

# **IIA examination addendum**

# Contents

- Introduction..... 2
- Non technical summary..... 4
- Background..... 22
- Part 1: Alternatives: Policies..... 37
- Part 1: Updated Policy Assessments ..... 186
- Part 1: Updated Assessment of Site Allocations ..... 405
- Part 1: Review of Cumulative Effects ..... 673
- Part 2: Appraisal of pre hearing modifications ..... 708
- Part 2: New and amended Site Assessments ..... 839
- IIA Examination Conclusions ..... 855
- IIA: Mitigation..... 866
- IIA: Monitoring ..... 870
- Appendix 1: EqlA Local Plan Modifications ..... 877
- Appendix 2: HRA screening update ..... 893
- Appendix 3: Flood Risk ..... 894

# Introduction

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

1.2 The aim of the report is:

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

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

Part 1 of the examination IIA responds to issues identified by the Planning Inspectors in respect of identification and assessment of alternatives for policies and site allocations, assessment of cumulative effects and identification of effects overall. The work completed in Part 1 creates new assessments, updates assessments and/or replaces assessments in the submission IIA.

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

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

includes assessment against the full set of appraisal objectives as requested by the Inspectors. Reasonable alternatives are considered alongside site assessments where relevant or explanations of where there are no alternatives. This section replaces relevant content in section 4 and all of the assessments in appendix 7.

- The assessment of the **submission policies** has been reviewed and additional effects identified. Also, further clarification in the assessment text has been added. This section replaces relevant content in section 4 of the submission IIA and all the assessments in appendix 6.
- The assessment of **cumulative effects** is new assessment that has been presented in a more comprehensive and transparent manner. This section replaces relevant content in section 4 of the submission IIA.
- The references made in Section 4 of the submission IIA which summarises the EqIA and HRA content remains valid.

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

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

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

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

# Non technical summary

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

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

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

- wider changes in the planning system.
- The Sustainability Appraisal process is iterative and on-going process, which has been in train from the start of the Local Plan review.
- The examination IIA has assessed the 8 new site allocations.

### Other assessments

- 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.
- An Equalities Impact Assessment (EqIA) is a way of measuring the potential impacts (both positive and negative) that a policy may have on groups with key protected characteristics covered by the Equality Duty and on Human Rights. The examination IIA has considered the modifications for potential impacts.
- The Habitats Regulations Assessment (HRA) purpose is to assess the impacts of a land-use plan against the conservation objectives of a European Site and determine whether it would adversely affect the integrity of that site. The closest European site to Islington is Epping Forest. European sites are designated to provide legal protection of habitats and species that are of European significance. The examination IIA has screened the modifications.

### Key Findings by Local Plan section

- **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.
- **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 particularly positive cumulative effect on meeting housing needs. In addition the assessment of alternative policy approaches for certain forms of housing such as student accommodation and large HMO also identifies the 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 no significant effects. The policy to meet older peoples housing needs resists market extra care housing 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 assessment alongside alternative policy approaches. Whilst there are land use benefits from the co-location of office and residential uses with industrial, it is considered that housing and office needs can be met elsewhere in the borough, and the importance of one of the last remaining industrial clusters within close proximity to central London had to be a factor in its continued protection for industrial use. The submission IIA considered that the effect of the retail policies will provide flexibility for town centres to respond to the changing retail environment which will help ensure residents various service and leisure needs continue to be met. However the examination IIA concluded that the wider changes made to the planning system would affect the wider function of town centres by removing the need to seek planning permission for non-retail uses which may exacerbate the structural weaknesses in the retail sector. Whilst results of the assessment of the policy modifications to respond to these wider changes to the planning system are considered positive there is uncertainty over the extent to which it is possible to plan to meet various service and leisure needs because of the wider changes to the Use Classes Order. In addition the assessment recognises the tension Class E has introduced which is particularly apparent with the assessment of marketing periods for the protection of existing retail uses with the assessment finely balanced over considering the options and the potential response of landowners with long term impacts considered to be overall negative.
- **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. The examination IIA identified the further positive effects from policy changes that seek to promote more sustainable freight movements helping further improve air quality, reduce congestion and other negative consequences relating to traffic.
- **Design and heritage and Plan1:** the Sustainability Appraisal considered that when taken together demonstrates the positive effects that design and a design led approach will have on improving peoples quality of life and reducing the potential amenity impacts of development. In particular the positive effect from ensuring the use of a site is 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 part 1 and part 2 assessments and sets out the cumulative conclusions of the examination IIA. 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 in part 2 add to the those identified in Part 1 unless they do not replace effects identified in part 1 of the examination IIA.

Objectives	Cumulative effects Part 1 submission IIA	Updated consideration of cumulative effects following modifications assessment in Part 2
<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>The assessment of modifications recognises the potential harmful effect on social and community uses but also the wider mix and balance of uses across the CAZ and town centres from Class E which the modifications can only partly mitigate. There is a change in effects from the submission IIA in response to introduction of Class E and whilst the modifications across various policy areas are considered positive these effects are now minor where previously they were considered significant positive. Effects are considered limited as there an element of uncertainty over how effective the approach will be in securing an inclusive, safe and sustainable built environment that places people at the heart of the design process and creates robust and adaptable buildings that respond to people’s changing needs over the long term.</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 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</p>	<p>The assessment of modifications recognises the potential harmful effect on the mix and balance of uses and efficient use of land in the CAZ from Class E which is considered to impact the wider economic function of the area. There is a change in effects from the submission IIA in response to introduction of Class E and whilst the modifications across various policy areas are considered positive these effects are now minor where previously they were considered significant positive but uncertainty is identified over how effective the approach in policy BC1 will be in maximising office floorspace.</p>

Objectives	Cumulative effects Part 1 submission IIA	Updated consideration of cumulative effects following modifications assessment in Part 2
	<p>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>The effect of Class E and the potential dilution of retail development in the most appropriate locations in town centres is a risk and an inefficient use of land which could be ineffective in balancing competing demands between land uses and will result in retail needs not being met. Whilst the preferred approach goes some way to mitigating this the advent of Class E is recognised as working against the policies assessed in the submission IIA which sought to balance the tensions between land uses and focus development in the right locations. Ultimately the introduction of Class E affects the ability of the Local Plan to meet the development needs of the area.</p>
<p><b>Objective 3 - Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment</b></p>	<p>The approach to heritage ensures that heritage assets will be strongly protected while recognising the need to accommodate new development. Where relevant Area Spatial Strategies in the Local Plan reference heritage assets highlighting their importance, alongside local views and landmarks. Site allocations also make reference where there are relevant heritage development considerations. Growth could impact heritage value but it is considered that this is mitigated by the relevant policies and will help new development to add to the borough's character and distinctiveness - Policy DH1 recognises this potential impact and seeks innovative approaches to address the risk of adverse heritage impacts. 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</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</p>	<p>The uncertainty around Class E is identified for social and community facilities, which could both</p>

Objectives	Cumulative effects Part 1 submission IIA	Updated consideration of cumulative effects following modifications assessment in Part 2
<p><b>neighbourhoods which support good quality accessible services and sustainable lifestyles</b></p>	<p>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 encourage permeability and movement and maintain and support access to services and facilities.</p>	<p>help to reduce health inequalities by increasing opportunities for healthcare facilities, as well as leisure and indoor recreation uses such as gyms but could also increase health inequalities by not protecting these facilities against change of use to higher value uses. The effect of Class E will also likely have minor negative effect on liveable neighbourhoods as the lack of planning control for many uses, including food and drink uses like cafes and restaurants, may result in some of these uses being developed in inappropriate locations and have negative impact due to their effect on residential amenity such as noise, odours, and servicing impacts. The wider impact on town centre vibrancy from the potential for Class E uses which do not form active frontages, such as offices at ground floor could cumulatively and in specific locations individually, have a negative impact on the diversity, vibrancy and economic prosperity of town centres and LSAs. Overall there is a change in effects from the submission IIA in response to introduction of Class E and whilst the modifications across various policy areas are considered positive these effects are now minor where previously they were considered significant positive.</p> <p>However, the increased ability for COU within the E use class may have positive impacts on upper floors in town centres, and especially in less well performing LSAs that would benefit from an influx of workers.</p>

Objectives	Cumulative effects Part 1 submission IIA	Updated consideration of cumulative effects following modifications assessment in Part 2
		<p>The additional site allocations specifically to address housing supply will deliver wider improvements beyond improvements in 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 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 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.</p>

Objectives	Cumulative effects Part 1 submission IIA	Updated consideration of cumulative effects following modifications assessment in Part 2
	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>There is a change in effects from the submission IIA in response to introduction of Class E and whilst the modifications across various policy areas are considered positive these effects are now minor where previously they were considered significant positive.</p>
<b>Objective 7 - Improve the health and wellbeing of the population and reduce health inequalities</b>	<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</p>	<p>Policy R5 seeks to maintain local shops and cafes. These facilities are often the closest facilities to where people live so enabling their protection as a local neighbourhood service that especially benefits access to goods and services by people with mobility issues is particularly relevant and considered to have a positive effect against this objective.</p> <p>Policy T1 and T2 changes in response to Class E will have a significant positive effect through helping to ensure that transport impacts of Class E can be appropriately assessed and mitigated which can help to reduce the impacts of pollution on the public realm which can help to tackle pollution and</p>

Objectives	Cumulative effects Part 1 submission IIA	Updated consideration of cumulative effects following modifications assessment in Part 2
	<p>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>air quality which can impact on health. Ensuring adequate cycle parking is provided will also help to promote active travel which can improve physical health and wellbeing. In addition the changes to Policy T5 are similarly positive in this respect.</p> <p>The new site allocations which specifically address housing supply and affordable housing delivery could potentially lead to impacts, for example in terms of the overall quantum of amenity space on estates potentially affecting access to that space. The effect of this is uncertain as it will depend on the circumstances of each site and the details of the final proposals at planning application stage. The effects of development on each site will be mitigated through other policies in the plan, for example on housing estates there is policy G2 which seeks to protect open space on estates and which sets criteria the for re-provision and enhancement of open space in the circumstance where development is proposed.</p>
<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</p>	<p>The wider positives of Class E are noted in particular the creation of a wider range of employment opportunities which could potentially help remove some barriers to employment across the borough with the increased flexibility around where uses can locate. However the assessment recognises the detrimental longer term effect on the existing economic function of parts of the borough if a significant quantum of floorspace changes via Class E to flexible uses over time. The detrimental</p>

Objectives	Cumulative effects Part 1 submission IIA	Updated consideration of cumulative effects following modifications assessment in Part 2
	<p>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>effect is recognised in particular on the role of the CAZ in supporting Central London's economy but uncertainty is recognised in terms of all locations – including town centres and more peripheral locations. There will also be a detrimental effect on LSIS, in particular Vale Royal, Islington's most significant LSIS. Protecting the industrial function of LSIS has wider benefits serving other economic functions in both the local and wider London economy, so there would be a detrimental effect in neighbouring boroughs depending on their dependency on the activities usually found in LSIS which support businesses in other boroughs.</p> <p>The tension Class E has introduced is particularly apparent with the assessment of marketing periods for the protection of existing uses with the assessment finely balanced over considering the options and the response of landowners with long term impacts considered to be overall negative.</p> <p>More generally in the longer term Class E is considered to have a negative effect on the overall supply of office space.</p>
<p><b>Objective 9: Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public</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</p>	<p>The transport impacts of class E are considered in Policy T1, T2 and T5 changes and will have a significant positive effect that builds on the submission policy through helping to ensure that transport impacts of Class E can be appropriately assessed and mitigated which can help encourage a shift to more sustainable forms of travel.</p>

Objectives	Cumulative effects Part 1 submission IIA	Updated consideration of cumulative effects following modifications assessment in Part 2
<b>transport, cycling and walking</b>	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.	The uncertainty over predictions of where uses will be located from Class E could now have a minor negative impact on road networks and sustainable transport modes when there is an accumulation of uses that have loading and parking requirements or high numbers of journeys such as offices in industrial areas for example which do not have appropriate public transport access.
<b>Objective 10: Protect and enhance open spaces that are high quality, networked, accessible and multi-functional</b>	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.	The changes to Policy G2 that provide clarification on how proposals for moorings and facilities to support moorings should be approached in the context of the canal as public open space identify no effects as the policy states that development can only take place where it there is no detrimental impact on nature conservation and biodiversity value, and the character and amenity of the waterway corridor and its function as public open space.
<b>Objective 11: Create, protect and enhance suitable wildlife habitats wherever possible and protect species and</b>	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	None of the modifications have significantly changed the assessments outcomes against this objective.

