..</p> <p>Clarification added in relation to approach to windfall sites prior to the completion of an immediate plan review.</p> <p>Various updates to supporting text made to reflect updated policy position.</p>	Screened in. Update to IIA and EqIA required given significance of policy change.
SDMM34	Policy B2, part C	<p>C. In LSISs shown on Figure 4.1, the overriding priority land uses are industrial uses (<del>B1(e)</del> <b>light industrial</b>, B2 <b>general industrial</b>, B8 <b>storage and distribution</b> and Sui Generis uses which are akin to industrial uses). The retention and intensification of industrial uses <del>and existing clusters of</del></p>	<p>Clarification that co-location and intensification of industrial use could be either through new floorspace or the redevelopment/modernisation of existing floorspace for</p>	Screened out. This is not considered to change the effects previously assessed in the assessment of the policy as modified.

Modification ref	Policy	Change	Summary	IIA/EqIA implications
		<p><del>industrial activity in LSISs</del> will be required as part of any proposal within a LSIS. <b>The light industrial element of Class E continues to be sought in the LSIS and will be secured through condition.</b> The provision of hybrid space is supported. The <del>development co-location</del> of <b>industrial use with office and/or research and development</b> uses <del>may be permissible as part of a hybrid workspace scheme, but it must only constitute a small proportion of the overall gross floorspace proposed</del> <b>will be permitted where there would be an intensification of industrial use on the site (either through new floorspace or the redevelopment/modernisation of existing floorspace) and it can be demonstrated that the continued industrial function of the LSIS would remain.</b> The introduction of <b>some</b> non-industrial uses <del>would</del> <b>could</b> undermine the primary industrial economic function <del>and compromise the future growth</del> of LSISs and will therefore <del>not be permitted unless they are clearly ancillary to a proposal</del> <b>only be allowed where proposals comply with the co-location criteria as set out above and/or policy B3: Existing business floorspace, Part D, where relevant.</b> <del>Residential use is not acceptable within LSISs.</del></p>	<p>consistency with the modification to SP3 via SDMM08.</p>	

Modification ref	Policy	Change	Summary	IIA/EqIA implications
SDMM37	Policy B4, Part G	<p><b>G. Site-specific viability assessments will only be accepted in exceptional circumstances. The following exceptional circumstances may be considered <u>This could include:</u></b></p> <p><b>(a) where a significant shift in macro-economic conditions has occurred which has a demonstrable negative impact on the delivery of development.</b></p> <p><b>(b) where a development is proposed which is of a wholly different type and is therefore not reflected by any of the typologies used in the viability assessment that informed the Local Plan.</b></p> <p><b>(c) where a development is proposed which demonstrates a very close alignment to a typology shown to be unviable at full policy compliance in the viability assessment that informed the Local Plan.</b></p> <p><b>H. Off-site financial contributions for affordable workspace may be sought in exceptional circumstances. The following exceptional circumstances may be considered:</b></p> <p><b>(i) Where the affordable workspace to be provided on site does not meet the qualitative criteria, and where it can be</b></p>	<p>Inspectors amended part G to make clear that the circumstances in which viability assessments may be accepted might be exceptional but are not exhaustive. A consequential change to part H(ii) is also made.</p>	<p>Screened out. The further changes by the Inspectors, whilst providing an element of additional flexibility are not considered to change the effects previously identified in the assessment of the policy as modified.</p>

Modification ref	Policy	Change	Summary	IIA/EqIA implications
		<p><b>demonstrated that the on-site provision of such workspace is inappropriate.</b></p> <p><b>(ii) Where a proposal <del>meets one or more demonstrates</del> exceptional circumstances outlined in Part G, a site-specific financial viability assessment can also be used to determine the maximum viable off-site affordable workspace financial contribution.</b></p> <p><del>4.49</del> <b>4.47</b> A requirement for affordable workspace will also apply to any major development proposals involving <b>31,000sqm</b> or more gross <del>B1(a) office</del> and/or <b>research and development B1(b) and/or general B1</b> and/or a Sui Generis use akin to <b>office/research and development B1(a)/B1(b)</b> floorspace within the <b>Vale Royal/Brewery Road LSIS and other LSISs</b>. Policies SP3 (with regard to the Vale Royal/Brewery Road LSIS specifically) and B2 are clear that industrial uses within <del>B1(c) light industrial</del>, B2 <b>general industrial</b> and B8 <b>storage and distribution</b> uses <del>classes</del> are the priority uses within the LSISs, <del>and that other business uses, namely B1(a), B1(b) and general B1 floorspace capable of being used for B1(a) or B1(b), will not be permitted except as part of a hybrid workspace scheme where such uses only constitute a small proportion of the overall gross floorspace proposed.</del> Notwithstanding this, in circumstances where <del>B1(a) office</del>,</p>		

Modification ref	Policy	Change	Summary	IIA/EqIA implications
		<p><del>B1(b) and research and development and/or general B1 and Sui Generis uses akin to office and research and development uses are is-</del>proposed, affordable workspace would be required from any <b>such proposal as set out above permitted floorspace</b>. There is no general requirement for seeking affordable workspace from industrial/hybrid uses within the LSISs as seeking affordable workspace from non-<b>office/research and development B1(a)/B1(b)/general B1</b>-uses in this area is more likely to constrain viability of such uses and therefore may preclude them coming forward, contrary to policy aims for the area; however, <b>B1(a) office and research and development B1(b)</b> floorspace has no such viability concerns, and hence any proposals which would allow for the development of <b>B1(a) office or research and development B1(b)</b> must provide affordable workspace. <del>For avoidance of doubt, this requirement must not undermine the clear policy position to resist non-industrial uses in the LSISs.</del></p>		
SDMM65	Policy T1 supporting text	<p><b>The Islington Transport Strategy was adopted on 26 November 2020. It sets the Council's vision for a fairer, healthier, safer, greener transport environment in the borough by 2041. Its overarching themes are the delivery of People Friendly</b></p>	Text amended to refer to people walking and cycling rather than pedestrians and cyclists.	Screened out. This is not considered to change the effects previously identified in the assessment of the policy as modified .

Modification ref	Policy	Change	Summary	IIA/EqIA implications
		<p><b>Streets, Vision Zero and a borough wide programme of Low Traffic Neighbourhoods. The Low traffic neighbourhoods are a long term initiative that restrict through traffic to create more space for <del>pedestrians and cyclists</del> <u>people walking and cycling on local streets.</u> Through traffic is traffic that is simply taking a short cut through a local area but has no origin or destination within that area.</b></p>		
SDMM74	Policy ST2 and supporting text	<p>The Hornsey Street Re-use and Recycling Centre will be safeguarded in order for Islington to continue to contribute to meeting aggregated waste planning requirements. <b><u>The safeguarded Hornsey Street Re-use and Recycling Centre is identified on the Policies Map.</u></b> Where development is proposed within close proximity to this facility, it must ensure that the ability of the Hornsey Street facility to operate effectively is not threatened, via the design/layout of a scheme and/or the incorporation of appropriate measures to limit effects of sound, vehicle movements and other effects, in line with the 'agent-of-change' principle.</p>	Reference to Safeguarded Hornsey Street re-use and recycling centre being identified on the Policies Map added to policy rather than supporting text.	Screened out. This is not considered to change the effects previously identified in the assessment of the policy as modified .
SDMM79	Appendix 2: Noise and vibration	<p><del>25. Where non-residential uses are placed above residential floorspace there are likely to be impact noise issues. An impact sound insulation limit will be specified. These will be determined on a case by case basis and in such cases specialist advice and assessment will be necessary.</del> <b>non-residential uses are</b></p>	Where new text has been added at paragraph 25 it needs to be clarified that the existing original text is to be deleted. This was omitted in error from the modification as drafted.	Screened out. This is not considered to change the effects previously identified in the assessment of the policy as modified .

Modification ref	Policy	Change	Summary	IIA/EqIA implications
		<b>placed above residential floorspace or high impact generating uses such as gyms are placed on the ground floor and residential above there are likely to be impact noise issues. An impact sound insulation limit will be specified. These will be determined on a case by case basis and in such cases specialist advice and assessment will be necessary.</b>		
SDMM100	Appendix 10: Housing trajectory	N/A	Housing trajectory table updated to remove reference to 20% buffer by deleting row in table.	Screened out. This is not considered to change the effects previously identified in the assessment of housing delivery and relevant policies.
SDMM101	Glossary definition – Tall Buildings	Buildings of more than 30 metres, <del>or those that are more than twice the contextual reference height of surrounding context (whichever is the lesser).</del>	Definition of tall building updated to refer to buildings of 30 metres only, excluding those that are more than twice the contextual reference height for consistency with modification to DH3 SDMM71.	Screened out. This is not considered to change the effects previously identified in the assessment of Policy DH3 as modified.

Table 5.2 Screening of further amendments to modifications made to Site Allocations

Modification ref	Policy	Change	Summary	IIA/EqIA implications
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SAMM07	Section 1, paragraph 1.32 (formerly paragraph 1.30)	<p>Amend text of second sentence as follows:</p> <p>Paragraph 68(a) of the NPPF states that LPAs should identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare. Over the period from 2020/21 to 2036/37, Islington's total housing requirement will be a <b>minimum of</b> 13,175 homes 11,625 residential units per annum; this means that 1,163 1,317 residential units will need to be identified on sites of one hectare or less, to accord with the NPPF.</p>		Additional wording added to clarify that the housing target over the plan period is a minimum.	Screened out. Not considered to change effects previously identified in the assessment. The plan in policy H2 was already clear that the aim was to meet <u>and exceed</u> the target.
SAMM98	OIS9: Highbury Quadrant Congregational Church (formerly OIS 29).	How the site was identified and planning history	<a href="#">Pre-application discussions and planning application permission P2020/2507/FUL</a>	Updated to reflect the site now has permission.	Screened out. This is not considered to change effects previously identified in the assessment of the policy as modified.
SAMM119 to SAMM123	Section 11: Gypsy and Traveller Sites	Gypsy and Traveller sites and associated text previously included in modifications deleted.		The Inspectors removed the three proposed Gypsy and Traveller sites for the reasons set out on letter (INS18) as they we unable to find them sound.	Screened out. The sites are no longer allocated so there are no effects to assess. The effect in terms of housing supply are not considered to have a significant impact on housing supply overall. The effect of the change in policy associated with the removal of Gypsy and Traveller sites is dealt with under an updated IIA assessment and EqIA analysis of the further changes to H12.



Table 5.3 Screening of further amendments to modifications made to Bunhill and Clerkenwell Area Action Plan

Modification ref	Policy	Change	Summary	IIA/EqIA implications
BCMM21	Site Allocation BC4 Finsbury Leisure Centre	<ul style="list-style-type: none"> <li>Development must be high quality contextual design in accordance with PLAN1 in the Strategic and Development Policies. Any development should protect the amenity of neighbouring residential properties, particularly those at <del>Burnhill House, Normal Street</del>.</li> </ul>	Changed the Finsbury Leisure Centre allocation so that protection of amenity of neighbouring properties is not only focused on Burnhill House, Normal Street .	Screened out. This is not considered to change effects previously identified in the assessment of the policy as modified.

## Post Inspectors report assessment

The screening assessment set out in the tables above identified one change that required further consideration by the assessment. This relates to policy H12 and meeting Gypsy and Traveller accommodation needs. The Inspectors report published on 5 July 2023 recommended the council to make modifications to Policy H12: Gypsy and Traveller accommodation. Policy H12 identifies the need for Gypsy and Traveller accommodation and how the need will be met.

### Background

Both during and following the hearings the Inspectors made clear that modifications to the draft Local Plan were necessary to achieve a sound and legally compliant plan. The submission policy identified that need for Gypsy and Traveller accommodation would be met through the identification of sites through the councils own house building programme or joint working with neighbouring boroughs and the GLA or a review of site allocations. The council attempted to identify Gypsy and Traveller sites in the earlier stages of the plan making process, but without success. At the hearings the Inspectors identified significant concerns that a site/sites had not been found and requested that the council work to try to identify Gypsy and Traveller sites as part of the Local Plan process. The council continued the site search and identified three potential sites which were included as modifications to the draft Local Plan and consulted on. The Inspectors report identified that the three sites (GT1, GT2 and GT3) could not be found sound and are removed from the modifications so the sites no longer exist as allocations. The reasons for the sites removal were set out in the Inspectors letter (reference INS18). The letter set out that based on representations from landowners sites GT1 and GT2 are no longer considered available or deliverable and the Inspectors report removed GT3 on the basis that they had no evidence to show that potential adverse noise and vibration constraints could be suitably mitigated. Previously site GT1 was allocated for residential development with potential to re-provide the existing D2 use. Site GT2 was not allocated in the plan and previously part of GT3 was allocated for re-provision of a community centre and potentially for housing on the Ronalds Road frontage (Site reference OIS13). The wider effect of no longer including the two allocations is considered under assessment of H12 and whilst it would have effects in terms of housing supply the effects are not considered to have a significant impact on housing supply overall. The Inspectors Report goes onto recommended further modifications to policy H12. The changes replace Part A of the policy with text which states that upon adoption of the Local Plan there will be a need for an immediate focused review of the Local Plan to address gypsy and traveller housing need. The modifications also confirm the need of 10 units should be selected following the judgement *Smith v Secretary of State for Levelling Up, Housing and Communities* [2022] EWCA Civ 1391. The changes have been assessed in the Sustainability Appraisal table below.

Table 5.2: Assessment for policy H12

IIA Objective	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Submission policy H12	0	0	0	0	+	+	0	0	0	0	0	0	0	0
Submission policy H12 with modifications	0	0	0	0	++	++	0	0	0	0	0	0	0	0
Submission policy H12 with further modifications	0	0	0	0	+	+	0	0	0	0	0	0	0	0
Commentary on assessment of likely significant effects	<p>The further modifications to Policy H12 are considered to continue to have a positive effect on housing quality (<b>objective 5</b>) and meeting housing needs. The modification to change Part A introduces a requirement for an immediate focused review to address needs which introduces some uncertainty because specific sites are no longer identified in the plan however there remains clarity over the process and timeframe in which sites will be identified. In addition the recognition of the higher level of need and adopting the 'ethnic' definition of Gypsies and Travellers following the Smith v SSLUHC judgement also contributes positive effects as it raises the number of pitches that need to be identified from 6 to 10. Overall the effects for the policy are considered to be minor positive for <b>objective 5</b> which is less positive than the submission policy with modifications but is still considered positive and consistent with the positive effect identified in the assessment of the submission policy as it seeks to meet needs for gypsy and travellers which will help to meet the diverse and changing needs of Islington. The effect of the removal of the two site allocations and their contribution to conventional housing supply overall is not considered to be significant given the size of the sites.</p> <p>Likewise a change in effects is considered to occur for <b>objective 6</b> to minor positive overall with the decrease in certainty around how gypsy and traveller needs will be met through the removal of policy which relates to identification of sites. However there remains clarity over the process and timeframe in which sites will be identified which will help to promote social inclusion and improve opportunities for gypsies and travellers to have their accommodation needs met in Islington so overall the effects are considered minor positive and consistent with the positive effect identified in the assessment of the submission policy.</p> <p>No other effects have been identified for the modifications.</p>													

## Conclusions

- The modifications make a number of changes to policy which creates positive effects in terms of how the defined needs of gypsies and travellers as set out in the Gypsy and Traveller Needs Assessment will be met through an immediate focused review of the Local Plan to address gypsy and traveller housing need.
- The assessment of the policy overall results in two changes in assessment effects resulting from the modifications: objective 5 for housing quality and objective 6 for social inclusion changing from significant positive to minor positive.



# 6 Assessment of Local Plan: Cumulative Effects

The approach taken in the interim IIA was to present the cumulative and synergistic effects at the end of each of the Local Plan sections in Section 4 of the report. This was done in a pragmatic way and to reflect an implicit consideration that individual policy and site assessments will have a variety of potential effects; therefore, while these were not all explicitly noted in individual assessments, there had been a detailed consideration of the effects undertaken. As part of the examination process the Inspectors requested further clarity on the assessment of cumulative effects raising concern in particular that a combination of minor effects could result in a significant cumulative effect. The review of cumulative effects in the addendum has drawn the consideration of cumulative effects together into one place and presented them more transparently with a fuller assessment of effects.

The approach has been clarified to consider that cumulative effects can arise when two or more impacts occur simultaneously, or have a significant effect when on its own may combine with another to produce a cumulative effect that is more significant.

There are two areas where cumulative effects will be considered; draft Local plan effects that could result from policies in the Plan working in combination; and inter-plan effects – synergistic effects, where effects of other strategies, plans or programmes act in combination with the draft Local Plan.

## **Methodology**

In order to provide a process to this updated cumulative assessment the Council has used a summary table of the updated assessment of plan policies and added a new row to provide an overall cumulative score. The overall score is a judgement based on the framework score, using the predominant score taking into account the pluses and minuses to generate an overall score.

Each section in the plan has been taken in turn and is presented below. The narrative from section 4 in the Regulation 19 interim IIA has been updated and expanded on and should be read as replacement text.

## **Consideration of cumulative and other effects for Local Plan objectives**

### **Table 6.1: Consideration of cumulative and other effects for Local Plan objectives**

TOPIC / POLICY	BUILT ENV	USE OF LAND	HERITAGE	LIVEABLE	AFFORDABLE	INCLUSION	HEALTH	ECONOMIC	NEED TO TRAVEL	OPEN SPACE	BIODIVERSITY	CLIMATE CHANGE	RESOURCE EFFICIENCY	NATURAL RESOURCES
Objective 1: Homes - Delivering decent and genuinely affordable homes for all	0	++	0	0	++	++	++	0	0	0	0	++	0	0
Objective 2: Jobs and money - Delivering an inclusive economy, supporting people into work and helping them with the cost of living	0	++	0	0	0	++	++	++	+	0	0	+	0	0
Objective 3: Safety - Creating a safe and cohesive borough for all	++	0	0	++	0	++	++	0	++	+	0	+	0	0
Objective 4: Children and Young People - Making Islington the best place for all young people to grow up	++	0	0	++	+	++	++	0	+	++	0	0	0	0
Objective 5: Place and environment - Making Islington a welcoming and attractive borough and creating a healthier environment for all	++	++	++	++	0	++	++	+	+	++	++	++	+	+
Objective 6: Health and independence - Ensuring our residents can lead healthy and independent lives	+	0	0	++	++	0	++	0	++	++	+	+	0	0
Objective 7: Well run council - Continuing to be a well-run council and making a difference despite reduced resources	0	0	0	+	0	+	+	0	0	0	++	++	+	+
<b>CUMULATIVE</b>	<b>++</b>	<b>+</b>	<b>0</b>	<b>++</b>	<b>+</b>	<b>++</b>	<b>++</b>	<b>0</b>	<b>+</b>	<b>++</b>	<b>+</b>	<b>+</b>	<b>0</b>	<b>0</b>

The Plan's objectives will have significant positive cumulative impacts. In particular against the Sustainability Framework objectives for Built Environment, Liveable Neighbourhoods, Inclusion and Equality, Health and Wellbeing and Open Space.

In relation to both the Built Environment and Liveable Neighbourhood sustainability framework objectives the Local Plan objectives for safety, place and environment and health combine with particular focus on making the built environment, including open spaces, feel safer. This helps encourage people to use more sustainable modes of transport, have more healthy lifestyles and better enables access to local facilities and services. This will have a positive effect on reducing emissions both for air quality and contribution to climate

change. This combines well with Objective 2: Jobs and Money which seeks to create more jobs locally which will have cumulative positive impacts against the Sustainability Framework objective for need to travel helping people into employment locally.

With regards Inclusion and Equality the delivery of genuinely affordable housing is a key aspect of the Local Plan under objective 1: Homes, which in combination with objective 2: Jobs and Money, aims to create an inclusive economy which will help improve opportunity for Islington residents. These will bring long term positive effects to borough residents with positive impacts on peoples' health and wellbeing through the Local Plan creating better employment opportunities and helping meet housing need through addressing the priorities for the competing demands for the use of the limited land resource in the borough.

There will also be cumulative benefits to Sustainability Framework objectives for Health and Wellbeing of residents arising from the effect of various objectives combining; Objective 3: Safety, Objective 4: Children and Young People, Objective 5: Place and environment and Objective 6: Health and independence which will all provide a healthier living environment for residents. This will work with the health benefits created by delivering high quality housing under objective 1: homes. For example having a safer environment (objective 3) will assist with making the borough the best place for children to grow up (objective 4) which will be supported by a welcoming and attractive environment (objective 5) which is inclusive. In addition ensuring residents lead healthy and independent (objective 6) lives with good access to services and opportunities for play and outdoor leisure will help children grow up fit and active.

### **Synergistic effects**

There is a clear link with the Islington Corporate Plan 2018 – 2022 which shares the same seven objectives with the Local Plan. The Corporate Plan sets how the Council will deliver on these objectives from the service point of view setting various targets and aims for the objectives, some of which relate directly to policy in the Local Plan. For example under the Place and Environment objective there is a commitment to work with TfL to remodel gyratories at Highbury Corner, Nags Head, Old Street and King's Cross. Apart from King's Cross three of these are set out in policy in the Local Plan. The emerging Islington Transport Strategy and other policies in the plan such as the car-free policy approach set out in T3: Car-free development, also helps with objective 5: Place and environment as it will help people make more sustainable transport choices in particular when combined with the various public realm improvements. Finally, the Council published the Islington Zero Carbon strategy in 2020 and the Local Plan will help to achieve the ambitious carbon reductions set out in Strategy.

### **Consideration of cumulative and other effects for PLAN1**



Policy PLAN1 has a number of cross-cutting elements which will help to deliver synergistic effects across objectives. For example:

- the contextual principle helps to deliver benefits in relation to the built environment, heritage and use of land ensuring that development is high quality and makes a positive contribution to local character, legibility and distinctiveness of an area, based upon an up-to-date understanding and evaluation of the defining characteristics of an area. This would include reflecting heritage assets.
- the connected principle has benefits in terms of liveable neighbourhoods, need to travel and health. The policy states that development must improve permeability and movement through areas and the quality, clarity and sense of spaces around and between buildings; and should sustain and reinforce a variety and mix of uses in line with any relevant land use priorities of the Local Plan.
- the inclusive principle assists with achieving objectives on liveable neighbourhoods, affordable housing and housing, inclusion and health through sustaining and reinforcing a variety and mix of uses in line with relevant land use priorities of the Local Plan.
- the sustainable principle has benefits in terms of use of land, health, climate change, resource efficiency and natural resources requiring development to respond to the principle which underpins the whole planning system.

The overarching nature of PLAN1 means that it can deliver cumulative impacts when considered alongside other policies in the plan.

The **contextual principle** aligns closely with the design and heritage policies within the plan and will complement their delivery, however it will also assist with delivering high quality housing, delivery of new employment and retail floorspace, the delivery of green infrastructure and sustainable design. The approach works together with other policies in the plan which deal with amenity and noise including Policy H4 which sets out detail on housing quality including noise impacts and Policy DH5 which deals with noise and vibration but also the agent of change aspect of policy. In addition retail policies make clear the need for residential or other uses to ensure the vitality and retail function of town centres and local centres is not impacted which helps contribute to economic growth and liveable neighbourhoods.

The **connected principle** will help with achieving access to services and facilities and through encouraging permeability and movement through areas which links well with other policies in the including H1, H7, H9, SC1 and R1. This will not only assist with helping to achieve social infrastructure and economic growth objectives in terms of delivering development in accessible locations, it will also assist with delivery of the transport policies. The clear connection with Policy T1 and T4 in terms of a developments connection with public realm reinforces the approach expected through PLAN1, adding detail on methodology and tools which could be used by designers. In addition, it will help development respond to site specific issues such as safety, crime and fear of crime.

The **inclusive principle** is crosscutting and supports policies across the plan both in terms of the mix of uses but also the design of development and the broader built environment. A mix of uses can respond to economic as well as social needs and is represented by policies in the Thriving Communities and Inclusive Economy sections of the plan. The inclusive approach supports development which is adaptable and meets changing and needs of the population which works with policy H4 and B2 which both seek flexibility of new housing and employment floorspace. Other aspects of inclusive require a policy response from development in terms of a developments function and requirements such as landscape design set out in Policy G4 will respond to safety and useability.

Finally the **sustainable principle** assists with balancing social, economic and environmental objectives and is therefore relevant to policies across the plan as well as the sustainability policies. Policies through the plan contribute to this principle, not just those which respond to

climate change but those which encourage re-use and renovation of buildings. Consideration of infrastructure provision is also part of the process of developing and designing a proposal which addresses this and other development principles.

More detailed considerations of PLAN 1 are set out under the site appraisal criteria – some of these criteria will specifically help with delivering specific policies in the plan (for example surface water flows) where as others will help with delivering cumulative benefits across policies (for example design quality).

## Consideration of cumulative and other effects for Area Spatial Strategies Section

Table 6.2: Consideration of cumulative and other effects for Area Spatial Strategies Section

TOPIC / POLICY	BUILT ENV	USE OF LAND	HERITAGE	LIVEABLE	AFFORDABLE	INCLUSION	HEALTH	ECONOMIC	NEED TO TRAVEL	OPEN SPACE	BIODIVERSITY	CLIMATE CHANGE	RESOURCE EFFICIENCY	NATURAL RESOURCES
Policy SP1: Bunhill and Clerkenwell	0	+	0	0	0	0	0	+	0	0	0	0	0	0
Policy SP2: King's Cross and Pentonville Road	+	+	+	+	+	0	+	+	+	+	+	0	0	+
Policy SP3: Vale Royal / Brewery Road Locally Significant Industrial Site	+	+	0	+	0	++	+	+	+	0	0	0	0	+
Policy SP4: Angel and Upper Street	+	+	+	+	0	0	0	+	+	0	0	0	0	0
Policy SP5: Nag's Head and Holloway	+	+	+	+	+	0	0	+	+	0	0	0	0	0
Policy SP6: Finsbury Park	+	+	+	+	+	0	+	+	+	0	0	0	0	0
Policy SP7: Archway	+	+	0	+	+	0	+	+	+	0	0	0	0	0
Policy SP8: Highbury Corner and Lower Holloway	++	+	+	+	0	0	0	+	++	+	0	0	0	0
<b>CUMULATIVE</b>	+	+	+	+	0	0	0	+	+	0	0	0	0	0

Taken together these will have considerable benefits in delivering growth in terms of business floorspace, retail and leisure space with clear positive effects which work together from all the Area Spatial Strategies to contribute to the objective for economic growth. Similarly the Area Spatial Strategies will all have positive effects on the objective for use of land with policy for business floorspace which reinforces the policy position set out in policy B2. This is not surprising given these areas are identified for growth, are accessible in either CAZ or town centre

locations and contain a concentration of different uses. The area policies however also have to grapple with balancing different land uses to meet different development needs. The area policies do this through making reference to where uses such as business uses are supported or residential uses are considered appropriate or where retail and leisure and cultural uses are supported in town centres. Balanced decisions in relation to individual sites are assessed as part of relevant site allocations, whilst alternatives which deal with the positives and negatives of different land uses in different locations as also assessed in relation to relevant strategic policies.

The Area Strategies help focus development in the most appropriate locations by recognising the various areas range of commercial uses including retail, leisure, service, and office uses. Some of the area strategies also recognise the rich variety of community uses and cultural spaces that are available. Having policy which promotes these diverse, vibrant and economically thriving spatial areas helps these locations serve the needs and wellbeing of the population. It also helps to better protect and enhance the uses in these locations. Area spatial strategy SP3 is a unique area with a focus on the protection of the industrial function of the area and protecting this helps contribute to meeting economic growth and compliments the function of the CAZ for example by providing space for industries which service the businesses in that area.

Policy in the area spatial strategies supports high quality improved public realm with more functional spaces that improves permeability and connectivity. This repeated emphasis on improving public realm throughout the spatial strategies creates a positive effect in making the built environment safer and more inclusive. Combined, these improvements will contribute to enhancing local character and create a high quality built environment. They also help contribute to a positive cumulative effect against the objective to reduce the need to travel by identifying improvements which help encourage increases in walking and cycling. These have positive effect on health and wellbeing benefits too. In addition a number of the spatial strategies in Nags head and Highbury Corner identify the benefits of open space either improving access to it or adding additional open space which will have wider health benefits.

Most of the spatial strategies identify specific heritage assets and local landmarks, highlighting them helps enhance the borough's heritage and culture. Most of the areas identify relevant social and community infrastructure which helps maintain residents access to facilities contributing to the objective liveable neighbourhoods across the borough, which also helps maintain facilities for the benefit of those both inside and outside the borough helping to serve wider needs across the borough.

### **Synergistic effects**

Key public realm and transport proposals in spatial policy areas align to and complement objectives of Islington's Transport strategy. The Infrastructure Delivery Plan contains an updated assessment of the infrastructure needed to support planned new development in Islington including transport.

Spatial policies complement existing plans that are in place in some areas – for example the Finsbury Park SPD.

## Consideration of cumulative and other effects for Thriving Communities section

The Thriving Communities section contains the housing policies and social and community policies.

**Table 6.3: Consideration of cumulative and other effects for Thriving Communities section**

TOPIC / POLICY	BUILT ENV	USE OF LAND	HERITAGE	LIVEABLE	AFFORDABLE	INCLUSION	HEALTH	ECONOMIC	NEED TO TRAVEL	OPEN SPACE	BIODIVERSITY	CLIMATE CHANGE	RESOURCE EFFICIENCY	NATURAL RESOURCES
H1: Thriving Communities	++	++	+	+	++	++	+	0	0	0	0	+	+	0
H2: New and existing conventional housing	++	++	0	+	++	+	+	+	0	0	0	0	0	0
H3: Genuinely affordable housing	0	+	0	+	++	+	+	+	+	0	0	+	0	0
H4: Delivering high quality housing	++	++	0	0	++	++	++	0	0	0	0	+	++	0
H5: Private outdoor space	+	+	0	0	+	+	+	0	0	+	+	+	0	0
H6: Purpose-built Student Accommodation	0	-	0	+	-	+	-	+	0	0	0	0	-	0
H7: Meeting the needs of vulnerable older people	+	-	0	+	0	0	+	0	+	0	0	0	-	0
H8: Self-build and Custom Housebuilding	+	+	0	0	+	0	0	0	0	0	0	0	0	0
H9: Supported Housing	0	0	0	+	+	++	++	0	+	0	0	0	0	0
H10: Houses in Multiple Occupation (HMOs)	0	-	0	+	-	0	-	0	0	0	0	0	-	0
H11: Purpose Built Private Rented Sector Development	-	-	0	0	-	0	+	0	0	0	0	0	0	0
H12: Gypsy and Traveller Accommodation	0	0	0	0	+	+	0	0	0	0	0	0	0	0
SC1: Social and Community Infrastructure	++	++	0	++	0	+	++	+	+	0	0	0	0	0
SC2: Play space	+	+	0	++	0	+	++	0	0	+	0	0	0	0
SC3: Health Impact Assessment	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SC4: Promoting Social Value	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>CUMULATIVE</b>	<b>++</b>	<b>0</b>	<b>0</b>	<b>++</b>	<b>++</b>	<b>++</b>	<b>++</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

Policies in the Thriving Communities section are focused on the societal objectives contained in the Sustainability Framework. When the policies within the section are considered together, they will have a particularly positive cumulative effect on the objectives including affordable housing, inclusion and equality, health and wellbeing, liveable neighbourhoods and the built environment.

Policies which address the health and wellbeing objective, in particular Policy H4, which determines housing quality within a development will combine with other policies in the section: Policy H2 considers the impact of development on social infrastructure, Policy H3 contributes affordable housing which will help reduce poverty, Policy H5 helps improve access to outdoor space which helps encourage health benefits. Other policies in the section link back to Policy H4 requiring the consideration of housing quality for older peoples accommodation, large scale HMO and purpose built private rented sector accommodation. High quality housing also helps encourage people into more active travel with access to cycle parking and encourages recycling with effective recycling facilities which helps resource efficiency. Policies SC1 and SC2 contribute to improving access to health and social care services/facilities by protecting existing facilities and providing a robust approach to considering changes in service provision are managed appropriately. Policy SC2 provides play space as part of development which contributes to both the health and wellbeing objective and also the built environment objective. This combination of these positive policy effects contributes to overall improvements in health and wellbeing of residents. In addition there is a policy check for development in Policy SC4 that requires Health Impact Assessment.

There is an overall positive effect against the built environment objective with housing policies supporting housing development at optimal densities which combines with H4 which includes minimum space standards that ensures quality is maintained whilst density is optimised. Quality also helps support adaptability and the efficient use of land. Housing mix priority is considered in Policy H2 which combines with both Policy H1 in terms of a priority for family units and Policy H3 in meeting affordable housing needs. This makes the best use of the scarce land resource in the borough and balance competing demands for land use across the borough. The Thriving Communities section also sets a principle of restricting inefficient forms of development; student accommodation, large HMO and purpose built private rented sector on the basis of land supply. There is a tension however with policies for large scale HMO accommodation and student accommodation, which are restrictive policies but can still permit these forms of development which detracts from meeting the overwhelming need for housing which does have a negative impact on the efficient use of land. Further detail on meeting needs is set out below under 'consideration of cumulative effects of the Site Allocations' section.

The combined effect of the Thriving Community policies against the objective for promoting social inclusion and equality is significantly positive. The policies aim to improve fairness and integration and tackle social exclusion, through the delivery of mixed and balanced communities which are economically, environmentally and socially resilient. Policy H1 optimise housing density and also restricts gated development. Policy H2 ensures the broadest range of needs possible are met to reduce inequality and provide more opportunity and potentially addressing overcrowding issues. Policy H3 increases the quantum of affordable housing reducing the negative consequences of relative poverty by reducing the proportion of income spent on accommodation and policy H4 ensures housing is tenure blind, promoting social cohesion which combines with requirements for accessible housing which also promotes social cohesion. In addition accessible homes can support older people to stay in their homes longer which contributes to meeting their needs, which is important given the potential tension with Policy H7 and

meeting wider housing needs and the restriction of market extra care accommodation. Finally Policy H9 helps improve peoples' opportunity for independence in particular for those more disadvantaged by protecting existing supported housing and supporting provision of new supported housing. Policies SC1 and SC2 contribute to social inclusion by improving access to health and social care services/facilities by protecting existing facilities and providing a robust approach to considering changes in service provision are managed appropriately which will help to ensure people's needs are considered and access for people to the same opportunities are available.