Objectives	Cumulative effects Part 1 submission IIA	Updated consideration of cumulative effects following modifications assessment in Part 2
<b>diversity</b>	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.	
<b>Objective 12: Reduce contribution to climate change and enhance community resilience to climate change impacts</b>	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 Spatial Strategies which also helps to reduce the need for goods and services to travel too which also reduces emissions from this source. Islington's car-free policy in Policy T3 and Policy T5 which seeks to minimise air pollution from the construction process as well as reducing deliveries will also help reduce transport emissions. The Sustainable Design policies in setting out the approach to flood risk management and sustainable drainage have cumulative benefits together to reduce the risk of flooding and help to manage water sustainably. These policies working alongside green infrastructure policies which also play a role in helping to reduce surface water run-off and reduce flood risk. Sustainability is	<p>The policy changes add to the submission policies Sustainable Design policies by responding to technological evolution and will help to minimise carbon emissions from heating systems and promote sustainable energy infrastructure, which will contribute towards a more sustainable built environment improving air quality through reduced NOx and a reduction in carbon emissions.</p> <p>The displacement of industrial activities of the LSIS through Class E could see an increase in vehicle mileage through Islington, which risks increased congestion and emissions, which would have climate change and air quality impacts.</p> <p>The transport impacts of class E are considered in the Policy T1 and T2 changes and will have a significant positive effect that builds on the submission policy through helping to ensure that transport impacts of Class E can be appropriately assessed and mitigated which can help reduce the carbon emissions associated with transport. In addition the changes to Policy T5 are similarly positive in this respect.</p>

Objectives	Cumulative effects Part 1 submission IIA	Updated consideration of cumulative effects following modifications assessment in Part 2
	identified in PLAN1 as one of the four key design principles for development in the borough.	
<b>Objective 13: Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste</b>	<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>
<b>Objective 14: Maximise protection and enhancement of natural resources including water, land and air</b>	<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>The potential negative impact on efficient, sustainable travel with potential distortion of the retail hierarchy across all policies through Class E could increase the need to travel and therefore carbon emissions associated with transport. Similarly, the displacement of industrial activities of the LSIS through Class E could see an increase in vehicle mileage through Islington, which risks increased congestion and emissions, which would have climate change and air quality impacts. This in turn contributes to the high levels of air pollution in London. High trip generating E uses located</p>

Objectives	Cumulative effects Part 1 submission IIA	Updated consideration of cumulative effects following modifications assessment in Part 2
		<p>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.</p> <p>Policy T1 and T2 changes in response to Class E will have a significant positive effect through helping to ensure that transport impacts of Class E can be appropriately assessed and mitigated which can help to reduce the impacts of air pollution. In addition the changes to Policy T5 are similarly positive in this respect.</p>

- **Mitigation** - In line with guidance potential mitigation measures should be considered where the assessments identify negative effects in order to reduce the negative effects. Negative effects were identified on land use from student accommodation and other similar land uses where the restriction in policy on student accommodation to specific sites was identified as the mitigation in itself. Where effects could not be mitigated included the effect of Class E but this was where the uncertainty of the impacts and the more limited role of the planning system to address those impacts was recognised. For site allocations various negative effects were identified for impact on heritage, biodiversity and liveable neighbourhoods and these were all considered would be addressed by the allocations and other policies in the plan.
- **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 have been identified.
- The **Health Impact Assessment** concludes that the policies in the draft Local Plan support health improvement and, importantly, underpin the Council’s vision in tackling inequalities, including health inequalities, in the borough.
- The **Habitats Regulation Assessment** considered the effect of Islington’s Local Plan policies on the European sites and concluded it is not significant. Impacts from policies or sites allocations in the plan on water resources, air quality and from visitors have been considered unlikely to have any significant effects.
- The **Equalities Impact Assessment** concluded that there were no negative impacts on groups with protected characteristics and highlighted the many positive effects that the policies in the Local Plan will have for all groups including those with protected characteristics.

The examination IIA has considered the modifications for impacts on groups with protected characteristics and not identified any negative impacts.

## **Next steps**

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

# Background

- 2.1 The Local Plan was approved at the meeting of full Council on 27 June 2019. Prior to the consultation two further changes were made to the draft Strategic and Development Management Policies document. Further changes were made to reflect updated evidence relating to Gypsy and Traveller accommodation need; and the Council declaration of an environment and climate emergency and the associated aim to achieve net zero carbon by 2030 ahead of the formal 2050 target set out in the draft Local Plan.
- 2.2 The Regulation 19 consultation on the draft Local Plan documents ran for a period of 6 weeks between 5 September 2019 to 18 October 2019. In total, 184 email / letter responses were received and a total 1,465 'set responses' were received. The 'Local Plan consultation statement (Regulation 22)' sets out a summary of responses to Islington Local Plan Regulation 19 draft (examination library reference PD7).
- 2.3 A response on the IIA was received from Tileyard London (examination library reference: R19.0132). The respondent commissioned an independent review of the IIA, which considered the IIA process for the draft Local Plan. The Council provided response to this review of the IIA as part of the submission documents in 'the London Borough of Islington Legal Compliance Statement' (examination library reference SD30).

## **Inspectors issues raised**

- 2.4 Following the Regulation 19 consultation the Local Plan was submitted to the Secretary of State on 12 February 2020. The Council received preliminary questions from the Planning Inspectors appointed to examine the draft Local Plan on 20 February 2020. This requested additional information on the housing trajectory, a response from the council on initial thoughts on a shortfall in housing supply and the deliverability of a number of sites which form part of the five-year land supply. In relation to the Site Allocations clarity was sought on site capacity, site selection and the balance of uses. Following the Councils response to this preliminary letter a further two letters were received from the Inspectors seeking further clarification on housing supply, the housing trajectory and site deliverability.
- 2.5 The Inspectors letters INS04 dated 30 April and INS05 dated 24 June sought further clarification and justification in relation to a number of matters associated with the Sustainability Appraisal. INS04 sought clarification with the assessment of reasonable alternatives and INS05 followed up on this requesting assessment of specific alternatives. In addition, the Inspectors in letter INS05 sought review of the assessment tables and cumulative assessments in order to ensure that all effects are documented. In addition the Inspectors requested

that the Council should review all allocations and consider whether different uses or a mix of different uses could feasibly be delivered on the site and assess these as part of the IIA or assess these as reasonable alternatives.

- 2.7 The Inspectors in their letters INS04 dated 30 April and INS05 dated 24 June also sought further clarification on the issue of housing supply both in respect of the five-year housing land supply and the housing supply over the plan period. Following the Council's initial response on this issue the Inspectors' significant concerns remained and they sought additional work from the Council to address both shortfall issues. The Inspectors identified that there would need to be additional consultation on both the IIA and in relation to the housing matters.
- 2.8 The Council in their letter 7 October 2020 set out the progress on addressing the issues raised and the indication of the future timetable. In terms of housing supply the council set out that it will put forward additional allocations alongside increased housing numbers from a small number of existing allocations. In respect of the IIA the council will undertake further work to address the points raised by the Inspectors. The additional sites will be considered as part of the IIA update.
- 2.9 Given the extent of the changes identified the Council has identified that approval for these changes will be needed by the Council before the additional consultation. The significance of the changes relates in no small way to the amendments to the Use Classes Regulations.

### **Identifying sustainability, health & equality issues for Islington**

- 2.10 The Scoping Report (first published February 2017) identified the sustainability issues for Islington (examination document ref PD17). In line with guidance, from the baseline information identified in the Scoping Report the main sustainability issues relevant to the Local Plan have been identified. These have been re-produced 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 position 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>i</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>ii</sup>, and the majority of Islington's primary and secondary schools recorded concentrations of NO<sub>x</sub> 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 NO<sub>x</sub>. 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.
- 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 developed 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 CO<sub>2</sub> 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.

## **Full Plan Framework**

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.

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>

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>
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> <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>

<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>

# Part 1: Alternatives: Policies

## 1. Introduction

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

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

- Step 1 – sift out policies where there is clearly no reasonable need to explore reasonable alternatives;
- 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. 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.

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

<b>Policy</b>	<b>Step reached in the process</b>
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.