The affordable housing objective has clear positive effects on it from the delivery of affordable housing which improves fairness and integration and tackles social exclusion with the delivery of mixed and balanced communities. Policies H1 to H4 combine to achieve this providing affordable housing, a housing mix with size priorities for different affordable tenures and high quality housing at an optimal density. This helps meet the broadest range of need possible. However there are negative effects for policy H6, H7, H10 and H11 as these forms of development can make it more difficult to deliver social rented housing that is effectively integrated within a development which combine to create a cumulative negative effect.

Policies H1 and H4 combines with the policies in the Sustainable Design section to create energy efficient homes which are more affordable to heat and also cooler in summer. This helps tackle inequality for those on lower incomes. There is also a link though to economic growth where affordable housing can help retain labour in Islington which can help key public service areas and lower skilled employment which when combined with Policy B4 and particularly Policy B5 helps to improve residents skills and employment opportunities.

The Thriving Communities set of policies has a positive effect on the objective for liveable neighbourhoods with social and community facility policies which link with Policy H2 that supports existing facilities to ensure that the appropriate level of infrastructure is available for the local population. This is supported by Policy H1, which seeks new housing development that is fully integrated within, and relates positively to, the immediate locality. It would include consideration of access to services. H1 in particular will support the provision of necessary social infrastructure to support residents, workers and visitors helping meet needs and improve access to essential services in the right locations which is supported by ST1 and the Islington Community Infrastructure Charging Levy. Policy SC1 also contribute to liveable neighbourhoods by improving access to health and social care services/facilities by protecting existing facilities and providing a robust approach to considering changes in service provision are managed appropriately as well as supporting new or extended social infrastructure.

Meeting identified needs for housing has to be balanced with meeting other identified needs. Therefore the housing policies have to work alongside other policies in the plan to help achieve the right balance. Other policies in the plan, such as those in the inclusive economy section below set out where housing is sometimes more restricted in certain circumstances/locations in order to help achieve this balance. There is a tension between balancing housing with other needs in the plan, primarily employment needs. Ensuring that employment needs are met is a key consideration of the Local Plan. Site allocations help to consider the balance of different uses to help balance different development needs given the limited supply of land in the borough.

### **Synergistic effects**

Some of the new housing, in particular social housing that will be developed will be undertaken by Islington Council as part of the ongoing programme of development on Council housing estates. This is one of the key aims of the Councils Housing Strategy which seeks to increase the supply of affordable homes and increase choice. All Council development will be completed in accordance with the housing policies of the Local Plan.

There is a link with regards social infrastructure and other infrastructure and the Islington Community Infrastructure Levy with a charge adopted in 2014. The update to the Infrastructure Delivery Plan provides an up to date assessment of the infrastructure needed to support planned new development in Islington.



## Consideration of cumulative and other effects for Inclusive Economy section

The Inclusive Economy section contains the policies for business floorspace, retail, leisure and services, culture and visitor accommodation

**Table 6.4: Consideration of cumulative and other effects for Inclusive Economy section**

TOPIC / POLICY	BUILT ENV	USE OF LAND	HERITAGE	LIVEABLE	AFFORDABLE HOUSING	INCLUSION	HEALTH	ECONOMIC GROWTH	NEED TO TRAVEL	OPEN SPACE ACCESSIB	BIODIVERSITY	CLIMATE CHANGE	RESOURCE EFFICIENCY	NATURAL RESOURCES
B1: Delivering business floorspace	+	++	0	+	0	++	+	++	++	0	0	+	0	+
B2: New business floorspace	+	++	0	+	0	+	+	++	++	0	0	+	0	+
B3: Existing business floorspace	0	+	0	+	0	+	+	+	+	0	0	+	0	+
B4: Affordable workspace	+	+	0	+	0	++	+	++	+	0	0	+	0	+
B5: Jobs and training opportunities	+	0	0	0	0	++	+	++	+	0	0	+	0	+
R1: Retail, leisure and services,	+	++	0	++	0	+	+0	++	+	0	0	0	0	0
R2: Primary Shopping Areas	+	++	0	++	0	0	+0	++	+	0	0	0	0	0
R3: Islington's Town Centres	+	++	+	++	0	0	+	++	+	0	0	0	0	0
R4: Local Shopping Areas	+	+	0	++	0	0	+	+	+	0	0	0	0	0
R5: Dispersed retail and leisure uses	+	+	0	++	0	0	+	+	+	0	0	0	0	0
R6: Maintaining and enhancing Islington's unique retail character	++	+	+	++	0	0	0	+	0	0	0	0	0	0
R7: Markets and SSAs	+	+	+	+	0	+	0	+	+	0	0	0	0	0
R8: Location and concentration of uses	+	0	0	++	0	0	+	0	0	0	0	0	0	0
R9: Meanwhile/ temporary uses	+	++	0	+	0	0	0	+	0	0	0	0	0	0
R10: Culture and NTE	+	++	0	++	0	+	+	++	+	0	0	0	0	0
R11: Public Houses	+	+	++	+	0	+	+	++	0	0	0	0	0	0
R12: Visitor accommodation	-	0	0	0	0	0	0	+	0	0	0	-	-	-

TOPIC / POLICY	BUILT ENV	USE OF LAND	HERITAGE	LIVEABLE	AFFORDABLE HOUSING	INCLUSION	HEALTH	ECONOMIC GROWTH	NEED TO TRAVEL	OPEN SPACE ACCESSIB	BIODIVERSITY	CLIMATE CHANGE	RESOURCES	NATURAL RESOURCES
CUMULATIVE	+	++	0	++	0	+	+	++	+	0	0	+	0	0

Policies in the Inclusive Economy section are focused on economic aspects with the Local Plan objective to deliver an inclusive economy which the plan does through supporting creation of a variety of new business floorspace, protecting existing floorspace, in particular industrial land through new LSIS designations and securing affordable workspace and jobs/training opportunities from development. Cumulatively, as identified in the Thriving Communities section this has positive effects against the objective for inclusion and inequality when combined with policies for meeting affordable housing need. There are other cumulative effects, for example, the benefit of protecting the industrial function helps to reduce the need for goods and services to travel, reducing congestion and air pollution which is positive against the climate change objective when combined with policies in the Transport and Public Realm section to manage delivery and servicing (T2 and T5). Policy B2 focuses and maximises the delivery of offices in the most accessible parts of the borough, hence it also combines to reduce transport emissions. This also has a positive cumulative impact on the climate change and natural resources objective in relation to air quality.

Retail policies within the section will have cumulative positive effects against the objective to meet the needs and wellbeing of local residents through enabling town centres and LSAs to continue to serve the local residents across different retail catchment areas by striking the right balance of retail, leisure, culture and business uses to enable response to changing retail patterns. The policies combine seeking to protect and enhance provision of services in town centres, local centres and dispersed shops. Enabling town centres to thrive also contributes to addressing inequality and inclusion objective through employment opportunities that retail, culture and the night time economies provide. This combines with the business floorspace policies to provide opportunities for economic growth. In addition, policies in this section have cumulative benefits against the objective to create liveable neighbourhoods when considered with policies in the Design and Heritage section which ensure that residential amenity is protected through suitable noise assessment and application of the agent of change principle.

Taken together the retail policies provide a framework to support facilities which can meet the needs of communities and this can provide health and , recreation and leisure benefits that are positive for both physical and mental health. The policies also provide a framework for taking into account cumulative impacts to provide against the proliferation of activities which can have/or have the potential to have negative health impacts. Maintaining and supporting retail centres is also positive for promoting an inclusive and equal society as they can act as informal spaces for communities to meet and strengthen local connections which can foster better community cohesion.

There is a tension between balancing housing with other needs in the plan, primarily employment needs. Ensuring that employment needs are met is a key consideration of the Local Plan. The plan aims to strike the right balance with employment growth focused and prioritised in certain locations, particularly the CAZ, and retail uses prioritised in Town Centres, for example. Relevant policies also set out where residential uses are and are not considered appropriate in these locations in order to help achieve that balance.

### **Synergistic effects**

Policy B4 is supported by Islington's Affordable Workspace Strategy; the council's Inclusive Economy team commission affordable workspace providers to deliver affordable workspace after it has been secured through planning permission. The Bunhill and Clerkenwell Area Action Plan and the City Fringe Opportunity Area also support policies B1 – B5 to prioritise employment and more specifically office use.

Policies B1, B2, B3, B4 and B5 are supported by the Council's 2020 Transport Strategy and Low Traffic Neighbourhoods programme which will enable people to reach a diverse range of employment types using active travel modes.

Policies R1 – R12 in conjunction with policies B1-B4 align with the objectives in the Finsbury Park Town Centre SPD which seek to strengthen the retail offer whilst promoting mixed use development especially around Finsbury Park station to provide office uses that benefit the viability and vibrancy of the retail and cultural environment. The Bunhill and Clerkenwell AAP also supports the aims of retail policies by providing for location specific criteria for retail, leisure and cultural development in the CAZ.

## Consideration of cumulative and other effects for Green Infrastructure section

The following section deals with policies dealing with green infrastructure and open space

**Table 6.5: Consideration of cumulative and other effects for Green Infrastructure section**

TOPIC / POLICY	BUILT ENV	USE OF LAND	HERITAGE	LIVEABLE	AFFORDABLE HOUSING	INCLUSION	HEALTH	ECONOMIC GROWTH	NEED TO TRAVEL	OPEN SPACE ACCESSIBILITY	BIODIVERSITY	CLIMATE CHANGE	RESOURCES	NATURAL RESOURCES
G1: Green Infrastructure	++	+	0	++	0	0	++	0	0	++	++	++	0	+
G2 Protecting open space	++	+	+	++	-	+	++	0	0	++	++	++	0	+
G3 New public open space	+	0	0	++	0	+	++	0	+	++	++	+	0	+
G4: Biodiversity, landscape design and trees	++	+	0	+	0	+	+	0	+	++	++	+	0	0
G5: Green roofs and vertical greening	+	++	0	0	0	0	+	0	+	0	++	+	0	0
<b>CUMULATIVE</b>	++	+	0/+	++	0/-	0	++	0	0	++	++	++	0	0

Cumulative effects are considered within this section in relation to the strategic approach to green infrastructure and for biodiversity and wildlife habitat with requirements for developers to incorporate as much biodiversity habitat into development as is reasonably possible. This will have a significant cumulative effect, along with policies in the Thriving Communities section, on the high quality built environment objective and the health and wellbeing objective. By ensuring that open spaces are preserved and increasing the amount of green open space, plants, trees, green walls and roofs in the urban environment this can help tackle air quality issues and encourage people to participate in more active travel, sport and recreation in the borough as well as help to mitigate the impacts of climate change (e.g. urban heat island and flood risk) therefore having cumulative benefits when considered with the policies in sections for Transport and Public realm and Sustainable Design. Together the policies in this section can also have significant cumulative effects in relation to liveable neighbourhoods through improving access to open spaces and improving connections to open space and green spaces, for example, which also leads to positive impacts in relation to the open space objective.

### Synergistic effects

The Local Plan policies related to Green Infrastructure are necessary to implement a large number of the actions set out in the Islington Biodiversity Action Plan 2020-2025, and its actions plans for the Built Environment, Parks and Urban Green Spaces, Designated Sites, and Access to Nature. The approach to protecting and enhancing green infrastructure also complements the Islington 2020 Zero Carbon Strategy which seeks to integrate the management of the natural environment as part of efforts to achieve net zero and mitigate the risks from the loss of biodiversity and the impacts that this can have for environmental, social and economic objectives. Finally, the approach to green infrastructure will assist with creating and enhancing opportunities for cycling and walking in the borough which aligns with the Local Implementation Plan and Transport Strategy.

## Consideration of cumulative and other effects for Sustainable Design section

The following section deals with policies dealing with sustainability, flood risk, air quality and circular economy.

**Table 6.6: Consideration of cumulative and other effects for Sustainable Design section**

TOPIC / POLICY	BUILT ENV	USE OF LAND	HERITAGE	LIVEABLE	AFFORDABLE HOUSING	INCLUSION	HEALTH	ECONOMIC GROWTH	NEED TO TRAVEL	OPEN SPACE ACCESSIB	BIODIVERSITY	CLIMATE CHANGE	RESOURCE EFFICIENCY	NATURAL RESOURCES
S1: Delivering Sustainable Design	++	+	0	+	++	+	++	+	0	0	0	++	++	+
S2: Sustainable Design and Construction	+	+	0	+	++	+	++	0	0	++	++	++	++	+
S3: Sustainable Design Standards	+	0	0	+	++	+	++	0	0	0	+	++	+	+
S4: Minimising greenhouse gas emissions	+	0	0	0	++	+	++	+	0	0	0	++	+	0
S5: Energy infrastructure	+	+	0	0	++	+	++	+	0	0	0	++	+	0
S6: Managing heat risk	+	0	0	0	+	0	++	0	0	0	0	++	0	0
S7: Improving Air Quality	+	0	0	+	0	0	++	0	+	0	+	0	0	++
S8: Flood Risk Management	+	0	0	0	0	0	0	0	0	0	0	++	0	0
S9: Integrated Water Management and Sustainable Drainage	+	0	0	0	0	0	+	0	0	+	+	++	0	++
S10: Circular Economy and Adaptive Design	+	+	0	0	+	0	0	+	0	0	0	++	++	+
<b>CUMULATIVE</b>	+	0	0	+	+	+	++	+	0	0	0	++	++	+

Cumulatively the Sustainable Design policies set out the council's strategic approach to delivering sustainable design with the aim to minimise the contribution of development to climate change and ensure that developments are designed to mitigate the effects of climate change. Policy S1, sets out the requirement for all development proposals to maximise energy efficiency in accordance with the energy hierarchy, reduce energy demand through fabric energy efficiency, and supply energy efficiently and cleanly, works with the

requirements set out in policies S2, S3, S4 and S5 and will have a significant positive effect against the framework objectives to reduce the contribution to climate change and promote resource efficiency. The sustainable design policies will also individually and cumulatively contribute to reducing fuel poverty in the borough contributing to reducing inequalities and improving wellbeing.

Cumulatively policies S6, S8 and S9 will have a significant positive effect against objectives to mitigate and adapt to the effects of climate change which also contributes positively to both health objectives and affordable housing. In addition, Policy S7 has significant positive cumulative effects on health and wellbeing alongside Policy S5 which promotes the adoption of an integrated approach to energy supply to maximise both air quality and climate change benefits and ensures heating systems do not have a significant impact on local air quality.

When considered together, the requirement in Policy S2 for developments to submit a Landscape Design Strategy, alongside Policy S9 and the Green Infrastructure policies (particularly policy G4), all have a positive cumulative effect on objectives relating to climate change and open space. These policies all require the incorporation of Sustainable Urban Drainage Systems (SUDS) into the landscape design as part of an integrated approach which maximises biodiversity, water quality and other benefits. Green Infrastructure Policy G4 and Policy S6 have cumulative benefits as the use of green roofs will help to minimise internal heat gain and the impacts of the 'urban heat island effect'.

Policies S4 and S10 have positive cumulative effects on objectives relating to reducing carbon emissions and promoting a circular economy approach by requiring the adoption of a whole life-cycle assessment methodology for the selection of heat sources and the use of building materials.

### **Synergistic effects**

These policies will help achieve the carbon reductions set out in the Islington 2020 Zero Carbon Strategy - the target is for all buildings in Islington to be net zero carbon by 2050. Improvements to building efficiency secured under Policies S1, S2 and S3 will help achieve the targets in the Government's 2020 Energy White Paper.

There will be synergies between these policies and the Islington Transport Strategy and co-ordinated cross boundary working with neighbouring boroughs on projects such as Old Street roundabout which provide inclusive redesign of the public realm.

The sustainable design policies will help ensure new connections to Islington's planned future heat networks which are identified on Islington's CIL Regulation 123 Infrastructure List (CIL 123 List).

These policies (in particular Policy S7) will also help achieve Islington's Air Quality Strategy, which outlines the proposed actions in Islington to reduce air pollution and lower exposure to the main pollutants between 2019 and 2023.

Policy S9 works with the Thames River Basin Management Plan (TRBMP) by ensuring that all development proposals located adjacent to the New River or Regent's Canal are required to protect the water environment to help maintain good ecological status for the waterways. Policies S8/S9 combine to ensure that flood risk in the borough is considered and addressed helping address areas of flood risk identified in Islington's Strategic Flood Risk Assessment and the Local Flood Risk Management Strategy.

Policy S10 is required to implement the Islington's Code of Practice for Construction Sites.



## Consideration of cumulative and other effects for the Public Realm and Transport section

The following section deals with policies dealing with public realm, sustainable transport, car-free development and delivery and servicing.

**Table 6.7: Consideration of cumulative and other effects for the Public Realm and Transport section**

TOPIC / POLICY	BUILT ENV	USE OF LAND	HERITAGE	LIVEABLE	AFFORDABLE HOUSING	INCLUSION	HEALTH	ECONOMIC GROWTH	NEED TO TRAVEL	OPEN SPACE ACCESSIB	BIODIVERSITY	CLIMATE CHANGE	RESOURCE EFFICIENCY	NATURAL RESOURCES
T1: Enhancing the public realm and sustainable transport	++	+	0	++	0	+	++	0	++	0	0	++	+	++
T2: Sustainable Transport Choices	++	+	0	++	0	+	++	0	++	0	0	++	+	++
T3: Car free development	++	++	0	+	0	+	+	0	+	0	0	++	+	++
T4: Public realm	++	0	0	++	0	+	++	0	++	+	0	++	0	++
T5: Delivery, servicing & construction	+	+	0	+	0	0	0	+	+	0	0	+	+	+
<b>CUMULATIVE</b>	++	+	0	++	0	+	++	0	++	0	0	++	+	++

The Public Realm and Transport policies when considered together will have significant positive cumulative effects against objectives for built environment, liveable neighbourhoods, health inequality and climate change by prioritising more active travel and use of more sustainable transport modes which will help promote a healthier lifestyle and which will have positive impacts against health inequality objective for residents and reducing carbon emissions objective.

The policies also have a positive impact on inclusion as they aim to improve transport for those with no access to private motor vehicles whilst providing wheelchair accessible parking for disabled people. As previously identified this is linked to the reduction in emissions and fuel consumption from land-use benefits of focusing and maximising development in the most accessible locations in the borough enabling more sustainable travel. There are also cumulative impacts with policies B2 and SP3 in reducing the negative impacts of transport relating to freight, servicing, delivery and construction. The transport policies (T1 and T4) also work in concert with spatial

policies in helping to promote sustainable transport and deliver development in locations and combine well with other policies in the plan such as policies PLAN1 and G4 which will help a proposal fully integrate within, and relate positively to, their immediate locality.

There is a positive effect against the built environment objective with Public realm and transport policy T1 prioritising practical, safe and convenient access to the public realm which will help to create a sustainable public realm , which combines with Policy T2 which seeks the same factors for provision of sustainable transport infrastructure. This helps ensure the built environment is sufficiently flexible and adaptable to accommodate evolving social and economic needs. This also contributes to making neighbourhoods more liveable. Both T2 and T4 in combination ensure neighbourhoods are more liveable neighbourhoods with more permeable and legible public realm which helps people access existing facilities and services by walking and cycling in particular. In addition these policies can be considered to contribute to economic growth through reducing congestion, which improves freight deliveries and an improved built environment which is more accessible and attractive to visit, particularly town centres.

### **Synergistic effects**

The public realm and transport policies have positive synergistic effects with Islington's 2020 Transport Strategy which aims at increasing the number of trips made by walking, cycling and public transport, whilst reducing the number of car trips. The promotion of Low Traffic Neighbourhoods is also a key component of the Transport Strategy, which is also supported by the Local Plan. In addition, the Council has published its 2020 Zero Carbon Strategy, which identifies transport as a key priority to minimise emissions and reach carbon neutrality. There are also synergistic effects with the London Plan, the Mayor's 2018 Transport Strategy's Healthy Streets, and TfL's Action plans. For instance, the ambition of T2 and T5 to de-motorise and optimise freight, delivery and service movements reflect TfL's 2019 Freight Action Plan. The transport policies also work in combination with the Mayor's Ultra Low Emission Zone (ULEZ), which will be extended in October 2021. Finally, the Government's 2020 Energy White Paper identifies the shift towards active travel and public transport as a key strategic priority for the decarbonisation of transport.

## Consideration of cumulative and other effects for the Design and Heritage section

The following section deals with policies dealing with design and heritage, building heights, basements, noise and advertisements

**Table 6.8: Consideration of cumulative and other effects for the Design and Heritage section**

TOPIC / POLICY	BUILT ENV	USE OF LAND	HERITAGE	LIVEABLE	AFFORDABLE HOUSING	INCLUSION	HEALTH	ECONOMIC GROWTH	NEED TO TRAVEL	OPEN SPACE ACCESSIBILITY	BIODIVERSITY	CLIMATE CHANGE	RESOURCES EFFICIENCY	NATURAL RESOURCES
DH1: Fostering innovation and conserving and enhancing the historic environment	++	++	+	+	+	+	+	+	0	0	0	+	0	0
DH2: Heritage assets	++	+	++	0	0	0	0	0	0	+	+	0	0	0
DH3: Building heights	++	++	++	0	0	0	0	-	+	0	+	+	+	+
DH4: Basement development	+	-	+	0	0	0	+	0	0	++	++	+	+	+
DH5: Agent of change, noise and vibration	+	0	0	++	++	0	++	+	0	0	0	0	0	0
DH6: Advertisements	+	0	+	0	0	0	+	0	0	0	0	0	0	0
DH7: Shopfronts	++	0	++	0	0	+	0	0	0	0	0	0	0	0
DH8: Public art	+	+	+	0	0	+	+	0	0	0	0	0	0	0
<b>CUMULATIVE</b>	<b>++</b>	<b>++</b>	<b>++</b>	<b>0</b>	<b>0</b>	<b>+</b>	<b>+</b>	<b>0</b>	<b>0</b>	<b>+</b>	<b>+</b>	<b>+</b>	<b>+</b>	<b>0</b>

Cumulatively, the Design and Heritage policies have a significant positive effect against the framework objectives for the built environment and use of land, in particular ensuring use of a site is fully optimised which helps make the best use of the scarce land resource in the borough helping meet and prioritise the various development needs in the borough in particular housing need and employment. Combined with the spatial policies and relevant site allocations and Bunhill and Clerkenwell AAP this combines to focus development in more accessible locations, although the policy notes that high density development can be accommodated throughout the borough.

Clearly there is a positive effect on the heritage objective with Policy DH2 and other policies having a positive effect including those that deal with basements, shopfronts, advertisements and public art which all expect to consider the effect on heritage. Basement Policy DH4 also has positive effects on private open spaces – gardens, by helping to protect the amount of land that can be developed and

heritage policy protects historic open spaces, which combines with DH3 building heights which ensures tall buildings consider their setting. These also have positive effects on biodiversity too.

The approach to tall buildings directs tall buildings to where they are most appropriate based on a robust and comprehensive evidence base while protecting local character, this includes taking into account other considerations which has cumulative benefits with other policies for example, taking into account heritage assets and impact on wider built environment as well as public transport accessibility. This combines with requirements set out in Policy H2 which supports housing development at optimal densities which combines with other policies – PLAN1 and DH1 which also seeks to fully optimise density levels. Site allocations also highlight heritage assets and considerations which will be important to take into account as key development sites come forward, including those for Tall Buildings. The Design and Heritage Policies will be important considerations alongside site allocations, spatial and strategic policies in considering how the boroughs heritage assets can be conserved and enhanced whilst accommodating growth to meet identified development needs.

The agent of change policy will also have a positive effect for health and wellbeing as it ensures that change does not adversely effect existing uses through noise and vibration impacts. This is cross referenced in the Inclusive Economy section and Policy H4 which has positive effects on health and wellbeing.

### **Synergistic effects**

Policies DH1, DH2, and DH3 will help achieve the objectives of the Conservation Area Design Guides for each conservation area, help in removing assets from Historic England's Heritage at Risk Register, and ensure that views in the London View Management Framework are protected (Mayor of London).

## Consideration of cumulative and other effects for the Strategic Infrastructure section

The following section deals with policies dealing with infrastructure, waste, telecommunications and water infrastructure

**Table 6.9: Consideration of cumulative and other effects for the the Strategic Infrastructure section**

TOPIC / POLICY	BUILT ENV	USE OF LAND	HERITAGE	LIVEABLE	AFFORDABLE HOUSING	INCLUSION	HEALTH	ECONOMIC GROWTH	NEED TO TRAVEL	OPEN SPACE ACCESSIB	BIODIVERSITY	CLIMATE CHANGE	RESOURCE EFFICIENCY	NATURAL RESOURCES
ST1: Infrastructure Planning and Smarter City Approach	+	++	0	++	0	++	++	+	++	++	0	++	0	0
ST2: Waste	++	++	0	+	0	0	+	0	+	0	0	+	++	+
ST3: Telecommunications, communications and utilities equipment	+	0	++	0	0	0	0	0	0	0	0	0	0	0
ST4: Water and Wastewater infrastructure	+	++	0	0	0	0	0	0	0	0	0	0	0	++
<b>CUMULATIVE</b>	+	++	0	+	0	0	+	0	+	0	0	+	0	+

The Strategic Infrastructure section will have a positive cumulative effect against objectives for the built environment, liveable neighbourhoods, need to travel, natural resources and efficient use of land as it seeks to balance the development needs of the borough ensuring the full range of residents development needs are met and provision of robust buildings with sufficient infrastructure. Safeguarding the Hornsey Street Re-use and Recycling Centre will reduce the need to travel and reduces associated emissions. This will work cumulatively with policy in the Thriving Communities section which aims to protect community facilities where justified helping ensure residents have access to the various essential services, facilities and amenities necessary and enhance these facilities. Policy ST3 will work with PLAN1 and design and heritage policies ensuring visual impact of telecoms promotes sensitive design contributing to the built environment objective. Policy ST4 combines with ST1 and where relevant the site allocations will have a positive effect against the framework objective for natural resources as it states it will ensure adequate water supply, surface water, foul drainage and sewerage treatment capacity exists to serve all new developments which will balance development needs in the borough which is positive cumulative effect for the use of land objective. This combines with the Sustainable Design Policies which require environmental accreditation for development and specific water conservation targets and Policy S10 encourages recycling and re-use at the building level. In addition Green Infrastructure policies helps reduce run-off which help contribute to demand on the sewer system. Policy H4

sets out design detail on how residential development should address waste needs and Policy B2 does the same for servicing of employment uses.

**Synergistic effects**

Policy ST1 is linked to the Infrastructure Delivery Plan (updated 2019) which provides a benchmark of infrastructure and future infrastructure requirements. CIL payments secured through development will help build infrastructure set out in the delivery plan.

Policy ST2 links to the North London Waste Plan by ensuring safeguarding of the Hornsey Street Re-use and Recycling Centre, and also set out that the policies in the North London Waste Plan will be used to consider proposals for waste management facilities across the seven North London boroughs, including Islington. Policy ST2 also has a synergistic effect with the North London Joint Waste Strategy through protecting the Hornsey Street facility.

Policy ST3 requires development to adhere to the Code of Best Practice on Mobile Network Development in England.

Policy ST4 requires that applicants engage with Thames Water with regard to water and wastewater requirements of development. This policy ensures that development takes place where there is sufficient water and wastewater capacity exist, helping to achieve Policy S8 and related plans.

### Consideration of cumulative and other effects for the Bunhill and Clerkenwell AAP

The following section deals with policies in Bunhill and Clerkenwell AAP including those that prioritise office use and spatial policies

**Table 6.10: Consideration of cumulative and other effects for the Bunhill and Clerkenwell AAP**

TOPIC / POLICY	BUILT ENV	USE OF LAND	HERITAGE	LIVEABLE	AFFORDABLE HOUSING	INCLUSION	HEALTH	ECONOMIC GROWTH	NEED TO TRAVEL	OPEN SPACE ACCESSIB	BIODIVERSITY	CLIMATE CHANGE	RESOURCE EFFICIENCY	NATURAL RESOURCES
BC1 Prioritising office use	0	++	0	0	-	+	0	++	+	0	0	0	0	0
BC2: Culture, retail and leisure uses	0	+	0	+	0	0	+	++	+	0	0	0	0	0
Policy BC3: City Fringe Opportunity Area	+	+	+	+	0	0	+	++	+	+	+	0	0	0
Policy BC4: City Road	+	+	+	+	+	0	+	+	+	+	+	+	0	+
Policy BC5: Farringdon	+	+	+	0	0	0	+	+	+	0	+	0	0	0
Policy BC6: Mount Pleasant and Exmouth Market	+	+	+	+	+	0	+	+	+	+	+	0	0	0
Policy BC7: Central Finsbury	+	+	+	+	+	0	+	+	+	+	+	0	0	0
Policy BC8: Historic Clerkenwell	+	+	++	0	0	0	+	+	+	+	+	0	0	0
<b>CUMULATIVE</b>	+	++	+	+	0	0	+	+	+	+	+	0	0	0

As identified elsewhere, policy BC1 in combination with policy in the Area Spatial Strategies, the Thriving Economy section and the Area Spatial Strategies in the AAP will likely to have a positive cumulative impact against the framework objective for the efficient use of land. The approach will focus development of employment uses which generate a large number of trips) in an area which is highly accessible by sustainable means of transport which will have cumulative benefits against reducing the boroughs contribution to climate change. The approach delivers maximisation of employment floorspace in the CAZ which the Islington Employment Study states is the location with the most demand for Grade A office space and over the long term will have a significant positive effect, including promoting the tech cluster and its supporting uses. This will likely also have a cumulative positive effect for health and wellbeing through providing increased opportunities for employment with particular positive benefits for those who may be on low incomes.

The Bunhill and Clerkenwell Area Action Plan Spatial Strategies (BC3 to BC8) work in combination with the area wide policies of the BCAAP and the Strategic and Development Management Policies to achieve likely positive effects against a number of objectives – built environment, use of land, liveable neighbourhoods, health, economic growth, transport, open space and biodiversity. These policies work by adding much more detailed policy helping implement the broader strategy, for example by protecting an individual use or space, or by designating a particular opportunity for development such as a new open space or route.

Policies within the Bunhill and Clerkenwell Area Spatial Strategies which support the built environment objectives include:

- An improved public realm along and new pedestrian crossings around City Road (Policy BC4)
- Development around Farringdon Station should contribute to an enhanced public realm that prioritises pedestrian circulation and provides good access between the station and other modes (Policy BC5)
- Improved links to Clerkenwell Green (Policy BC5)
- New development in Historic Clerkenwell should reflect long established building lines, street frontages and plot widths (Policy BC8)

Policies within the Bunhill and Clerkenwell Area Spatial Strategies which support the liveable neighbourhood objectives include:

- Focus of retail and leisure activities at the Old Street Local Shopping Area (Policy BC3)
- The Council will preserve and enhance Exmouth Market Local Shopping Area as a destination for food, drink, retail and entertainment uses (Policy BC6)
- Focus retail at Whitecross Street Local Shopping Area (Policy BC7)

Policies within the Bunhill and Clerkenwell Area Spatial Strategies which support the economic development objectives include:

- Allocation of a significant amount of office floorspace at the Moorfields Eye Hospital site to create a new business quarter (Policy BC3)
- Encouraging Grade A office development at the southern end of City Road (Policy BC4)
- Sites adjacent to Farringdon station must be predominantly offices and associated business uses (Policy BC5)
- There is a significant tension between balancing housing with other needs in the plan, primarily employment needs. Ensuring that employment needs are met is a key consideration of the Local Plan. Striking the right balance with a focus on employment uses in the right locations has been taken, with employment growth focused in particular in the CAZ where it is promoted over residential use.

Policies within the Bunhill and Clerkenwell Area Spatial Strategies which support the transport objectives include:

- Removal of the gyratory at the Old Street Roundabout, new development around the roundabout to explore providing access to the station (Policy BC3)
- Support for change of use of the underground car park at Finsbury Square to other uses (Policy BC3)



- Proposals to promote a single station environment around Farringdon station, as well as cycling parking, docking stations, and pedestrian signage (Policy BC5)
- Public realm improvements at Exmouth Market should further improve pedestrian priority of the street (Policy BC6)
- Public realm improvements across Central Finsbury should facilitate easy pedestrian and cyclist access through and within the area, in line with pedestrian and cycle desire lines (Policy BC7)

Policies within the Bunhill and Clerkenwell Area Spatial Strategies which support the open space and biodiversity objectives include:

- Enhancement of the public open space at Finsbury Square (Policy BC3)
- Protection of the environmental and amenity value of the City Road Basin and new links to the space (Policy BC4)
- Development near Spa Fields should support role of the space and improve links (Policy BC6)

Policies within the Bunhill and Clerkenwell Area Spatial Strategies which support the reducing climate change policies include:

- Support for Bunhill Phase 2 at the City Road/Central Street junction, and a potential new energy centre powered by a water source heat pump Bunhill Phase 3 - at the City Road Basin (Policy BC4)
- Safeguarding the City Road substation and National Grid 400kV network (Policy BC4)

### **Synergistic effects**

Policies BC1 and BC2 support the City Fringe Opportunity Area Planning Framework, in particular the objectives to ensuring there is the space for continued business growth in City Fringe, and to balance between residential and commercial development. In addition the BCAAP spatial strategies (BC3 to BC8), supporting City Fringe Opportunity Area Planning Framework objectives of protecting the mix of uses that makes City Fringe special, identifying the key strategic development sites (along with the site allocations BC1 to BC51), and Connecting the City Fringe.

Policy BC2 and the Spatial Strategy Policies for Historic Clerkenwell and Farringdon will help achieve objectives set out in the City of London Plan with respect to the Culture Mile.

## Consideration of cumulative and other effects for the Site Allocations

Consideration has also been given to the potential for cumulative effects associated with the site allocations. The scores for all sites have not been presented in a single cumulative effect summary table for each objective because this would not provide a meaningful representation of the sites and their effects. Rather, an overview is provided against relevant objectives.

Cumulatively site allocations can have a positive effect in promoting a high quality built environment (objective 1) – both through the delivery of large strategic individual sites as well as the cumulative effect of a number of smaller site allocations where they are within a spatial strategy area. Site Allocations will help bring forward sites for redevelopment and/or refurbishment. The refurbishment of buildings can help to enhance existing buildings whereas the redevelopment of existing building can help to secure high quality architecture that can make a positive contribution to local character and distinctiveness, particularly where existing buildings or use of the land does not do this. Site allocations will work alongside design policies in the plan to help achieve this, for example, policy PLAN 1 and relevant design and heritage policies. In addition many site allocations highlight how the public realm can be improved which cumulatively can help to provide a more attractive, functional and sustainable public realm across the borough as well as making the built environment safer and more inclusive, complementing relevant public realm and transport policies such as policy T4. Design considerations/criteria for site allocations can assist with helping to deliver development on sites which responds to the character and context of each site, alongside other spatial and strategic policies within the plan, which can cumulatively enhance the built environment across different parts of the borough.

Taken together, site allocations can have a positive effect in relation to the use of land (objective 2). Many site allocations highlight the scope for redevelopment or intensification of existing buildings, whilst others seek to make more efficient use of space on existing sites and/or utilise vacant, underused or underutilised land. In addition, through specifying particular uses site allocations can help to focus development in the most appropriate locations and help balance competing demands between land uses. As the site assessments illustrate, given the competing demands for land in the borough, the most appropriate mix of uses can be finely balanced on some sites.

Taken together the sites will have considerable benefits in delivering growth in terms of both housing and business floorspace. The cumulative quantitative contribution of sites to identified development needs is summarised in both the Site Allocations DPD Bunhill and Clerkenwell Area Action Plan in tables 1.2 and 4.2 respectively. This sets out the quantity of homes and office floorspace that will be delivered across the Area Spatial Strategies identified in the Local Plan. The sites, together will make a significant contribution towards delivering housing and business floorspace, therefore contributing to positive effects in relation to housing (objective 5) and economic growth (objective 8) both of which also have benefits in relation to social inclusion (objective 6), In addition site allocations, particularly those within town centres, will also help to meet retail needs and contribute to supporting liveable neighbourhoods (objective 4). Site allocations, in making a significant contribution towards identified development needs, complement other policies in the plan which also

seek to deliver against these objectives particularly Housing Policies H2 and H3 and Inclusive Economy Policies linked to the provision of business and retail floorspace (for example B1-B5 and R1-R3).

Many site allocations have a neutral score in relation to heritage (objective 3). Where heritage assets are within or in proximity to a site this is acknowledged in the site designations and constraints section of the allocation. Site allocations will work alongside relevant policies in the plan to conserve or enhance the boroughs heritage assets (for example spatial strategies and policies DH1-DH3). The application of other policies in the plan will be important in assessing and, where appropriate, helping to mitigate impacts on heritage assets. Some site allocations have been identified as having a positive effect, for example KC4, Former York Road Station highlights that the existing station is of heritage value and should be retained. However a site allocation has also been identified as having a negative effect, OIS21: Former railway sidings adjacent to Caledonian Road Station may have a negative impact on the Caledonian Road Station which is a grade II listed building. This is an example of the recognised tension between policy which seeks to optimising density and policy which seeks to protect the historic environment with the potential impacts on heritage value potentially increased by higher density.

Overall the site allocations can have a positive cumulative effect in relation to liveable neighbourhoods (objective 4) in a number of ways. Some site allocations improve or protect access to social infrastructure, open space and retail can help to improve access to services and facilities near to the homes of residents. Some site allocations identify the potential for development on sites with existing social infrastructure, however this is mitigated through the loss of social infrastructure needing to be justified first consistent with policy SC1 (For example site allocation FP7: Holloway Police Station). The site allocations in town centres and local shopping areas can together, alongside relevant policies in the plan such as R1-R4) help to promote a mix of town centre uses (e.g. retail and employment) that can promote diverse, vibrant and economically thriving town centres and local centres. This also helps improve access to employment, a positive benefit to social inclusion (objective 6). Many site allocations also identify public realm and permeability improvements that can help to improve connections between communities and facilities and complements other policies in the plan in particular the area spatial strategies. Finally some site allocations help to protect and promote cultural provision in the borough (for example sites within Angel and Archway).

Whilst the majority of sites have been identified as having a neutral effect in relation to health and well being, there are some sites which have also been identified as having positive effect, this includes sites that help to promote access to green space by creating new open space, improving existing spaces or creating improved links. There are also several sites that support access to health, social care, sport and recreation facilities which have direct benefits in relation to improving health and well-being and reducing health inequalities.

Several sites identify improvements to green infrastructure, or access improvements to open spaces and whilst this is not reflected in the overall scoring, these sites alongside landscaping improvements in Green Infrastructure policies in the plan can together help to contribute positively towards the boroughs green infrastructure, including open space and biodiversity provision. Sites will be expected to protect, enhance and maximise green infrastructure and biodiversity provision consistent with other policies in the plan (e.g. policies

G1-G5), cumulatively this can help to make a positive impact in relation to biodiversity (objective 12). Several site allocations are identified as being in close proximity or partially within (Sites of Importance for Nature Conservation SINCs) – it will be important for these sites to assess and mitigate impacts on biodiversity to avoid negative effects.

Whilst sites don't specify sustainable design and transport measures, the delivery of these cumulative will play a key role in helping to deliver these policies and can therefore positively contribute towards climate change and transport objectives. A number of site allocations help to support and promote sustainable transport outcomes – either through identifying opportunities for public realm enhancements for example, or by promoting development in accessible locations. Whilst the effect of individual allocations on reducing the need to travel and promoting sustainable connections and networks may be uncertain, cumulatively there is the opportunity to have a larger positive effect across the borough and in relation to different neighbourhoods, working alongside relevant spatial and strategic policies which also promote sustainable transport outcomes.

### **Synergistic effects**

- The Site Allocations are complementary to the delivery of the Council's Transport Strategy with a number of site allocations helping to support and promote sustainable transport outcomes.
- Several sites recognise the important of landscape and green infrastructure improvements and the context of nearby open spaces/SINCs. Delivery of development on these sites can help with the achievement of objectives in the Council's Biodiversity Action Plan.

## **Consideration of cumulative effects for the Local Plan**

The following section brings together the overall cumulative effects of the plan against the sustainability framework objectives, drawing out positive effects between policy areas but also potential tensions.

### **Objective 1 - Promote a high quality, inclusive, safe and sustainable built environment**

The effect of the Local Plan on the Built Environment objective is positive with housing policies supporting development at optimal densities which combines with other policies – PLAN1 and DH1 to fully optimise density levels. and combine well with other policies in the plan such as policies PLAN1 and G4 which will help a proposal fully integrate within, and relate positively to, their immediate locality. The policy in DH1 supports innovative approaches to design as a means to increasing development capacity whilst recognising that the scale of development is dependent on design and character. PLAN1, T1, T4 and G4 also help a proposal fully integrate within, and relate positively to, their immediate locality which combined with the Area Spatial Strategies, which promote public realm improvements helps to create buildings and places that are both high quality and safer and more inclusive.

### **Objective 2 - Ensure efficient use of land, buildings and infrastructure**

The Local Plan makes the best use of the scarce land resource in the borough and balances the competing demands for land use across the borough. There is an overall positive effect against this objective with housing policies supporting housing development at optimal densities which combines with other policies – PLAN1 and DH1 which also seeks to fully optimise density levels. This efficient use of land and infrastructure can also have wider environmental benefits in terms of helping protect green spaces from development and reducing carbon emissions. There is a tension between optimising density and the historic environment with the potential impacts on heritage value potentially increased by higher density. Policy DH1 recognises this potential impact and seeks innovative approaches to address the risk. The Inclusive Economy policies B1/B2 and R1 work in concert with the Area Spatial Strategy policies to focus development in the right locations in the borough which combines with the approach in Policy T1 which recognises that land use should take account of accessibility and ensure proposals promote connectivity. The Thriving Communities section also sets a principle of restricting inefficient forms of development; student accommodation, large HMO and purpose built private rented sector on the basis of land supply. The development of visitor accommodation is also restricted by Policy R12 for the same reason. Infrastructure needs are addressed both through policy and Site Allocations where relevant.

### **Objective 3 - Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment**

The approach to heritage ensures that heritage assets will be strongly protected while recognising the need to accommodate new development. Where relevant Area Spatial Strategies in the Local Plan reference heritage assets highlighting their importance, alongside local views and landmarks. Site allocations also make reference where there are relevant heritage development considerations. Growth could impact heritage value - there is a tension between optimising density and the historic environment with the potential impacts on heritage value potentially increased by higher density. But it is considered that this is mitigated by the relevant policies and will help new development to add to the borough's character and distinctiveness - Policy DH1 recognises this potential

impact and seeks innovative approaches to address the risk of adverse heritage impacts. Policy also considers cultural value in the borough recognising the inherent sensitivity these uses can have to the introduction of new uses. Area Spatial Strategies identify where culture is a priority and the identification of cultural quarters will help support and enhance the uses in these locations.

**Objective 4 - Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles**

The Local Plan policies seek to ensure that the appropriate level of infrastructure is available for the local population with policies in the Thriving Communities section protecting social and community facilities and policy ST1 supporting new strategic infrastructure where needed. In addition policy seeks to respond to where facilities already exist with a link in Policy H2 to supporting existing facilities. This is supported by Policy H1, which seeks new housing development that is fully integrated within, and relates positively to, the immediate locality and policies SC1 and SC2 which contribute to improving access to health and social care services/facilities by protecting existing facilities and providing a robust approach to considering changes in service provision are managed appropriately. The Area Spatial strategies identify relevant social and community infrastructure which helps maintain residents access to facilities. The retail policies seek to strike the right balance of retail, leisure, culture and business uses which will help maintain the access to these services close to peoples homes. Policy recognise the need to protect residential amenity eg through suitable noise assessment and application of the agent of change principle which is covered by housing, retail and design policies. PLAN1 draws this all together with the connected and inclusive principles which helps development to encourage permeability and movement and maintain and support access to services and facilities.

**Objective 5 - Ensure that all residents have access to good quality, well-located, affordable housing**

The objective has clear positive effects resulting from policy which seeks delivery of affordable housing from all development and responds to a key objective of the Local Plan to maximise the delivery of genuinely affordable housing. This improves fairness and integration, addressing inequality and tackling social exclusion with the delivery of mixed and balanced communities. As identified in Thriving Communities section above the policies have significant positive cumulative effects by helping ensure all residents have access to good quality housing through ensuring all housing meets high standards of energy efficiency and relevant sustainable design standards; which helps to reduce fuel poverty and contributes to reducing inequality. This also contributes health benefits with residents benefiting from warmer homes and more affordable homes to heat. There is a significant tension between balancing housing with other needs in the plan, primarily employment needs. The tension with other forms of housing has already been identified – large scale HMO accommodation and student accommodation. Ensuring that employment needs are met is a key consideration of the Local Plan. Striking the right balance with a focus on employment uses in the right locations has been taken, with employment growth focused in the CAZ and priority employment locations and LSIS where residential uses are restricted. The restriction on residential uses in town centre Primary Shopping Areas is also an example of the tension. Site Allocations play a key role in the borough in demonstrating that both employment and housing needs will be met with significant levels of growth identified.

**Objective 6 - Promote social inclusion, equality, diversity and community cohesion**

The same positive effect from the Local Plan approach to maximise the delivery of genuinely affordable housing results on this objective too. Other policies in the Thriving Communities section also aim to improve fairness and integration and tackle social exclusion, through the delivery of mixed and balanced communities which are economically, environmentally and socially resilient. Policy PLAN1 and the inclusive principle supports policies across the plan both in terms of the mix of uses but also the design of development and the broader built environment. The Inclusive Economy section supports the economy through supporting creation of a variety of new business floorspace, protecting existing floorspace and securing affordable workspace and jobs/training opportunities from development which helps promote equity, provide opportunity and remove barriers to employment.

### **Objective 7 - Improve the health and wellbeing of the population and reduce health inequalities**

Policies throughout the plan help address the health and wellbeing objective, in particular housing policies which determine housing quality which combine with other policies in the plan to help a proposal fully integrate within, and relate positively to, their immediate locality. The Area Spatial Strategy policies promote specific public realm improvements which combined with high quality housing helps encourage people into more active travel through a healthier public and built environment supported by car free transport policies and adequate cycle parking. The Social and Community policies contribute to improving access to health and social care services/facilities by protecting existing facilities and providing a robust approach to considering changes in service provision are managed appropriately. Public Realm and Transport policies will have significant positive cumulative effects against objectives relating to health and climate change as they seek to reduce pollutants and improve air quality. This works with policy for Green Infrastructure which preserves open spaces and increases the amount of green open space, plants, trees, green walls and roofs in the urban environment which will also contribute to improving air quality and encouraging people to participate in more active travel, sport and recreation in the borough. The sustainable design policies also contribute health benefits with residents benefiting from warmer homes and more affordable homes to heat and housing design policies that highlight the importance of designing the home as a place of retreat which can contribute to wellbeing, improving both physical and mental health.

### **Objective 8: Foster sustainable economic growth and increase employment opportunities**

Policies B1 to B4 recognises the importance of supporting the economy through the creation of a variety of new business floorspace, protecting existing floorspace - in particular industrial land through new LSIS designations. Meeting employment needs is a clear priority for the Local Plan with other uses restricted to ensure that these needs are adequately met – the Site Allocations which prioritise employment space help to contribute to this meeting this need as will the Area Spatial Strategies which provides further policy support for employment growth in key areas such as the knowledge economy in Kings Cross and Tech City in the Bunhill and Clerkenwell AAP. As mentioned under the affordable housing objective striking the right balance between meeting housing and employment needs is a tension that the Local Plan has to deal with. Employment uses are prioritised in specific locations has been taken, with employment growth focused in the CAZ and priority employment locations and LSIS where residential uses are restricted. The restriction on residential uses in town centre Primary Shopping Areas is also an example of the tension. Retail policies also contribute to economic growth and London's wider economy by seeking the right balance of retail, leisure, culture and business uses to meet residents,

business and visitor needs through seeking to protect and enhance provision of services in town centres, local centres and dispersed shops. The requirement to secure affordable workspace and jobs/training opportunities from development helps to widen opportunities for residents and tackle barriers to employment. The Sustainable Design policies support the delivery of an inclusive economy by helping to contribute to a green economy with commercial buildings that have high environmental standards and can be designed to be flexible and adaptable.

**Objective 9: Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking**

The locational benefits of the Local Plan are also considered with cumulative benefits from reduced transport emissions from focusing office development in the most accessible locations in the borough through policy in the Thriving Economy section; the AAP area, CAZ, town centres and CAZ fringe. These locational benefits are reinforced by policy in the Area Spatial Strategies, site allocations alongside strategic policies on specific land uses and policies for public realm and design/ PLAN 1 which support improvements in the built environment. The policy approach in the Bunhill and Clerkenwell AAP in particular aims to maximise floorspace with a percentage requirement to help maximise floorspace in the most accessible location in the borough. This combined with Transport, Public Realm policies and PLAN1 encourages more sustainable and accessible transport and cycle parking requirements will all help people transition to more sustainable modes of travel. The cumulative benefit of protecting the industrial function also helps to reduce the need for goods and services to travel too which also reduces congestion and air pollution. The Area Spatial Strategies, through promoting public realm improvements, also help to create places that are both high quality and safer and therefore more inclusive.

**Objective 10: Protect and enhance open spaces that are high quality, networked, accessible and multi-functional**

The approach ensures that open spaces are preserved and seeks to increase the amount of green open space. Area Spatial Strategies will help to create a high quality built environment with public realm improvements and also identify improvements to access existing green open spaces or add additional open space. This will have wider health benefits when combined with Urban Greening policies and enhancement of green infrastructure. Combined with other policies in the Local Plan this helps to promote physical and mental health, health benefits associated with access to nature, responds to impacts of climate change (flood risk and urban heat island) as well as improving air quality.

**Objective 11: Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity**

Cumulative positive benefits for biodiversity are created through a strategic approach to green infrastructure, biodiversity and wildlife habitat with requirement for developers to maximise green infrastructure and biodiversity provision consistent with G1. Several Site Allocations identify landscape and green infrastructure improvements as do Area Spatial Strategies which respond to the context of nearby open spaces/SINCs and the Regent's Canal. Delivery of development on these sites can also help with the achievement of objectives in the Council's Biodiversity Action Plan. The policy approach to biodiverse green roofs, green walls and soft landscaping through PLAN1 will also contribute to enhancing biodiversity. The Green Infrastructure policies will also combine with the Sustainable



Design policies and the integrated approach to flood risk management and sustainable drainage to have cumulative benefits together which reduce the risk of flooding and helping to manage water sustainably and ensure wider benefits such as biodiversity and a drainage hierarchy that promotes green features over grey.

**Objective 12: Reduce contribution to climate change and enhance community resilience to climate change impacts**

Cumulatively the Sustainable Design policies set out the council's strategic approach to delivering sustainable design with the aim to minimise the contribution of development to climate change and ensure that developments are designed to mitigate the effects of climate change. There is a fundamental tension between any development, which contributes to climate change through emissions and resource use and meeting social needs through development, in particular housing and employment but also other infrastructure needs. The Sustainable Design policies go some way to addressing this tension through energy efficiency measures for example and also introduces new policy approach – Policy S10 circular economy and adaptive design which will help mitigate the effect of resource use of development. The locational benefits of the Local Plan are also considered to have cumulative benefits from reduced transport emissions notably from focusing office development in the most accessible locations in the borough. There is also a benefit of protecting the industrial function in LSIS and Area Spatial Strategies which also helps to reduce the need for goods and services to travel too which also reduces emissions from this source. Islington's car-free policy in Policy T3 and Policy T5 which seeks to minimise air pollution from the construction process as well as reducing deliveries will also help reduce transport emissions. The Sustainable Design policies in setting out the approach to flood risk management and sustainable drainage have cumulative benefits together to reduce the risk of flooding and help to manage water sustainably. These policies working alongside green infrastructure policies which also play a role in helping to reduce surface water run-off and reduce flood risk. Sustainability is identified in PLAN1 as one of the four key design principles for development in the borough.

**Objective 13: Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste**

The policies in the Sustainable Design section set out requirements for development proposals to promote resource efficiency through application of an approach to the Circular Economy. Policy in the Thriving Economy section supports the intensification, renewal and modernisation of business floorspace. The approach to circular economy and adaptive design has cumulative benefits when considered alongside other policies in the plan, this include PLAN 1 which required development to be durable and adaptable, policies ST2, H4 and B2 which seek to maximise re-use and recycling as well as Sustainable Design policies by reducing the environmental impacts, including embodied carbon emissions, that new development can have. Policy for high quality housing provides seeks well designed facilities for the management of recycling for residents and Strategic Infrastructure ensures that the waste management facility in the borough is protected. The borough is also working jointly with neighbouring boroughs on the North London Waste Plan, that will plan for waste management needs for the borough.

**Objective 14: Maximise protection and enhancement of natural resources including water, land and air**

Air quality is a cross cutting issue addressed by a number of policies that cumulatively will help to tackle air quality issues in the borough, this includes design policies, locational policies set out in the Area Spatial Strategies, site allocations alongside strategic policies on specific land uses which seek to locate uses in the most appropriate locations, green infrastructure and public realm and transport policies which all have a role in helping to improve air quality and minimise exposure. The policies in the Sustainable Design section set out requirements for conserving water resources and managing flood risk and dealing with contaminated land.

# 7 Conclusions

- The table below pulls together the cumulative conclusions of the examination IIA for the submission policies and updates this following the modifications. The table seeks to bring together the overall cumulative effects of the plan against the sustainability framework objectives, drawing out positive effects between policy areas but also potential tensions. It is intended to make clear that the effects identified for the modifications in the IIA examination addendum May 2022 add to the those identified in the examination IIA March 2021 unless they do not replace effects identified in examination IIA March 2021.

Table 7.1 Cumulative conclusions

Objectives	Cumulative effects submission IIA	Updated consideration of cumulative effects following modifications assessment
<p><b>Objective 1 - Promote a high quality, inclusive, safe and sustainable built environment</b></p>	<p>The effect of the Local Plan on the Built Environment objective is positive with housing policies supporting development at optimal densities which combines with other policies – PLAN1 and DH1 to fully optimise density levels. and combine well with other policies in the plan such as policies PLAN1 and G4 which will help a proposal fully integrate within, and relate positively to, their immediate locality. The policy in DH1 supports innovative approaches to design as a means to increasing development capacity whilst recognising that the scale of development is dependent on design and character. PLAN1, T1, T4 and G4 also help a proposal fully integrate within, and relate positively to, their immediate locality which combined with the Area Spatial Strategies, which promote public realm improvements helps to create buildings and places that are both high quality and safer and more inclusive.</p>	<p>There is some uncertainty of the effects from the policy changes to submission policies in response to introduction of Class E, particularly in relation to retail, however the modifications across various policy areas are considered to maintain positive effects and continue to focus development in the right areas that enhances local character.</p>
<p><b>Objective 2 - Ensure efficient use of land,</b></p>	<p>The Local Plan makes the best use of the scarce land resource in the borough and balances the competing demands for land use across the borough. There is an overall positive effect against the built environment objective with housing policies supporting housing development at</p>	<p>The effect of Class E in particular in town centres but also in the LSIS is recognised as a risk in terms of the efficient use of land. Class E was introduced by the Government through legislation in</p>

Objectives	Cumulative effects submission IIA	Updated consideration of cumulative effects following modifications assessment
<p><b>buildings and infrastructure</b></p>	<p>optimal densities which combines with other policies – PLAN1 and DH1 which also seeks to fully optimise density levels. This efficient use of land and infrastructure can also have wider environmental benefits in terms of helping protect green spaces from development and reducing carbon emissions. There is a tension between optimising density and the historic environment with the potential impacts on heritage value potentially increased by higher density. Policy DH1 recognises this potential impact and seeks innovative approaches to address the risk. The Inclusive Economy policies B1/B2 and R1 work in concert with the Area Spatial Strategy policies to focus development in the right locations in the borough which combines with the approach in Policy T1 which recognises that land use should take account of accessibility and ensure proposals promote connectivity. The Thriving Communities section also sets a principle of restricting inefficient forms of development; student accommodation, large HMO and purpose built private rented sector on the basis of land supply. The development of visitor accommodation is also restricted by Policy R12 for the same reason. Infrastructure needs are addressed both through policy and Site Allocations where relevant.</p>	<p>September 2020 to amend and simplify the system of use classes in England and create one new broad ‘Commercial, business and service’ use class to allow for a mix of uses to reflect changing retail and business models. The risk is the potential for cumulative impacts and dilution of retail development in the most appropriate locations in town centres. Similarly light industrial floorspace in LSIS could change to other E Class Uses. However, through the use of conditions the modifications go some way to mitigating this change in national policy. It is also noted that there is some uncertainty in relation to the take up of Class E.</p> <p>There is policy relaxation in respect of residential uses in town centres, changes in requirements to protect against loss of business floorspace and also changes to marketing requirements. Whilst these changes have the potential to lead to an overall reduction in commercial floorspace the assessment recognises that there could be positive effects by encouraging landowners to optimise the use of buildings for alternate uses and intensify their land through the planning process. Also, the assessment recognises that in some cases the development of underutilised upper floors for residential development could aid in the efficient use of buildings and meet different development needs including those for housing. Whilst overall the modifications to retail and business policy may have cumulative effects which combine to reduce opportunities for commercial, social and cultural</p>

Objectives	Cumulative effects submission IIA	Updated consideration of cumulative effects following modifications assessment
		floorspace it is considered that the policies in the plan will ensure that retail and business needs can be met.
<p><b>Objective 3 - Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment</b></p>	<p>The approach to heritage ensures that heritage assets will be strongly protected while recognising the need to accommodate new development. Where relevant Area Spatial Strategies in the Local Plan reference heritage assets highlighting their importance, alongside local views and landmarks. Site allocations also make reference where there are relevant heritage development considerations. Growth could impact heritage value but it is considered that this is mitigated by the relevant policies and will help new development to add to the borough's character and distinctiveness - Policy DH1 recognises this potential impact and seeks innovative approaches to address the risk of adverse heritage impacts. Policy also considers cultural value in the borough recognising the inherent sensitivity these uses can have to the introduction of new uses. Area Spatial Strategies identify where culture is a priority and the identification of cultural quarters will help support and enhance the uses in these locations.</p>	<p>None of the modifications have significantly changed the assessments outcomes against this objective.</p>
<p><b>Objective 4 - Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles</b></p>	<p>The Local Plan policies seek to ensure that the appropriate level of infrastructure is available for the local population with policies in the Thriving Communities section protecting social and community facilities and policy ST1 supporting new strategic infrastructure where needed. In addition policy seeks to respond to where facilities already exist with a link in Policy H2 to supporting existing facilities. This is supported by Policy H1, which seeks new housing development that is fully integrated within, and relates positively to, the immediate locality and policies SC1 and SC2 which contribute to improving access to health and social care services/facilities by protecting existing facilities and providing a robust approach to considering changes in service provision are managed appropriately. The Area Spatial strategies identify relevant social and</p>	<p>The submission policy with modifications is more permissive of residential uses in town centres, which could increase local accessibility to services for the new residents living within town centres which is positive. Conversely this could reduce access to services cumulatively by reducing the amount of commercial floorspace available in town centres albeit the policy enables residents and business needs to still be met. The assessment considered the wider impact on town centre vibrancy from the potential for Class E uses which do not form active frontages (such as offices at</p>

Objectives	Cumulative effects submission IIA	Updated consideration of cumulative effects following modifications assessment
	<p>community infrastructure which helps maintain residents access to facilities. The retail policies seek to strike the right balance of retail, leisure, culture and business uses which will help maintain the access to these services close to people’s homes. Policy recognise the need to protect residential amenity e.g. through suitable noise assessment and application of the agent of change principle which is covered by housing, retail and design policies. PLAN1 draws this all together with the connected and inclusive principles which helps development to encourage permeability and movement and maintain and support access to services and facilities.</p>	<p>ground floor), which could cumulatively and in specific locations individually, have a negative impact on the diversity, vibrancy and economic prosperity of town centres and LSAs. Overall these changes are beyond the scope of Local Plan policy and the overall effects remain positive.</p> <p>The additional site allocations specifically to address housing supply will deliver wider improvements beyond housing quality and supply that will help create a safer and more inclusive environment and promote more liveable neighbourhoods through landscaping, safety measures, improved play spaces and community facilities.</p>
<p><b>Objective 5 - Ensure that all residents have access to good quality, well-located, affordable housing</b></p>	<p>The objective has clear positive effects resulting from policy which seeks delivery of affordable housing from all development and responds to the number one objective of the Local Plan to maximise the delivery of genuinely affordable housing. This improves fairness and integration, addressing inequality and tackling social exclusion with the delivery of mixed and balanced communities. As identified in Thriving Communities section above the policies in the Sustainability Appraisal section have significant positive cumulative effects by helping ensure all residents have access to good quality housing through ensuring all housing meets high standards of energy efficiency and relevant sustainable design standards; which helps to reduce fuel poverty and contributes to reducing inequality. This also contributes health benefits with residents benefiting from warmer homes and more affordable homes to heat. There is a significant tension between balancing housing with other needs in the plan, primarily employment needs. The tension with other forms of housing has already been identified – large scale HMO accommodation</p>	<p>The policy change which sets out a more flexible and permissive approach to residential use in town centres alongside the additional policy clauses for relevant spatial policies could cumulatively help to increase land available for housing and therefore affordable housing, contributing to meeting housing need which combined with the additional site allocations specifically to address housing supply will make a significant contribution to affordable housing which will help to meet need in the borough as well as contribute to wider improvements on housing estates. The Inspectors Report confirmed the modifications which amended the policy approach and removed the sites identified to meet Gypsy and Traveller needs. This reduces the significant positive cumulative effects</p>

Objectives	Cumulative effects submission IIA	Updated consideration of cumulative effects following modifications assessment
	<p>and student accommodation. Ensuring that employment needs are met is a key consideration of the Local Plan. Striking the right balance with a focus on employment uses in the right locations has been taken, with employment growth focused in the CAZ and priority employment locations and LSIS where residential uses are restricted. The restriction on residential uses in town centre Primary Shopping Areas is also an example of the tension. Site Allocations play a key role in the borough in demonstrating that both employment and housing needs will be met with significant levels of growth identified.</p>	<p>identified previously, although effects remain positive with clarity provided over the process and timeframe in which sites will be identified in future policy documents. The increased clarity for meeting boat dwellers needs increases cumulative positive effects.</p>
<p><b>Objective 6 - Promote social inclusion, equality, diversity and community cohesion</b></p>	<p>The same positive effect from the Local Plan approach to maximise the delivery of genuinely affordable housing results on this objective too. Other policies in the Thriving Communities section also aim to improve fairness and integration and tackle social exclusion, through the delivery of mixed and balanced communities which are economically, environmentally and socially resilient. Policy PLAN1 and the inclusive principle supports policies across the plan both in terms of the mix of uses but also the design of development and the broader built environment. The Inclusive Economy section supports the economy through supporting creation of a variety of new business floorspace, protecting existing floorspace and securing affordable workspace and jobs/training opportunities from development which helps promote equity, provide opportunity and remove barriers to employment.</p>	<p>Similarly to objective 5 regarding the changes in relation to meeting Gypsy and Traveller needs that reduced the significant positive cumulative effects identified previously, with the decrease in certainty around how gypsy and traveller needs will be met, although effects remain positive with clarity provided over the process and timeframe in which sites will be identified in future policy documents. There is a reduction in percentage requirement for both wheelchair accessible Purpose Built Student Accommodation bedspaces in Policy H6 and Large-Scale HMOs in Policy H10 from 10% to 5% of the total bedspaces and a further change to make requirements adaptable on completion rather than accessible on completion. Overall these changes are still considered to have positive effects. However, the modification to remove the requirement for bursary contributions towards students leaving council care and students facing hardship does not help in reducing inequality and therefore the overall effect of the policy changes are considered to be neutral.</p>

Objectives	Cumulative effects submission IIA	Updated consideration of cumulative effects following modifications assessment
		<p>Policy H4 which applies to conventional housing and various Wheelchair Accessible Unit requirements has also been subject to modifications, although for these changes the screening notes that there is considerable uncertainty identified in part because the effect would depend on the demand for these units.</p>
<p><b>Objective 7 - Improve the health and wellbeing of the population and reduce health inequalities</b></p>	<p>Policies throughout the plan help address the health and wellbeing objective, in particular housing policies which determine housing quality which combine with other policies in the plan to help a proposal fully integrate within, and relate positively to, their immediate locality. The Area Spatial Strategy policies promote specific public realm improvements which combined with high quality housing helps encourage people into more active travel through a healthier public and built environment supported by car free transport policies and adequate cycle parking. The Social and Community policies contribute to improving access to health and social care services/facilities by protecting existing facilities and providing a robust approach to considering changes in service provision are managed appropriately. Public Realm and Transport policies will have significant positive cumulative effects against objectives relating to health and climate change as they seek to reduce pollutants and improve air quality. This works with policy for Green Infrastructure which preserve open spaces and increases the amount of green open space, plants, trees, green walls and roofs in the urban environment which will also contribute to improving air quality and encouraging people to participate in more active travel, sport and recreation in the borough. The sustainable design policies also contribute health benefits with residents benefiting from warmer homes and more affordable homes to heat and housing design policies that highlight the importance of designing the home as a place of retreat which can contribute to wellbeing, improving both physical and mental health.</p>	<p>The modifications to the retail policies which clarify the Council's approach following the 2020 amendments to the Use Classes Order and the introduction of Class E will provide a framework which goes some way to supporting the facilities which can meet the needs and wellbeing of communities. Whilst the protection afforded by individual policy is not considered to be significantly reduced there may be effects at a borough level due in terms of cumulative total floorspace which meets community needs, although as the assessment makes clear these effects are considered uncertain at this stage.</p>



Objectives	Cumulative effects submission IIA	Updated consideration of cumulative effects following modifications assessment
<p><b>Objective 8: Foster sustainable economic growth and increase employment opportunities</b></p>	<p>Policies B1 to B4 recognise the importance of supporting the economy through the creation of a variety of new business floorspace, protecting existing floorspace - in particular industrial land through new LSIS designations. Meeting employment needs is a clear priority for the Local Plan with other uses restricted to ensure that these needs are adequately met – the Site Allocations which prioritise employment space help to contribute to this meeting this need as will the Area Spatial Strategies which provides further policy support for employment growth in key areas such as the knowledge economy in Kings Cross and Tech City in the Bunhill and Clerkenwell AAP. As mentioned under the affordable housing objective striking the right balance between meeting housing and employment needs is a tension that the Local Plan has to deal with. The focus on employment uses in the right locations has been taken, with employment growth focused in the CAZ and priority employment locations and LSIS where residential uses are restricted. The restriction on residential uses in town centre Primary Shopping Areas is also an example of the tension. Retail policies also contribute to economic growth and London’s wider economy by seeking the right balance of retail, leisure, culture and business uses to meet residents, business and visitor needs through seeking to protect and enhance provision of services in town centres, local centres and dispersed shops. The requirement to secure affordable workspace and jobs/training opportunities from development helps to widen opportunities for residents and tackle barriers to employment. The Sustainable Design policies support the delivery of an inclusive economy by helping to contribute to a green economy with commercial buildings that have high environmental standards and can be designed to be flexible and adaptable.</p>	<p>As noted above under objective 2 the changes to retail and business policy may have cumulative effects which combine to reduce opportunities for commercial, social and cultural floorspace albeit the policy is considered to still enable residents and business needs to be met. There is policy relaxation in respect of residential uses in town centres, changes in requirements to protect against loss of business floorspace and also changes to marketing requirements. In addition policy supporting office co-location in Locally Significant Industrial Sites (LSISs) is introduced. These changes when combined with the flexibility provided by UCO changes creates a potential cumulative effect on providing sufficient space in the right locations for different types of businesses to develop, grow and thrive. There are positive aspects to some of the changes to protecting existing business floorspace (for example retaining the 24 month marketing period but instead requiring vacancy to be demonstrated at the time of application rather than 24 months of vacancy) which reduces the negative impact of short term vacancy. This change may also encourage landowners to seek alternative uses through the planning system in the medium and long term rather than consider changing use within Class E. Using Class E could result in not intensifying an existing office use of a building but simply changing existing floorspace to another Class E use.</p>