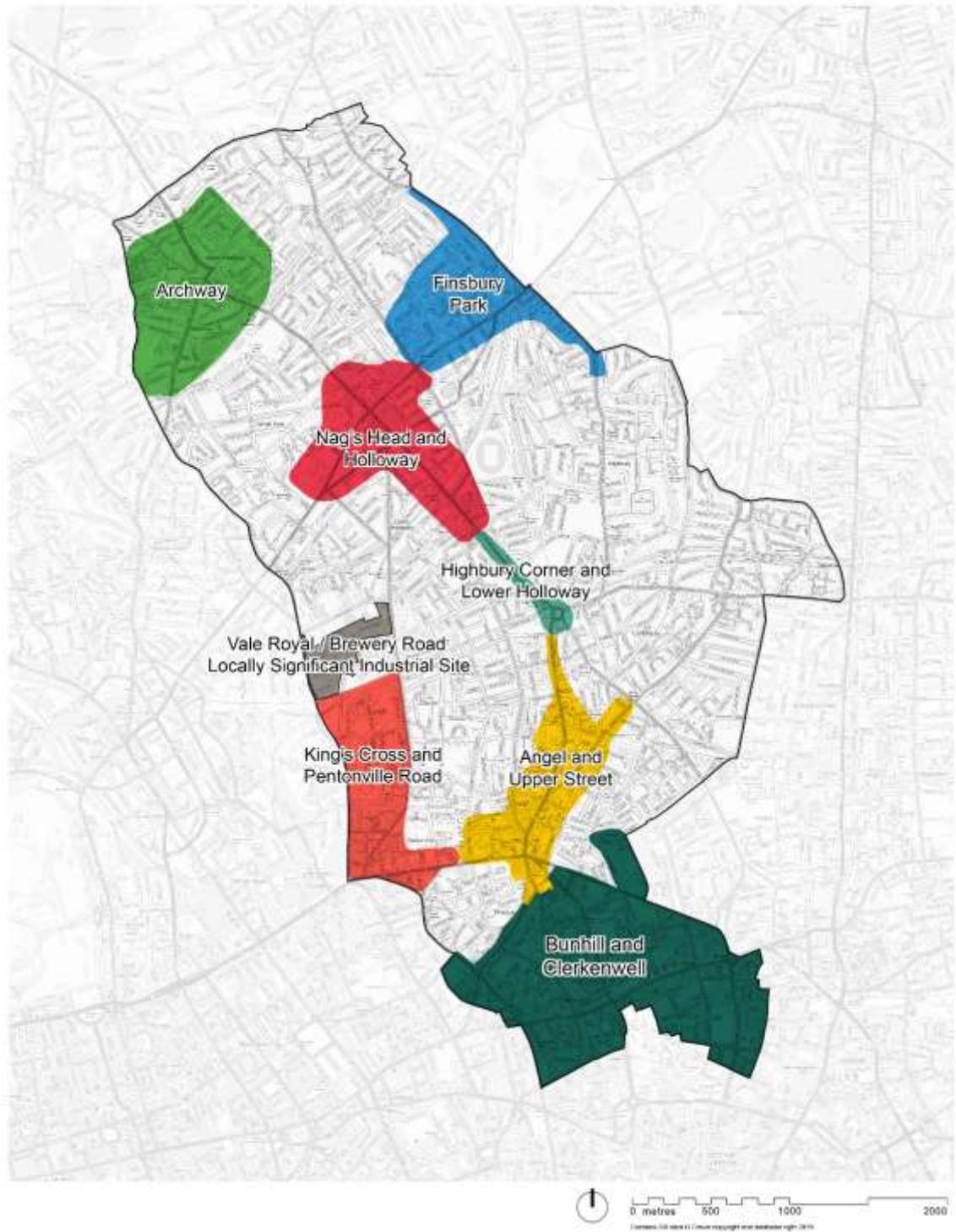
The Local Plan contains a number of spatial strategies for various parts of the borough where growth and change is expected to occur within the plan period. These are shown on figure 4.1 below. Each spatial strategy policy sets out the key priorities and requirements for the respective areas, with a 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 4.1: Map showing Area Spatial Strategies**



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

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

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

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

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

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

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

## 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 1.2 Policy H2 alternative description

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

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

IIA Objective	Policy H2	Alternative to Policy H2	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	++	0	<p>Policies H1 and H2 will have a significant positive effect. H1 promotes high quality new homes which fully integrate within, and relate positively to, the immediate locality. Both policies promote optimal densities having regard, inter alia, to the specific site context, which will allow for location sensitive density levels to be determined. Gated development - which can isolate new development and impact on local character, as well as reducing opportunities for crime reduction through increased passive surveillance – is explicitly identified as unsuitable in policy H1. Policy H1 sets out the expectation that new homes should be adaptable over their lifetime and meet a variety of needs, which contributes to the positive effect.</p> <p>New positive effects have been identified following review of the IIA as part of the examination for Policy H2 which does not change the overall effect. Policy H2 restricts bedsits on the basis that there is no evidence of need so they are not a priority unit size and the approach sets out priorities for larger unit sizes, in particular 2 bedroom units. Larger unit sizes are more likely to create robust and adaptable dwellings and buildings.</p> <p>No effect for alternative to policy H2 which relates to a specific aspect of policy H2.</p>
2. Ensure efficient use of land, buildings and infrastructure	++	0	<p>Policy H2 will have significant positive effect. It requires development proposals involving new housing to optimise the use of the building/site. This includes consideration of competing demands from other land uses. The policy resists smaller studio and bedsit units, and high concentrations of one-bed units, which will ensure that there is a greater supply of larger residential units which meet a broader range of housing need and can be more easily adapted to evolving social and economic needs more generally. H2 also prevents housing supply being wasted by ensuring new homes will be occupied; this is a direct measure to ensure that land will actually be used for its permitted purpose, and hence directly leads to the efficient use of land.</p> <p>There is a minor negative effect for the policy H2 alternative, as it would mean there is less certainty that units will be occupied. This would have the effect of units not fulfilling the boroughs housing need. However it is acknowledged that development finance could be withheld by lenders, on the</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>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 1.4: Policy H3 Alternative Description

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

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

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

IIA Objective	Policy H3	Alternative 1 to Policy H3	Alternative 2 to Policy H3	Alternative 3 to Policy H3	Alternative 4 to Policy H3	<b>Commentary on assessment of likely significant effects of policies</b> (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	0	0	0	0	0	No effect for alternatives to policy H3 or policy H3.
2. Ensure efficient use of land, buildings and infrastructure	+	-	-	+	--	<p>Policy H3 will have minor positive effect. It provides a strong requirement for the delivery of affordable housing, which ensures that this key priority is appropriately factored in to any judgement on balancing competing development needs. Delivery of affordable housing is one of the key development needs of the area.</p> <p>There is a minor negative effect for the policy H3 alternative 1. While the alternative would allow for site specific evidence to be provided in more circumstances, which introduces more flexibility, it would likely result in the delivery of less affordable housing and therefore contribute less to meeting the boroughs identified development needs. Given the Viability evidence which demonstrates that more than 35% affordable housing can be achieved, this approach whilst positive when considered against the baseline, in comparison to the preferred approach has a minor negative effect.</p> <p>Alternative 2, whilst similar to alternative 1 introduces more flexibility to provide site specific viability evidence for every development</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	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
optimises resource use and minimises waste						
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	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 1.6 Policy H4: Alternative Description

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

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

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

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

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

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

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

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

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

## Summary

Whilst there could be benefits to increasing the supply of housing from the alternative, it is not possible to conclude that these would be significant enough and that both more homes and more affordable homes would be delivered 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 1.8 Policy H6: Alternative Description

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

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

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

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)
			<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, and the wider historic and cultural environment.	0	0	No effect for policy H6 and alternative to policy H6.
4. Promote liveable neighbourhoods which	+	+	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

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)
support good quality accessible services and sustainable lifestyles			<p>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> <p>In addition purpose-built student accommodation in particular tends to be small in terms of space, which is not sustainable in terms of the ability to meet a range of needs, e.g. families, in the future.</p>
6. Promote social inclusion, equality, diversity and community cohesion	+	0	New effects have been identified which changes the effects from neutral to minor positive for H6 following review of the IIA as part of the examination process. A minor positive effect is considered as a

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>
			<p>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	-	-	<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. 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.</p>
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	+	+	<p>New effects have been identified which changes the effects from neutral to minor positive for H6 following review of the IIA as part of the examination process. A minor positive effect is considered as a result of the requirement for bursary contributions towards students leaving council care and students facing hardship which can also contribute towards training support for local people helping to increase their employment opportunities.</p> <p>The alternative to Policy H6 would have same effect as policy H6 which would be more positive if the alternative delivers more student accommodation.</p>
9. Minimise the need to travel and create accessible, safe and sustainable connections	0	0	<p>No effect for policy H6 and alternative to policy H6.</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)
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 H6 and alternative to policy H6.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	No effect for policy H6 and alternative to policy H6.
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	0	No effect for policy H6 and alternative to policy H6.
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	-	--	<p>There is a minor negative effect for policies H6 and H10. Due to their design, student accommodation and large-scale HMOs may be less able to respond to changing needs (such as accommodating families), and would therefore require potentially considerable resource to renovate the design to meet such needs.</p> <p>There is a significant negative effect for the alternative to policy H6 as due to their design, purpose-built student accommodation may be less able to respond to changing needs (such as accommodating families), and would therefore require potentially considerable resource to renovate the design to meet such needs. There is a significant negative effect for the alternative policy H6 compared to H6 given the potential increase in quantity of purpose-built student accommodation the alternative would support.</p>

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)
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 1.10: Policy H7 Alternative Description

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

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

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

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

IIA Objective	Policy H7	Alternative 1 Policy H7	<b>Commentary on assessment of likely significant effects of policies</b> (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	0	-	<p><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> <p>Overall there is a minor negative effect for the policy alternative to 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>
			<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	Commentary 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	+	+	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 1.12: Alternative Description for H10

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

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

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

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

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

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

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

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

## Summary

The assessment recognises that large-scale shared living developments may provide a housing option for 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 1.14 Alternative description for Policy H11

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

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

IJA Objective	Policy H11	Alternative 1 Policy H11	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	-	-	New effects have been identified which changes the effects from neutral to minor negative for H6, H7, H10 and H11 following review of the IJA as part of the examination process. These uses in most cases would not deliver sufficiently flexible and adaptable buildings for evolving social and economic needs, compared to conventional housing which meets the broadest spectrum of housing need. The more permissive alternative policy approach to private rented sector development would increase the significance of this effect.
2. Ensure efficient use of land, buildings and infrastructure	-	-	There is a minor negative effect for policy H11 and policy alternative to H11. Both policy approaches to land uses would not be sufficiently flexible and adaptable in most cases to accommodate evolving social and economic needs, compared to conventional housing which meets the broadest spectrum of housing need. There is no evidence to suggest that PRS can provide the same level of flexibility and adaptability as conventional housing in meeting housing need over the short, medium and long term as conventional housing development can. Providing these forms of accommodation would therefore not optimise the use of land. The more permissive alternative policy approach to private rented sector development would increase the significance of this effect.
3. Conserve and enhance the	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)
significance of heritage assets and their settings, and the wider historic and cultural environment.			
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	0	0	No effect for policy H11 and policy alternative to H11.
5. Ensure that all residents have access to good quality, well-located, affordable housing	-	--	There is a minor negative effect for policy H11 and significant negative effect for policy alternative to H11. Purpose built Private Rented Sector would likely provide less genuinely affordable housing overall than conventional models of housing although it is noted that they expect application of policy H4; in particular, these alternative models can make it more difficult to deliver social rented housing that is effectively integrated within a development. The more permissive alternative policy approach to private rented sector development would increase the significance of this effect.
6. Promote social inclusion, equality, diversity and community cohesion	0	0	No effect for policy H11 and policy alternative to H11.
7. Improve the health and wellbeing of the population and reduce health inequalities	+	+	New effects have been identified which changes the effects from neutral to minor positive for Policy H11 following review of the IIA as part of the examination process. The policy expects high quality housing in line with H4 which has various aspects to which is overall likely to improve health and wellbeing. The same effect will be created for the alternative to Policy H11.

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)
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, accessible and multi-functional	0	0	No effect for policy H11 and policy alternative to H11.
11. Create, protect and enhance suitable wildlife habitats wherever possible and	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)
protect species and diversity.			
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	0	No effect for policy H11 and policy alternative to H11.
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	No effect for policy H11 and policy alternative to H11.
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	No effect for policy H11 and policy alternative to H11.

## Summary

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

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

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

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

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

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

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

The Social and Community Infrastructure Topic Paper (document reference SD25) provides further justification for Policy SC2, which protects existing 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 1.16: Alternative Description for Policies SP3, B1 and B2 – Locally Significant Industrial Sites (LSIS)

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

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

IIA Objective	Policy SP3 (and parts of B1 and B2): protecting and promoting industrial uses in the LSIS	Alternative 1 to Policy SP3 (and parts of B1 and B2): housing co-location in LSIS	Alternative 2 to Policy SP3 (and parts of B1 and B2): office co-location in LSIS	Alternative 3 to Policy SP3 (and parts of B1 and B2): housing and office co-location in LSIS	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	+	-	-	-	<p>Policy SP3 would have a minor positive effect because the proposed policy aims to protect the primary economic function of the industrial cluster. There is a minor positive effect for policy SP3. The policy provides specific guidance on building heights within the area, informed by evidence. Height restrictions will ensure that future development will enhance the local character and distinctiveness of the industrial area.</p> <p>Alternative 1 could have a minor negative effect on the preservation of the Vale Royal and Brewery Road LSIS as it would introduce development that is contrary to the area’s primary economic function. This area is already significantly constrained and it is the borough’s only significant reservoir of industrial land, occupies only a 1% of the borough and many of the existing industrial sites tend to be smaller in size (&lt;3,000sqm). The co-location of industrial with residential could have potential impact on the size and type of spaces that can be accommodated alongside residential, and this could have effects on existing activities due to the constrained nature of the LSIS. Industrial buildings demand a different scale of design and there is a risk that these could be made to replicate residential units, without complementing the industrial character of the area. For example on smaller sites, the co-location of such uses could result in residential buildings overlooking operational yard spaces. The lack of open and green spaces within this area would also reduce the quality of residential amenity. Whilst in theory industrial and housing can be co-located and design mitigation measures put in place, in reality 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	<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>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</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>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 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</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>PLAN1 and DH1, DH2 and DH3 and to an extent SP3 which favours refurbishment projects. The impact is therefore considered to be neutral.</p> <p>Alternatives 1,2 and 3 are assumed to have a similar effect to the assessment for policy SP3.</p>
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	+	-	0	-	<p>New effects have been identified for Policy SP3 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. The Policy seeks to improve pedestrian connections throughout the LSIS. This could improve connections for residents with the primary school which is located in the LSIS.</p> <p>Alternative 1 would overall have a minor negative effect against the objective to promote liveable neighbourhoods. It may have a minor positive effect as the co-location of industrial with residential development may provide opportunities to connect to other neighbourhoods nearby with residents access to nearby Caledonian Road's shopping area. It could also provide opportunities to improve pedestrian access and develop further the sustainable transport networks in the area. The area also has a primary school. However, these benefits would need to be balanced against the existing industrial nature of the neighbourhood which 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>

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)
					Similarly, alternative 3 would have a minor negative effect against this objective. The mix of residential and office uses could promote more liveable neighbourhoods and bring opportunities to improve sustainable transport networks in the area. However, this is likely to impact on the extent to which industrial activities operate and has the potential to undermine the primary function of the LSIS.
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 1.18 Alternative Description for Policy R1 SP3, B1 and B2

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

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

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 demonstrate that additional business floorspace is not possible which allows other priorities to take precedent</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>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>
<p>3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.</p>	0	0	<p>No effect for the alternative to policy R1 or policy R1.</p>
<p>4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles</p>	++	-	<p>Policies R1, R2 and R3 will have significant positive effects on enabling town centres and LSAs to continue to serve the needs and wellbeing of the local residents across different retail catchment areas by striking the right balance of retail, leisure and business uses. The PSA approach improves access and legibility to essential services through concentrating A1 uses in the core of the town centre which enjoy the best transport links. The increased flexibility of uses in the secondary shopping area will support the expansion of cultural provision and encourage a vibrant environment for residents and visitors alike. Policy R1 will support and manage a thriving and safe cultural and high-time economy, directing appropriate cultural and NTE development to town centres and CAZ locations and cultural quarters and ensuring appropriate design which is safer and more inclusive. The agent of change principle is highlighted and applies in town centres and allows for vibrant town centre uses that attract visitors to be maintained.</p>

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 1.20 Alternative Descriptions for Policy R2:

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

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

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

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

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

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

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

IIA Objective	Policy R2	Policy alternative 1	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	++	0	<p>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	<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	+	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	Commentary 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>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 1.22: Alternative Description for Policy R7

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

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

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

IIA Objective	Policy R7	Alternative 1 to Policy R7	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	+	0	<p>New effects have been identified for Policies R7 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. A minor positive has been identified for policy R7 as the protection and enhancement of markets and specialist shopping areas will help to maintain and enhance the local character of the borough. It will also help to ensure activity and natural surveillance within these locations which can help to create a safer and more inclusive environment.</p> <p>There is no effect for policy R7 alternative. 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 1.24: Alternative Description for Policy R8:

Alternative Reference	Alternative Description
1.	Have no quantitative restrictions on hot food takeaways and betting shops across the 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 1.25: Assessment of Alternatives for Policy R8: Location and Concentration of Uses

IIA Objective	Policy R8	Alternative 1 to Policy R8	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	+	0	<p>Policy R8 has a minor positive effect. It seeks to manage the detrimental concentrations of uses that hinder public health and wellbeing, amenity, character and function, and affect the vitality and viability of places. There is some evidence that increased numbers of betting shops can lead to increases in crime and ASB, including fear/perceptions of crime and ASB therefore managing the concentration of such uses could have positive effects on the built environment 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	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	++	-	<p>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 1.26: Alternative Description for Policy R12

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

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

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

IIA Objective	Policy R12: Visitor accommodation	Alternative 1 to Policy R12	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	0	0	<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>
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.

IIA Objective	Policy R12: Visitor accommodation	Alternative 1 to Policy R12	<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>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.</p>
7. Improve the health and wellbeing of the population and reduce health inequalities	0	0	<p>No effect for policy R12 and alternative to policy R12.</p>
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 1.28: 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 1.29: 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>
3. Conserve and enhance the significance of heritage assets and their settings,	0	0	<p>There is a neutral effect for both the policy and the policy alternative. Connection to a heat network may have a more limited impact on a heritage asset compared to other low carbon heat sources, such as air source heat pumps which affect the exterior of a building. Therefore the alternative, by not requiring any minor developments to connect, may indirectly result in an increased risk of harm to heritage assets. Not requiring any minors to connect</p>

and the wider historic and cultural environment.			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.
7. Improve the health and wellbeing of the population and reduce health inequalities	++	0	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.  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.
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	+	-	<p>Policy S5 will have a minor positive effect and support the development of green industries and a low-carbon economy through its use of low and zero carbon heating options, particularly heat networks and secondary heat sources.</p> <p>There is a minor negative effect for the policy alternative. Not requiring any minor developments to connect to a heat network may affect the development and expansion of green industries and a low carbon economy, particularly opportunities related to the heat network itself, including opportunities to link with other networks to achieve wider agglomeration benefits.</p>
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	0	0	No effect for Policy S5 or alternative to Policy S5.
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. 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	+	-	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.

growth and enabling a circular economy that optimises resource use and minimises waste			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).
14. Maximise protection and enhancement of natural resources including water, land and air	0	-	There is no effect for Policy S5.  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.

## 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 1.30: 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 1.31: Assessment of Alternatives for Policy DH3: Tall Buildings

IIA Objective	Policy DH3	Alternative 1 to Policy DH3	Alternative 2 to Policy DH3	<b>Commentary on assessment of likely significant effects of policies</b> <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>

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

4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	0	0	0	No effect for policy alternatives to Policy DH3.
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	0	0	<p>New assessment detail has been added following review of the IIA as part of the examination process: Policy DH3 may limit opportunities for tall buildings which can provide housing on specific sites which could impact to some degree on housing delivery. However research has shown that high densities of housing can be achieved in lower rise development, which also offer a better range of unit types and sizes. High densities will be secured through policy DH1 which requires that development optimises density. The total effect on housing delivery in the borough is not likely to be sufficiently to justify a negative scoring and housing targets are being achieved. In addition under DH3 some sites identified as potentially appropriate for tall buildings are allocated to include residential development, therefore also delivering affordable housing.</p> <p>No effect for policy alternatives to Policy DH3.</p>
6. Promote social inclusion, equality, diversity and community cohesion	0	0	0	No effect for policy alternatives to Policy DH3.
7. Improve the health and 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, cycling and walking	+	0	+	<p>Proposed Policy DH3 will have a minor positive effect. The suitable locations for tall buildings have been identified in principle based on a co-ordinated and holistic approach which focuses development in the most appropriate locations considering transport accessibility, infrastructure and land use. The policy criteria ensure that tall buildings do not prejudice the ongoing functionality of sites in the local area including the functionality of the existing transport network.</p> <p>No effect for alternative 1 to Policy DH3.</p> <p>Policy Alternative 2 will have a minor positive effect. The broad locations for tall buildings would be selected based partly on their transport accessibility, ensuring that tall buildings, which generate large numbers of trips, are located where these trips can be made by public transport, walking and cycling.</p>
10. Protect and enhance open spaces that are high quality, networked, accessible 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>

				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.
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 change and enhance community resilience to climate change impacts.	+	0	0	<p>New effects have been identified which changes the effects from neutral to minor positive following review of the IIA as part of the examination process. Policy DH3 will have a minor positive effect on reducing climate change by requiring new tall buildings to be of exceptional design standards.</p> <p>No effect for policy alternatives to Policy DH3.</p>
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use	+	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>

and minimises waste				
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 1.32: Alternative description for BC1: Prioritising office use.

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

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

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

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

IIA Objective	Policy BC1	Alternative 1 to Policy BC1	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	0	0	<p>New effects have been identified for Policy BC1 following review of the IIA as part of the examination and changed the effects from minor positive to neutral. The policy will likely have a neutral effect on promoting a high quality, inclusive, safe, and sustainable built environment. Given the limited number of development sites, combined with policies to protect certain uses (e.g. housing, business, cultural uses) any mix of land uses proposed in new developments is unlikely to change the overall mixed use character of the AAP area during the plan period.</p> <p>The alternative to policy BC1 will likely have a neutral effect on promoting a high quality, inclusive, safe, and sustainable built environment. The alternative requires different mixes of uses to be provided in development in the Bunhill and Clerkenwell Area. Given the limited number of development sites, combined with policies to protect certain uses (e.g. housing, business, cultural uses) any mix of land uses proposed in new developments is unlikely to change the overall mixed use character of the AAP area during the plan period.</p>
2. Ensure efficient use of land, buildings and infrastructure	++	++	<p>Policy BC1 and the alternative to policy BC1 will have a significant positive effect on the efficient use of land. The policy will focus development of employment uses (which generate a large number of trips) in an area highly accessible by sustainable means of transport. Development will be located in areas with excellent public transport accessibility including to the underground and Crossrail. The Islington Employment Study states that the Central Activities Zone is the location with the most demand for Grade A office space and this will be the priority. Maximisation of business floorspace will be required in the CAZ, given this is the area which will see the most demand for business floorspace. Local evidence currently indicates that there is a significant shortfall in supply of employment land. This policy will maximise development of floorspace in this most appropriate location ensuring the efficient use of the land. But in terms of balancing the competing demands between land uses, the alternative requires employment-led development, which means some of the floorspace must be in business use. It therefore allows for the development of non-business uses, provided these do not make up more than the majority of floorspace, which could have a</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)
			positive impact on its own but in comparison to BC1 is considered a less positive effect although still significant.
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	0	No effect for policy BC1 and the alternative to policy BC1.
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	0	+	<p>Policy BC1 will have a neutral effect. While this policy requires that the majority proportion of new development is office, it does allow smaller proportions of other uses on site. In addition, a number of sites are allocated for other (non-office) uses. These factors combined with the existing mixed-use character of the area means the mix of uses which support liveable neighbourhoods will not be affected.</p> <p>The alternative to policy BC1 will have a likely minor positive effect on liveable neighbourhoods providing a mix of uses with some office space allowing sufficient flexibility to provide sufficient floorspace for different uses on a number of floors.</p>
5. Ensure that all residents have access to good quality, well-located, affordable housing	-	0	<p>Policy BC1 will likely have a minor negative effect on the provision of affordable housing. The policy requires that most new development in Bunhill and Clerkenwell is office-led. This will lead development of less housing as it will prevent some residential-led schemes coming forward. In addition, it also means that less affordable housing will be developed, as it is required to be provided as a proportion of new residential developments. However the Council has assessed future housing delivery and considers that it can meet its housing target with this policy in place.</p> <p>The alternative to policy BC1 will likely have a neutral effect on the provision of affordable housing. The alternative may mean that more housing and affordable housing will likely be developed.</p>