Objectives	Cumulative effects submission IIA	Updated consideration of cumulative effects following modifications assessment
		<p>The wider positives of Class E are noted in particular the creation of a wider range of employment opportunities which could potentially help remove some barriers to employment across the borough with the increased flexibility around where uses can locate. The assessments recognise the uncertainty in the longer term effect on the existing economic function of parts of the borough if a significant quantum of floorspace changes via Class E to flexible uses over time. Where new development is concerned this effect is mitigated against through use of conditions. There could also be a detrimental effect on LSISs, in particular Vale Royal, Islington's most significant LSIS where light industrial floorspace is potentially at risk of being lost to other non-industrial class E use that attract higher values. This effect is considered uncertain and the update to the policy will help to ensure that potential impacts can be mitigated through the planning system as far as possible. Protecting the industrial function of LSIS has wider benefits serving other economic functions in both the local and wider London economy, so there could be a detrimental effect in neighbouring boroughs depending on their dependency on the activities usually found in LSIS which support businesses in other boroughs. Overall the protection given by demonstrating the continued industrial function mitigates the risk of displacement of this important and unique cluster of industrial businesses. In addition the use of conditions for new light industrial floorspace also</p>

Objectives	Cumulative effects submission IIA	Updated consideration of cumulative effects following modifications assessment
		helps to mitigate the potential loss of light industrial class E uses.
<p><b>Objective 9: Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking</b></p>	<p>The locational benefits of the Local Plan are also considered with cumulative benefits from reduced transport emissions from focusing office development in the most accessible locations in the borough through policy in the Thriving Economy section; the AAP area, CAZ, town centres and CAZ fringe. These locational benefits are reinforced by policy in the Area Spatial Strategies, site allocations alongside strategic policies on specific land uses and policies for public realm and design/ PLAN 1 which support improvements in the built environment. The policy approach in the Bunhill and Clerkenwell AAP in particular aims to maximise floorspace with a percentage requirement which will help achieve most floorspace in the most accessible location in the borough. This combined with Transport, Public Realm policies and PLAN1 encourages more sustainable and accessible transport and cycle parking requirements will all help people transition to more sustainable modes of travel. The cumulative benefit of protecting the industrial function also helps to reduce the need for goods and services to travel too which also reduces congestion and air pollution. The Area Spatial Strategies through promoting public realm improvements also help to create places that are both high quality and safer and therefore more inclusive.</p>	<p>The uncertainty over where uses will be located from Class E in particular could have a minor negative impact on road networks and sustainable transport modes when there is an accumulation of uses that have loading and parking requirements. Class E was introduced by the Government through legislation in September 2020 to amend and simplify the system of use classes in England and create one new broad 'Commercial, business and service' use class to allow for a mix of uses to reflect changing retail and business models. Where new development is concerned this effect is mitigated against as far as possible through the use of conditions.</p>
<p><b>Objective 10: Protect and enhance open spaces that are high quality, networked, accessible and multi-functional</b></p>	<p>The approach ensures that open spaces are preserved and seeks to increase the amount of green open space. Area Spatial Strategies will help to create a high quality built environment with public realm improvements and also identify improvements to access existing green open spaces or add additional open space. This will have wider health benefits when combined with Urban Greening policies and enhancement of green infrastructure. Combined with other policies in the Local Plan this helps to promote physical and mental health, health benefits</p>	<p>The changes to Policy G2, SP2 and BC4 provide clarification on how proposals for moorings and facilities to support moorings should be approached in the context of the canal as public open space. No effects were identified as the policy states that development can only take place where there is no detrimental impact on nature conservation and biodiversity value, and the character and amenity of the waterway corridor including its function as</p>

Objectives	Cumulative effects submission IIA	Updated consideration of cumulative effects following modifications assessment
	associated with access to nature, responds to impacts of climate change (flood risk and urban heat island) as well as improving air quality.	public open space. The modifications clarify the approach in terms of future operation of the canal for different uses and the development of a Waterspace Strategy for Islington's canal network which will help balance the competing demands on use of the canal and its role as open space.
<b>Objective 11: Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity</b>	<p>Cumulative positive benefits for biodiversity are created through a strategic approach to green infrastructure, biodiversity and wildlife habitat with requirement for developers to maximise green infrastructure and biodiversity provision consistent with G1. Several Site Allocations identify landscape and green infrastructure improvements as do Area Spatial Strategies which respond to the context of nearby open spaces/SINCs and the Regent's Canal. Delivery of development on these sites can also help with the achievement of objectives in the Council's Biodiversity Action Plan. Policy approach to biodiverse green roofs, green walls and soft landscaping through PLAN1 will also contribute to enhancing biodiversity. The Green Infrastructure policies will also combine with the Sustainable Design policies and the integrated approach to flood risk management and sustainable drainage to have cumulative benefits together which reduce the risk of flooding and helping to manage water sustainably and ensure wider benefits such as biodiversity and a drainage hierarchy that promotes green features over grey.</p>	<p>The submission Policy G4 with modifications is revised in respect to SINCs being protected commensurate with their classification. The assessment considers that the mitigation measures alongside other measures in the policy mean that overall there is no change in the effects identified in respect to this modification with a strong emphasis on maintaining biodiversity and there is no cumulative effect.</p>
<b>Objective 12: Reduce contribution to climate change and enhance community resilience to</b>	<p>Cumulatively the Sustainable Design policies set out the council's strategic approach to delivering sustainable design with the aim of minimising the contribution of development to climate change and ensure that developments are designed to mitigate the effects of climate change. There is a fundamental tension between any development, which contributes to climate change through emissions and resource use and meeting social needs through development, in particular housing and employment but also other infrastructure needs. The Sustainable Design</p>	<p>The policy changes add to the submission policies Sustainable Design policies by responding to technological evolution and will help to minimise carbon emissions from heating systems and promote sustainable energy infrastructure, which will contribute towards a more sustainable built environment improving air quality through reduced NOx and a reduction in carbon emissions.</p>

Objectives	Cumulative effects submission IIA	Updated consideration of cumulative effects following modifications assessment
<p><b>climate change impacts</b></p>	<p>policies go some way to addressing this tension through energy efficiency measures for example and also introduces new policy approach – Policy S10 circular economy and adaptive design which will help mitigate the effect of resource use of development. The locational benefits of the Local Plan are also considered to have cumulative benefits from reduced transport emissions from focusing office development in the most accessible locations in the borough. There is also a benefit of protecting the industrial function in LSIS and Area Spatial Strategies which also helps to reduce the need for goods and services to travel too which also reduces emissions from this source. Islington’s car-free policy in Policy T3 and Policy T5 which seeks to minimise air pollution from the construction process as well as reducing deliveries will also help reduce transport emissions. The Sustainable Design policies in setting out the approach to flood risk management and sustainable drainage have cumulative benefits together to reduce the risk of flooding and help to manage water sustainably. These policies working alongside green infrastructure policies which also play a role in helping to reduce surface water run-off and reduce flood risk. Sustainability is identified in PLAN1 as one of the four key design principles for development in the borough.</p>	
<p><b>Objective 13: Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises</b></p>	<p>The policies in the Sustainable Design section set out requirements for development proposals to promote resource efficiency through application of an approach to the Circular Economy. Policy in the Thriving Economy section supports the intensification, renewal and modernisation of business floorspace. The approach to circular economy and adaptive design has cumulative benefits when considered alongside other policies in the plan, this include PLAN 1 which required development to be durable and adaptable, policies ST2, H4 and B2 which seek to maximise re-use and recycling as well as Sustainable Design policies by reducing the environmental impacts, including embodied carbon emissions, that new development can have. Policy for high quality housing provides seeks well designed facilities for the management of recycling for</p>	<p>None of the modifications have significantly changed the assessments outcomes against this objective.</p>

Objectives	Cumulative effects submission IIA	Updated consideration of cumulative effects following modifications assessment
<p><b>resource use and minimises waste</b></p>	<p>residents and Strategic Infrastructure ensures that the waste management facility in the borough is protected. The borough is also working jointly with neighbouring boroughs on the North London Waste Plan, that will plan for waste management needs for the borough.</p>	
<p><b>Objective 14: Maximise protection and enhancement of natural resources including water, land and air</b></p>	<p>Air quality is a cross cutting issue addressed by a number of policies that cumulatively will help to tackle air quality issues in the borough, this includes design policies, locational policies set out in the Area Spatial Strategies, site allocations alongside strategic policies on specific land uses which seek to locate uses in the most appropriate locations, green infrastructure and public realm and transport policies which all have a role in helping to improve air quality and minimise exposure. The policies in the Sustainable Design section set out requirements for conserving water resources and managing flood risk and dealing with contaminated land.</p>	<p>There is a potential negative impact on efficient, sustainable travel from class E through impacting on the retail hierarchy. Class E was introduced by the Government through legislation in September 2020 to amend and simplify the system of use classes in England and create one new broad 'Commercial, business and service' use class to allow for a mix of uses to reflect changing retail and business models. High trip generating Class E uses located outside of town centres could see these uses not located in the most well served locations for public transport infrastructure specifically bus, tube and rail connections. The take up of Class E is uncertain although it is recognised as working against some of the policies which sought to balance the tensions between land uses in a fine grain way. The modifications go some way to mitigating this by encouraging retail uses to locate according to the retail hierarchy e.g. at ground floor in the core of town centres, application of the sequential test and impact assessments but ultimately there is considerable uncertainty over the effectiveness of this given Class E changes do not require planning permission.</p>

# 8 Mitigation

Mitigation was considered in the IIA examination addendum March 2021 and IIA examination addendum May 2022. These are set out below in part a and part b. No additional mitigation was considered necessary post modifications.

## a. IIA: Mitigation March 2021

In line with guidance potential mitigation measures should be considered where the assessments identify negative effects in order to reduce the negative effects. The assessment should also consider ways that policies can be improved. The updated assessments in part 1 and the consideration of modifications in part 2 have not identified any significant negative effects which require mitigation. However minor negative effects have been identified by the updated policy assessments in Part 1, the updated assessment of Site Allocations and the assessments in Part 2. These are considered below.

There were two main minor negative effects identified for the housing policies. For policy H6: Purpose built student accommodation the assessment identifies the negative impact on the use of land and adaptability. The assessment considers there is no evidence to suggest that student accommodation can provide the same level of flexibility and adaptability as conventional housing in meeting housing need over the short, medium and long term as conventional housing development can. It is also considered that the policy would reduce the ability of development to meet wider development needs including through likelihood of delivering less affordable housing and therefore not optimise the use of land. 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 restriction on student accommodation to specific sites is mitigation in itself. However the negative affect on use of land and housing adaptability is also considered to be mitigated in part by the approach in Policy H6 which allows the intensification of existing student accommodation on sites which are already in use as purpose-built existing student accommodation. The principle that the extension, alteration and refurbishment of existing student accommodation for additional student accommodation should be

considered in practical terms. It is less likely that existing student accommodation presents opportunities to create either more housing or more employment space given the separate management needs, amenity needs which would complicate the design and efficient use of the building if it were to be intensified as mixed use residential or employment. Therefore allowing flexibility for intensification of existing sites provides additional mitigation to the negative adaptability and land use effects by reducing pressure for further student accommodation to be developed in the borough. Other housing policies with similar negative effects; policies H10: Large HMO and H11: PRS development do not benefit from this mitigation likewise nor does policy R10: Visitor accommodation. They rely on the restriction in policy on the development of these uses to mitigate the negative effect of these uses.

In respect to R12: Visitor accommodation the assessment has similarly identified the issue around land supply and delivery of visitor accommodation as the only negative effect for this policy. 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.

The appraisal for Policy H7: Meeting the Needs of Vulnerable Older People identifies the same negative effects as for other housing policies i.e. that older persons accommodation cannot provide the same level of flexibility and adaptability as conventional housing in meeting housing need over the short, medium and long term. The assessment of the alternative notes that a more permissive alternative approach would contribute to meeting wider London needs in addition to local older people's specialist housing needs, which would be a positive effect. As mitigation for the approach and the less adaptive provision of this accommodation there could be a proactive engagement exercise to identify sites where existing accommodation is provided and the opportunity for intensification may be possible – both for existing care homes and existing supported housing where it is unlikely mixing conventional housing with housing for older people will be practical. This may also have the benefit of facilitating improvements to the existing stock.

The introduction of Class E could see landowners take advantage of the flexibility to change use to a more economically valuable use whilst not seeking extensions to a building or redevelopment as that would require planning permission. If proposals were considered development then, depending on the nature of the proposal, there could be policy restrictions through the planning system, however where proposed changes don't come through the planning system then they cannot be mitigated. The tension is identified in the assessment of the pre-hearing modification for policy B3 around changes to marketing periods. The Preferred approach has some minor negative effects, in particular in the



short term as a longer marketing period may discourage landowners from seeking alternative uses through the planning system and instead they may likely consider changing use within Class E and not intensifying their sites and that would represent a lost opportunity. Conversely the alternative reducing marketing could encourage more efficient use of sites where they seek alternative uses through the planning system and result in intensification of use. The uncertainty of how the market will respond to Class E and more importantly the more limited role of the planning system to manage this response means this cannot be mitigated. This uncertainty is greater for the retail policies where the assessment suggest impacts include a potential distortion of the retail hierarchy which could have a range of effects including ability to meet retail needs, wider provision of services, increasing the need to travel and associated carbon emissions. In particular the potential dilution of retail development in the most appropriate locations is considered to be ineffective in balancing competing demands between land uses and ultimately an inefficient use of land. Again the uncertainty of how the market will respond and more importantly the more limited role of the planning system to manage this response means this cannot be mitigated.

The industrial area of Vale Royal presents an opportunity in respect of Class E where commercial uses such as offices or town centre uses maybe introduced into the industrial area of Vale Royal via use of Class E. Where it is development it would require some form of mitigation to enable the continued operation of existing industrial users. Class E could have impacts on the operation of industrial businesses, which could lead to issues such as lack of space for loading facilities and negative effects on air quality and amenity. Issues of residential amenity would also be a concern if reforms to the planning system introduce this as a permitted development right for landowners. The need for mitigation could only be considered through site specific negotiations with applicants were they to seek subsequent applications once they had taken advantage of the Class E opportunity. Additionally if neighbouring industrial sites intensify for additional industrial use this may provide the opportunity for design mitigation. The assessment highlights the benefits of securing new uses through the planning system where impacts of Class E can be considered and mitigated where necessary via use of conditions.

For policy R1 there is a potential for a minor negative effect as the policies affect the supply of housing in the primary shopping areas across the borough. However, the assessment considers this to have no effect overall as other policy ensures housing is delivered outside the locations identified which will ensure housing targets are met. The policies set out circumstances where residential would be suitable in town centres and LSAs. The alternative, a more flexible approach to housing in the PSA, which would mitigate this effect on housing supply; the assessment identified the potential benefits but considered that overall these would not outweigh the benefits of the policy approach. The assessment also noted that Class E represents a commercial opportunity on all floors in the PSA, which if the policy were to permit residential use would inhibit this Class E led growth in the long term. The other policy which has a similar effect on housing supply and judges the balancing with meeting employment needs is BC1. For this policy the assessment notes that the market housing developed in this area is unaffordable to the vast majority of Islington residents and notes that residential use is the biggest threat to provision of land for commercial floorspace. No mitigation is therefore considered possible for these policy effects as the alternatives have demonstrated.

For DH3 there maybe minor negative effects on economic development as the development of tall buildings will be directed to key locations where they are most appropriate, which may result in a lower overall quantum of floorspace delivery than an approach where tall buildings could be developed in more locations across the borough. These effects are minor as lower rise buildings will meet the vast majority of this need, and on many sites lower rise buildings can rival tall buildings for floorspace delivery. Possible mitigation to this constraint on growth could include a relaxation on the height limit for tall buildings and increased number of potential locations. The increased number of potential locations was considered as part of the alternatives and on balance was found to be less positive and create uncertainty in respect to negative impact on local character and distinctiveness and contribute only minor additional floorspace.

### **Site Allocations**

Development on site allocations will be subject to other plan policies which will help to assess and mitigate potential impacts, for example on Green Infrastructure and heritage policies. Specific negative impacts have been identified on the following sites.

KC1: King's Cross Triangle Site and KC2: 176-178 York Way, KC5: Belle Isle Frontage and OIS21: Former railway sidings adjacent to Caledonian Road Station have potential impacts on biodiversity. The assessments all recognise the potential for development to have a negative impact on biodiversity/green infrastructure as the sites are partially within a SINC or adjacent to one. The assessments all note that the effects should be carefully considered and managed. For these sites the question of whether the 'Development Considerations' could be expanded is not considered necessary given the borough-wide policies but this could be a matter for further discussion.

The development of site allocation OIS21: Former railway sidings adjacent to Caledonian Road Station may have a negative impact on the Caledonian Road Station which is a grade II listed building. The assessment notes that the design of any proposal would be sensitive to the specific location, reflecting the need to preserve the heritage asset and ensure amenity impacts from the railway line are mitigated. In response to representations at Regulation 19 consultation from Historic England further work will be done to consider this potential impact.

OIS31: Hillside Estate is a new site allocated to meet housing need and identified as part of the pre-hearing consultation. The proposal consists of residential development where there is the potential for existing community facilities to be lost as a result of development of this site. Unless this can be robustly justified in accordance with policy SC1, it could have a negative effect on liveable neighbourhoods and social inclusion by reducing residents' access to essential services and opportunities for people to connect with their community. The mitigation would be provided by application of policy SC1 which would require development to consider local social infrastructure needs through a Community Needs Assessment.

OIS10: Hornsey Road and Grenville Works, 2A Grenville Road, this a pre-hearing assessment made following modification of the allocation which introduces residential development into the allocation. Given the site is within the Hornsey Road/Marlborough Road Priority Employment Location and the current employment use of the site, a mixed use development could lead to the loss of existing business floorspace which

could have a negative impact on economic growth, however the provision of some office development would still contribute towards employment objectives helping to mitigate the impacts of this to some extent leading to a neutral/minor negative effect in relation to economic development overall.

## **b. IIA: Mitigation May 2022**

In line with guidance potential mitigation measures should be considered where the assessments identify negative effects in order to reduce the negative effects. The assessment should also consider ways that policies can be improved. This section considers mitigation for the effects identified from the modifications. There are no significant negative effects from the modifications which require mitigation. However minor negative effects from the modifications have been identified. These are considered below.

The appraisal for Policy H7: Meeting the Needs of Vulnerable Older People identifies the same negative effects as for other housing policies i.e. that older persons accommodation cannot provide the same level of flexibility and adaptability as conventional housing in meeting housing need over the short, medium and long term. The modifications to the submission policy have amended the policy to take into account the London Plan benchmark which was previously considered as part of a more permissive policy alternative. The assessment of the alternative notes that a more permissive alternative approach would contribute to meeting wider London needs in addition to local older people's specialist housing needs, which would be a positive effect with 60 units a year sought in Islington by the London Plan benchmark. This may lead to more proposals for specialist housing coming forward in the borough and provide more choice including for market specialist housing. The policy provides a clear steer on the need for affordable specialist accommodation as opposed to market accommodation which provides some mitigation given the local evidence on need.

The industrial area of Vale Royal presents an opportunity in respect of Class E where commercial uses such as offices or town centre uses maybe introduced into the industrial area of Vale Royal via use of Class E. Where it is development it would require some form of mitigation to enable the continued operation of existing industrial users. The policy also seeks to mitigation this through the use of conditions.

The co-location of industrial use with offices would bring additional jobs and opportunities for economic growth but depending on the extent to which offices are intensified it could reduce the capacity for industrial growth and restrict expansion of existing industrial operations in Inner London locations, effecting supply chains for central London and leading to impacts on air quality and climate change. But the modifications are clear about the need to intensify industrial uses as part of co-location and to demonstrate the continued industrial function of the LSIS will remain which will help to mitigate the effects intensification of offices could have. Co-location could also bring forward more intensification of industrial uses than would have happened otherwise which could further

counteract this effect. The modified policy SP3 will therefore still lead to the intensification of industrial uses. The modifications are clear about the need to demonstrate the continued industrial function of the LSIS which will help to mitigate some of the potential impacts that intensification of offices could have. Also the submission policy with modifications has introduced a new clause D in policy B2 which cross references to other policies where development proposed in LSIS would have significant increase in vehicle movements and makes clear mitigation should be provided. This will also encourage sustainable transport choices.

For policy R1 the submission assessment identified a potential for a minor negative effect as the policies affected the supply of housing in the primary shopping areas across the borough. Whilst the assessment considered this to have no effect overall as other policy ensured housing is delivered outside the locations identified which will ensure housing targets are met. The modifications introduce a more flexible approach to housing in the PSA and wider town centre, which mitigates this effect on housing supply. The changes to retail and business policy may have cumulative effects which combine to reduce opportunities to meet commercial, social and cultural needs and reduce the balance between competing land uses. This policy relaxation in respect of residential uses in town centres, the changes in requirements to protect against loss of business floorspace and also changes to marketing requirements may result in reduced floorspace for commercial purposes. Meeting housing needs and affordable housing needs is one of the priorities of the plan alongside meeting the need for business floorspace and it is noted that overall the modifications to retail policies still maintain a positive effect in relation to economic development whilst employment policies clearly identify the priority locations for new business floorspace.

### **Site Allocations**

The development of site allocation OIS20: Former railway sidings adjacent to Caledonian Road Station was identified in the submission IIA that it may have a negative impact on the Caledonian Road Station which is a grade II listed building. Modifications have been made to the development considerations in the site allocation in terms of heritage impacts. Additional criteria have been added aimed at mitigating the impacts of future development on the heritage of the site. Applicants will be required to prepare a heritage statement responding to the potential impacts of development on the site's heritage, and considering opportunities for improvement. The criteria were informed by additional work in the form of a heritage assessment (examination document reference: SD75), completed during the examination process.

OIS29: Hillside Estate is a new site allocated to meet housing need and the proposal consists of residential development where there is the potential for existing community facilities to be lost as a result of development of this site. Unless this can be robustly justified in accordance with policy SC1, it could have a negative effect on liveable neighbourhoods and social inclusion by reducing

residents' access to essential services and opportunities for people to connect with their community. The mitigation would be provided by application of policy SC1 which would require development to consider local social infrastructure needs through a Community Needs Assessment. Other examples of modifications where social and community infrastructure is expected to be re-provided in line with policy SC1 are OIS27: Barnsbury Estate and BC4: Finsbury Leisure Centre.

The site GT1: 207a Junction Road which is allocated for a Gypsy and Traveller site in the modifications is currently used as a martial arts centre. The loss of the current use could have negative impacts on communities who use it. The site allocation highlights that the council will work with the current occupiers of the site to identify a suitable site for its relocation within the local area and that this should be of equivalent quality, quantity and accessibility. This will help to mitigate potential negative impacts.

OIS10: Hornsey Road and Grenville Works, 2A Grenville Road, this modification introduces residential development into the allocation. Given the site is within the Hornsey Road/Marlborough Road Priority Employment Location and the current employment use of the site, a mixed use development could lead to the loss of existing business floorpace which could have a negative impact on economic growth, however the provision of some office development would still contribute towards employment objectives helping to mitigate the impacts of this to some extent leading to a neutral/minor negative effect in relation to economic development overall.

The modifications include several new site allocations for residential use identified on existing housing estates:

- KC8: Bemerton Estate South (modification reference SA-MM-15)
- OIS9: Highbury Quadrant Congregational Church (modification reference SA-MM-98)
- OIS12: New Orleans Estate, N19 (modification reference SA-MM-101)
- OIS26: York Way Estate (modification reference SA-MM-113)
- OIS27: Barnsbury Estate (modification reference SA-MM-114)
- OIS28: Cluse Court Estate (modification reference SA-MM-115)
- OIS29: Hillside Estate (modification reference SA-MM-116)
- OIS30: Kerridge Court (modification reference SA-MM-117)
- OIS31: Drakeley Court Estate and Aubert Court Estate (modification reference SA-MM-118)

Increasing housing on a site might lead to a loss of amenity space for residents. This risk could affect all residents benefitting from existing playspace, outdoor or community space. This risk is partly mitigated by the fact that the details of each proposal will be set out at planning stage, with site specific issues and local amenity need identified and addressed in line with other relevant policies, for example Policy G2 C. Allocations do not specify exactly where different uses need to be on site, and the Council would expect a design-led approach to respond to different strategic needs

# 9 Monitoring

The SEA regulations set out that local planning authorities should monitor the significant environmental effects of implementing the Local Plan. The purpose of this is to identify any unforeseen adverse effects at an early stage so appropriate remedial actions can be taken. Monitoring of Islington’s Local Plan will be set out in the Authorities Monitoring Report and details of Islington’s monitoring indicators are set out in the modifications. These have been included below where they are a relevant alternative or complimentary to the proposed IIA indicator.

**Table 9.1 Proposed IIA indicators and proposed Local Plan indicators**

TOPIC	IIA Objective	Prompt Questions	Proposed IIA Indicator	Proposed Local Plan indicator
BUILT ENV	1. Promote a high quality, inclusive, safe and sustainable built environment	<p>Will the policy...</p> <ul style="list-style-type: none"> <li>Secure high quality architecture and urban design that enhances local character and distinctiveness?</li> <li>Promote location sensitive density and design?</li> <li>Ensure consideration of the spaces between buildings to provide an attractive, functional and sustainable public realm?</li> <li>Create robust and adaptable buildings that can respond to change over their life?</li> <li>Make the built environment safer and more inclusive?</li> <li>Promote an approach to design that places people at the heart of the design process?</li> <li>Encourage measures to reduce crime and fear of crime including anti-social behaviour?</li> </ul>	<ul style="list-style-type: none"> <li>Rate of crime (per 1000 residents)</li> <li>Perceptions of anti-social behaviour</li> </ul>	<ul style="list-style-type: none"> <li>Visitor accommodation change (completions) in schemes and bed spaces in identified locations and outside of identified locations</li> </ul>
USE OF LAND	2. Ensure efficient use of land, buildings and infrastructure	<p>Will the policy...</p> <ul style="list-style-type: none"> <li>Optimise use of previously developed land, buildings and existing infrastructure?</li> <li>Optimise the use of previously developed sites and new builds to implement Green Infrastructure in unused areas such as footpath sides, blank walls and roof space?</li> <li>Focus development in the most appropriate locations?</li> </ul>	<ul style="list-style-type: none"> <li>Proportion of floorspace consented in class E use vs proportion in conditioned class E use for office, shops, community infrastructure and light industrial.</li> </ul>	<ul style="list-style-type: none"> <li>Number of homes and amount of business floorspace completed in spatial strategy areas (cumulative totals)</li> <li>Business floorspace completed (and net change) in major developments within (i) CAZ and Bunhill and Clerkenwell AAP (ii) CAZ fringe Spatial</li> </ul>



TOPIC	IIA Objective	Prompt Questions	Proposed IIA Indicator	Proposed Local Plan indicator
		<ul style="list-style-type: none"> <li>Balance competing demands between land uses to provide for the full range of development needs of the area?</li> <li>Provide the necessary infrastructure in the right locations to support development e.g. water, sewerage, energy transport etc?</li> <li>Ensure that development is sufficiently flexible and adaptable to accommodate evolving social and economic needs</li> </ul>		Strategy areas – Angel and Upper Street; and King’s Cross and Pentonville Road (iii) Priority Employment Locations (PELs)
HERITAGE	3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	<p>Will the policy.....</p> <ul style="list-style-type: none"> <li>Protect sites, features and areas of historical, archaeological and cultural value and their setting in and around Islington?</li> <li>Enable the borough’s heritage and culture to be understood, explored and appreciated as much as possible and by as wide a range of people as possible?</li> <li>Protect views of historically important landmarks and buildings and valued local views?</li> <li>Ensure Islington’s historic environment contributes to social and cultural life in the borough?</li> <li>Successfully balance access and energy efficiency requirements with the conservation and enhancement of heritage assets?</li> <li>Encourage management plans to be actively prepared and implemented?</li> </ul>	<ul style="list-style-type: none"> <li>Changes in the number of Heritage assets; listed Buildings, Conservation Areas</li> <li>Change in number of heritage assets held on heritage at risk register</li> </ul>	<ul style="list-style-type: none"> <li>Additions and removals from the Historic England Buildings at Risk Register</li> <li>Tall buildings completed in identified locations and outside of identified locations</li> </ul>
LIVEABLE	4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	<p>Will the policy...</p> <ul style="list-style-type: none"> <li>Improve access for all residents to all essential services, facilities and amenities near their home? Such as health facilities, schools, early years provision, council services, advice services, libraries, community and faith facilities, leisure centres, open space and play areas, food growing space, and neighbourhood shops.</li> <li>Promote diverse, vibrant and economically thriving town and local centres that serve the needs and wellbeing of the population?</li> <li>Improve connections of neighbourhoods with facilities/amenities?</li> <li>Encourage a vibrant social environment that attracts visitors to the borough while respecting the needs of residents?</li> <li>Reduce the impacts of noise, vibration and pollution on the public realm?</li> </ul>	<ul style="list-style-type: none"> <li>Access to dispersed convenience store / supermarket</li> <li>Level of vacancies in major and local centres</li> <li>Access to services and facilities and amenities</li> <li>Noise complaints registered with the council</li> <li>Cultural provision outside cultural quarters</li> </ul>	<ul style="list-style-type: none"> <li>Proportion of units within each Town Centre that are vacant</li> <li>Proportion of units within each Local Shopping Area that: (i) are in class E use; (ii) are vacant; (iii) have changed to C3 use within the monitoring year.</li> <li>Proportion of completed new hotel rooms that are wheelchair accessible</li> <li>S106 contributions for accessible parking bays</li> </ul>

TOPIC	IIA Objective	Prompt Questions	Proposed IIA Indicator	Proposed Local Plan indicator
		<ul style="list-style-type: none"> <li>Support the expansion and enhancement of cultural provision and maximise opportunities for the cultural life of the borough to flourish?</li> </ul>		
AFFORDABLE HOUSING	5. Ensure that all residents have access to good quality, well-located, affordable housing	<p>Will the policy...</p> <ul style="list-style-type: none"> <li>Ensure all housing is of a good standard, including for energy efficiency?</li> <li>Increase the supply of affordable housing to meet identified need as far as possible?</li> <li>Improve the diversity of housing sizes, types, prices and tenures?</li> <li>Ensure tenures are fully integrated?</li> <li>Encourage development at an appropriate density, standard, size and mix?</li> <li>Provide for housing that meets the diverse and changing needs of the population?</li> </ul>	<ul style="list-style-type: none"> <li>Income to average house price ratio</li> </ul>	<ul style="list-style-type: none"> <li>Housing completions and net change</li> <li>Mix of dwelling sizes in completed developments</li> <li>Gross and net affordable housing completions for major developments</li> <li>Affordable housing contributions secured for minor schemes (permitted)</li> </ul>
INCLUSION	6. Promote social inclusion, equality, diversity and community cohesion	<p>Will the policy...</p> <ul style="list-style-type: none"> <li>Reduce inequality and the negative consequences of relative poverty?</li> <li>Reduce social exclusion and ensure that everyone has access to the same opportunities?</li> <li>Promote fairness, social cohesion and integration?</li> <li>Promote equity between population groups and those with protected characteristics?</li> <li>Support active engagement of the wider community in decisions that affect their area?</li> <li>Encourage active and connected, strong and cohesive community?</li> <li>Support the delivery of integrated and accessible early years services necessary to ensure that vulnerable children have the best start in life?</li> <li>Remove barriers to employment and increase the skills of residents?</li> <li>Improve opportunities and facilities for formal, informal and vocational learning for all ages?</li> </ul>	<ul style="list-style-type: none"> <li>Resident satisfaction with local services</li> <li>% of people who believe people from different backgrounds get on well together in their local area</li> <li>Proportion of resident pupils attending Islington schools achieving 5+ A-Cs including English and Maths</li> </ul>	<ul style="list-style-type: none"> <li>Progress in meeting identified needs for Gypsy and Traveller Accommodation</li> </ul>
HEALTH	7. Improve the health and wellbeing of the population and reduce health inequalities	<p>Will the policy...</p> <ul style="list-style-type: none"> <li>Improve mental and physical health and wellbeing?</li> <li>Increase use and ease of access to green spaces for all residents, particularly those with mental and physical health concerns?</li> <li>Reduce health inequalities?</li> <li>Reduce the proliferation of activities with negative health externalities?</li> </ul>	<ul style="list-style-type: none"> <li>Health deprivation (IND)</li> <li>Life expectancy</li> <li>Rate of obesity in children</li> </ul>	<ul style="list-style-type: none"> <li>Public houses gained and lost (completions)</li> <li>Annual mean air pollution levels for nitrogen dioxide and PM10</li> </ul>

TOPIC	IIA Objective	Prompt Questions	Proposed IIA Indicator	Proposed Local Plan indicator
		<ul style="list-style-type: none"> <li>• Improve access to a full range of coordinated health and social care services/facilities in all sectors for all residents?</li> <li>• Ensure that the built and natural environments promote health and wellbeing, including by facilitating physical activity and active travel and encouraging social interaction?</li> <li>• Increase food growing opportunities?</li> <li>• Support fully inclusive health, recreation, leisure and sport facilities that meet the needs of the whole community?</li> <li>• Reduce fuel poverty?</li> <li>• Manage noise issues and their effect on individual health?</li> <li>• Improve air quality?</li> </ul>	<ul style="list-style-type: none"> <li>• All-age all cause mortality rate</li> </ul>	
ECONOMIC GROWTH	8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	<p>Will the policy...</p> <ul style="list-style-type: none"> <li>• Sustain and increase the borough's contribution to the London and national economy?</li> <li>• Support a range of local businesses of different types and sizes?</li> <li>• Provide sufficient space in the right locations for different types of businesses to develop, grow and thrive?</li> <li>• Support the development of green industries and a low carbon economy?</li> <li>• Widen the opportunities for local residents to access employment, particularly those groups experiencing above average worklessness?</li> <li>• Provide a range of employment opportunities?</li> <li>• Tackle barriers to employment, such as affordable childcare and skill levels?</li> <li>• Provide training and job opportunities for local residents?</li> </ul>	<ul style="list-style-type: none"> <li>• Net gain in employment floorspace (by type and size)</li> <li>• Proportion of Islington residents with no qualifications</li> <li>• Income deprivation (IND)</li> </ul>	<ul style="list-style-type: none"> <li>• Number of homes and amount of business floorspace completed in spatial strategy areas (cumulative totals)</li> <li>• Business floorspace completed (and net change) in major developments within (i) CAZ and Bunhill and Clerkenwell AAP (ii) CAZ fringe Spatial Strategy areas – Angel and Upper Street; and King's Cross and Pentonville Road (iii) Priority Employment Locations (PELs)</li> </ul>
NEED TO TRAVEL	9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	<p>Will the policy...</p> <ul style="list-style-type: none"> <li>• Improve connectivity both within the borough and to neighbouring boroughs and wider London?</li> <li>• Encourage a shift to more sustainable forms of travel and away from private vehicle use?</li> <li>• Reduce the need to travel, especially by car?</li> <li>• Improve road safety for all, particularly pedestrians and cyclists?</li> <li>• Improve accessibility of the borough's transport network?</li> <li>• Provide facilities that will support sustainable transport options?</li> <li>• Enhance capacity of the transport network?</li> </ul>	<ul style="list-style-type: none"> <li>• Proportion of residents using sustainable modes of transport</li> <li>• Volume of transport in Islington</li> <li>• Number of people killed or seriously injured on Islington roads</li> </ul>	<ul style="list-style-type: none"> <li>• Change in mode share</li> </ul>