IIA Objective	Policy BC1	Alternative 1 to Policy BC1	<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>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>
<p>6. Promote social inclusion, equality, diversity and community cohesion</p>	+	-	<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>
<p>7. Improve the health and wellbeing of the population and reduce health inequalities</p>	0	0	<p>No effect for policy BC1 and the alternative to policy BC1.</p>
<p>8. Foster sustainable economic growth and increase employment opportunities</p>	++	+	<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</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>
across a range of sectors and business sizes			<p>development has the potential to undermine the strategic functions of the CAZ and East London Tech City. As part of office development, other Local Plan policies will ensure that these developments also provide affordable workspace and space suitable for small and medium enterprises, helping to diversify the employment opportunities in the borough.</p> <p>The alternative to policy BC1 will likely have minor positive effect on economic growth. The alternative will help to address the need for employment space but in comparison to BC1 it will not maximise delivery so is considered inefficient use of land which could restrict economic growth and employment in the borough. This will potentially reduce the opportunity for the local economy to grow, reducing the amount of new jobs provided by development and reducing the amount of affordable workspace and training and apprenticeships opportunities for local residents in comparison to BC1. Other Local Plan policies will ensure provision of a range of employment opportunities for example the provision of affordable workspace and space suitable for small and medium enterprises.</p>
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	+	+	Both Policy BC1 and the alternative to BC1 will have a minor positive effect as both policies promote development in areas with excellent public transport accessibility, including to the underground and Crossrail. The alternative may lead to more residential or non-office employment uses being developed, but this would be in the same equally accessible location (the CAZ) as the policy approach, therefore there would be no additional benefit.
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	No effect for policy BC1 and the alternative to policy BC1.

IIA Objective	Policy BC1	Alternative 1 to Policy BC1	<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)
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	No effect for policy BC1 and the alternative to policy BC1.
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	0	No effect for policy BC1 and the alternative to policy BC1.
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	No effect for policy BC1 and the alternative to policy BC1.
14. Maximise protection and	0	0	No effect for alternative.

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

### Summary

The assessment 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.

# Part 1: Updated Policy Assessments

## **Introduction**

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

**Table 1.34: Policy PLAN1 assessment**

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

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

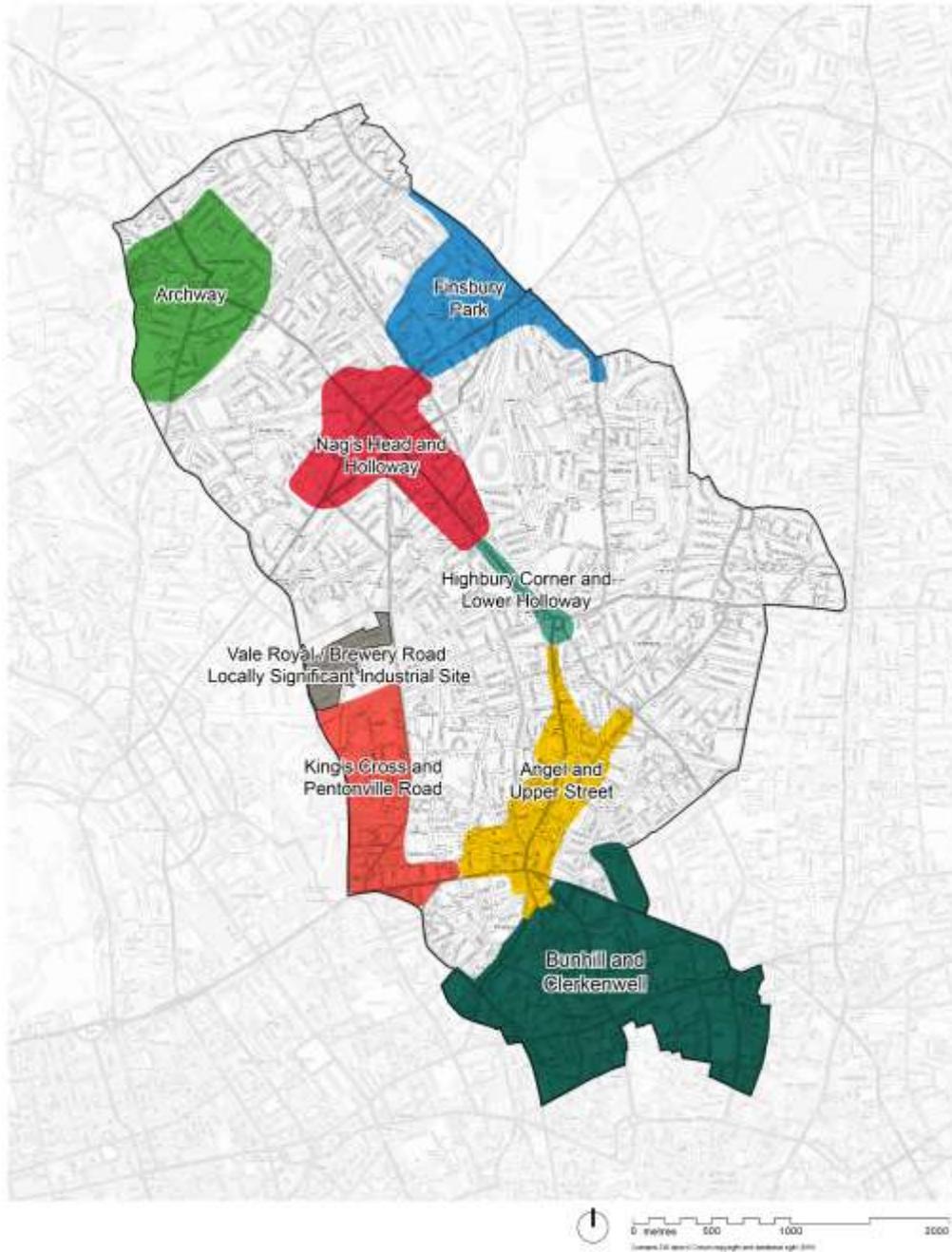
IIA Objective	Policy PLAN1: Site appraisal, design principles and process	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
		<b>New effects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

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

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

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

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



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

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

## Area Spatial Strategies policy assessment

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

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

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)
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>
3. Conserve and enhance the	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)
significance of heritage assets and their settings, and the wider historic and cultural environment.				<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 positive. The Policy seeks to improve pedestrian connections throughout the LSIS. This could improve connections for residents with the primary school which is located in the LSIS.</b></p>

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)
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 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</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)
				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.
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 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>

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)
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 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.</p>
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road,	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>

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)
public transport, cycling and walking				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.
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	+	0	<p>There is no effect for policy SP1.</p> <p>There is a minor positive effect for policy SP2. The policy sets out specific criteria for residential moorings on Regent's Canal, a designated open space in to protect use and function of this space.</p> <p>There is no effect for policy SP3.</p>
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	+	0	<p>There is no effect for policy SP1.</p> <p>There is a minor positive effect for policy SP2. The policy sets out specific criteria for residential moorings on Regent's Canal, a designated open space in to protect use and function of this space. <b>Also the policy recognises the Regent's Canal's importance as a wildlife corridor and need for development which increases access for recreational purposes and should not cause detrimental impacts.</b></p> <p>There is no effect for policy SP3.</p>

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)
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 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>
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	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)
natural resources including water, land and air				<p>There is a minor positive effect for policy SP2 as the policy sets out specific criteria for residential moorings on Regent's Canal in relation to air pollution which can be an issue with residential moorings.</p> <p>There is a minor positive effect for Policy SP3. Policy SP3 will support the strategic location of the LSIS which enables shorter journeys and supply chains, while providing industrial, storage, distribution and other uses that are increasingly essential to the functioning of London's economy, and meeting the needs of its growing population and the aspect of its role in servicing the Central London Economy. Without the policy protection, industrial businesses are likely to be displaced to Outer London locations and this will have significant impacts on transport routes into London, leading to increased traffic congestion and emissions from traffic which will impact on the health of residents. In addition, the proposed policy for the area integrates requirements to improve pedestrian and vehicle connections in the area, where possible, having regard to routes identified to improve connections in the area.</p>

### 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 1.36: Assessment of Area Spatial Strategies for SP4 to SP8**

IIA Objective	Policy SP4: Angel and Upper Street	Policy SP5: Nag's Head and Holloway	Policy SP6: Finsbury Park	Policy SP7: Archway	Policy SP8: Highbury Corner and Lower Holloway	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	+	+	+	+	++	<p><b>New effects have been identified for Policies SP4 to SP8 following review of the IIA as part of the examination and changed the effects from neutral to minor positive.</b></p> <p><b>Policy SP4 seeks to prioritise opportunities for public realm improvements for walking and cycling 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> <p><b>Both policy SP6 and SP7 support creation of a high quality environment that is accessible to residents, employees and visitors and good connectivity that will improve walking and cycling experience.</b></p> <p><b>Policy SP8 supports the transformation project which will make Highbury Corner safe and accessible for all users, in particular pedestrians and cyclists. In addition the policy also supports improvements to the current station and accessibility including potential use of the former entrance.</b></p>
2. Ensure efficient use of land, buildings and infrastructure	+	+	+	+	+	<p>There is a minor positive effect for policies SP4, SP5, SP6, SP7 and SP8. These areas are considered to be the most appropriate locations for development, being the areas where growth and change is expected to occur within the plan period. The areas are located in close proximity to key infrastructure such as public transport hubs and/or are located on key commercial routes.</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><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> <p><b>SP6 expects development to maintain the predominant commercial role of the area with a focus on retail and services recognised on ground floors, the specialist shopping area of Fonthill Road and the potential of the area to develop as a CAZ satellite for office floorspace. The leisure and cultural attraction of the area is also recognised.</b></p> <p><b>SP7 expects development to maintain the predominant commercial function of the area with a focus on retail and services recognised on ground floors. The leisure function and identification of the area as a cultural quarter is also recognised.</b></p> <p><b>SP8 supports maintaining the function of the existing Local Shopping Areas and encourage new office floorspace in the employment areas.</b></p>
3. Conserve and enhance the significance of heritage assets and their	+	+	+	0	+	<p><b>New effects have been identified for policies SP4, SP5, SP6 and SP8 following review of the IIA as part of the examination. These are identified below.</b></p> <p><b>For Policy SP4 the effects have been changed from neutral to minor positive. The policy makes reference to the historic character of the</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)
settings, and the wider historic and cultural environment.						<p><b>Angel and Upper Street area, making specific reference to the Islington Tunnel that runs underneath the spatial strategy area.</b></p> <p><b>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.</b></p> <p><b>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.</b></p> <p><b>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.</b></p> <p><b>No effect was identified for policy SP7.</b></p>
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	+	+	+	+	+	<p><b>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.</b></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 focuses development in the most appropriate</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	<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>locations by recognising the area as appropriate for a range of commercial uses including retail and office uses which will help to promote diverse, vibrant and economically thriving town centres that serve the needs and wellbeing of the population. In addition the role of the London Metropolitan University is recognised which will help improve access of this facility for residents.</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.
7. Improve the health and	0	0	+	+	0	There is no effect for Policies SP4, SP5, 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)
wellbeing of the population and reduce health inequalities						<p><b>New effects have been identified for Policy SP6 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. The policy seeks to improve permeability and prioritise opportunities to increase access to Finsbury Park open space which will contribute towards encouraging people to access the space which will benefit physical health and wellbeing.</b></p> <p><b>New effects have been identified for Policy SP7 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. The policy supports the re-provision of the St Pancras Mental health hospital on the Whittington hospital site which will improve access to health facilities/social infrastructure in the borough.</b></p>
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	+	+	+	+	+	<p>There is a minor positive effect for policy SP4 Angel and Upper Street which identifies business use as the priority land use with specific areas identified which reinforces the policy position set out in policy B2 and helps contribute to economic growth.</p> <p>There is a minor positive effect for policy SP5 Nags Head which aims to diversify the local economy which reinforces the policy position set out in policy B2 and helps contribute to economic growth.</p> <p>There is a minor positive effect for policy SP6 Finsbury Park which identifies the centre as having potential to develop as a satellite location for B use classes which reinforces the policy position set out in policy B2 and helps contribute to economic growth.</p> <p>There is a minor positive effect for policies SP7 Archway, and SP8 Highbury Corner and Lower Holloway, which reinforces the Inclusive Economy policies, notably policies B2 and R3, and helps contribute to economic growth.</p>

IIA Objective	Policy SP4: Angel and Upper Street	Policy SP5: Nag's Head and Holloway	Policy SP6: Finsbury Park	Policy SP7: Archway	Policy SP8: Highbury Corner and Lower Holloway	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	+	+	+	+	++	<p><b>New effects have been identified for Policies SP4 to SP7 following review of the IIA as part of the examination and changed the effects from neutral to minor positive.</b></p> <p><b>Policy SP4 seeks to prioritise opportunities for public realm improvements which will contribute towards encouraging more sustainable forms of travel.</b></p> <p><b>Policy SP5 seeks to prioritise opportunities for public realm improvements which will contribute towards encouraging more sustainable forms of travel. In addition there is reference to removing the gyratory system and junction improvements to improve cycle route linkages.</b></p> <p><b>Policy SP6 seeks to improve permeability and prioritise opportunities for public realm improvements which will contribute towards encouraging more sustainable forms of travel.</b></p> <p><b>Policy SP7 seeks to improve permeability and prioritise opportunities for public realm and road safety improvements which will contribute towards encouraging more sustainable forms of travel.</b></p> <p><b>New effects have been identified for Policy SP8 following review of the IIA as part of the examination and changed the effects from neutral to significant positive. The policy supports the transformation project which will make Highbury Corner safe and accessible for all users, in particular pedestrians and cyclists with creation of dedicated cycle lanes as part of road junction improvements. In addition the policy also supports improvements to the current station and accessibility including the former entrance.</b></p>

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

IIA Objective	Policy SP4: Angel and Upper Street	Policy SP5: Nag's Head and Holloway	Policy SP6: Finsbury Park	Policy SP7: Archway	Policy SP8: Highbury Corner and Lower Holloway	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	0	0	0	There is no effect for Policies SP4, SP5, SP6, SP7 and SP8.
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	0	0	0	There is no effect for Policies SP4, SP5, SP6, SP7 and SP8.

### **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 1.37: Assessment of policies H1 to H5**

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

IIA Objective	Policy H1: Thriving Communities	Policy H2: New and existing conventional housing	Policy H3: Genuinely affordable housing	Policy H4: Delivering high quality housing	Policy H5: Private outdoor space	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
						<p>lifetime and meet a variety of needs, which contributes to the positive 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 is positive and will help create robust and adaptable dwellings and buildings which respond to evolving social needs.</b></p>

IIA Objective	Policy H1: Thriving Communities	Policy H2: New and existing conventional housing	Policy H3: Genuinely affordable housing	Policy H4: Delivering high quality housing	Policy H5: Private outdoor space	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
2. Ensure efficient use of land, buildings and infrastructure	++	++	+	++	+	<p>Policy H1 will have significant positive effect against the objective to ensure efficient use of land. The policy promotes optimal density levels, in reference to high density housing with specific reference to other Development Plan policies, and specific site context meaning that optimisation will be an active consideration and balancing of competing demands between land uses and considering a sites location. H1 also promotes homes that are designed to be adaptable over their lifetime to meet a range of needs that can arise at various stages of the buildings life. <b>Text updated as part of the review of the IIA during the examination: The policy also sets a principle of restricting inefficient forms of development; student accommodation, large HMO and purpose built private rented sector on the basis of land supply and sustainable use of land. The approach aims to balance competing demands for land use and these forms of housing in most cases would not be sufficiently flexible and adaptable to accommodate evolving social and economic needs, compared to conventional housing which meets the broadest spectrum of housing need.</b></p> <p>Policy H2 will have significant positive effect. It requires development proposals involving new housing to optimise the use of the building/site. This includes consideration of competing demands from other land uses. The policy resists smaller studio and bedsit units, and high concentrations of one-bed units, which will ensure that there is a greater supply of larger residential units which meet a broader range of housing</p>

IIA Objective	Policy H1: Thriving Communities	Policy H2: New and existing conventional housing	Policy H3: Genuinely affordable housing	Policy H4: Delivering high quality housing	Policy H5: Private outdoor space	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
						<p>need and can be more easily adapted to evolving social and economic needs more generally. H2 also prevents housing supply being wasted by ensuring new homes will be occupied; this is a direct measure to ensure that land will actually be used for its permitted purpose, and hence directly leads to the efficient use of land.</p> <p>Policy H3 will have minor positive effect. It provides a strong requirement for the delivery of affordable housing, which ensures that this key priority is appropriately factored in to any judgement on balancing competing development needs. Delivery of affordable housing is one of the key development needs of the area.</p> <p>Policy H4 will have significant positive effect. It ensures that where housing is developed, it is high quality which makes the most out of land available. Policy H4 includes a number of design standards which mean that homes are adaptable to meet a range of needs 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 amenity space, including accessibility requirements, which is positive and will help create flexible and adaptable dwellings and buildings which respond to evolving social needs and which can also help to support green infrastructure.</b></p>

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

IIA Objective	Policy H1: Thriving Communities	Policy H2: New and existing conventional housing	Policy H3: Genuinely affordable housing	Policy H4: Delivering high quality housing	Policy H5: Private outdoor space	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
						<p>infrastructure requirements and the impact on existing social infrastructure. This will help to ensure that the appropriate level of SI is available for the local population.</p> <p>Policies H4 and H5 will have no effect.</p>
5. Ensure that all residents have access to good quality, well-located, affordable housing	++	++	++	++	+	<p>Policy H1 will have significant positive effect. It includes delivery of genuinely affordable housing as a key priority, and specifies that such housing must be affordable for those in need. Financial contributions are also sought from the policy. Overall, the policy is likely to significantly increase the supply of AH, both directly and through spending of any financial contributions secured to deliver AH elsewhere in the borough. <b>The policy promotes optimal density levels, size mix which reflects local need, and also references meeting needs of vulnerable older people and gypsies and travellers.</b></p> <p>Policy H2 will have significant positive effect. The policy seeks a mix of housing sizes informed by evidence of need and population growth; this includes specific size priorities for different affordable tenures. Encouraging a diverse mix ensures that affordable housing provision can meet the broadest range of need possible. H2 also seeks the optimum use of sites/buildings, informed in part by housing density.</p> <p>Policy H3 will have significant positive effect. It will increase the delivery of affordable housing through implementation of robust policy and the refusal of applications which do not provide the appropriate level of AH; and through collection of financial contributions which will go toward measures to further increase AH supply. The policy requires that the majority of AH secured is social rent, which reflects housing need established by evidence.</p>

IIA Objective	Policy H1: Thriving Communities	Policy H2: New and existing conventional housing	Policy H3: Genuinely affordable housing	Policy H4: Delivering high quality housing	Policy H5: Private outdoor space	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
						<p>Policy H4 will have significant positive effect. It will ensure that all housing is of a high quality through requirement to meet specific design standards, including minimum space standards. Taken together and with other policy requirements of the Local Plan, the standards in H4 will deliver homes that are adaptable to meet the diverse and changing needs of Islington's population 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, equality, diversity and community cohesion	++	+	+	++	+	<p>Policy H1 will have a significant positive effect. The policy aims to improve fairness and integration and tackle social exclusion, through the delivery of mixed and balanced communities which are economically, environmentally and socially resilient. It also seeks new housing development that is fully integrated within, and relates positively to, the immediate locality, and resists gated development. These measures combined are likely to be of significant benefit in terms of creating a fairer, more integrated Islington. <b>The policy seeks to meet needs of general housing and for gypsies and travellers which promotes equity between population groups and those with protected characteristics helping reduce social exclusion.</b></p> <p><b>New effects have been identified for Policy H2 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. The policy seeks a mix of housing sizes informed by evidence of need and population growth; this includes</b></p>

IIA Objective	Policy H1: Thriving Communities	Policy H2: New and existing conventional housing	Policy H3: Genuinely affordable housing	Policy H4: Delivering high quality housing	Policy H5: Private outdoor space	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
						<p><b>specific size priorities for different affordable tenures. Encouraging a diverse mix ensures that housing provision can meet the broadest range of need possible and reduce equality providing more opportunity and potentially addressing overcrowding issues.</b></p> <p>Policy H3 will have minor positive effects. Increased delivery of AH could help reduce the negative consequences of relative poverty by reducing the proportion of income spent on accommodation and therefore freeing up a greater proportion of income for other living costs. AH is also an important component in delivering mixed and balanced communities which will improve social cohesion and integration.</p> <p>Policy H4 will have a significant positive effect. The requirement for new development to be 'tenure blind' will promote social cohesion and integration. This requirement, and others included in H4 such as requiring certain proportions of wheelchair accessible and adaptable properties, could lead to greater equity between population groups and those with protected characteristics.</p> <p><b>New effects have been identified for Policy H5 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policy H5 sets out requirements for private amenity space provided via gardens, balconies or shared private amenity space. Ensuring provision of private amenity space is positive and will help support active communities and cohesive communities where shared space is provided.</b></p>
7. Improve the health and wellbeing of the population and	+	+	+	++	+	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