TOPIC	IIA Objective	Prompt Questions	Proposed IIA Indicator	Proposed Local Plan indicator
		<ul style="list-style-type: none"> <li>Reduce harmful emissions from transport?</li> <li>Reduce the negative impacts of servicing and freight?</li> </ul>		
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"> <li>Protect existing public and private open spaces?</li> <li>Contribute to meeting the increasing need for open space?</li> <li>Link existing open spaces?</li> <li>Prioritise open space in areas of deficiency?</li> <li>Improve the quality of open space?</li> <li>Promote or improve public accessibility of open space now and in the future?</li> <li>Ensure that open space is considered within the wider context of green infrastructure and delivering multiple benefits?</li> <li>Improve inclusive access to a range of open space types to meet local needs?</li> </ul>	<ul style="list-style-type: none"> <li>Quantity of open space (ha)</li> <li>Resident satisfaction with open space</li> </ul>	<ul style="list-style-type: none"> <li>Designated public open space gains and losses (sqm) (completions)</li> </ul>
BIODIVERSITY	11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	<p>Will the policy...</p> <ul style="list-style-type: none"> <li>Increase protection and improve opportunities for biodiversity?</li> <li>Ensure that development has no harmful effects on biodiversity and that development resulting in biodiversity net gain is given priority?</li> <li>Encourage development that implements strategic and connected green infrastructure?</li> <li>Ensure development does not increase flood risk ?</li> <li>Protect existing trees and increase tree planting?</li> <li>Increase biodiverse green roofs, green walls and soft landscaping?</li> <li>Protect the populations of priority species identified in Islington's BAP?</li> <li>Maximise opportunities to enhance biodiversity?</li> <li>Impact on access to nature?</li> <li>Increase green infrastructure and improve connectivity?</li> <li>Maximise opportunities for engagement with wildlife, including environmental education?</li> <li>Support positive management of green infrastructure (green roofs, walls, soft landscaping etc) for biodiversity?</li> <li>Support biodiversity enhancement of The Regents Canal?</li> </ul>	<ul style="list-style-type: none"> <li>Change in areas designated for conservation significance</li> <li>Additional area of green roofs installed in new developments</li> </ul>	

TOPIC	IIA Objective	Prompt Questions	Proposed IIA Indicator	Proposed Local Plan indicator
CLIMATE CHANGE	12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	<p>Will the policy...</p> <ul style="list-style-type: none"> <li>• Improve energy efficiency and carbon emissions associated with buildings and transport?</li> <li>• Promote the use of low and zero carbon technologies including decentralised energy networks?</li> <li>• Improve energy security?</li> <li>• Encourage buildings and places designed to respond to changing conditions?</li> <li>• Reduce the impact of climate change, including flooding and urban heat island effect?</li> <li>• Improve the microclimate?</li> <li>• Reduce greenhouse gas emissions?</li> <li>• Reduce fuel poverty?</li> <li>• Provide the necessary infrastructure to support development?</li> <li>• Steer development to the areas at lowest risk of flooding in the borough?</li> </ul>	<ul style="list-style-type: none"> <li>• Overall greenhouse gas emissions for Islington</li> <li>• Per capita reduction in CO2 emissions in the LA Area</li> <li>• EPC certificates</li> </ul>	<ul style="list-style-type: none"> <li>• On-site carbon reduction achieved for major development</li> <li>• Offsetting contributions from completed new developments</li> <li>• Major developments (completions) that have: 1. Connected to a heat network. 2. Where there is a Commitment to connect to a future network</li> </ul>
RESOURCE EFFICIENCY	13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	<p>Will the policy...</p> <ul style="list-style-type: none"> <li>• Use local, sustainable materials and resources?</li> <li>• Promote the use of renewable sustainable energy sources?</li> <li>• Minimise the use of non-renewable resources?</li> <li>• Ensure design is appropriate for lifetime of development?</li> <li>• Support the circular economy?</li> <li>• Provide opportunities for businesses to benefit from the circular economy?</li> <li>• Minimise the volume of waste produced in Islington, including construction and deconstruction waste, food and household waste?</li> <li>• Support the 'Waste Hierarchy'?</li> <li>• Increase the proportion of waste recycled or composted?</li> <li>• Provide the right type of infrastructure to deal with residual waste in the most sustainable way?</li> </ul>	<ul style="list-style-type: none"> <li>• Water consumption per capita</li> <li>• Residual household waste per household</li> <li>• Percentage of household waste sent for reuse, recycling and composting</li> </ul>	<ul style="list-style-type: none"> <li>• Circular Economy Statements for referable applications (permissions)</li> </ul>
NATURAL RESOURCES	14. Maximise protection and enhancement of natural resources including water, land and air	<p>Will the policy...</p> <ul style="list-style-type: none"> <li>• Minimise air, water, and soil pollution and their negative impacts on human health?</li> <li>• Improve air quality in line with national and international standards?</li> <li>• Protect surface and groundwater quality?</li> <li>• Promote the sustainable use of water resources?</li> </ul>		<ul style="list-style-type: none"> <li>• Annual mean air pollution levels for nitrogen dioxide and PM10</li> </ul>

TOPIC	IIA Objective	Prompt Questions	Proposed IIA Indicator	Proposed Local Plan indicator
		<ul style="list-style-type: none"> <li>• Prevent soil pollution and restore contaminated land?</li> <li>• Ensure sustainable use and protection of natural resources, including water?</li> <li>• Ensure the necessary water and sewerage infrastructure to service development?</li> </ul>		

# Appendix 1: Summary of consultation responses

Table A1.1 Summary of consultation responses on draft Scoping Report

RESPONDENT	COMMENTS SUBMITTED	UPDATES TO SCOPING REPORT
1. Environment Agency	<p><b>Stage A1</b></p> <p>The following documents should also be included:</p> <ul style="list-style-type: none"> <li>• Thames River Basin Management Plan (2015)</li> <li>• Sustainable Design and Construction SPG (GLA, 2014)</li> <li>• Any up-to-date Strategic Flood Risk Assessment carried out by LBI</li> <li>• Any Surface Water Management Plans or Local Flood Risk Management Strategies published by LBI as part of the Drain London project</li> </ul> <p><b>Stage A2</b></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 <a href="https://data.gov.uk/">https://data.gov.uk/</a> and <a href="http://environment.data.gov.uk/catchment-planning/">http://environment.data.gov.uk/catchment-planning/</a></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 and</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>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><b>Stage A3</b></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> <p><b>Stage A4</b></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>	



RESPONDENT	COMMENTS SUBMITTED	UPDATES TO SCOPING REPORT
	<p>Potential indicators:</p> <ul style="list-style-type: none"> <li>• Water Framework Directive status of the Regents Canal.</li> <li>• Number of proposals that have improved habitat on the Regents Canal, if it was possible to obtain data on proposals.</li> </ul> <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><b>Stage A4</b></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> <ul style="list-style-type: none"> <li>• Potential indicator: Increased building density results in a net gain for biodiversity and an increased use of previously unused space for green infrastructure.</li> </ul> <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>	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"> <li>• Will the policy ensure that development has no harmful effects on biodiversity and that development resulting in biodiversity net gain is given priority?</li> <li>• Will the policy encourage development that implements strategic and connected Green Infrastructure?</li> </ul> <p>Potential indicators:</p> <ul style="list-style-type: none"> <li>• Development results in biodiversity net gain/loss.</li> <li>• Development results in increased use of previously unused space for Green Infrastructure.</li> </ul> <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><b>Stage A1</b></p> <p>The following documents should also be included:</p> <ul style="list-style-type: none"> <li>• The Historic Environment in Local Plans: Historic Environment Good Practice Advice in Planning 1 (Historic England, 2015)</li> <li>• Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning 2 (Historic England, 2015)</li> <li>• The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning 3 (Historic England, 2015)</li> <li>• Historic England Advice Note 1 Conservation Area Designation, Appraisal and Management (Historic England, 2016)</li> <li>• Easy Access to Historic Buildings (Historic England, 2015)</li> <li>• Energy Efficiency and Historic Buildings: Application of Part L of the Building Regulations to historic and traditionally constructed buildings (Historic England, 2011)</li> <li>• Any conservation area appraisals and management plans</li> </ul> <p><b>Stage A2</b></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>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> <p>Comments regarding Stage A4 are noted and appropriate updates have been made.</p>

RESPONDENT	COMMENTS SUBMITTED	UPDATES TO SCOPING REPORT
	<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><b>Stage A4</b> Objectives 1 and 3 are welcomed but the evidence base for the judgements required has to be clear.</p> <p>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.</p>	
<p>4. Historic England – response 2</p>	<p><b>Stage A2</b> Baseline information could be developed further by:</p> <ul style="list-style-type: none"> <li>• Capturing all types of heritage assets, including registered parks and gardens;</li> <li>• Referencing the existing condition of heritage assets in the borough, such as assets held on the Historic England Heritage at Risk Register.</li> <li>• Including an illustration to demonstrate the spatial spread of heritage assets in the borough</li> <li>• Establishing a benchmark which articulates the positive contribution heritage makes to the economic, social and environmental qualities of the borough</li> </ul> <p><b>Stage A4</b> 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"> <li>• greater enhancement of heritage assets</li> <li>• ensuring assets are brought back into beneficial use, and/or repaired so that their significance is reinstated</li> <li>• management plans are actively prepared and implemented</li> <li>• new assets are identified and appropriately conserved</li> </ul>	<p>Stage A2 and Stage A4 have been updated to take account of the points raised.</p>
<p>5. Canal and River Trust</p>	<p><b>Stage A1</b></p>	<p>Suggested changes and additions to A1 and A2 have been integrated.</p>

RESPONDENT	COMMENTS SUBMITTED	UPDATES TO SCOPING REPORT
	<p>Additional documents to be included:</p> <ul style="list-style-type: none"> <li>• 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’]</li> </ul> <p><b>Stage A2</b></p> <p>Paragraph 5.18 states that the Regent’s Canal is managed by British Waterways. British Waterways became the Canal &amp; 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>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>	<p>Suggestions regarding energy infrastructure capacity are policy formulation and not considered appropriate for inclusion in this document.</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>	<p>Noted.</p>
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</p>	<p>Comments noted. Prompt questions in Stage A4 recognise the role of sport, recreation and leisure facilities in achieving overarching objectives.</p> <p>Suggestions with regard to evidence gathering are noted and will be taken into account during plan preparation.</p>

RESPONDENT	COMMENTS SUBMITTED	UPDATES TO SCOPING REPORT
	<p>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 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"> <li>• Number of developments approved against the recommendation of the statutory water/sewerage undertaker on low pressure / flooding grounds.</li> </ul> <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><b>Stage A1</b> Additional documents to be included:</p> <ul style="list-style-type: none"> <li>• Islington’s Joint Strategic Needs Assessment (2014)</li> <li>• Islington’s Joint Health and Wellbeing Strategy 2014-2020 (consultation draft)</li> </ul> <p><b>Stage A2</b> Public Health submitted detailed comments and suggested amendments to the baseline information. This includes:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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 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.</li> <li>• 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</li> </ul>	<p>Suggested changes and additions have been integrated.</p>

RESPONDENT	COMMENTS SUBMITTED	UPDATES TO SCOPING REPORT
	<p><b>Stage A3</b></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><b>Stage A4</b></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 (IDAOPI).</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>	
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"> <li>• 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.</li> <li>• Objectives 1 and 2 - Prompt Questions should also cover the long life, loose fit and low energy of policies.</li> </ul>	<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
	<ul style="list-style-type: none"> <li>• Objective 3 - Additional Potential Indicators would be to monitor the fabric, use and setting of these sites.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• Objectives 13 and 14 - Prompt Questions should aim for low consumption overall (in addition to the recycling of what is consumed as currently drafted).</li> <li>• Objective 14 - Potential Indicators - the level of green chains, pedestrian and cycle routes would also be useful measures here.</li> </ul> <p>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?</p>	
12. Canonbury Society	<p>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.</p>	Support noted.



## Summary of responses on Initial IIA report – September 2019

Four responses were received on the IIA at submission stage. The following respondents made comments:

- Tileyard London Limited (examination reference R19.0132)
- Lion Portfolio Ltd (examination reference R19.0143)
- The Canonbury Society (examination reference R19.0180)
- The Upper Street Association (examination reference R19.0181)

### Tileyard London Limited

The respondent commissioned an independent review of the IIA, which considered that the IIA process for the draft Local Plan is deficient, particularly in respect of the assessment of 'reasonable alternatives', as well as substantial flaws in the application of the IIA methodology itself.

The response also considered that the Council had failed to prepare for consult on an IIA for the Regulation 18 draft Local Plan 2018, removing the opportunity for the authorities or the public to have early or effective consultation on the impacts of the emerging Plan, or to show how the IIA has influenced the emerging plan as it has evolved.

As a result of the deficiencies identified, the respondent considered that the IIA process had failed to comply with the Regulations and guidance to demonstrate that the chosen strategy is appropriate when considered against reasonable alternatives, as required by the test of soundness.

The council set out a detailed point by point response to Tileyard in the Legal Compliance statement (examination reference SD30) which was provided as part of the documents submitted to the Planning Inspectorate for examination of the Local Plan. Regarding the failure to prepare an IIA for the Regulation 18 Local Plan the council considered that there is no regulatory basis to publish a sustainability appraisal for each draft version of a plan. Various comments on IIA process were made in relation to plan making and the Council responded by clearly stating that it has carried out an IIA in line with guidance and regulations. Regarding alternatives the respondent considers that reasonable alternatives should have been identified for the Vale Royal/Brewery Road, a Locally Significant Industrial Site (LSIS) but we disagree; as noted above there are no reasonable alternatives. The assessment itself was considered inadequate by the respondent, the council responded stating the assessment is considered adequate and that many of the sustainability framework objectives will not be affected by policy and that ultimately, there is no requirement set out in guidance to provide full detailed narrative for assessment of every policy against every objective.

The three other respondents included a developer and two local societies. The developer considered that a reasonable alternative had not been considered, however the council had considered a criteria based approach. The local societies were concerned about updating the baseline data and also provided supportive comments.

More generally the Regulation 22 statement (examination document reference PD7) sets out a high level summary of the responses received to the Regulation 19 consultation. The council response to each representation is set out in a separate document (examination document reference PD9b) with a more detailed summary of each representation.

#### Summary of responses to IIA examination addendum – March 2021

Following submission the Secretary of State appointed two Planning Inspectors to undertake the independent examination into whether the London Borough of Islington Local Plan was sound and complies with all the legal requirements. During the initial phase of the examination the Inspectors wrote to the council seeking further information and justification on a number of issues including the IIA. The letters of 30th April 2020 ((examination reference INS04) and 24th June 2020 ((examination reference INS05) set out the issues identified by the Planning Inspectors in respect of identification and assessment of alternatives for policies and site allocations, assessment of cumulative effects and identification of effects overall.

The initial letter from the Inspectors identified the policies which they had concerns with the assessment of alternatives. Concerns were also raised with the depth of assessment set out in the tables, the various effects considered and the brevity of assessment of cumulative effects. The fact no reasonable alternatives for Site Allocations was also questioned and whether any sites could have been allocated for another use. The Council responded and sought to justify the consideration of alternatives and explain the approach taken to assessment and cumulative effects. The Inspectors second response confirmed that they remained concerned and considered that some reasonable alternatives had been unfairly discounted or had not been assessed. The letter concluded stating that the Council should review the Sustainability Appraisal in full to satisfy itself that all reasonable alternatives for each policy and site had been appropriately and robustly assessed. The Inspectors also identified the need for additional consultation on the SA and suggested that this could be undertaken alongside any further consultation needed in relation to housing matters.

Consultation on the pre hearing modifications commenced in March 2021 and included the examination IIA. Consultation was in response to issues raised by the Planning Inspectors, also in response to recent changes to national planning legislation, as well as other clarifications and updates. As part of the work on the IIA and the examination AECOM were commissioned by the council to review the Integrated Impact Assessment (IIA) work undertaken, ahead of publication of the IIA Examination Addendum. A series of four review notes were published alongside the consultation (examination reference SD63). For the consultation the examination IIA was presented in two parts. Part 1 addressed the concerns raised by the Inspectors and presented the assessment of alternatives, updated policy assessments, updated assessment of site allocations including assessment of alternatives. A review of the cumulative effects was presented. Part 2 assessed the draft modifications to the submission plan including new sites assessments. Examination conclusions and mitigation were presented and a section on monitoring. As part of the iterative process of assessment the examination IIA was a significant update with changes made and new information presented in response to points raised by the Inspectors.

There was one response to the Examination IIA addendum March 2021 from Tileyard London Ltd (examination reference PHM0072). This continued to raise issues with the assessment considering amongst others that it continues to fail to assess the full significance of effects, highlight changed scoring, that positive effects are not considered, a lack of evidence is available to justify some assertions, identifies contradictory assessment of sites and policies. Also, considers the IIA has not demonstrated how consultation responses have been taken into account in the assessment.

The council set out a summary of each representation made to the consultation alongside a response to each in the summary of responses to pre-hearing modifications (examination reference PD19a). This included a detailed point by point response to each of the points made in relation to the IIA addendum by Tileyard. The Council explained the changes in scoping or where there were differences, identified where relevant statements from the AECOM notes and that the council has considered all responses on the Regulation 18 and 19 draft plans before proceeding with subsequent stages of plan preparation.

With regards to the comments that effects have not been fully assessed the council responded to say that the approach taken in presenting the effects in the IIA is pragmatic and reflects an implicit consideration in the individual policy and site assessments that most policies will have a variety of potential effects; therefore, while these may not all be explicitly noted in individual assessments, there has been detailed consideration of the effects. It is noted that the assessment of effects was updated in Part 1. With regards to changes in scoring these were explained and related to the differences between effects of site allocations and spatial policies. With regards to assertions made in the assessment the council refers to the notes and review carried out by AECOM, and also notes that the IIA is based on appropriate and proportionate evidence. With regards to positive effects the response provides further explanation where necessary.

The Inspectors included a number of questions on the IIA in their Matters and Issues for examination and Tileyard London responded to these questions under Matter 1: Legal requirements. There was also further discussion on the IIA as part of the examination hearings in September 2021.

# Appendix 2: HRA screening update

The effects of Islington's Local Plan policies and allocations on the identified European sites were assessed through a Screening Assessment, as part of the regulation 19 interim IIA September 2019 and were not considered to be significant. The effect 'in combination' with other plans when combined with the Local Plan was also not considered to be significant. Therefore, it is concluded it was not necessary to carry out a full appropriate assessment (Stage 2 of the HRA process) as the Local Plan policies and allocations have been 'screened out'. The modifications to the Local Plan are not considered to effect the conclusions of the original screening.

# Appendix 3a: Sequential flood risk consideration of site allocations

This appendix is presented in two parts and sets out the flood risk analysis for sites proposed to be allocated to the Local Plan. Appendix 3a presents the regulation 19 stage sequential test of sites and appendix 3b presents the sequential test of sites identified in the modifications to the Local plan.

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.

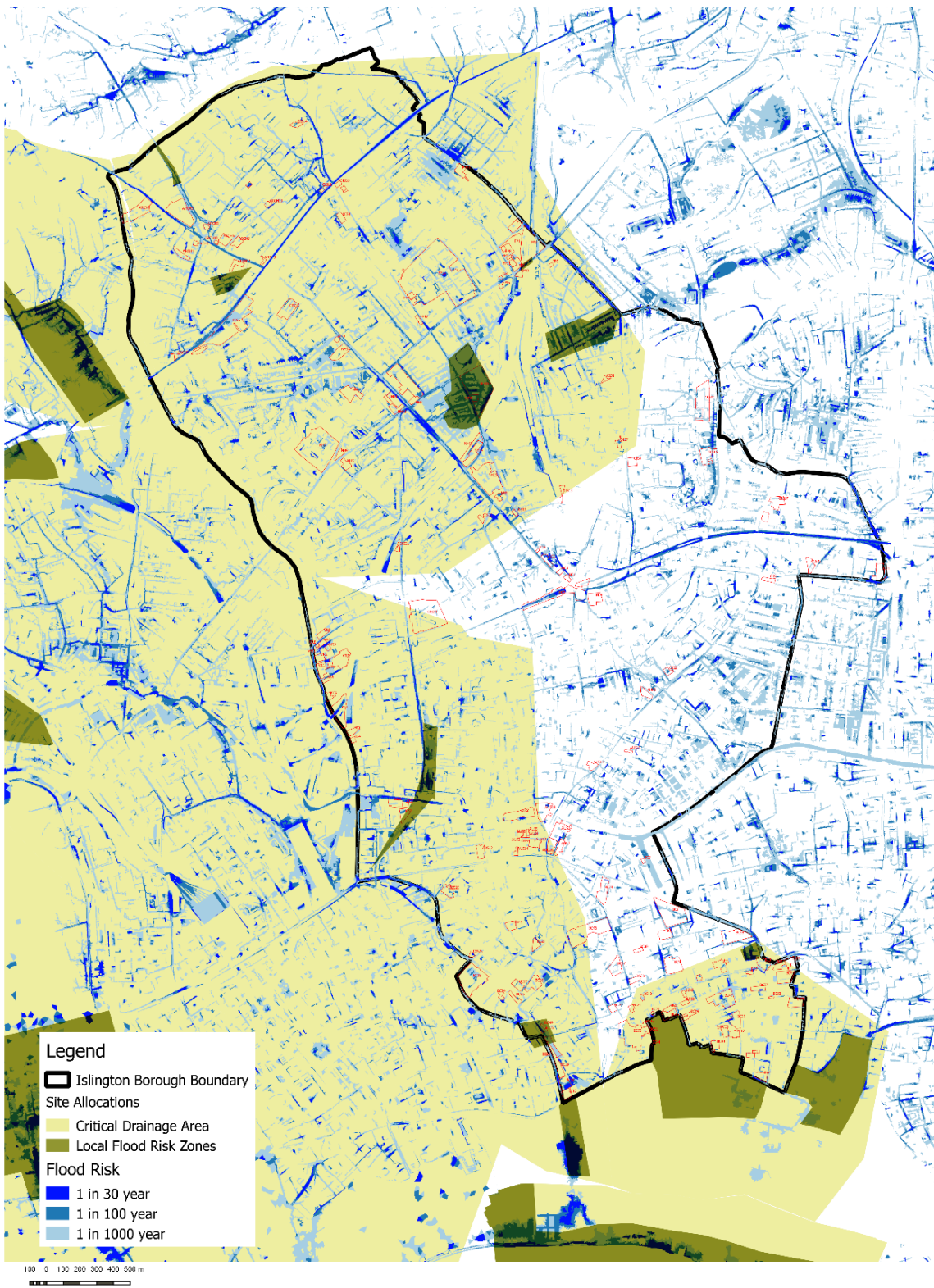
## Site Allocations – Flood Risk Sequential Test

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.



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



Elthorne Estate, Archway, N19 4AG	ARCH10							N/A	Yes
Dwell House, 619-639 Holloway Road, N19 5SS	ARCH11							N/A	Yes
798-804 Holloway Road, N19 3JH	ARCH12							N/A	Yes
City North Islington Trading Estate, Fonthill Road and 8-10 Goodwin Street, N4	FP1							N/A	Yes
Morris Place/Wells Terrace (including Clifton House), N4 2AL	FP2							N/A	Yes
Finsbury Park Station and Island, Seven Sisters Road, N4 2DH	FP3						Part of southern site boundary in LFRZ	N/A	Yes
129-131 & 133 Fonthill Road & 13 Goodwin Street, N4	FP4							N/A	Yes
Conservative Club, 1 Prah Road, N4 2RA	FP5							N/A	Yes
Cyma Service Station, 201A Seven Sisters Road, N4 3NG	FP6							N/A	Yes
Holloway Police Station, 284 Hornsey Road, N7 7QY	FP7							N/A	Yes
113-119 Fonthill Road, N4 3HH	FP8							N/A	Yes

233 Seven Sisters Road, N4 2DA	FP9						Part of south eastern site boundary in LFRZ	N/A	Yes
Former George Robey Public House, 240 Seven Sisters Road, N4 2HX	FP10						Part of northern site boundary in LFRZ	N/A	Yes
139-149 Fonthill Road, N4 3HF	FP11							N/A	Yes
179-199 Hornsey Road, N7 9RA	FP12							N/A	Yes
Tesco, 103-115 Stroud Green Road, N4 3PX	FP13							N/A	Yes
Andover Estate bounded by Durham Road, Moray Road, Andover Road, Hornsey Road, Newington Barrow Way and Seven Sisters Road, London N7	FP14						Small areas of the site include EA RoFSW High Risk Areas, with the majority of the site having no EA RoFSW flood risk.	Redevelopment of the estate will include estate-wide public realm and landscape improvements.	Yes
216-220 Seven Sisters Road, N4 3NX	FP15							N/A	Yes
Morrison's supermarket and adjacent car park, 10 Hertslet Road, and 8-32 Seven Sisters Road, N7 6AG	NH1							N/A	Yes
368-376 Holloway Road (Argos and adjoining shops), N7 6PN	NH2							N/A	Yes
443-453 Holloway Road, N7 6LJ	NH3							N/A	Yes
Territorial Army Centre, 65-69 Parkhurst Road, N7 0LP	NH4							N/A	Yes

392A and 394 Camden Road, N7	NH5							N/A	Yes
11-13 Benwell Road, N7 7BL	NH6							N/A	Yes
Holloway Prison, Parkhurst Road, N7 ONU	NH7						Small areas of the include EA RoFSW High Risk Areas, with the majority of the site having no EA RoFSW flood risk.	Development will include creation of new on-site open space.	Yes
457-463 Holloway Road, N7 6LJ	NH8							N/A	Yes
Islington Arts Factory, Parkhurst Road, N7 0SF	NH9							N/A	Yes
45 Hornsey Road (including land and railway arches 1-21 to rear), N7 7DD and 252 Holloway Road, N7 6NE	NH10						Small area of the site includes EA RoFSW High Risk Area, with over half of the site having no EA RoFSW flood risk.	N/A	Yes
Mamma Roma, 377 Holloway Road, N7 0RN	NH11							N/A	Yes
379-391 Camden Road and 341-345 Holloway Road	NH12							N/A	Yes
166-220 Holloway Road, N7	NH13							N/A	Yes
236-250 Holloway Road, N7 6PP and 29 Hornsey Road, N7 7DD	NH14							N/A	Yes

Leroy House, 436 Essex Road, N1 3QP	OIS1							N/A	Yes
The Ivories, 6-8 Northampton Street, N1 2HY	OIS2							N/A	Yes
Belgravia Workshops, 157-163 Marlborough Road, N19 4NF	OIS3							N/A	Yes
1 Kingsland Passage and BT Telephone Exchange, Kingsland Green	OIS4						Very small EA RoFSW High Risk Area on south eastern edge of site. Majority of site has no EA RoFSW flood risk and is not in a CDA.	N/A	Yes
Bush Industrial Estate, Station Road, N19 5UN	OIS5						Small areas of the site include EA RoFSW High Risk Areas, with the majority of the site having no EA RoFSW flood risk.	N/A	Yes
100 Hornsey Road, N7 7NG	OIS6							Redevelopment includes open space and public realm improvements	Yes
Highbury Delivery Office, 2 Hamilton Lane, N5 1SW	OIS7							N/A	Yes
Legard Works, 17a Legard Road, N5 1DE	OIS8							N/A	Yes
Ladbroke House, 62-66 Highbury Grove, N5 2AD	OIS9							N/A	Yes
500-502 Hornsey Road and Grenville Works, 2A Grenville Road, N19 4EH	OIS10							N/A	Yes

Parkview Estate, Collins Road, N5	OIS11							N/A	Yes
202-210 Fairbridge Road, N19 3HT	OIS12							N/A	Yes
Highbury Roundhouse Community Centre, 71 Ronald's Road, N5 1XB	OIS13						Half of site in CDA.	N/A	Yes
17-23 Beaumont Rise, N19 3AA	OIS14							N/A	Yes
Athenaeum Court, 94 Highbury New Park, N5 2DN	OIS15							N/A	Yes
Harvist Estate Car Park, N7 7NJ	OIS16						Some EA RoFSW High Risk Areas, particularly along the south/east boundary and substantial EA RoFSW medium risk areas.  Site is located in a LFRZ.	Development to include improvements to the public realm	Yes
Hathersage and Besant Courts, Newington Green, N1 4RF	OIS17							N/A	Yes
Wedmore Estate Car Park, N19 4NU	OIS18							N/A	Yes
25-27 Horsell Road, N5 1XL	OIS19						Very small EA RoFSW High Risk Areas along north eastern site boundary. Majority of site has no EA RoFSW flood risk.	N/A	Yes
Vernon Square, Penton Rise, WC1X 9EW	OIS20							N/A	Yes
Former railway sidings adjacent to and potentially including Caledonian Road Station	OIS21							N/A	Yes

114 Balls Pond Road and 1 King Henry's Walk, N1 4NL	OIS22							N/A	Yes
1 Lowther Road, N7 8US	OIS23							N/A	Yes
Pentonville Prison, Caledonian Road, N7 8TT	OIS24						Half of site in CDA.	N/A	Yes
Charles Simmons House, 3 Margery Street, WC1X 0HP	OIS25						Approximately a third of site includes EA RoFSW High Risk Areas. Majority of site has no EA RoFSW flood risk.	Development to include landscaped area at front.	Yes
Amwell Street Water Pumping Station, Clerkenwell, EC1R	OIS26							N/A	Yes
12, 16-18 and 24 Highbury Corner, N5 1RA	HC1							N/A	Yes
Spring House, 6-38 Holloway Road, N7 8JL	HC2						Some EA RoFSW High Risk Areas. Approximately half of site has no EA RoFSW flood risk.	N/A	Yes
Highbury and Islington Station, Holloway Road, N5 1RA	HC3						Some EA RoFSW High Risk Areas. Approximately half of site has no EA RoFSW flood risk.	Redevelopment to include open space and public realm improvements.	Yes
Dixon Clark Court, Canonbury Road, N1 2UR	HC4							N/A	Yes
2 Holloway Road, N7 8JL and 4 Highbury Crescent, London, N5 1RN	HC5						Very small EA RoFSW High Risk Area on eastern boundary. Majority of site has no EA RoFSW flood risk.	N/A	Yes
Land adjacent to 40-44 Holloway Road, N7 8JL	HC6							N/A	Yes

Fayers Site, 202-228 York Way, Former Venus Printers, 22-23 Tileyard Road, adjacent 196-200 York Way, N7 9AX	VR1							N/A	Yes
230-238 York Way, N7 9AG	VR2							N/A	Yes
Tileyard Studios, Tileyard Road, N7 9AH	VR3						Very small EA RoFSW High Risk Area on western boundary. Majority of site has no EA RoFSW flood risk.	N/A	Yes
20 Tileyard Road, N7 9AH	VR4						Small EA RoFSW High Risk Areas on north western boundary. Majority of site is a EA RoFSW low risk area.	N/A	Yes
4 Brandon Road, N7 9AA	VR5							N/A	Yes
The Fitzpatrick Building, 188 York Way, N7 9AD	VR6							N/A	Yes
43-53 Brewery Road, N7 9QH	VR7							N/A	Yes
55-61 Brewery Road, N7 9QH	VR8							N/A	Yes
Rebond House, 98-124 Brewery Road, N7 9BG	VR9							N/A	Yes
34 Brandon Road, London N7 9AA	VR10							N/A	Yes
King's Cross Triangle Site, bounded by York Way, East Coast Main Line & Channel Tunnel Rail Link, N1	KC1						Some EA RoFSW High Risk Areas. Majority of site has no EA RoFSW flood risk.	Development to include open space	Yes

176-178 York Way, N1 0AZ	KC2							N/A	Yes
Regents Wharf, 10, 12, 14, 16 and 18 All Saints Street, N1	KC3							N/A	Yes
Former York Road Station, 172-174 York Way	KC4							N/A	Yes
Belle Isle Frontage, land on the east side of York Way	KC5							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 no EA RoFSW flood risk.	Development to include protection and enhancement of existing open space.	Yes
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.  Small area of north of site in LFRZ.	Development to include new open space and public realm improvements.	Yes
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 Cloudesley 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
2, 4-10 Clerkenwell Road, 29-39 Goswell Road & 1-4 Great Sutton Street, Islington, London EC1M 5PQ	BC21						Majority of site in CDA.	N/A	Yes
Vine Street Bridge, EC1R 3AU	BC22						Includes EA RoFSW High Risk Areas. Majority of site is EA RoFSW low risk area.	Development involves conversion to public open space	Yes
Sycamore House, 5 Sycamore Street, EC1Y 0SR	BC23							N/A	Yes
Clerkenwell Fire Station, 42-44 Rosebery Avenue, EC1R 4RN	BC24							N/A	Yes
Mount Pleasant Post Office, 45 Rosebery Avenue, EC1R 4TN	BC25						Very small EA RoFSW High Risk Areas on south eastern boundary. Majority of site has no EA RoFSW flood risk.	Development to include open space and public realm improvements	Yes

68-86 Farringdon Road (NCP carpark), EC1R 0BD	BC26							N/A	Yes
Finsbury Health Centre and Pine Street Day Centre, EC1R 0LP	BC27							N/A	Yes
Angel Gate, Goswell Road, EC1V 2PT	BC28						Very small EA RoFSW High Risk Areas in north of site. Majority of site has no EA RoFSW flood risk.	N/A	Yes
Taylor House, 88 Rosebery Avenue, EC1R 4QU	BC29							N/A	Yes
Telfer House, 27 Lever Street, EC1V 3QX	BC30							N/A	Yes
Travis Perkins, 7 Garrett Street, EC1Y 0TY	BC31							N/A	Yes
Monmouth House, 58-64 City Road, EC1Y 2AE	BC32						Includes EA RoFSW High Risk Area. Majority of site has no EA RoFSW flood risk.	N/A	Yes
Oliver House, 51-53 City Road, EC1Y 1AU	BC33							N/A	Yes
20 Ropemaker Street, 101-117 Finsbury Pavement, 10-12 Finsbury Street, EC2Y 9AR	BC34							N/A	Yes
Finsbury Tower, 103-105 Bunhill Row, EC1Y 8LZ	BC35						Small EA RoFSW High Risk Areas in west of site. Majority of site has no EA RoFSW flood risk.	N/A	Yes
Finsbury Business Centre, 40 Bowling Green Lane, EC1R 0NE	BC36							N/A	Yes

Triangle Estate, Goswell Road/Compton Street/Cyrus Street, EC1	BC37							N/A	Yes
Moorfields Eye Hospital, City Road, EC1V 2PD	BC38						Small Some EA RoFSW High Risk Areas in west of site. Majority of site has no EA RoFSW flood risk.	Development to include new public space and public realm improvements	Yes
Laser House, 132-140 Goswell Road, EC1V 7DY	BC39							N/A	Yes
The Pentagon, 48 Chiswell Street, EC1Y 4XX	BC40							N/A	Yes
Central Foundation School, 15 Cowper Street, 63-67 Tabernacle Street and 19 [Shoreditch County Court] & 21-23 Leonard Street, EC2	BC41							N/A	Yes
Site of electricity substation opposite 15-27 Gee Street and car park spaces at 90-98 Goswell Road, EC1	BC42							N/A	Yes
Easy Hotel, 80-86 Old Street, EC1V 9AZ	BC43							N/A	Yes
108 Aldersgate Street, EC1A 4JN	BC44							N/A	Yes
27 Goswell Road, EC1M 7AJ	BC45							N/A	Yes
City, University of London, 10 Northampton Square, EC1V 0HB	BC46						Half of site in CDA. Includes small EA RoFSW High Risk Areas. Majority of site has no EA RoFSW flood risk.	N/A	Yes
Braithwaite House and Quaker Court, Bunhill Row, EC1Y 8NE	BC47						Includes small EA RoFSW High Risk Area. Majority of	Development may include landscape improvements.	Yes

							site has no EA RoFSW flood risk.		
Castle House, 37-45 Paul Street, EC2A 4JU	BC48							N/A	Yes
Building adjacent to railway line and opposite 18-20 Farringdon Lane, EC1R	BC49							N/A	Yes
Queen Mary University, Charterhouse Square Campus, EC1M 6BQ	BC50						Majority of site in CDA.  Includes small EA RoFSW High Risk Area. Majority of site has no EA RoFSW flood risk.	N/A	Yes
Italia Conti School, 23 Goswell Road, EC1M 7AJ	BC51							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 will ensure that any surface water flood risk to the development on the allocated sites 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 Guidance<sup>4</sup>, 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

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<sup>4</sup> Available from: <https://www.gov.uk/guidance/flood-risk-and-coastal-change#Table-2-Flood-Risk-Vulnerability-Classification>

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, a number 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, 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.



# Appendix 3b: Flood Risk update

This provides an updated flood risk sequential test for new sites proposed to be allocated in the modifications to the Local Plan from the modifications as consulted on in May 2022 and presented in the IIA addendum May 2022. This is an update to the flood risk analysis in appendix 3 of the regulation 19 interim IIA September 2019.

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).

**Table 1: Updated flood risk sequential test for new sites proposed to be allocated**

Site name/address	Reference number	Site located in a SWMP Critical Drainage Area (CDA)	Site located in a SWMP Local Flood Risk Zone (LFRZ)	Site includes EA RoFSW High Risk Area - 1 in 30 year (3.3% annual probability)	Site includes EA RoFSW Medium Risk Area- 1 in 100 year (1% annual probability)	Site includes EA RoFSW Low Risk Area- 1 in 1000 year (0.1% annual probability)	Additional Notes	Opportunities for flood risk management/mitigation where site includes EA RoFSW High Risk Areas	Is the level of flood risk acceptable?
Bemerton Estate South	KC8						Small area of the site includes EA	N/A	Yes

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?
							RoFSW Medium Risk Area, with the majority of the site having no EA RoFSW flood risk. Eastern boundary adjacent to RoFSW High Risk Area and LFRZ.		
York Way Estate	OIS27							N/A	Yes
Barnsbury Estate	OIS28						Some EA RoFSW High and Medium Risk Areas concentrated in western quarter of site. Majority of site has no EA RoFSW flood risk. Western part of site is located in a LFRZ.	Development to include open space and landscape improvements, and to maximise urban greening.	Yes

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?
Highbury Quadrant Congregational Church	OIS29							N/A	Yes
Cluse Court	OIS30						Small area in the eastern part of the site includes EA RoFSW High Risk Area, with the majority of the site having no EA RoFSW flood risk.	Development to include landscape improvements and maximise urban greening.	Yes
Hillside Estate	OIS31						Small areas of the site include EA RoFSW High Risk Areas, with the majority of the site having no EA RoFSW flood risk.	Development to include landscape improvements and maximise urban greening.	Yes
New Orleans Estate	OIS32						Small areas of the site include EA RoFSW High Risk Areas,	Development to include landscape improvements and	Yes

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?
							with the majority of the site having no EA RoFSW flood risk.	maximise urban greening.	
Drakeley Court and Aubert Court	OIS33						Small area of the site include EA RoFSW High Risk Areas, with the majority of the site having no EA RoFSW flood risk.	Development to include landscape improvements and maximise urban greening, including creation of a new green square.	Yes
Kerridge Court	OIS34						Very small EA RoFSW Medium Risk Area on south eastern boundary of site, with the majority of the site having no EA RoFSW flood risk.	N/A	Yes

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?
Junction Road	GT2						The site does not include any areas of EA RoFSW flood risk. Northern boundary adjacent to RoFSW Medium Risk Area along railway line.	N/A	Yes

The above matrix demonstrates that the level of flood risk for each of the 10 new allocated sites is deemed to be acceptable following the application of the sequential test. 7 of the allocated sites are located within a CDA, but only 1 is located in a LFRZ. The location of a development within a CDA does not necessarily mean it is at higher risk from surface water flooding, but that it is within a catchment area which contributes to a flooding in a LFRZ. The assessment demonstrates that the majority of the 10 new sites include an EA Risk of Flooding from Surface Water (RoFSW) Low Risk Area, with 1 site including Low Risk Areas only (no Medium or High Risk Areas) and 2 sites including no EA RoFSW identified risk of surface water flooding at all. 2 sites include a Medium Risk Area with no High Risk Areas and 5 sites include a High Risk Area. Where the new sites include areas of EA RoFSW, there are only some areas of flood risk within the site, with the majority of each of these sites including no EA RoFSW flood risk at all. For 4 of the 5 sites that include EA RoFSW High Risk Areas, the high risk area only covers a small area of the site. Barnsbury Estate is the only new site that includes a larger EA RoFSW High Risk Area when compared to the other sites and is also located in a LFRZ. The high risk area is, however, concentrated in one part of the site, with the majority of the site having no EA RoFSW flood risk.

It is concluded that following the application of the sequential test to Islington's new site allocations, the council is satisfied that there are no alternative locations where the allocated sites can be located due to wider sustainable development objectives and constraints on development in the borough. The above matrix demonstrates that for all of the 10 new sites the flood risk to the majority of each site is low, and that where sites that do coincide with higher surface water flood risk, this risk only covers a small area and can be successfully managed using appropriate flood risk management and mitigation measures in accordance with the requirements set out in Appendix 8 of the Draft Regulation 19 IIA Interim Report, alongside the sequential approach to site layout. Further details explaining how the sequential test has been applied, and the use of appropriate flood risk management and mitigation measures, are set out in Appendix 8 of the Draft Regulation 19 IIA Interim Report.

# **Appendix 4a: Equalities Impact Assessment**

# Equalities Impact Assessment Islington Local Plan

September 2019





## Preliminary Information

**Date of Equalities Impact Assessment (EqIA):** September 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.

**Documents assessed:** Islington's Local Plan Proposed Submission (Regulation 19) - September 2019, comprising Strategic and Development Management Policies, Site Allocations and the Bunhill and Clerkenwell Area Action Plan

**Author(s) of Local Plan:** Islington's Planning Policy Team

**Status of the EqIA:** This EqIA assesses the Proposed Submission Local Plan (September 2019). Following Regulation 19 consultation, the Local Plan will be submitted for Examination. This EqIA will be kept under review with regard to any significant changes to the document required as a result of the Examination.

## Purpose of the Local Plan

1. 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.
  
2. 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**



3. 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>
4. We can only deliver on the Local Plan objectives 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.
5. 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.
6. 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.
7. 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

8. 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
9. 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 Development Management, Planning Enforcement, Public Realm (e.g. Greenspace), as well as Economic Development Projects and Transport, and Inclusive Economic Development.

## Consultation, key facts and findings

10. The process of developing the Local Plan is long, and we are now approaching the final stages. Community involvement plays an important role throughout 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)
11. The next stage of consultation is planned for autumn 2019, when the Regulation 19 consultation will take place, followed by submission to the Planning Inspectorate in late 2019, with a view to holding Examination hearings in spring 2020.
12. Given the wide ranging nature of the document, and the importance of different policy areas within it, it is important to engage different groups with protected characteristics to understand their perspectives.
13. At the borough-wide level and extensive database of contacts has been established, which includes a diverse range of broadly representative groups who have been consulted at various stages during the drafting of the Local Plan.
14. A consultation statement with the full details of consultation will be provided as part of the proposed submission documents in the forthcoming Regulation 19 consultation.
15. The following documents and activities have informed this EqIA, and 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. This project looked at how to make the borough a fairer place, seeking to address inequality of wealth, health, housing, education and crime in the borough. Reviews of progress towards implementation of the Fairness Commission findings continue to inform the corporate plan - 'Building a Fairer Islington' 2018-22 and the vision of the Council.
- Planning policy team members were active participants in the Fair Futures Commission, a Council project which explores what measures are needed to improve the futures of children, young people and their families in Islington. This involved 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 importance of public open space and the rights of young people to occupy it.
- The 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.
- The planning policy team held a Streetbook Surgery in October 2017 to discuss several proposed site allocations in terms of their contribution to the public realm. This included attendees from various council departments, who contributed to a broad discussion of each site, including impacts on inclusive design, and provision of playspace for young people.
- The planning policy team approached colleagues in Housing and Adult Social Services (HASS) department to obtain evidence/intelligence regarding 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.
- The 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.
- The 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.
- 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.eg. 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.

## Summarising the Local Plan approach

16. 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.
17. 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'. Seven key objectives are set out which collectively will help to deliver this vision.

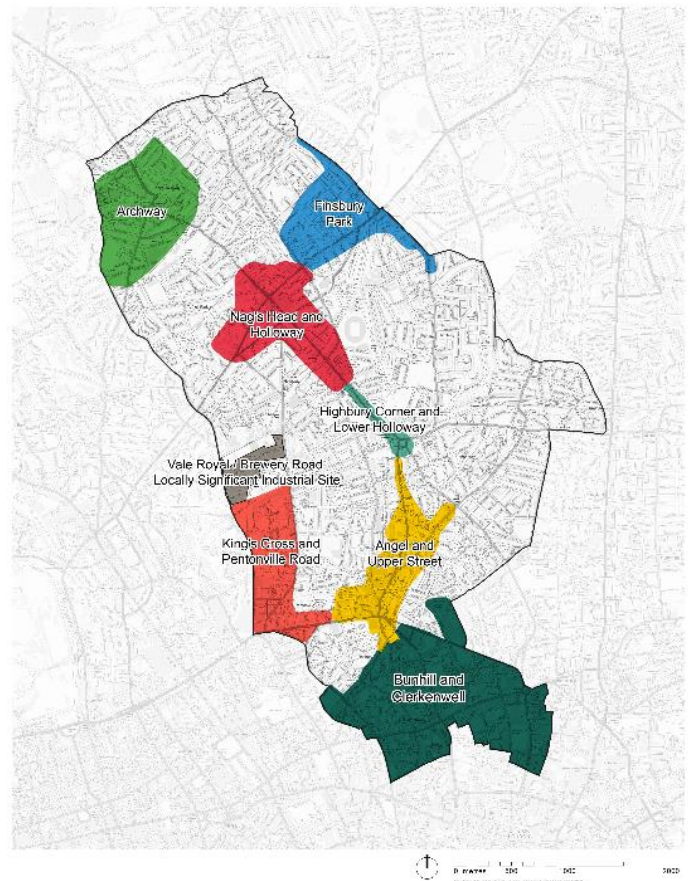
18. In terms of specific policies, to ensure that the vision and objectives of the Local Plan are realised, policy PLAN1 expects all development in Islington to, from the very first iteration of the proposal, reflect four key development principles:

- Contextual
- Connected
- Inclusive
- Sustainable

19. 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.

20. **Area Spatial Strategies (policies SP1-SP8)** set 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 and Lower Holloway



21. 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, for example by improving public spaces.

22. **Thriving Communities (policies H1 to H12 and SC1 to SC4)** sets out how Islington will deliver high quality 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, and in line with the London Plan all new housing must be provided to a basic standard of visitability and adaptability, with 10% built to wheelchair accessible standards.

23. **Inclusive Economy (policies B1 to B5 and R1 to R12)** sets out how Islington can create a more inclusive economy including protecting business floorspace and maximising new business floorspace, to meet demand for new jobs, as well as provision of affordable workspaces and encouraging training opportunities. Retail policies support the continued vitality and viability of town centres and the protection and enhancement of the culture and night time economy.
24. **Green Infrastructure (policies G1 to G2)** set out how we will preserve and enhance provision of green infrastructure for existing and future communities which will likely have a number of benefits, including on biodiversity and on the health and wellbeing of the population by encouraging people to participate in more active travel, sport and recreation in the borough.
25. **Sustainable Design (policies S1 to S10)** 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.
26. **Public Realm and Transport (policies T1 to T5)** sets out the elements for a coherent and inclusive public realm in order to encourage the role of streets as places, identifying the movement priorities, and parking and cycle parking standards (including particular considerations of the needs of disabled pedestrians, cyclists and drivers).
27. **Design and Heritage (policies DH1 to DH8)** supports innovative approaches to development capacity to meet identified needs whilst addressing adverse impacts on the historic environment and protecting and enhancing the unique character of the borough. This section also sets out the approach to building heights and basement development.
28. **Strategic Infrastructure (policies ST1 to ST4)** sets out the approach to identifying and delivering infrastructure required to support growth over the plan period.
29. **The Bunhill and Clerkenwell Area Action Plan (AAP)** sets out specific policies and spatial strategies (policies BC1 to BC8) for the south of the borough.
30. **The Site Allocations and the Bunhill and Clerkenwell AAP** identify 157 site allocations, locations where development is expected to come forward over the plan period. These allocations include various housing and employment sites.

## Methodology

31. This EqIA takes a three stage approach to assess the main potential impacts of Local Plan policies 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
  - Gender reassignment
  - Marriage and civil partnership
  - Pregnancy and maternity
  - Race
  - Religion or belief
  - Sex
  - Sexual orientation
32. The Council is also committed to considering socio-economic equality in Islington, when making decisions about how it exercises its functions, therefore this factor will also be considered as part of the assessment.
33. 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.
34. The assessment has been undertaken by Local Plan policy sections, considering the categories of protected characteristic and highlighting potential impacts.. 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.
35. 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 20185 with some supplemental information taken from the Baseline Information set out in section 3 of the IIA.

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<sup>5</sup> <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 is the 13th most deprived borough in the country, which is an improvement on earlier versions of the IMD.

## 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.<sup>11</sup>
- 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

## 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%), compared 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.

## Sex

- 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).
- The general fertility rate for the borough, meaning the number of live births per 1,000 women aged 15-44, was 42.5. This was lower than the average figures for London (60.1) and England (59.2). The total fertility rate for Islington in 2018, meaning the number of children a woman is likely to have based on the age-specific average of the calendar year in question, was 1.2. Again, this was

lower than the averages for London (1.63 children) and England (1.7 children). 2,793 babies were born in Islington in 2018.

- 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

- 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 LGBT 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.
- 145 same-sex marriages and 34 civil partnerships took place in Islington in 2016 (the most recent year statistics for both are available). This was very similar to the figures for 2015 (146 same-sex marriages and 29 civil partnerships). 2015 is the first full year statistics on same-sex marriage are available following its legalisation in England and Wales in 2014.

## 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 or belief / marriage

- 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.

## Socio-economic

- Poverty is an issue in every part of Islington: there is a neighbourhood in every ward in Islington that is among the poorest 20% of neighbourhoods in England.
- As of 2015, the 5 most deprived wards in the borough were (in order of most to least deprived): Finsbury Park, Caledonian, Tollington, Holloway and Hillrise.
- 21.7% of the Islington population are living in income deprived households and 17.8% of all Islington households are workless.
- In 2018, 6.4% of Islington's working age population had no qualifications, which is lower than the average rate for London (6.6%) and Great Britain (7.8%).
- 67.1% of the working age population was educated to degree/NVQ4 level or above, significantly higher than the average for London (53.1%) and Great Britain (39.3%).
- Median gross annual pay for a full-time worker resident in Islington in 2018 was £37,271. This is 23% above the London median annual pay of £30,311.
- In 2017 the borough had approximately 221,000 jobs, 79.2% of which were full-time. This is significantly above the averages for London (73%) and Great Britain (67.5%).
- Islington had 18,780 enterprises in 2018, the majority of which (88.2%) were micro enterprises (0 to 9 employees). This is slightly below the average for London (90.6%) and the borough has slightly higher percentages of medium (50-249 employees) and large (250+ employees) enterprises, 2% and 0.5% respectively, than the London averages of 1.5% and 0.4%.
- In 2018, the average lower-quartile monthly rent for a two-bedroom home in Islington was the fourth highest in London. Rent accounted for 70% of lower-quartile monthly gross earnings.
- The average price of a property in Islington was £615,783 in June 2019, compared to £466,824 for London and £246,728 for England. The ratio of median house price to median gross annual earnings was 13 in Islington in 2018. This was similar to the figure for London (12.82) but significantly above the ratio for England (7.70)

## Local Plan Equalities Impact Assessment

**Table 1: Area Spatial Strategies, set out in Strategic and Development Management Policies, policies SP1 to SP8; and Bunhill and Clerkenwell Area Action Plan policies BC3 to BC8**

Does the Local Plan have a positive or negative impact on groups with protected characteristics?	How will the policies in this section impact and which groups with protected characteristics will it effect?
<p>General permeability and access improvements will benefit 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.</p> <p>Safety improvements to the public realm benefit everyone including those with mobility, sensory and or cognitive impairments which will be positive for those with disabilities but will also benefit the young</p>	<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 as part of the IIA.</p> <p>One of the specific features of the spatial strategies is identifying specific built environment improvements such as BC3 in the BCAAP which identifies the Old Street roundabout and related public realm improvement work and SP8 which identifies the ongoing transformation at Highbury Corner. These 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. Also SP7 identifies specific accessibility improvements at entrance level to Archway station as well as more general public realm and road safety improvements.</p> <p>More generally some of the spatial policies support development improvements which enhance permeability across these areas and public realm enhancements with the aim to facilitate ease of movement. These sort of enhancements 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.</p> <p>Policy in Strategic and DM policies identifies various positive improvements. SP2 Kings Cross encourages 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</p>

**Does the Local Plan have a positive or negative impact on groups with protected characteristics?**

**How will the policies in this section impact and which groups with protected characteristics will it effect?**

and old, women and mothers.

Maintaining the retail function of town centres and local centres will particularly help to cater for the needs of older people, children and young people, disabled residents, pregnant women/mothers of very young children.

Promoting cultural centres in accessible locations will help provide facilities which helps benefit those less able to access such as disabled and older people. In addition maintaining a variety of cultural spaces is important for all groups because these provide meeting venues/ night

groups. SP3 identifies the lack of north south pedestrian and vehicle routes in Vale Royal and would like to see new routes opened up. This will help accessibility generally and may also benefit those with mobility, sensory and or cognitive impairments and will be positive for those with disabilities who need to access the area. Both SP4 for Angel and SP6 for Finsbury Park identify the importance of contribution to the creation of a high quality environment that is accessible to all residents, employees and visitors which is again positive for protected groups. SP4 also seeks to reduce the dominance of through traffic along Upper Street. SP5 for Nags Head identifies safety improvements at three road junction crossings and if feasible the removal of the gyratory system. SP6 identifies access improvements to the retail areas of Fonthill Road and Finsbury Park. SP7 for Archway identifies safety improvements along Junction Road.

Policy BC7 identifies the redevelopment of Finsbury Leisure Centre which will deliver improved sporting facilities which will benefit local people and encourage more sporting activity and 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 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.

The importance of maintaining the retail function of town centres is identified across the town centres SP4: Angel and Upper Street SP5 Nag’s Head SP6 Finsbury Park and SP7 Archway and SP2 for Kings Cross recognising the need to continue to provide important services for local communities. This will particularly help to cater for the needs of older people, children and young people, disabled residents, pregnant women/mothers of very young children. Town centres 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. Protecting markets will also have similar positive impacts and several policies recognise the importance of specific markets that fall within particular SS areas. Local markets 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

**Does the Local Plan have a positive or negative impact on groups with protected characteristics?**

**How will the policies in this section impact and which groups with protected characteristics will it effect?**

time venues for everybody including groups with protected.

Supporting economic growth will have a beneficial impact on those on low incomes including various groups with protected characteristics and it may help to address inequalities.

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. Finally markets also tend to employ people on low incomes and BAME groups.

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. SP4 Angel also has similar positive effects as it designates the town centre a cultural quarter and SP6 Finsbury Park recognises the importance of music venues and community based cultural and entertainment offer in this town centre.

Various spatial strategies will have a positive impact on economic growth by promoting areas as locations for development including office space. 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.



**Table 2: Thriving Communities, set out in Strategic and Development Management Policies, policies H1 to H12 and SC1 to SC4**

Does the Local Plan have a positive or negative impact on groups with protected characteristics?	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> <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</p>	<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 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 let at a premium compared to traditional private rented accommodation so is considered to have negative socio-economic impacts, so on balance 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 – such as ‘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– the Local Plan is more supportive of this form of HMO (pending criteria being met).. Overall the restrictive policy approach is considered more likely neutral/slightly positive 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 people and those with disabilities who are more likely to be 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 housing, especially homes rented at significantly below market rates. It could therefore provide increased and improved housing opportunities for those on low incomes which will have a positive effect on these protected groups.</p>

Does the Local Plan have a positive or negative impact on groups with protected characteristics?	How will the policies in this section impact and which groups with protected characteristics will it effect?
<p>also benefit from access improvements including parents/carers and older people.</p> <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>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 through applying space standards and other standards such as minimum 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 to live independently and more easily, but also older residents and those who develop a disability, illness or injury. Given the prevalence of some forms of disability (identified in the baseline to be 13% of the Islington population in 2017), achieving the required 10% wheelchair user standard will lead to a positive impact on this group. Policy H4 also seeks 10% of hotel bedrooms, and 10% of student housing and large scale HMOs in new developments to be wheelchair accessible. This will be particularly beneficial for disabled people, provided that disabled people can access these forms of specialist 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 from minimum 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 'visitability' and adaptability that is reasonably achievable within an existing structure and this is considered to mitigate the issues as far as is reasonable.</p>

Does the Local Plan have a positive or negative impact on groups with protected characteristics?	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>Policy H5: Private outdoor space includes a requirement for 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 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 the needs of older people will be primarily met through the delivery of conventional housing. The policy recognises the potential local need for affordable extra care housing, which is a positive impact, given the baseline evidence that 36% of Islington’s 60+ population are living in income deprived households. A high proportion of older people live in social rented housing therefore ensuring that this housing stock can meet the needs of older residents, in particular access needs, will be important to create a positive impact. The impact on some older people who can self-fund their own care needs is considered neutral; such individuals may experience a minor negative impact due to potential for less specialist provision, but the policy does not entirely preclude such accommodation and such individuals will be better placed to fund adaptations to their existing homes than residents who need affordable extra care.</p> <p>Student accommodation developments are required to provide funding for bursaries for students leaving council care and other Islington students facing hardship. This could have a positive impact on young people in low income households in particular.</p> <p>Gypsy and Travellers are a protected ethnicity and policy H12: Gypsies and Travellers aims to provide accommodation to meet identified need from this group. Evidence has identified a need and the Council will seek to identify site(s) to meet that defined need either through the Councils ongoing house building programme and/or through a potential review of the Site Allocations document, and/or working sub-regionally with the GLA and other boroughs. 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</p>

Does the Local Plan have a positive or negative impact on groups with protected characteristics?	How will the policies in this section impact and which groups with protected characteristics will it effect?
	<p>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 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. The policy allows for rationalisation of public sector social facilities provided they have considered the needs 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 to provide design and space standards which meet the needs of intended occupants; this will benefit all groups but particularly those disabled, young and old.</p> <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 (in England male life expectancy is 79.5 years and female life expectancy is 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 (based on average life expectancy measured against local deprivation decile between 2013-15) and this has remained stable in recent years, whereas inequality in life expectancy for men has been rising over the last 5 years,. Providing social infrastructure which benefits both groups is important but will particularly benefit women more than men given life expectancy for women is longer. Access to facilities is an important aspect of lessening social and economic inequalities.</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</p>

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**How will the policies in this section impact and which groups with protected characteristics will it effect?**

disabled people, their families and friends. Provision of accessible toilets can also benefit other groups with protected characteristics such as gender reassigned.

The Local Plan 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.

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.

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.

**Table 3: Inclusive Economy, set out in Strategic and Development Management Policies, policies B1 to B5 and R1 to R12; and Bunhill and Clerkenwell Area Action Plan policies BC1 and BC2**

Does the Local Plan have a positive or negative impact on groups with protected characteristics?	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 with particular positive benefits for those protected groups who may be on low incomes.</p>	<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 do disabled people. Child poverty is closely linked to unemployment - just over a third (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, e.g. 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. There may be 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</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. 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</p>

**Does the Local Plan have a positive or negative impact on groups with protected characteristics?**

**How will the policies in this section impact and which groups with protected characteristics will it effect?**

impacts identified. Protecting cultural facilities will benefit many groups with protected characteristics, especially where it maintains venues where specific events occur, such as LGBTQI+ events

Bunhill and Clerkenwell AAP policy BC1 is likely to have a positive impact for all groups with protected characteristics with particular positive benefits for those protected groups who may be on low incomes.

Bunhill and Clerkenwell AAP policy BC2 Cultural policy is likely to be positive for groups.

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.

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 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, which is likely to have a positive impact for disabled people and parents with young children in particular.

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 and parents with young children. Town Centres are a focal point for socialising and support social interaction, they also support employment and training offering flexible entry level jobs for young and old people. Older people will also generally place value on retail which is convenient as they generally make fewer journeys, therefore policies R4: Local Shopping Areas and R5: Dispersed retail and leisure uses are important and will have a positive impact.

Policy R7: Markets and specialist shopping areas seeks to maintain and support the local markets which can be a source of affordable food as well as their vibrancy and range and variety of goods on offer. This is likely to be beneficial for people of all financial means but particularly people on lower incomes. In addition, markets and specialist shops can provide specialist food for BAME groups and religious groups, not just convenience produce but also comparison goods e.g. Fonthill Road

Does the Local Plan have a positive or negative impact on groups with protected characteristics?	How will the policies in this section impact and which groups with protected characteristics will it effect?
<p>Protecting cultural facilities will benefit many groups with protected characteristics where it maintains venues where specific events occur, such as LGBTQI+ event.</p>	<p>specialises in clothing. Finally markets and some specialist shopping areas can provide employment for 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 amenity impacts such as 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 has a positive impact for children and young people; 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 the CAZ or town centres and particularly promotes access via sustainable modes of transport which will disabled and older people. Cultural venues have come under development pressure in recent years with many closing. Protecting various cultural spaces such as pubs is important for a range of groups because these spaces provide meeting venues/ night time venues including for groups with protected characteristics such as those with gender reassignment characteristic, religious or BAME groups.</p> <p>BC1 will have positive effects for all groups. The Local Plan aims to deliver an inclusive economy. In line with the policy assessment of Policy B1 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.</p> <p>BAME groups for example have a 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</p>



**Does the Local Plan have a positive or negative impact on groups with protected characteristics?**

**How will the policies in this section impact and which groups with protected characteristics will it effect?**

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

BC2 supports the location of retail and leisure uses in commercial areas. It also supports cultural uses locating in cultural quarters. Supporting cultural uses will have positive effects, for example, by protecting and promoting various cultural spaces such as pubs which are important for a number of groups because these provide meeting venues/ night time venues. Cultural venues have come under development pressure in recent years with many closing and supporting their location in the CAZ will be important particularly given the high level of accessibility via sustainable modes of transport in this location.

**Table 4: Green Infrastructure, set out in Strategic and Development Management Policies, policies G1 to G5**

Does the Local Plan have a positive or negative impact on groups with protected characteristics?	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 groups with protected characteristics in particular disabled groups, older people and the young and children</p>	<p>The Local Plan takes 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 wellbeing; adapting to the impacts of climate change; 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 projected 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, the Local Plan policy affords strong protection for open space and seeks improvement of existing provision and the maximisation of further provision.</p> <p>Local Plan Policy G2: Protecting open space protects open space on housing estates. 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 must improve the quality of space which should enable access improvements which can benefit disabled people, and young and old people. Any loss has to ensure improvements are made and the space remains both functional and useable.</p> <p>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 people, helping improve their opportunity for health and wellbeing benefits.</p>

**Does the Local Plan have a positive or negative impact on groups with protected characteristics?**

**How will the policies in this section impact and which groups with protected characteristics will it effect?**

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.

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 to 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 SINC's for local communities, and recognises parts of Islington are deficient in terms of access to nature. The policy protects access to SINC's by refusing planning permissions for schemes that adversely impact designated SINC's.

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 can be beneficial for mental health across a number of protected groups. 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.

**Table 5: Sustainable Design, set out in Strategic and Development Management Policies, policies S1 to S10**

Does the Local Plan have a positive or negative impact on groups with protected characteristics?	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 groups with protected characteristics in particular the very young and old who are most at risk of the impacts of climate change</p>	<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 groups, particularly older people and the very young, who are likely to be more affected by its impacts such as hotter summers, colder winters and flooding. The Local Plan policies e.g. policy 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. A significant proportion of Islington’s buildings are older; therefore it will be important to work with partners and local communities to improve the environmental credentials, in particular energy efficiency, of existing (older) buildings. 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. 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> <p>Policy S7: Improving Air Quality expects development to mitigate or prevent adverse impacts on air quality; this will benefit those individuals who could be more susceptible to poorer air quality. 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</p>

**Does the Local Plan have a positive or negative impact on groups with protected characteristics?**

**How will the policies in this section impact and which groups with protected characteristics will it effect?**

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.

**Table 6: Public Realm and Transport, set out in Strategic and Development Management Policies, policies T1 to T5**

Does the Local Plan have a positive or negative impact on groups with protected characteristics?	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 particular benefits for old and young people and disabled groups with regards to accessibility.</p> <p>The only potential minor negative impact is on families with young children (particularly children with a disability) or the elderly who may need access to parking facilities close to dwellings; negative impacts may, wholly or partly, be balanced by the improvements to health as a result of less</p>	<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 which 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 parents with young children through improvements to pedestrian crossings/junctions which would improve safety, with a consistently designed street environment which is also a positive for older people. 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>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 e.g. people with disabilities including 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, for example through provision of 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 various improvements to stations, e.g. in the spatial strategy policies, noting that the Council will work with Transport for London to realise improvements. Accessibility improvements in policy T2: Sustainable Transport Choices will benefit disabled cyclists in particular through introduction of cycle parking standards which recognise the difference design needs for facilities for specialist bikes, such as those which cater for people with disabilities or young children. 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 women, the young and old, religious, BAME, disabled and gender reassigned.</p>

**Does the Local Plan have a positive or negative impact on groups with protected characteristics?**

**How will the policies in this section impact and which groups with protected characteristics will it effect?**

parking and therefore less cars

Policy T4: Public Realm will ensure that 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 but will also benefit the young and old, and parents. The policy also requires privately owned public spaces to provide management plans to detail how space can be utilised by a range of users, which potentially benefits all groups with protected characteristics where new private owned public realm is created.

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. This will be beneficial for those with disability in particular people with impaired or no vision who can find “shared space” schemes dangerous and difficult to navigate.. “Shared space” must deliver logical, legible, inclusive and safe environments, informed by a contextual appraisal.

Policy T3: Car-free development restricts car parking and the ability to access parking permits for all development. Accessible parking will be provided in accordance with the relevant standards, however the remainder will be car free. Accessible spaces will be prioritised 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, for who a car is the only option. Whilst this is beneficial in many aspects for other groups, for example by 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.