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)
reduce health inequalities						<p>the home as a place of retreat which can contribute to wellbeing, improving both physical and mental health .</p> <p><b>New effects have been identified for Policy H2 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. H2 requires the optimal use of sites/buildings and consideration of social infrastructure (SI) requirements and impact on existing SI. This will help to support existing facilities and ensure that the appropriate level of SI is available for the local population.</b></p> <p>Policy H3 will have minor positive effect. By providing greater amounts of affordable accommodation, greater amounts of people are less likely to experience financial hardship, which can be a key contributor to poor mental and physical health. By reducing the proportion of income spent on accommodation, this frees up a greater proportion of income for other living costs such as utilities bills, which could reduce fuel poverty.</p> <p>Policy H4 will have significant positive effect. The policy is underpinned by the idea of the home as a place of retreat where people can feel comfortable and safe. Delivery of high quality homes in line with H4 is therefore likely to improve 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</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>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 detrimental to health; however, the policy allows for alternatives where the level of noise impact would be significant, which would mitigate noise impacts but still deliver private space. Outside space could also be utilised for food growing which could assist with healthier lifestyles.</p>
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	0	+	+	0	0	<p>There are no effects for policies H1, H4 and H5.</p> <p><b>New effects for Policy H2 have been identified which changes the effects from neutral to minor positive following review of the IIA as part of the examination process. Policy H2 considers the interaction with other policy priorities in particular new business floorspace helping ensure sufficient space is provided in the right locations where appropriate.</b></p> <p><b>New effects for Policy H3 have been identified which changes the effects from neutral to minor positive following review of the IIA as part of the examination process. 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>

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)
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>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 affordable housing can help retain labour in Islington which can help key public service areas and lower skilled employment. The significant expense of housing in the borough can act as a significant barrier to employment driving people out of the borough and potentially out of the capital this therefore can help reduce the need to travel.</b></p>
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	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)
protect species and diversity.						
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>A new effect has been identified which changes the effects from neutral to minor positive for H5 following review of the IIA as part of the examination process. The policy recognises the need to seek to balance the use of green roofs for amenity purposes with renewable energy equipment which helps development meet their priorities to reduce carbon emissions.</p> <p>There are no effects for policies H2.</p>
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	+	0	0	++	0	<p>Policy H1 will have a minor positive effect. It promotes homes that are designed to be adaptable over their lifetime to meet a range of needs that can arise at various stages of life.</p> <p>Policy H4 will have significant positive effect. The policy requires new homes to consider how recycling and waste arising from occupation of the development will be stored, collected and managed, which could contribute to increased levels of recycling. Policy H4 includes a number of design standards which mean that homes are adaptable to meet a range of needs over their lifetime. This will contribute to the delivery of a circular economy.</p> <p>There are no effects for policies H2, H3 and H5.</p>
14. Maximise protection and 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 1.38: Assessment of policies H6 to H12**

IIA Objective	Policy H6: Purpose-built Student Accommodation	Policy H7: Meeting the needs of vulnerable older people	Policy H8: Self-build and Custom Housebuilding	Policy H9: Supported Housing	Policy H10: Houses in Multiple Occupation (HMOs)	Policy H11: Purpose Built Private Rented Sector Development	Policy H12: Gypsy and Traveller Accommodation	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	0	0	+	0	0	-	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 these policies. A similar balance and overall</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)
								neutral effect is considered to apply for policy H7 too.
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 positive effect from policy H7 as it focuses</b></p>

IIA Objective	Policy H6: Purpose-built Student Accommodation	Policy H7: Meeting the needs of vulnerable older people	Policy H8: Self-build and Custom Housebuilding	Policy H9: Supported Housing	Policy H10: Houses in Multiple Occupation (HMOs)	Policy H11: Purpose Built Private Rented Sector Development	Policy H12: Gypsy and Traveller Accommodation	<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>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.</p> <p>New effects have been identified which changes the effects from neutral to minor positive for H8. The policy for self-build housing promotes the most efficient use of land and optimal densities having regard to the specific site context.</p>
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	0	0	0	0	0	0	No effect for the policies H6 to H12.

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)
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</b></p>

IIA Objective	Policy H6: Purpose-built Student Accommodation	Policy H7: Meeting the needs of vulnerable older people	Policy H8: Self-build and Custom Housebuilding	Policy H9: Supported Housing	Policy H10: Houses in Multiple Occupation (HMOs)	Policy H11: Purpose Built Private Rented Sector Development	Policy H12: Gypsy and Traveller Accommodation	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
								<p><b>does not maximise the quantum of housing provided compared to conventional housing.</b></p> <p>Large-scale HMOs and student accommodation in particular tend to be small in terms of space, which 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	+	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</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>
community cohesion								<p><b>council care and students facing hardship which contributes to reducing inequality.</b></p> <p>Policy H7 could be conceived to reduce the opportunity to provide market extra care homes but 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>

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)
7. Improve the health and wellbeing of the population and reduce health inequalities	-	+	0	++	-	+	0	<p>No effect for policies H8, and H12.</p> <p><b>New effects have been identified which changes the effects from neutral to minor positive for Policy H11 following review of the IIA as part of the examination process. The policy expects high quality housing in line with H4 which has 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</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)
								seeing studios preferred over communal flats reducing the opportunity for social interaction between students.
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	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.

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)
transport, cycling and walking								
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.

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)
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	0	0	0	0	0	0	No effect for the policies H6, H7, H8, H9, H10, H11 and H12.
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and	-	-	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.

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)
minimises waste								
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	0	0	0	0	0	No effect for the policies H6, H7, H8, H9, H10, H11 and H12.

**Policy H6: Purpose built Student Accommodation**

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

Policy H6 and H10 are considered together because the assessment results in similar overall negative impacts against the framework for these policies as a result of the affect created by the accommodation which the policies are trying to mitigate. There is an overwhelming need to provide housing and affordable housing with limited amount of developable land in the borough, and conventional housing meets the broadest spectrum of need, so any form of housing that detracts from meeting this overwhelming need is going to have a negative impact on use of land in the Sustainability Appraisal. This negative impact against the efficient use of land is extended in the Sustainability Appraisal for the alternatives to both policy H6 and H10. The two policy alternatives would apply the London Plan

policy which would permit more student housing in well-connected accessible locations such as town centres with local services. For large scale HMOs the London Plan is also supportive and considers that this kind of accommodation may have a role in meeting housing needs in London. Note that the Local Plan is supportive of small scale HMO – those considered C4 use class and resists large scale purpose built HMO – those considered sui generis.

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

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

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

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

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

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

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

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

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

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

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

## Social and community infrastructure

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

- Policy SC1: Social and Community Infrastructure - Policy SC1 focuses on protecting, supporting, assessing and meeting needs for social and community infrastructure.
- Policy SC2: Play space - Policy SC2 seeks to protect existing play space and ensure playspace is provided in all major developments and playable public space is provided in all development.
- Policy SC3: Health Impact Assessment - sets out when Health Impact Assessments will be required.
- Policy SC4: Promoting Social Value - Policy SC4 encourages development to maximise social value and sets requirement for major development proposals to undertake a Social Value self-assessment.

**Table 1.39: Assessment of policies SC1 to SC4**

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

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

quality accessible services and sustainable lifestyles					<p>where there is a need both from market demand and community need. This should mean that the range of community facilities necessary for the community are protected.</p> <p>Policy SC2 will have a significant positive effect. It will ensure play space is both maintained through protecting existing play space and new play space is provided in all major developments.</p> <p>There is no effect for policy SC3. See assessment against objective 1.</p> <p>There is no effect for policy SC4. See assessment against objective 1.</p>
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	0	0	0	<p>No effect for policies SC1 and SC2.</p> <p>There is no effect for policy SC3. See assessment against objective 1.</p> <p>There is no effect for policy SC4. See assessment against objective 1.</p>
6. Promote social inclusion, equality, diversity and community cohesion	+	+	0	0	<p>Policies SC1 and SC2 will have a minor positive effect. Social infrastructure and play space can contribute to social cohesion and integration by providing buildings and spaces where different groups of people can come together.</p> <p>There is no effect for policy SC3. See assessment against objective 1.</p> <p>There is no effect for policy SC4. See assessment against objective 1.</p>
7. Improve the health and wellbeing of the population and reduce health inequalities	++	++	0	0	<p>Policy SC1 will have significant positive effects as it will seek to protect existing social and community infrastructure, and ensure new facilities are built to be accessible and inclusive. Where policy identifies estates rationalisation for recognised public sector bodies the proposals will be required to evidence community needs through a community impact assessment which will help ensure that health needs are met in the borough.</p> <p>Policy SC2 will have significant positive effects as it will seek to ensure there are sufficient play facilities and play space provided as part of new development and where proposals would result in a loss of play space, replacement provision is required. The adventure playgrounds in the borough will be protected.</p> <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.
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 1.40: Assessment of policies B1 to B5**

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

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

of heritage assets and their settings, and the wider historic and cultural environment.						<p><b>the wider historic environment depending on implementation. This could happen if development has negative impacts in terms of massing, scale, visual impacts. However this is counterbalanced by other local plan policies such as PLAN1 and DH1, DH2 and DH3 and to an 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	++	+	+	++	++	<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.</p>

community cohesion						<p>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 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	+	+	+	+	+	<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</b></p>

health inequalities						<b>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>
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</p>

					<p>proportion of Islington's enterprises and make a significant contribution to the success of the local economy, reinforcing the need to ensure they are able to remain within the Borough.</p> <p><b>New effects have been identified for Policy B3 following review of the IIA as part of the examination and changed the effects from significant positive to minor positive. A potential negative impact of Policy B3 is identified where requirements to market existing business space for 24 months before any net-loss of business space could lead to reduced footfall and further vacancy in neighbouring business floorspace and might be more likely during periods of economic uncertainty. However this potential immediate temporary minor negative impact is offset by the fact that the 24 months period plays a key role in helping protect and sustain business floorspace to support businesses of different types and sizes. In the medium and long term it is likely to have benefits in helping to protect business floorspace for which there is evidenced demand.</b></p> <p>Policy B4 will have a significant positive effect. The development of affordable workspace contributes towards creating a strong and diverse economy. The provision of affordable workspace allows a variety of businesses to locate in the Borough's most unaffordable locations. It can contribute to ensuring a supply of space for different types of businesses, including start up or SMEs, who are usually more sensitive to cost changes. The policy seeks to address social exclusion and promotes fairness. As part of the commissioning process, the Council will maximise the potential for removing barriers to employment, increasing skills for residents and creating opportunities for learning and vocational learning, through apprenticeships.</p> <p>Policy B5 will have long term positive effects. Jobs and training opportunities from new business development widen opportunities for local residents and can address worklessness. Training opportunities can address barriers to employment, such as skill levels. Opportunities for vocational learning, in construction for example, could also be increased. Construction jobs will also be secured meaning that there will be opportunities for local residents to access vocational learning and jobs opportunities.</p>	
9. Minimise the need to travel and create accessible,	++	++	+	+	+	<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>

safe and sustainable connections and networks by road, public transport, cycling and walking						<p>Policy B3 through protecting existing business floorspace will have a minor positive effect particularly through maintaining diversity outside the CAZ and town centres, helping counter predominantly residential neighbourhoods, and reducing people's journeys to work albeit to less connected locations.</p> <p><b>New effects have been identified for Policies B4 and B5 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policies B4 and B5 benefit from B1-B2 to provide employment opportunities in the borough of local people. This supresses the need to travel and could have a minor positive impact on transport.</b></p>
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	0	0	0	There are no effects for policies B1 to B5
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	0	0	0	There are no effects for policies B1 to B5