**Table 7: Design and Heritage, set out in Strategic and Development Management Policies, policies D1 to D8**

<p><b>Does the Local Plan have a positive or negative impact on groups with protected characteristics?</b></p>	<p><b>How will the policies in this section impact and which groups with protected characteristics will it effect?</b></p>
<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. There could also be minor negative impacts related to fuel poverty where conservation necessitates limiting sustainable design features.</p> <p>A restrictive approach is taken to the locations where tall buildings can in principle be sited. 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 equalities groups, e.g. the old and the young; however, the policy has criteria to assess proposals and if these 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: Basement development allows for basement development where proposals address specific criteria. Basements by their nature create negative impacts relating to accessibility, and given that they will often be retrofitted there is likely to be little scope for lifts. This means that there may be a negative impact on groups who experience access issues, particularly wheelchair users and the elderly. However, additional space created by basements can accommodate growing families and can promote inter-generational living, and can be more cost-effective than moving home; therefore, there may be positive benefits, particularly health and socio-economic benefits, for children, older people and parents. Overall, DH4 is considered to be neutral in terms of the impact of protected groups.</p>



**Does the Local Plan have a positive or negative impact on groups with protected characteristics?**

**How will the policies in this section impact and which groups with protected characteristics will it effect?**

Policy DH5: 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.

Policy DH7: Shopfronts will have a positive impact on all groups, but particularly for groups who experience access issues, as it requires provision of accessible and inclusive shopfronts

**Table 8: Strategic infrastructure, set out in Strategic and Development Management Policies, policies ST1 to ST4**

Does the Local Plan have a positive or negative impact on groups with protected characteristics?	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 as aims to provide the infrastructure necessary for growth</p>	<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, where necessary, review and update this to support the implementation of the Local Plan and any future Local Plan reviews.</p> <p>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> <p>Policy ST2: Waste recognises that development proposals should include waste recycling facilities which are accessible to all. This should benefit all residents but will be particularly beneficial for disabled and older people. Accessible recycling facilities will both enable and encourage people to recycle more having wider benefits on resource efficiency and the environment. The policy is cross referenced with policy H4 which details that residential development recycling facilities must be wheelchair accessible and located conveniently within the development, to encourage uptake of recycling.</p>

**Table 9: Site Allocations, including sites within the Bunhill and Clerkenwell Area Action Plan**

Does the Local Plan have a positive or negative impact on groups with protected characteristics?	How will the policies in this section impact and which groups with protected characteristics will it effect?
<p>Likely to be various positive impacts depending on the site allocations for all or some of the protected characteristic groups as allocations provide development which meet identified needs and reflects the policies set out in the Local Plan.</p> <p>Sites which deliver housing and affordable housing will benefit those on low incomes which are more likely to include groups with protected characteristics. They will also provide a proportion of accessible accommodation which will have a positive effect on disabled and others with mobility needs.</p> <p>Sites with permeability and access improvements will benefit those with mobility, sensory and or cognitive impairments such as those with disabilities but also the young and old, women and mothers.</p> <p>Sites which ensure a range of retail provision will particularly help meet</p>	<p>The EqIA considered the site allocations at a high level. Site allocations deliver Local Plan policies which have also been subject to EqIA although there are some specific benefits which 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. The EqIA consideration identified various positive effects of specific sites.</p> <p>Sites which are allocated for housing, in particular KC1: King’s Cross Triangle, NH1: Morrisons, NH7: Holloway Prison, FP1: City North, FP14: Andover Estate, ARCH5: Archway Campus and OIS24: Pentonville Prison, are likely to have a greater beneficial impact on those on low incomes who themselves are more likely to include groups with protected characteristics. This is because housing proposals must provide through affordable housing which is also of a high quality and in addition provides a proportion of accessible accommodation which will have a positive effect on disabled and others with mobility needs.</p> <p>Improvements to permeability where new pedestrian routes were identified as part of public realm improvements were considered particularly positive for sites AUS6: Sainsbury’s, NH7: Holloway Prison, FP1: City North Islington trading estate, OIS24: Pentonville Prison, BC25: Land adjacent to Mount Pleasant Sorting office and BC38: Moorfields eye hospital. Permeability improvements aim to facilitate ease of movement and are likely to lead to improvements in terms of access, safety and convenience of all groups 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, and parents.. In addition, various site allocations include requirements for active frontages which will help improve safety potentially benefiting all groups with protected characteristics.</p> <p>Sites which ensure delivery of employment floorspace, particularly business space, will contribute to delivering economic benefits to those on low incomes, which may include those with protected characteristics. Therefore, sites which deliver significant increases in quantity of such floorspace maybe lead to positive benefits; this includes BC38: Moorfields eye hospital and BC24: 20 Ropemaker Street.</p>

Does the Local Plan have a positive or negative impact on groups with protected characteristics?	How will the policies in this section impact and which groups with protected characteristics will it effect?
<p>the needs of older people, children and young people, disabled residents, pregnant women/mothers of very young children. Sites which protect cultural space are important for all groups as provide meeting venues/ night time venues for groups including those with protected characteristics such as those with gender reassignment characteristic, or religious or BAME groups.</p> <p>Sites which ensure delivery of employment floorspace will help contribute to delivering economic benefits to those on low incomes which may include those with protected characteristics.</p> <p>Changes and improvements to amenity spaces on Council estates as part of housing development on estates are considered positive in particular for young people, given the concentration of such groups living in this housing tenure.</p>	<p>Sites with a retail element help to improve the quantity of retail floorspace which will help to encourage a diverse range of shops across the borough. 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, and pregnant women/parents of very young children. Having a range of retail provision is likely to be beneficial for people of all financial means but particularly poorer people since it may increase the diversity of shops and therefore the goods on offer. In addition, markets and specialist shops can provide specialist food for BAME groups, and religious groups. Sites which have specific positive effects include AUS6: Sainsbury's, NH1: Morrisons supermarket and adjacent car park and FP1: City North Islington trading estate.</p> <p>There are various sites which protect or enhance cultural venues including AUS8: 161-169 Essex Road, NH3: 443-453 Holloway Road, ARCH3: Archway Central Methodist Hall and HC1: Highbury Corner. Protecting these various cultural spaces is important for all groups because these provide meeting venues/ night time venues for all groups with protected characteristics such as gender reassignment, religious or BAME groups.</p> <p>There are various council sites which are identified for housing development and will also have improvements to amenity space or playspace and public realm improvements, such as FP14: Andover Estate, OIS16: Harvist Estate car park and OIS18: Wedmore Estate car park. Amenity spaces, whilst not formally designated open space, are recognised as important spaces for 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. The site allocations which help improve these spaces will be positive and particularly relevant for groups with protected characteristics, in particular young people, given the concentration of such groups living in this housing tenure. Whilst a loss of open space on housing estates may be permitted, it is intended to improve the quality of space which should enable access improvements which can benefit disabled people, and young and old people.</p> <p>There is one specific site allocation which provides directly for groups with protected characteristics. AUS15: Windsor Street Car Park is allocated (and has planning permission) for the development of supported housing for people with learning disabilities.</p>

Does the Local Plan have a positive or negative impact on groups with protected characteristics?	How will the policies in this section impact and which groups with protected characteristics will it effect?
<p>Sites which protect and re-provide community space are considered positive and 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.</p>	<p>Various sites include re-provision of social infrastructure and are 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. This includes NH9: Islington Arts Factory, FP9: 221-223 Seven Sisters Road, OIS9: Ladbroke House and OIS23: 1 Lowther Road, which all include replacement or protection of social and community space. Site BC4: Finsbury Leisure Centre includes improvements to sports facilities which will have a positive impact on a number of groups including young people</p>

# Appendix 4b: EqIA Local Plan Modifications

## Islington Local Plan modifications – Equalities Impact Assessment update

A full equalities impact assessment was undertaken as part of the Regulation 19 IIA. The following provides an update to this specifically looking at the equalities implications of proposed modifications to the plan.

**Table 1: Area Spatial Strategies, set out in Strategic and Development Management Policies, policies SP1 to SP8; and Bunhill and Clerkenwell Area Action Plan policies BC3 to BC8**

Do the modifications have a positive or negative impact on groups with protected characteristics?	How will the modifications in this section impact and which groups with protected characteristics will it effect?
Modifications are likely to positively impact on groups with protected characteristics.	<p><b>Policies SP2 and BC4</b></p> <p>Modifications to SP2 (reference SD-MM-065) and BC4 (reference BC-MM-08) provide clarification on how proposals for moorings and facilities to support moorings should be approached in the context of identified needs and the canal as an open space. The modifications have the potential to improve boat dwellers’ safety, convenience and quality of life by improving their access to water, electricity and waste collection facilities and by improving air by reducing reliance on combustion heating. Modifications to SP2 seek to identify opportunities to meet the need of 7 permanent boat dwellers’ moorings by 2025. This change will benefit boat dwellers who may possess one or more protected characteristics; a 2016 survey of London boat dwellers conducted by the Canal and River Trust found 10% of</p>

Do the modifications have a positive or negative impact on groups with protected characteristics?	How will the modifications in this section impact and which groups with protected characteristics will it effect?
	<p>respondents reported a disability and 11% were from non-white backgrounds.<sup>6</sup> Better boater facilities also contribute to creating a cleaner and better-quality environment for pedestrians and cyclists, therefore benefitting many protected groups who walk, cycle or spend time beside the canal. The development of a waterspace strategy will help to provide a framework for different uses on the canal including leisure, recreational, education and training uses which could have wider benefits for local communities, including those with protected characteristics. The development of a strategy may help to identify where improvements to facilities - water, electricity and waste collection – can be made. However, the policy does not require improvements are made and so the extent of positive impacts will depend on implementation. This modification is cross-referenced by a modification in G2. The impacts of modifications of G2 for protected groups are considered in that section below.</p> <p><b>Policy SP3</b></p> <p>In the modification to SP3 Part A (reference SD-MM-08), the approach to securing new light industrial floorspace through planning conditions, responding to the introduction of Class E, will help to retain a range of employment opportunities which can help to benefit local people who may possess one or more protected characteristics. Islington’s 2016 Employment Study<sup>7</sup> highlights that land prices in the LSIS are much more affordable than in other parts of the borough, which provides a lower price threshold for enterprise space needed for new and emerging businesses. This can favour small to medium size businesses. The location of the</p>

<sup>6</sup> <https://canalrivertrust.org.uk/media/original/30901-whos-on-londons-boats-survey-summary-report.pdf>

<sup>7</sup> Islington 2016 Employment Study <https://www.islington.gov.uk/-/media/sharepoint-lists/public-records/planningandbuildingcontrol/publicity/publicconsultation/20192020/20190904bislingtonelsreportmay2016.pdf?la=en&hash=C3305DAEED480FD4B392393D31A69DDEFC1E0A51>

Do the modifications have a positive or negative impact on groups with protected characteristics?	How will the modifications in this section impact and which groups with protected characteristics will it effect?
	<p>LSIS in Inner London makes it an accessible employment area for local people, who can also access it by public transport. This is likely to have a positive impact on people who possess one or more protected characteristics, who may be on lower incomes; Black, Asian and Minority Ethnic backgrounds / communities, disabled people and pregnant women in particular are less likely to have access to private motorised transport.<sup>8</sup> It is worth noting that car ownership increases with household income, types of household and homes. People on lower incomes, lone parents and people who rent their properties are less likely to own a car.<sup>9</sup> In spite of these identified positive impacts, existing light industrial floorspace can be converted into other uses within Class E, which could lead to a reduction in the range of employment opportunities. Class E was introduced by the Government through legislation in September 2020 to amend and simplify the system of use classes in England and create one new broad ‘Commercial, business and service’ use class to allow for a mix of uses to reflect changing retail and business models. This could have negative impacts for local people, including those with protected characteristics as identified above, albeit this is uncertain and beyond the scope of the policy. The additional wording for SP3 Part C relating to co-location seeks to protect and intensify industrial functions. This promotes intensification for other types of jobs such as office jobs, providing employment options which could benefit low income or unemployed workers with or without additional protected characteristics.</p> <p><b>Policy SP5</b></p>

<sup>8</sup>Future of Transport -Equalities and access to opportunity. Department of Transport, 2020

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/937223/F13-Future-of-Transport-Equalities-access-to-opportunity-rapid-evidence-review-accessible.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/937223/F13-Future-of-Transport-Equalities-access-to-opportunity-rapid-evidence-review-accessible.pdf)

<sup>9</sup> <https://www.centreforlondon.org/reader/parking-kerbside-mangement/chapter-1/#car-ownership-in-london-has-changed-little-over-time>



Do the modifications have a positive or negative impact on groups with protected characteristics?	How will the modifications in this section impact and which groups with protected characteristics will it effect?
	<p>The proposed changes to SP5 (reference SD-MM-12) and Site Allocation NH1 (reference SA-MM-43) seek to balance the retention and enhancement of retail and employment floorspace and to emphasise the need to provide a significant amount of residential space on upper floors. This will help to provide additional housing including affordable housing to support meeting identified housing needs. Black, Asian and Minority Ethnic backgrounds / communities (with the exception of India/Pakistani and White Other households) as well as young and older people and those with disabilities are more likely to be on lower incomes and to be housed in social rented housing.<sup>10</sup> Providing increased and improved housing opportunities for those on low incomes is likely to have a positive effect on these protected groups. The provision of accessible accommodation will also have a positive effect on disabled people and people with mobility needs. Modifications to Part K seek to mitigate any adverse impacts on residents or businesses resulting from removal of the Seven Sisters Road, Isledon Road/Tollington Road gyratory system. Benefits of this could be felt by residents with protected characteristics and by local SME business owners. However, the specific impacts and mitigation measures are unclear at this stage and the extent of positive impacts will depend upon implementation.</p> <p><b>Policies SP2, SP4 and SP8</b></p> <p>Several of the spatial policy areas including SP2, SP4 and SP8 have had additional policy clauses added which address the future provision of residential uses in these areas. These</p>

<sup>10</sup> Islington State of Equalities Report, 2019 [https://www.islington.gov.uk/~/\\_media/sharepoint-lists/public-records/communications/information/adviceandinformation/20182019/20190131stateofequalitiesreport2019.pdf](https://www.islington.gov.uk/~/_media/sharepoint-lists/public-records/communications/information/adviceandinformation/20182019/20190131stateofequalitiesreport2019.pdf) , New Social Housing Lettings, UK Gov, 2018, <https://www.ethnicity-facts-figures.service.gov.uk/housing/social-housing/new-social-housing-lettings/latest#by-ethnicity-and-local-authority>, as identified in the original Regulation 19 EqIA

<p><b>Do the modifications have a positive or negative impact on groups with protected characteristics?</b></p>	<p><b>How will the modifications in this section impact and which groups with protected characteristics will it effect?</b></p>
	<p>additions provide a more positive policy framework for the provision of housing which, alongside other policies, can help to provide additional affordable housing. As identified in the Regulation 19 EqIA, this can have a number of positive effects for groups who possess one or more protected characteristics.</p> <p><b>Policy SP7</b></p> <p>Modification reference SD-MM-16 removes reference to Archway’s designation as a cultural quarter following Inspectors letter INS14. Cultural venues are important for all groups including groups with protected characteristics such as those with gender reassignment characteristic, or religious or Black, Asian and Minority Ethnic backgrounds / communities because they provide meeting venues/ night time venues for everybody. There will be reduced policy support for cultural provision in Archway. However, that is not to say cultural uses will not be supported in Archway. R10 still provides a framework for such development, promoting such uses within town centres which are accessible and SC1 still seeks to protect existing cultural uses. Therefore, the effect of this modification is uncertain.</p> <p><b>Policy BC7</b></p> <p>The modifications to BC7 (reference BC-MM-13) policy moved from supporting text into the policy box relates to design, scale, definition of space, public realm, and pedestrian and cycle connections and so is not considered to have additional impacts. The clarification in relation to Finsbury Leisure Centre and social infrastructure is not considered to effect the positive impacts previously identified in relation to improved sporting and social facilities supporting</p>

Do the modifications have a positive or negative impact on groups with protected characteristics?	How will the modifications in this section impact and which groups with protected characteristics will it effect?
	<p>physical and mental health and wellbeing and helping to encourage community cohesion for all groups.<sup>11</sup></p> <p><b>Policy BC8</b></p> <p>The modification to BC8 (BC-MM-15) clarifies the approach to commercial development and removes the requirement for it to be limited in scale and provides clarity about the protection of existing employment uses. This provides a clearer and more positive framework for employment uses in the spatial strategy area alongside other policies which could have positive effects in relation to employment opportunities including for those with protected characteristics. The new text in relation to the provision of additional public space, public realm and street improvements, through providing a clearer more positive policy framework also has the potential to have positive impacts depending on implementation. As identified in the Regulation 19 EqIA, the increased access to open space can benefit all local residents including groups with protected characteristics; particularly disabled groups and young people, helping to increase opportunities to access health and wellbeing benefits. Improved conditions for walking and cycling can also have physical and mental health benefits which can have positive impacts for people with protected characteristics.</p> <p>Other modifications were identified to have no specific impacts.</p>

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<sup>11</sup> Regulation 19 EqIA 4.67

<p><b>Do the modifications have a positive or negative impact on groups with protected characteristics?</b></p>	<p><b>How will the modifications in this section impact and which groups with protected characteristics will it effect?</b></p>
	<p>Overall the spatial policies of the local plan are still considered to have positive effects as identified in the Regulation 19 EQIA.</p>

**Table 2: Thriving Communities, set out in Strategic and Development Management Policies, policies H1 to H12 and SC1 to SC4**

<p><b>Do the modifications have a positive or negative impact on groups with protected characteristics?</b></p>	<p><b>How will the modifications in this section impact and which groups with protected characteristics will it effect?</b></p>
<p>Modifications likely to positively impact on groups with protected characteristics.</p>	<p><b>Policy H4</b></p> <p>The Regulation 19 EqIA considered that achieving the required 10% wheelchair user standard will lead to a positive effect for people who are disabled. However, this positive impact could be slightly reduced as a result of the changes made to H4 B following Inspector’s letter INS14. Modifications (reference SD-MM-23) to this policy could result in fewer market homes being ready for immediate occupancy by wheelchair users’, potentially affecting disabled people in urgent need of market wheelchair accessible units. This will not affect low-income wheelchair users with a need for social rented wheelchair accessible housing, who will still be provided with M4(3)(2)(b) units. The effects of this change is however considered to be uncertain as identified in the IIA screening. Further requirements for wheelchair user dwellings have been removed following receipt of INS14; wheelchair user dwellings are no longer required to be located on the ground floor, or where they are provided above or below entrance level, to be served by two lifts at a convenient distance from front doors. This change could negatively impact wheelchair users if the sole lift they rely on is found to be out of service, resulting in them being unable to leave or enter their dwelling until repairs are made. However, the policy will still lead to the</p>

Do the modifications have a positive or negative impact on groups with protected characteristics?	How will the modifications in this section impact and which groups with protected characteristics will it effect?
	<p>development of wheelchair accessible dwellings which will have a positive effect on people who are disabled.</p> <p><b>Policy H6</b></p> <p>H6 was found, in the round, to have a positive effect on people with protected characteristics in the IIA, requiring a proportion of student bedspaces to be adaptable for wheelchair users. The modification to H6- part B (ii) (reference SD-MM-24) following Inspector’s letter INS14 reduces the percentage of bedspaces required for purpose-built student accommodation from 10% to 5% and removes the requirement for the bedspaces to be accessible from the outset. If disabled students require accommodation, they may experience delays before they can move in, especially if rooms need extensive adaptation. Whilst this could cause a minor short term negative effect, it is not considered to change the policy’s overall positive impact.</p> <p>The requirement for accessible bedspaces to adhere to best practice guidance, and to be served by two lifts if located above the ground floor has also been removed. This means that regular space standards will be applied, and design details that would make the accommodation easier to live in for disabled people will not be specifically supported by policy. This could mean that if a lift malfunctions, a disabled student may find themselves trapped either inside or outside of their room, or not able to enter their accommodation with ease and dignity. These changes may have a negative impact on disabled students, resulting in less choice of wheelchair accessible accommodation, ready from the outset, and available close to their university which could serve as an additional barrier to higher education for disabled students who already experience significant barriers to education due to greater living costs.<sup>12</sup></p>

<sup>12</sup> SD26 Specialist Housing Topic Paper 4.56

Do the modifications have a positive or negative impact on groups with protected characteristics?	How will the modifications in this section impact and which groups with protected characteristics will it effect?
	<p>The modification to H6 Part B (iii) removes the provision of student bursaries (requested in Inspectors letter LBI INS14) which would have provided financial support to Islington care-leavers and Islington students facing hardship to attend further or higher education. This policy provision could equally impact people with protected characteristics or not. The policy was previously identified as having a positive impact on young people and low income households in particular. The removal of this policy clause will therefore have a negative effect for those who might have otherwise have benefited from the provision of bursaries.</p> <p>Despite the effects of the modifications considered above the policy is still considered to have overall positive impacts on students who possess one or more protected characteristics, including young people and disabled students.</p> <p><b>Policy H7- Meeting the needs of vulnerable older people</b></p> <p>The amendments (reference SD-MM-25) reflect a more permissive approach allowing a strategic element of need (the London Plan benchmark) to be considered which could lead to more older people’s housing proposals coming forward. This would have benefits for some older people, including those who can self-fund their care needs in the borough as well as older people outside of the borough, in providing more specialist accommodation. However, there is also a recognition that specialist accommodation can also be less flexible/adaptable.</p> <p><b>Policy H10</b></p> <p>Modifications to H10 (reference SD-MM-26) have reduced the proportion of wheelchair accessible HMO bedspaces from 10% to 5%. Similar to the changes to H6 B (ii), the</p>

<p><b>Do the modifications have a positive or negative impact on groups with protected characteristics?</b></p>	<p><b>How will the modifications in this section impact and which groups with protected characteristics will it effect?</b></p>
	<p>modification removes requirements for these bedspaces to be delivered according to best practice guidance, to be accessible from the outset, and for rooms above ground level to be served by two lifts. These features will serve to make this type of accommodation less accessible to disabled people. However, overall the policy will still have a positive effect on disabled people who require HMO accommodation.</p> <p><b>Policy H12</b></p> <p>As identified in the Regulation 19 EqIA, Gypsy and Travellers are a protected ethnicity and H12: Gypsies and Travellers aims to provide accommodation to meet identified need for this group. Evidence has identified a need and the Council will seek to identify site(s) to meet that defined need. 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 the need for Gypsy and Traveller accommodation.</p> <p>The modifications to H12 (reference SD-MM-28) and the supporting text respond to the deletion of the London Plan definition of Gypsies and Travellers and reflect the Government’s definition. Islington has given consideration to how differing definitions of this protected ethnic group influence the identified accommodation need (Council’s Gypsy and Traveller Accommodation Assessment (2019)). The proposed modifications retain the commitment to meeting identified need. However, the change to the level of need now reflects the amended London Plan definition.</p>

Do the modifications have a positive or negative impact on groups with protected characteristics?	How will the modifications in this section impact and which groups with protected characteristics will it effect?
	<p>The planning and delivery of new pitches may result in a reduction in social exclusion, and promote equality, fairness and respect for some Gypsies and Travellers. Providing for pitches based on the government’s definition is now proposed. This will lead to the delivery of a lower number of pitches (6 rather than 10). The provision of pitches in line with the government’s definition has the potential to reduce the overall positive impact, but is still considered to have a positive effect overall. The Local Plan, whilst recognising the challenges in meeting identified need due to the circumstances of the borough, has identified three sites in the Local Plan. This will be the first time that pitches have been identified and planned for in the borough. The change to Part A and the replacement of wording from <i>exploring</i> to <i>allocation</i> of sites has amended the mechanism to achieve meeting need which provides more certainty about how need will be met.</p> <p>The modification relating to windfall sites that come forward during the plan period, adds additional clarification that proposed sites must provide a high quality of housing consistent with relevant aspects of policy H4, reiterating the important requirement of high-quality housing for the Gypsy and Traveller community. Additions to paragraph 3.150 emphasise that amenity blocks must meet accessibility standards and a good level of privacy is to be maintained. This detail will promote high accessibility standards for members of the Gypsy and Traveller community, especially for those who possess a disability.</p> <p><b>Policy SC1</b></p> <p>SC1 new criterion C (reference SD-MM-29) proposes to secure necessary social and community infrastructure at planning stage. Securing social and community infrastructure services and facilities is generally considered to have a positive impact on all groups in terms of</p>



Do the modifications have a positive or negative impact on groups with protected characteristics?	How will the modifications in this section impact and which groups with protected characteristics will it effect?
	<p>supporting physical and mental health and wellbeing and helping to encourage community cohesion. As stated in the Regulation 19 Equality Impact Assessment for SC1, this infrastructure is likely to have a positive impact on disabled people and older people, particularly older women, who live longer but spend more years living with a disability, as these groups rely more on health services. Positive impacts are also especially likely to be felt by some specific Black, Asian and Minority Ethnic backgrounds / communities who are more likely to experience poor health.<sup>13</sup> Community infrastructure also supports children, older people, and families and can also offer support to people who possess one or more protected characteristics relating to religion, race, gender reassignment, sex and sexual orientation. In spite of this positive impact, it is worth noting that the introduction of Class E has potential impacts in terms of loss of certain social infrastructure which the policy can no longer affect. The introduction of Class E has curtailed the ability of the policy to safeguard existing social and community infrastructure facilities that fall within Class E, such as nurseries, day centres, medical and health services and indoor sports facilities. This could both help to increase access to facilities by increasing opportunities for healthcare facilities, as well as leisure and indoor recreation uses such as gyms but could also decrease access to facilities by not protecting these facilities against change of use to higher value uses. Whilst these wider impacts are considered uncertain, the update to the policy will help to ensure that potential impacts can be mitigated through the planning system as far as possible.</p> <p><b>Policy SC2</b></p> <p>Updated text to policy SC2 (reference SD-MM-30) clarifies that replacement play space should be secured and where on-site play is provided, details of management and maintenance will be</p>

<sup>13</sup> <https://www.gov.uk/government/publications/the-report-of-the-commission-on-race-and-ethnic-disparities/health>

<p><b>Do the modifications have a positive or negative impact on groups with protected characteristics?</b></p>	<p><b>How will the modifications in this section impact and which groups with protected characteristics will it effect?</b></p>
	<p>secured by condition. Whilst these modifications will assist with the implementation of the policy and the benefits this can provide, they are not considered to change the positive impacts already identified for children and young people.</p> <p><b>Policy SC3</b></p> <p>The updated text to policy SC3 (reference SD-MM-31) clarifies that HIAs, where required, should be secured by condition at planning stage and that where specific measures are required to mitigate a health impact or enhance health benefits these will be secured through a legal agreement/condition. Whilst these changes will help with the implementation of the policy, no specific equalities impacts have been identified.</p> <p><b>Policy SC4</b></p> <p>The deletion of Policy SC4 (Social Value) is considered to have no specific impacts. 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.</p> <p>Other modifications were identified as have no specific impacts.</p> <p>The Regulation 19 EqIA concluded that the Local Plan Thriving Communities policies are likely to have an overall positive impact for groups with protected characteristics with particular positive benefits for those protected groups who may be on low incomes. This continues to be the case.</p>

<p><b>Do the modifications have a positive or negative impact on groups with protected characteristics?</b></p>	<p><b>How will the modifications in this section impact and which groups with protected characteristics will it effect?</b></p>

**Table 3: Inclusive Economy, set out in Strategic and Development Management Policies, policies B1 to B5 and R1 to R12; and Bunhill and Clerkenwell Area Action Plan policies BC1 and BC2**

<p><b>Do the modifications have a positive or negative impact on groups with protected characteristics?</b></p>	<p><b>How will the modifications in this section impact and which groups with protected characteristics will it effect?</b></p>
<p>There are likely to be various positive impacts on groups with protected characteristics.</p>	<p><b>Policy B1</b></p> <p>The amendment to B1, part E (reference SD-MM-33) clarifies the approach to Locally Significant Industrial Sites within the context of the changes to the use class order, their continued protection and encouragement for their renewal, modernisation and intensification. However, the changes are clarifications and updates will not change the overall positive benefits previously identified in the EqIA.</p> <p><b>Policy B2</b></p>

Do the modifications have a positive or negative impact on groups with protected characteristics?	How will the modifications in this section impact and which groups with protected characteristics will it effect?
	<p>B2 Part A and supporting text modifications relating to the use of planning conditions to secure employment activities in the right locations could have a positive impact on lower income communities who might suffer from unemployment or job insecurity. The change to part C (SD-MM-34) and additional wording relating to co-location seeks to protect and intensify industrial functions whilst also providing intensification for other types of jobs such as office jobs. Provision of a diversity of job opportunities can help to secure a range of employment provision for employed and unemployed Islington residents, including people with protected characteristics. This could especially benefit Black, Asian and Minority Ethnic backgrounds / communities for example, as a greater proportion of people from these backgrounds have no qualifications and face barriers to employment when compared to people from white British backgrounds<sup>14</sup>. This policy could also benefit children living in poverty as child poverty is also closely linked to unemployment.</p> <p>It should however be recognised that beyond the new policies, Class E, whilst providing flexibility, also limits the Council’s ability to protect employment space in the right locations. Existing business floorspace can be converted into other uses within Class E, which could lead to a reduction of business floorspace in the borough’s employment locations potentially reducing employment opportunities for protected groups. Class E was introduced by the Government through legislation in September 2020 to amend and simplify the system of use classes in England and create one new broad ‘Commercial, business and service’ use class to allow for a mix of uses to reflect changing retail and business models. Whilst these wider</p>

<sup>14</sup> <https://data.london.gov.uk/economic-fairness/> Data available in the ‘labour market’ and ‘equal opportunities’ sections.

<p><b>Do the modifications have a positive or negative impact on groups with protected characteristics?</b></p>	<p><b>How will the modifications in this section impact and which groups with protected characteristics will it effect?</b></p>
	<p>impacts are considered uncertain, the update to the policy will help to ensure that potential impacts can be mitigated through the planning system as far as possible.</p> <p>The modification to policy B2, part D and associated supporting text require developments to mitigate air quality impacts in Locally Significant Industrial Sites (LSISs). As stated in the Islington Air Quality Strategy (2019)<sup>5</sup> disabled people, children, older people and those on lower incomes are more likely to suffer from the negative impacts of air pollution. The policy, alongside other policies in the plan which address air quality can therefore help to have a positive effect on people who possess one or more of these protected characteristics.</p> <p><b>Policy B3</b></p> <p>Changes to B3 (reference SD-MM-36) and the various amendments to Parts B and D are not considered to significantly change the policy requirements which seek to protect business uses. As set out in the Regulation 19 EqIA, the policies seek to protect a range of different businesses on sites across the borough including industrial. All of this will help to ensure a range of employment provision for Islington residents, including lower skilled residents.</p> <p><b>Policy B4</b></p> <p>There have been a number of changes to the affordable workspace policy, B4 (reference SD-MM-37). Whilst some of the thresholds which trigger the policy have been amended which could affect the number of circumstances in which affordable workspace is secured, it is not considered to result in an overall significant change in the likely positive effects for the policy. It</p>

<p><b>Do the modifications have a positive or negative impact on groups with protected characteristics?</b></p>	<p><b>How will the modifications in this section impact and which groups with protected characteristics will it effect?</b></p>
	<p>is noted that the threshold has not changed in the CAZ which is where significant levels of new office floorspace are expected to be delivered. Overall the policy is still considered to have positive impacts in helping to deliver a range of employment space in the borough which will help to provide a range of employment opportunities, including for lower skilled residents. A new policy clause clarifies that on mixed use proposals, where there are exceptional circumstances where provision of affordable workspace will undermine the ability to secure affordable housing, affordable housing would take precedence. This both has the potential to have negative and positive impacts where the situations arise, as affordable workspace provides opportunities for people in lower income groups whilst at the same time, the acute need for affordable housing is evidenced. The paragraph ensures that in limited cases affordable workspace would not prevent schemes that deliver policy compliant affordable housing from coming forward.</p> <p><b>Policy B5</b></p> <p>Modifications have been made to B5 (SD-MM-41). The threshold in Part A has been amended which could affect the number of circumstances in which the policy for on-site training is applied. However, this has only changed for non-residential schemes and whilst this could lead to a reduction in the overall number of employment and training opportunities secured, it is not considered a significant change and brings the threshold to be consistent with the current Planning Obligations SPD. The policy will continue to have positive impacts in the provision of training opportunities which will also benefit people with protected characteristics. Similarly, the modification in the policy Part B to apply to major development and refer to guidance is also not considered to significantly change the positive impacts in relation to the provision of financial contributions to help tackle worklessness in the borough.</p>

<p><b>Do the modifications have a positive or negative impact on groups with protected characteristics?</b></p>	<p><b>How will the modifications in this section impact and which groups with protected characteristics will it effect?</b></p>
	<p><b>Policy R1</b></p> <p>The modifications to R1 (SD-MM-72) are made to reflect changes to the Use Class Order and to reflect policy changes to other more detailed policies which have been assessed, where relevant, below.</p> <p><b>Policy R2</b></p> <p>The changes to policy R2 (SD-MM-76) aim to maintain a retail core in Town Centres, in particular maintaining a ground floor retail frontage, ensuring shops and services are accessible and managing the impacts of uses. This has beneficial impacts on protected groups as having accessible shops helps to cater for the needs of older people, children and young people, disabled residents, pregnant women and parents with young children. Town Centres are a focal point for socialising and support social interaction, they also support employment and training by offering flexible entry level jobs for young and older people. Older people will benefit from retail which is conveniently located as they will be able to make fewer journeys. The proximity and accessibility to Town Centre also incentivises walking trip generation, increasing the amount of physical exercise people take with its accompanying health and social benefits which could be felt by all groups of residents.</p> <p>It should however be recognised that beyond the new policies, Class E, whilst providing flexibility, also limits the Council's ability to protect retail spaces in the right locations. Existing retail floorspace can be converted into other uses within Class E, which can lead to a reduction</p>

Do the modifications have a positive or negative impact on groups with protected characteristics?	How will the modifications in this section impact and which groups with protected characteristics will it effect?
	<p>of retail floorspace in the borough’s shopping areas. Whilst these wider impacts are considered uncertain, the update to the policy will help to ensure that potential impacts can be mitigated through the planning system as far as possible.</p> <p><b>Policy R3</b></p> <p>There are various amendments to R3 (modification reference SD-MM-44). These include modifications to part G which are more supportive of residential uses within town centres, which could provide benefits in relation to additional housing supply and affordable housing to meet identified needs and to increase accessibility to services for some residents living within the town centre. However, this could potentially lead to the loss of some retail and service premises in accessible locations such as the borough’s town centres. It could also limit the already constrained land supply to provide commercial, cultural and civic activity for all Islington residents. The relaxation of policy restricting residential uses could reduce the ability of town centres to continue to serve the needs and wellbeing of local residents across different retail catchment areas. This potential reduction of the optimum mix of main town centre uses could particularly impact people who possess one or more protected characteristics who make use of town centre services. However, Part C seeks to ensure adverse impacts on vibrancy, vitality, viability and character are fully mitigated as well as requiring engaging frontages and a good level of amenity for residents and businesses. This will go some way to ensuring a vibrant environment is achieved that supports sufficient access to a range of uses whilst respecting the needs and amenity of residential uses within town centres. The policy overall still seeks to protect and enhance retail and service functions in accessible locations. It is recognised that there is additional uncertainty introduced as a result of the introduction of class E in terms of access to specific shops and services. However, this is beyond the scope of the policy and</p>



<p><b>Do the modifications have a positive or negative impact on groups with protected characteristics?</b></p>	<p><b>How will the modifications in this section impact and which groups with protected characteristics will it effect?</b></p>
	<p>other policies seek to secure specific retail uses, for example in Primary Shopping Areas in R2 which will help to ensure development of shops and services in accessible locations.</p> <p>Additional supporting text has been added in relation to impact assessments outside of town centres which could help to identify impacts of proposals for specific town centre uses on different retail centres which will help to ensure that the vitality of different retail/service locations is considered. This can help to limit impacts on retail and services and help to provide accessible services to residents, including those with protected characteristics. The cross reference to the requirement for impact assessments for developments over 200sqm of main town centre uses will result in the identification of potential individual and cumulative impacts of uses, including amenity impacts</p> <p>R3 Footnote 30 states that some Class E uses like clinics and nurseries will not be required to adhere to the Sequential Test in certain circumstances but may be conditioned to operate in that use. The clarification of not requiring the sequential test for planning application purposes is unlikely to have an impact on the provision of social infrastructure alone.</p> <p><b>Policy R4</b></p> <p>R4 supporting paragraph 4.106 ensures that suitable Class E premises are vacant and marketed for 6 months prior to a non – E main town centre change of use which has scope to ensure that demand for Class E uses is fully explored before such a change of use. This is likely to benefit families, children, older people and people with physical, sensory and cognitive</p>

Do the modifications have a positive or negative impact on groups with protected characteristics?	How will the modifications in this section impact and which groups with protected characteristics will it effect?
	<p>disabilities and related limited mobility to retain access to suitable retail, services and leisure uses.</p> <p><b>Policy R5</b></p> <p>Modifications to part B enable the council to secure a retail unit outside of a designated Town Centre for the provision of essential daily goods where a need is identified. As with R4 (D) - this policy will benefit those older people and disabled people who may have limited mobility. It will also improve convenience shopping for the wider population. However, it is recognised that there will be impacts associated with the introduction of class E which could result in the loss of existing retail which provide essential daily goods to users of other class E uses such as offices, albeit this is not something that policy can affect.</p> <p><b>Policy R10</b></p> <p>Modifications to R10 have been considered and where changes increase the flexibility for cultural facilities to be located outside of the CAZ or Town Centres, this could lead to improved access of cultural uses closer to homes. As identified in the regulation 19 EqIA, supporting cultural uses will have positive effects, for example, by promoting various cultural spaces such as pubs, theatres, nightclubs and galleries which are important for a number of groups.</p> <p><b>Policy BC1</b></p>

Do the modifications have a positive or negative impact on groups with protected characteristics?	How will the modifications in this section impact and which groups with protected characteristics will it effect?
	<p>Modifications to BC1 and supporting text (reference BC-MM-03) clarify the policy in the context of use class order changes. This includes clarifying the use of conditions for new developments in Bunhill and Clerkenwell consistent with the modifications for policies B1 and B2. Ensuring that new development can provide for business space can help to secure positive benefits for people receiving lower incomes, Black, Asian and Minority Ethnic backgrounds / communities<sup>15</sup> and disabled people<sup>16</sup> who face employment barriers. This in part mitigates against the other impacts of Class E which remove the Council’s ability to prevent existing office stock from changing to other Class E uses. Other modifications provide further clarity in relation to the circumstances which set out exceptions and clauses which require proposals to be 80% or 90% of office floorspace or office-led. Whilst this provides a greater degree of flexibility in certain circumstances, it is not considered to change the positive overall effects of the policy for residents in the borough in relation to creation of jobs. Although it is recognised that there is still a more restrictive approach to residential uses in this location, this is balanced with other policies in the plan which seek to meet housing needs.</p> <p><b>Policy BC2</b></p> <p>Modifications to BC2 (reference BC-MM-05) clarify the locations where retail, leisure and cultural uses might be appropriate. This will help to ensure that these uses do not harm the amenity of the area, which can have a positive impact on the wellbeing and safety of residents, including people who possess one or more protected characteristics.</p>

<sup>15</sup> <https://www.gov.uk/government/publications/the-report-of-the-commission-on-race-and-ethnic-disparities/employment-fairness-at-work-and-enterprise>

<sup>16</sup> [https://publications.parliament.uk/pa/cm5802/cmselect/cmworpen/189/18903.htm#\\_idTextAnchor000](https://publications.parliament.uk/pa/cm5802/cmselect/cmworpen/189/18903.htm#_idTextAnchor000)

Do the modifications have a positive or negative impact on groups with protected characteristics?	How will the modifications in this section impact and which groups with protected characteristics will it effect?
	<p>The removal of the sequential test for cultural uses outside the cultural quarter could result in more cultural uses across the AAP. Cultural uses may not locate within cultural quarters and the wider agglomeration benefits of this may not be felt by people with protected characteristics such as LGBTQI+, Black, Asian and Minority Ethnic backgrounds / communities and children and young people who might have benefited from this. However, this change is not considered significant as the wider Local Plan policy framework still seeks to focus cultural uses within cultural quarters. This change could also result in positive effects by allowing more cultural uses across the CAZ. As identified in the regulation 19 EqIA supporting cultural uses will have positive effects, for example, by protecting and promoting various cultural spaces such as pubs which are important for a number of groups of people with protected characteristics, their location in the CAZ will be important particularly given the high level of accessibility via sustainable modes of transport in this location. Bunhill and Clerkenwell AAP policy BC2 Cultural policy is therefore still likely to be positive for people who possess one or more protected characteristics.</p> <p>Other modifications were identified to have no specific impacts.</p> <p>Overall, the Inclusive Economy policies of the local plan are still considered to have positive effects on people who possess one or more protected characteristics as identified in the Regulation 19 EQIA.</p>

**Table 4: Green Infrastructure, set out in Strategic and Development Management Policies, policies G1 to G5**

Do the modifications have a positive or negative impact on groups with protected characteristics?	How will the modifications in this section impact and which groups with protected characteristics will it effect?
<p>This modification is likely to see mainly positive impacts on groups with protected characteristics. Some minor negative impacts may also be felt by people with protected characteristics- mitigation of this is suggested.</p>	<p>The modifications to G2, part A (SD-MM-MOD10954), alongside amendments to SP2 and BC4 provide clarification on how proposals for moorings should be approached in relation to the canal as an open space. As with SP2, this policy has potential to positively impact boat dwellers' access to amenities and quality of life plus also improve the environment for pedestrian and cyclist users of the canals. There is potential for a minor negative impact on the amenity of open space enjoyed by pedestrians and cyclists with protected characteristics who use the canal depending on implementation. To mitigate this, any boater facilities must be designed to have no detrimental impact on the character and amenity of the waterway and its function as an open space.</p> <p>Other modifications were identified to have no specific impacts.</p> <p>As concluded in the Regulation 19 EqIA the green infrastructure policies in the plan are likely to have a positive impact for all groups with protected characteristics in particular disabled groups, older people and the young and children.</p>

**Table 5: Sustainable Design, set out in Strategic and Development Management Policies, policies S1 to S10**

Do the modifications have a positive or negative impact on groups with protected characteristics?	How will the modifications in this section impact and which groups with protected characteristics will it effect?
<p>No major additional impacts on protected groups have been identified as a result of the modifications</p>	<p>The modifications for policy S5 (SD-MM-60) and supporting text aim to reduce carbon consumption through low / zero carbon heating sources which will help to make homes more energy efficient. These energy efficiencies can lead to cheaper energy bills, which can reduce fuel poverty and improve long-term energy security, supporting lower income households as well as groups more likely to live in poor housing accommodation including children<sup>17</sup> and Black, Asian and Minority Ethnic backgrounds residents<sup>18</sup>. The modifications to policy S5 and supporting text also include requirements for minor developments with an individual heating system using air source heat pumps and direct electric heating to achieve a high specification of fabric energy efficiency. This will ensure that developments using these heating systems achieve minimal heat demands, and as a result, do not lead to increased energy bills.</p> <p>Low and zero carbon heating sources, including low-carbon heat networks and secondary heat sources will have a positive impact on air quality. The modifications to policy S5 and supporting text seek to ensure that minor new-build developments with an individual heating system prioritise low carbon heating systems, such as air source heat pumps. The modifications also ensure that the use of ultra-low NOx gas boilers in both individual and communal heating systems will only be acceptable in exceptional circumstances where other heating options are not feasible. Gas will only be considered as the heat source for communally heated developments as part of a hybrid system involving heat pumps. These modifications will ensure that the impact on air quality of heating systems used by minor and major developments is minimised and has benefits for all groups, and in particular for children, older and disabled people, as identified in the Islington 2020 Zero Carbon Strategy.</p>

<sup>17</sup> [https://www.housing.org.uk/globalassets/files/people-in-housing-need/people-in-housing-need-2021\\_summary.pdf](https://www.housing.org.uk/globalassets/files/people-in-housing-need/people-in-housing-need-2021_summary.pdf)

<sup>18</sup> <https://www.ethnicity-facts-figures.service.gov.uk/housing/housing-conditions/non-decent-homes/latest>

<p><b>Do the modifications have a positive or negative impact on groups with protected characteristics?</b></p>	<p><b>How will the modifications in this section impact and which groups with protected characteristics will it effect?</b></p>
	<p>Other modifications were identified as having no specific impacts.</p> <p>Overall, consistent with the conclusions in the Regulation 19 EqIA the sustainable design policies are still likely to 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.</p>

**Table 6: Public Realm and Transport, set out in Strategic and Development Management Policies, policies T1 to T5**

<p><b>Do the modifications have a positive or negative impact on groups with protected characteristics?</b></p>	<p><b>How will the modifications in this section impact and which groups with protected characteristics will it effect?</b></p>
<p>Positive impacts have been identified for people with protected characteristics.</p>	<p><b>Policy T1</b></p> <p>The modification to Policy T1 Part B (reference SD-MM-65) will have a slight positive effect on disabled people who require a car for their mobility; it ensures that developments must include accessible parking provision alongside the prioritisation of sustainable transport modes. It also explicitly excludes Blue Badge Holders' vehicles from being included in the description of private vehicle use.</p>

Do the modifications have a positive or negative impact on groups with protected characteristics?	How will the modifications in this section impact and which groups with protected characteristics will it effect?
	<p>Policy T1 supporting text - modification referencing Low Traffic Neighbourhoods, Vision Zero and People Friendly Streets relate to the Islington 2020 Transport Strategy – and they aim at improving the environment for walking and cycling through minimising through traffic and reducing speeds, therefore reducing road danger and air pollution. These benefits will be particularly felt by children and older adults who are disproportionately likely to be involved in collisions, killed or seriously injured by motor vehicles. Reducing through traffic also improves air quality which will especially benefit people with disabilities relating to respiratory health. Whilst the policies referred to above are not directly linked to the Local Plan, policy T1-T5 are complementary of its objectives and will help deliver the Transport Strategy.</p> <p>Appendix 3 and 4 modifications translate the former use class order into the new use class order, and create a general Class E requirement which aims at mitigating transport impacts via Transport assessments or provide appropriate cycle parking for Class E. The mitigation of transport impacts via Transport Assessments will have positive impacts on people on low incomes, disabled people, children and older people who all suffer disproportionately from traffic externalities<sup>19</sup>. The provision of general needs and accessible cycle parking at an appropriate level for general Class E will also support those who do not have access to a private car in providing a more sustainable transport choice.</p> <p>Other modifications were identified to have no specific impacts.</p>

<sup>19</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/784685/future\\_of\\_mobility\\_access.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/784685/future_of_mobility_access.pdf)



Do the modifications have a positive or negative impact on groups with protected characteristics?	How will the modifications in this section impact and which groups with protected characteristics will it effect?
	Overall, consistent with the conclusions in the Regulation 19 EqlA, 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 people and disabled groups with regards to accessibility.

**Table 7: Design and Heritage, set out in Strategic and Development Management Policies, policies DH1 to DH8**

Do the modifications have a positive or negative impact on groups with protected characteristics?	How will the modifications in this section impact and which groups with protected characteristics will it effect?
No major additional impacts on protected groups have been identified as a result of the modifications	Modifications were identified as having no impacts.

**Table 8: Strategic infrastructure, set out in Strategic and Development Management Policies, policies ST1 to ST4**

Do the modifications have a positive or negative impact on groups with protected characteristics?	How will the modifications in this section impact and which groups with protected characteristics will it effect?
Modifications likely to have minor positive impacts on groups with protected characteristics.	<p>The supporting text for paragraph 9.4 sets out that developer contributions may be secured retrospectively to forward fund infrastructure projects, which can benefit all Islington residents and particularly those with protected characteristics who might benefit from a more inclusive and sustainable environment delivered through infrastructure.</p> <p>The supporting text for paragraph 9.6 establishes that the Council might secure infrastructure costs for additional education infrastructure via CIL. The supply of that infrastructure has benefits for children and parents and more generally for the wider community.</p> <p>Overall, the main conclusions of the Regulation 19 EqlA are still considered to be applicable, with the strategic infrastructure policies likely to have a positive impact for all protected characteristic groups as aims to provide the infrastructure necessary for growth</p>

**Table 9: Site Allocations, including sites within the Bunhill and Clerkenwell Area Action Plan**

Do the modifications have a positive or negative impact on groups with protected characteristics?	How will the modifications in this section impact and which groups with protected characteristics will it effect?
	<b>New Site Allocations for residential use</b>

Do the modifications have a positive or negative impact on groups with protected characteristics?	How will the modifications in this section impact and which groups with protected characteristics will it effect?
<p>Various positive impacts are identified.</p>	<p>The modifications include several new site allocations for residential use:</p> <ul style="list-style-type: none"> <li>• KC8: Bemerton Estate South (modification reference SA-MM-15)</li> <li>• OIS9: Highbury Quadrant Congregational Church (modification reference SA-MM-98)</li> <li>• OIS12: New Orleans Estate, N19 (modification reference SA-MM-101)</li> <li>• OIS26: York Way Estate (modification reference SA-MM-113)</li> <li>• OIS27: Barnsbury Estate (modification reference SA-MM-114)</li> <li>• OIS28: Cluse Court Estate (modification reference SA-MM-115)</li> <li>• OIS29: Hillside Estate (modification reference SA-MM-116)</li> <li>• OIS30: Kerridge Court (modification reference SA-MM-117)</li> <li>• OIS31: Drakeley Court Estate and Aubert Court Estate (modification reference SA-MM-118)</li> </ul> <p>The modifications include additional site allocations for residential development which will provide affordable housing. Low income groups are more likely to benefit from the provision of affordable housing and are likely to include groups with protected characteristics.<sup>20</sup> Provision of residential schemes providing more than 10 units will benefit disabled and older people, as suitable accessible housing will be required for these schemes.</p> <p>Notwithstanding these positive impacts, it should be noted that increasing housing on a site might lead to a loss of amenity space for residents. This risk could impact all residents benefitting from existing playspace, outdoor or community space, which may be particularly felt by older residents, families and children. This risk is partly mitigated by the fact that the details of each proposal will be set out at planning stage, with site specific issues and local amenity</p>

<sup>20</sup> [https://www.london.gov.uk/sites/default/files/homes\\_for\\_londoners\\_-\\_affordable\\_homes\\_programme\\_2021-2026\\_-\\_equality\\_impact\\_assessment.pdf](https://www.london.gov.uk/sites/default/files/homes_for_londoners_-_affordable_homes_programme_2021-2026_-_equality_impact_assessment.pdf)

<p><b>Do the modifications have a positive or negative impact on groups with protected characteristics?</b></p>	<p><b>How will the modifications in this section impact and which groups with protected characteristics will it effect?</b></p>
	<p>need identified and addressed in line with other relevant policies, for example Policy G2 C. Allocations do not specify exactly where different uses need to be on site, and the Council would expect a design-led approach to respond to different strategic needs.</p> <p>The following allocations include reprovision, refurbishment and/or addition of community facilities which are considered to have a positive impact on people who possess one or more protected characteristics in terms of supporting physical and mental health and wellbeing and helping encourage community cohesion:</p> <ul style="list-style-type: none"> <li>• KC8: Bemerton Estate South - includes the replacement of community space,</li> <li>• OIS9: Highbury Quadrant Congregational Church - reprovision of church and community space.</li> <li>• OIS26: York Way Estate - enhancement of communal facilities, playspace and landscaping,</li> <li>• OIS27: Barnsbury Estate - provision of two new parks, a community centre, a play space and public realm improvements,</li> <li>• OIS29: Hillside Estate - is added but on condition that development does not result in a loss of social infrastructure which would disproportionately affect groups who possess one or more protected characteristics.</li> </ul> <p>These facilities are considered to have a positive impact on people who possess one or more protected characteristics in terms of wellbeing and helping to encourage community cohesion. They have the more specific potential to benefit older people and disabled people, as well as children and young people, through improved access to services.</p>

Do the modifications have a positive or negative impact on groups with protected characteristics?	How will the modifications in this section impact and which groups with protected characteristics will it effect?
	<p>The following allocations will see improvements in landscaping, community amenity areas, play space or games areas:</p> <ul style="list-style-type: none"> <li>• OIS12: New Orleans Estate - play space, landscaping and reprovision of multi-use games area.</li> <li>• OIS28: Cluse Court - playspace, amenity space and landscaping.</li> <li>• OIS30: Kerridge Court- re-provision of the existing multi-use games area within a new, centrally located public space. Improvements to play space, amenity space and landscaping across the estate.</li> <li>• OIS31: Drakeley Court and Aubert Court - relocation of Aubert Court community centre to improve visibility and accessibility. Improved landscaping, including the creation of a new green square.</li> </ul> <p><b>Vale Royal/Brewery Road Locally Significant Industrial Site Allocations</b></p> <p>Modifications to several of the site allocations in the Vale Royal/Brewery Road Locally Significant Industrial Site (e.g. VR2, VR4, VR5, VR6 and VR10) recognise the potential for co-location of offices and industrial uses. Whilst this is a change from allocating the sites solely for industrial intensification, the modifications seek to protect and intensify industrial functions whilst also supporting intensification for other types of jobs such as office jobs. This could help to provide employment options which would benefit low income or unemployed workers including those with protected characteristics.</p> <p>The modification to site VR3 seeks to intensify offices and studios on site to support existing businesses in the music industry and related sectors. The allocation supports a range of unit sizes including those suitable for SMEs which, whilst no longer solely promoting intensification</p>

<p><b>Do the modifications have a positive or negative impact on groups with protected characteristics?</b></p>	<p><b>How will the modifications in this section impact and which groups with protected characteristics will it effect?</b></p>
	<p>of industrial uses, could also help to provide a range of employment opportunities which could benefit low income or unemployed workers including those with protected characteristics.</p> <p><b>AUS8: 161-169 Essex Road</b></p> <p>Through recognising the potential suitability of the site for use as a place of worship, alongside other uses, the modification to the site allocation (SA-MM-35) could have positive impacts for those with a religion/belief.</p> <p><b>NH1: Morrison’s supermarket and adjacent car park, 10 Hertslet Road, and 8-32 Seven Sisters Road</b></p> <p>Modifications to this site allocation (SA-MM-43) recognise the scope for a large quantum of residential use, together with retention of and improvements to existing retail floorspace and new office space. The previous EQIA recognised the potential for the site to have a greater beneficial impact on those on low incomes who themselves are more likely to include groups with protected characteristics. This is because housing proposals must provide affordable housing which is of a high quality, as well as a proportion of accessible accommodation which will have a positive effect on disabled people and others with mobility needs. The increased recognition of the scope for housing on the site is not considered to change the earlier assessment of positive impacts, although the provision of a greater amount of housing is likely to increase the extent of positive impacts overall.</p>

<p><b>Do the modifications have a positive or negative impact on groups with protected characteristics?</b></p>	<p><b>How will the modifications in this section impact and which groups with protected characteristics will it effect?</b></p>
	<p><b>FP4: 129-131 &amp; 133 Fonthill Road &amp; 13 Goodwin Street</b></p> <p>The modification to the site allocation (SA-MM-60) recognises that an element of residential use may be acceptable as part of a retail-led mixed use development. This could have positive impacts if it contributes towards the provision of affordable and accessible housing as identified above.</p> <p><b>FP5: 1 Prah Road</b></p> <p>The modification for residential use (SA-MM-61) may have positive impacts in relation to people with protected characteristics through the provision of affordable and accessible housing. The removal of specific reference to public realm improvements at the site is not considered to change the earlier assessment of positive impacts. However, the removal of the requirement for business floorspace, particularly workspace suitable for SMEs, could reduce the range of job opportunities in the area. Such jobs may have benefitted low income or unemployed workers, including those with protected characteristics, although the impact is uncertain.</p> <p><b>ARCH1: Vorley Road/Archway Bus Station</b></p> <p>The modification to include social and community infrastructure (SA-MM-72) could have positive impacts on social inclusion and health and well-being, through the provision of new community facilities in the area. However, the specific benefits for protected characteristics will depend on the final use that comes forward as part of future development on the site/through the planning application process.</p>

Do the modifications have a positive or negative impact on groups with protected characteristics?	How will the modifications in this section impact and which groups with protected characteristics will it effect?
	<p><b>ARCH3: Archway Central Methodist Hall</b></p> <p>Modification SA-MM-74 removes reference to the provision of a cultural hub and replaces the uses specified with mixed use development including offices and retail. The provision of retail and office use could have positive impacts through the provision of a range of employment opportunities. However, the removal of the cultural hub for the site could serve to restrict space for increased cultural activities in Archway - the impacts of this on people with protected characteristics is however uncertain.</p> <p><b>Site Allocation ARCH6: Job Centre, 1 Elthorne Road</b></p> <p>The change in the allocation from business-led to mixed use development, could increase provision of residential on-site and reduce the amount of business floorspace delivered. However, a mixed use development could provide a range of employment opportunities alongside housing, including affordable and accessible housing, which both have benefits including for those with protected characteristics.</p> <p><b>Site Allocation OIS5: Bush Industrial Estate, Station Road</b></p> <p>The site allocation is subject to a modification that co-location of offices and/or research and development uses will be permitted where there is an intensification of industrial use on the site, where it can be demonstrated that the continued industrial function of the LSIS would remain. The retention and intensification of industrial use remains as an objective. As a higher density employment use, co-locating office/research and development uses with industrial uses could</p>



<p><b>Do the modifications have a positive or negative impact on groups with protected characteristics?</b></p>	<p><b>How will the modifications in this section impact and which groups with protected characteristics will it effect?</b></p>
	<p>result in an optimisation of existing employment floorspace. Whilst this is a change from solely intensification for industrial uses, the modifications seek to protect and intensify industrial functions whilst also providing intensification for other types of jobs such as office jobs. This can help to provide employment options which could benefit low income or unemployed workers including those with protected characteristics. However, it is noted that there is likely to be less opportunity to intensify industrial uses to the extent envisaged in the original allocation.</p> <p><b>Gypsy and Traveller Sites</b></p> <p>Gypsy and Travellers are a protected ethnicity. Three sites have been identified to meet the evidenced need for Gypsy and Traveller pitches in the borough. This is considered to have a positive effect in relation to the housing needs of future residents who share that protected characteristic.</p> <p>The site at 154 Junction Road is currently vacant. Its close proximity to the railway line will mean that impacts in relation to noise and vibration will need to be considered. The allocation recognises this and seeks to provide a good level of residential amenity for future occupiers.</p> <p>The site at 207a Junction Road is currently used as a martial arts centre. The loss of the current use could have negative impacts on communities who use it, including those with protected characteristics. The site allocation highlights that the council will work with the current occupiers of the site to identify a suitable site for its relocation within the local area and that this should be of equivalent quality, quantity and accessibility. This will help to mitigate potential negative impacts. The site is also in close proximity to the railway line and so consideration of noise and</p>

<p><b>Do the modifications have a positive or negative impact on groups with protected characteristics?</b></p>	<p><b>How will the modifications in this section impact and which groups with protected characteristics will it effect?</b></p>
	<p>vibration impacts will be important to provide a good level of amenity as recognised by the allocation.</p> <p>The site at Ronald’s Road is a vacant site, part of which forms access to the Highbury Roundhouse Community Centre to the rear of the site. As part of site design it will be important that suitable access to the new community centre is provided – this is recognised in the allocation. The allocation also highlights the importance of screening to provide a good level of amenity in relation to the access road to the community centre as well as Ronald’s Road. Finally, as recognised in the allocation it will be important to mitigate vibrations from the railway tunnel that runs beneath the site.</p> <p>All three site allocations specify the need to provide essential infrastructure prior to occupation.</p> <p>Overall, given the site-specific issues identified it is considered that the allocations recognise these and provide a framework for suitable mitigation measures identified through the more detailed site design and planning application process.</p> <p>Each site allocation specifies the need to provide a good level of amenity, with the site design process carried out in consultation with the Gypsy and Traveller community and local communities. This should help to identify and mitigate potential issues in relation to site design, which could also help to foster good relations between the communities.</p>

Do the modifications have a positive or negative impact on groups with protected characteristics?	How will the modifications in this section impact and which groups with protected characteristics will it effect?
	<p>Other modifications were identified as having no specific impacts.</p> <p><b>Site Allocation BC13: Car park at 11 Shire House, Whitbread Centre, Lamb’s Passage</b></p> <p>The modifications to this allocation support the provision of a significant amount of office floorspace, as part of a mixed use development alongside residential use, whilst acknowledging that hotel use may be acceptable. It is considered this will have a positive effect in relation to housing delivery, including affordable and accessible housing, but may reduce the amount of employment floorspace delivered. However on balance both employment and housing use can have positive impacts for those with protected characteristics.</p> <p><b>Site Allocation BC24 Clerkenwell Fire Station, 42-44 Rosebery Avenue</b></p> <p>The modified site allocation seeks to clarify and expand other uses on the ground floor, to include commercial or community uses. This may not result in the provision of social infrastructure on the site and so may not have the same benefits in terms of the provision of community facilities, therefore the effects of this on groups with protected characteristics are uncertain.</p> <p><b>Site Allocation BC37: Triangle Estate, Goswell Road/Compton Street/Cyrus Street</b></p> <p>Modification to state that development should not lead to unacceptable impacts on existing residents, and should improve the security, function, accessibility, and appearance of public realm and open space on the estate.</p>

Do the modifications have a positive or negative impact on groups with protected characteristics?	How will the modifications in this section impact and which groups with protected characteristics will it effect?
	<p>The modification will benefit residents by ensuring that impacts on them are minimised and that development improves the security, function, accessibility, and appearance of public realm and open space on the estate. This is likely to help provide positive outcomes for disabled residents and others with mobility needs in particular.</p> <p>Other modifications were identified as having no specific impacts.</p>

## Conclusion

Overall the modifications made to policy at this stage are likely to have a positive effect or no additional effect on people who possess protected characteristics. Some of the modifications will have a potential positive effect, but at times this is uncertain and will depend on the implementation of policy. Notably, modifications relating to Gypsies and Travellers will improve the certainty that sites are delivered for this protected group. Social and Community and Retail and Employment policy modifications are affected by the wider effects of Class E. These effects are uncertain and beyond the scope of the policy. However they may affect people who possess protected characteristics.

# Appendix 4c: EqIA Local Plan post Modifications

## Islington Local Plan modifications – Equalities Impact Assessment update

A full equalities impact assessment was undertaken as part of the Regulation 19 IIA. Further updates to this were undertaken to assess the impacts of the modifications in the IIA addendums published in March 2021 and June 2022. This update to the EqIA is to take into account the proposed additional changes to the plan as directed by the Planning Inspectors in their report. The recommendations of the Inspectors are binding on the council.

The main further changes identified in the Inspectors reports are set out below:

- Gypsy and Traveller accommodation provision: Modifications to remove the proposed site allocations for Gypsy and Traveller sites (GT1, GT2 and GT3), together with consequential changes to Strategic and Development Management Policy H12 to reflect the fact that site allocations are not proposed and that all Gypsy and Traveller matters should be dealt with through an immediate early review.

Other further amendments were identified in the Inspectors Report, these were not considered to change the previous consideration of positive or negative impacts on groups with protected characteristics.

**Table 1: Policy H12 and associated amendments to proposed site allocations for Gypsy and Traveller accommodation**

<b>Do the modifications have a positive or negative impact on groups with protected characteristics?</b>	<b>How will the modifications in this section impact and which groups with protected characteristics will it effect?</b>
Reduction in positive impacts	<p>As identified in the Regulation 19 EqIA, Gypsy and Travellers are a protected ethnicity and policy H12: Gypsies and Travellers aims to provide accommodation to meet identified need for this group.</p> <p>In the plan as submitted no sites to meet identified need for Gypsy and Traveller accommodation were identified however policy H12 set out a commitment to meeting that need and ways in which that would be done. Overall, this policy was identified to be likely to have positive impacts.</p> <p>In the first IIA addendum a change was proposed to H12 to recognise the removal of the London Plan definition of Gypsies and Travellers and introduction of the Government definition in the London Plan.</p>

In relation to the main modifications consulted post hearing, the modifications to H12 (reference SD-MM-28) and the supporting text responded to the deletion of the London Plan definition of Gypsies and Travellers and reflected the Government's definition. The proposed modifications retained the commitment to meeting identified need. However, the change to the level of need reflected the adopted London Plan which included the Government's definition.

It was identified that the planning and delivery of new pitches may result in a reduction in social exclusion, and promote equality, fairness and respect for some Gypsies and Travellers. Providing for pitches based on the government's definition would lead to the delivery of a lower number of pitches (6 rather than 10). The provision of pitches in line with the Government's definition was identified as having the potential to reduce the overall positive impact, but was still considered to have a positive effect.

Following a recent Court of Appeal judgement (Smith v SSLUHC [2022] EWCA Civ 1391) it was found that the government's definition was discriminatory. The proposed modifications therefore revert back to the London Plan definition of need that was in the plan as originally drafted and therefore commits to meeting the identified need for 10 Gypsy and Traveller pitches. This has a positive impact overall, reverting back to the position in the Regulation 19 plan.

As part of the Examination process the Inspectors identified significant concerns that a site/sites had not been found and requested that the council work to try to identify Gypsy and Traveller sites as part of this Local Plan process. The council continued the site search and identified three potential sites which were included as Modifications to the draft Local Plan. The EqlA update for the proposed site allocations in June 2022 considered that the identification of the 3 sites was to have a positive effect in relation to the housing needs of future Gypsy and Traveller residents who share protected characteristics. However, following consultation on the proposed modifications, the Inspectors could not find the proposed allocations sound with consequential amendments to policy H12. Not having specific sites identified within the plan will reduce the positive effects of the plan as a whole in relation to meeting Gypsy and Traveller housing needs. However, the plan still retains a commitment to meet these needs and identifies a mechanism for these to be addressed through an immediate focused review (in part A) which can help to secure some positive effects and so it is considered that Policy H12 retains some positive impacts to some extent. This includes a timescale of 24 months. The removal of the ways in which sites could be identified in policy H12 will be a matter of detail for the focused review. The plan still includes criteria for windfall sites that come forward. A separate Equalities Impact Assessment will need to be carried out on the early focused review of Gypsy and Traveller planning policy. For 207a Junction Road the removal of the site allocation will help to remove potential negative impacts on communities who use the site currently, including those with protected characteristics.

As identified in previous EQIA updates the modifications relating to windfall sites that come forward during the plan period adds additional clarification that proposed sites must provide a high quality of housing consistent with relevant aspects of policy H4, reiterating the important requirement of high-quality housing for the Gypsy and Traveller community. Additions to paragraph 3.150 emphasise that amenity blocks must meet accessibility standards and a good level of privacy is to be maintained. This detail will promote high accessibility standards for members of the Gypsy and Traveller community, especially for those who possess a disability.

The other modifications to the supporting text involve deletions to discussion of need and how this is defined, which is now clarified in the policy. Further discussion of need, how this can be met and particular constraints in the borough are considered matters for the early focused review and are not considered to have additional equalities impacts.

# Appendix 5: Health Impact Assessment





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# 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

# Health Impact Assessment

This Health Impact Assessment of the Islington Local Plan: Strategic and Development Management Policies - Regulation 18 draft (November 21018) 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.
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

## 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.
6. Recommendation: For clarification the paragraph 3.144 should include post-16 education as social infrastructure.

## 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.<sup>21</sup>

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

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<sup>21</sup> [https://www.ukgbc.org/sites/default/files/Health%20Wellbeing%20and%20Productivity%20in%20Offices%20-%20The%20next%20chapter%20for%20green%20building%20Full%20Report\\_0.pdf](https://www.ukgbc.org/sites/default/files/Health%20Wellbeing%20and%20Productivity%20in%20Offices%20-%20The%20next%20chapter%20for%20green%20building%20Full%20Report_0.pdf)

consistently achieving EU objectives with the exception of the annual mean objective of 40µg/m<sup>3</sup> or less for roadside NO<sub>2</sub> (although there has been a downward trend). However, 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.

- |   |
|---|
| <p>8. Recommendation: That the Local Plan includes childcare facilities as a type of community infrastructure in paragraph 3.144.</p> |
|---|

## 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 of 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 health and wellbeing of the population.

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 Councils 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 19 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%20Wellbeing%20and%20Productivity%20in%20Offices%20-%20The%20next%20chapter%20for%20green%20building%20Full%20Report\\_0.pdf](https://www.ukgbc.org/sites/default/files/Health%20Wellbeing%20and%20Productivity%20in%20Offices%20-%20The%20next%20chapter%20for%20green%20building%20Full%20Report_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 Councils 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 Councils 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.