12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	+	+	+	+	+	<p>Policy B1 and B2 will direct business development to the most appropriate and accessible locations in the borough, therefore reducing the need to travel by car and encouraging more sustainable transport choices thereby reducing effect on climate change.</p> <p><b>New effects have been identified for Policy B3 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policy B3 through protecting existing business floorspace will have a minor positive effect particularly through maintaining diversity outside the CAZ and town centres, helping counter predominantly residential neighbourhoods, and reducing people’s journeys to work, which has the potential to reduce transport related emissions and have a minor positive impact on climate change.</b></p> <p><b>B3 also has a positive impact on air quality as it protects LSISs which are located strategically in inner London to ‘service’ the CAZ, which shortens 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	0	0	0	0	0	There are no effects for policies B1 to B5

circular economy that optimises resource use and minimises waste						
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</b></p>

						<p>supply chains and the length of vehicular journeys to deliver goods, and therefore has a positive impact on air quality.</p> <p>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.</p>
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**B1: Delivering Business Floorspace & B2: New business floorspace**

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

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

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

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

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

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

### **B4: Affordable workspace**

Policy B4 requires provision of affordable workspace which the **Sustainability Appraisal** identifies will have a significant positive effect against the objective addressing social exclusion and promoting fairness. Affordable workspace is space leased to the Council at peppercorn rate and who will in turn sub-lease the space to operators through a commissioning process. These organisations will be selected in relation to the extent in which they support local businesses and provide training and education outcomes to remove barriers to employment. The development of affordable workspace also contributes towards creating a strong and diverse economy, allowing a variety of businesses to

locate across the Borough meeting a range of business needs. Both policies B4 and B5 benefit from B1-B2 to provide employment opportunities in the borough of local people. This suppresses the need to travel and has a minor positive impact on transport, which can in turn have a positive impact on air quality.

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

Policy B5 is considered by the **Sustainability Appraisal** to have a significant positive effect against the objective addressing social exclusion and promoting fairness. The Policy secures jobs and training opportunities from development of new business floorspace. Construction jobs will also be secured meaning that there will be opportunities for local residents to access vocational learning and jobs opportunities. The creation of employment and training opportunities for Islington residents and financial contributions which help tackle worklessness in the borough. Participation in education and training provides young disadvantaged residents the opportunity to gain qualifications which make a difference to future life chances and help tackle problems of anti-social behaviour. Therefore, the policy promotes inclusive communities, which can help lead to safer build environments. Both policies B4 and B5 benefit from B1-B2 to provide employment opportunities in the borough of local people. This suppresses the need to travel and has a minor positive impact on transport, which can in turn have a positive impact on air quality.

## Inclusive Economy: Retail policies

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

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

**Table 1.41: Assessment of policies R1 to R5**

IIA Objective	R1: Retail, leisure and services, culture and visitor 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 considered to have a minor positive effect in relation to Objective 1.</p>

						<p>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.</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 two-year vacancy and marketing period for change of use</b></p>

					<p>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 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> <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</b></p>
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						<p><b>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 services and sustainable lifestyles	++	++	++	++	++	<p>Policies R1, R2 and R3 will have significant positive effects on enabling town centres and LSAs to continue to serve the needs and wellbeing of the local residents across different retail catchment areas by striking the right balance of retail, leisure and business uses. The PSA approach improves access and legibility to essential services through concentrating A1 uses in the core of the town centre which enjoy the best transport links. The increased flexibility of uses in the 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</p>

						<p>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 where people live so enabling their protection as a local neighbourhood service is particularly beneficial.</p>
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	0	0	0	0	<p>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</p>

						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	<p>Minor positive effect for policies R1 to R5.</p> <p><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></p>
7. Improve the health and wellbeing of the population and reduce health inequalities	+	+	+	+	+	<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. 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.</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</p>

						service is particularly relevant and considered to have a positive effect against this objective.
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	++	++	++	+	+	<p>Policies R1, R2, and R3 will have a significant positive effect. The policies aim to strike the right balance between retail, leisure and business uses to enable response to changing retail patterns. Town centre uses are key drivers in the local and London economy and also provide important local services. Town centres, LSAs and edge of centre locations are all promoted for varying degrees of flexibility of use based on their function and appropriateness for certain types of development. Town Centres provide the employment opportunities outside the CAZ and help provide job opportunities for local residents. An enhanced cultural NTE role will increase employment opportunities and contribute to the local economy.</p> <p>Policy R1 could provide opportunities for employment related to visitor accommodation, particularly for local people, albeit lower-skilled jobs at a relatively low employment density. Visitor accommodation can play a supporting role to other more economically important uses such as offices; this provides a more indirect economic benefit. Visitor accommodation may not be compatible with a range of other uses which may limit its ability to support a range of local business. <b>New effects have been identified following review of the IIA as part of the examination process. This includes the two year vacancy and marketing period for change of use away from A1 in the PSA potentially limiting a range of main town centre uses establishing here that would benefit from the high PTAL 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.</b></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</p>

						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.
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	+	+	+	+	+	No effect for policies R1 to R5.  <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>
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.

### **R1: Retail, leisure and services, culture and visitor accommodation**

The Sustainability Appraisal considers Policy R1 will have significant positive effects against meeting needs and wellbeing of local residents through enabling town centres and LSAs to continue to serve the local residents across different retail catchment areas by striking the right balance of retail, leisure, culture and business uses to enable response to changing retail patterns. This provides a framework filtering through policies R1-R4 that meets the needs of residents benefiting health and ability to enjoy recreational activities. This is also positive for the wider economy with town centre uses key drivers in both the local service provision and the London economy. In addition the enhanced cultural

NTE role will increase employment opportunities and contribute to the local economy focusing commercial, cultural and civic activity in town centres. The Sustainability Appraisal considers that Policy R1 will have a significant positive effect on the framework objective to optimise the use of developed land by focusing commercial, cultural and civic activity in town centres helping to balance land use needs through protection of existing venues and directing new venues to these locations. These locations are already the focus for cultural and night-time economy (NTE) uses and are appropriate given the commercial character which can better absorb the potential impacts.

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

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

## **R2: Primary Shopping Areas**

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

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

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

#### **R4: Local Shopping Areas**

The Sustainability Appraisal identifies a significant positive effect against the framework objective relating to needs and wellbeing of the local residents across local retail catchment areas by striking the right balance of retail, leisure and business uses. Local centres are drivers in the local economy and ensuring space is protected will help meet the needs of small businesses. The six month marketing period for change of use from A1 to non-A1 commercial uses on balance allows viability to be assessed without applying overly onerous periods of vacancy in an LSA that provides localised retail needs but is third in the retail hierarchy behind PSAs and Town Centres.

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

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

## Inclusive Economy, Local retail and specialist retail policies

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

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

### 1.42: Assessment of policies R6 to R9

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

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

and cultural environment.					<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 cumulative undermining of the vitality and viability of these centres which could affect their medium to long term outlook.</p> <p>Policy R9 will have a minor positive effect as it will support a wide range of possible temporary uses increasing services available to residents.</p>

5. Ensure that all residents have access to good quality, well-located, affordable housing	0	0	0	0	Policies R6 to R9 will have no effect.
6. Promote social inclusion, equality, diversity and community cohesion	0	+	0	0	<p>Policies R6, R8 and R9 will have no effect.</p> <p><b>New effects have been identified for Policies R7 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policy R7 will have a minor positive effect due to markets providing places for informal interaction, reduce social exclusion and increase social cohesion.</b> The provision of markets also provides the spaces to enable the establishment of local businesses from different demographics of Islington's population.</p>
7. Improve the health and wellbeing of the population and reduce health inequalities	0	0	+	0	<p>Policies R6, R7 and R9 will have no effect</p> <p>Policy R8 will have a minor positive effect. The policy working in tandem with other health initiatives should improve physical and mental health through restricting an overconcentration of HFT and BS which contribute to poor health and wellbeing. In particular reducing the proliferation of HFT fast food within 200m of a school which school children would be easily able to access will be particularly beneficial.</p>
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	+	+	0	+	<p>Policy R6 will have a minor positive effect. It will protect small shops which will help to maintain a supply of space for small business which is important as they form a large part of Islington's economy. <b>New effects have been identified following review of the IIA as part of the examination process. In theory, a protective approach to small shops could have a minor negative effect by limiting the economic expansion of individual retail and other main town centre uses. However, Policy R6 recognises that in order to maintain a strong local economy and support small and independent businesses, the unique character of Islington as a whole needs to be maintained and the benefits of this are recognised.</b></p>

					<p>Policy R7 will have a minor positive effect as SSA and markets make a contribution to the local economy of town centres and act as specific pull factors for visitors and residents to visit town centres. <b>New effects have been identified following review of the IIA as part of the examination. This includes the two year vacancy and marketing period for change of use away from A1 in the SSA potentially limiting a range of main town centre uses establishing here that would benefit from the high PTAL rating and ability for the area to absorb adverse amenity impacts. A short term minor negative economic effect could arise from a downturn in viability of A1 retailing potentially resulting in vacant units in the SSA. However, on balance, as the plan period runs until 2036 the need to protect and secure retail in the long term outweighs this potential short term negative effect.</b></p> <p>Policy R8 will have neutral effect by providing a quantitative restriction within centres which will help prevent a level of hot food takeaways, betting shops and adult gaming centres. On a purely economic basis the policy could have a <b>minor negative impact by limiting jobs in the betting and hot food takeaway industries, however from a sustainable economic development point of view the adverse economic impacts caused by obesity and personal debt is a far greater negative effect than the restrictions on these sectors growth. Controls on the location and concentration of uses can also have wider economic benefits by supporting a range of businesses by mitigating the cumulative adverse impacts some uses can have on the viability and vitality of areas which can include impacts on character and rents.</b></p> <p>Policy R9 will have a minor positive effect through allowing space to be used for a wide range of potential uses helping contribute to the local economy.</p>
9. Minimise the need to travel and create accessible, safe and sustainable	0	+	0	0	<p>Policies R6, R8 and R9 will have no effect</p> <p><b>New effects have been identified for Policies R1-R4 following review of the IIA as part of the examination and changed the</b></p>

connections and networks by road, public transport, cycling and walking					<b>effects from neutral to minor positive. Policy R7 could see a minor positive effect by protecting markets and SSAs in accessible locations that help to promote local trips by sustainable and active travel transport modes.</b>
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	0	0	Policies R6 to R9 will have no effect
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	0	0	Policies R6 to R9 will have no effect
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	0	0	0	Policies R6 to R9 will have no effect
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	0	0	Policies R6 to R9 will have no effect
14. Maximise protection and	0	0	0	0	Policies R6 to R9 will have no effect

enhancement of natural resources including water, land and air					
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### **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 1.43: Assessment of policies R10 to R12**

IIA Objective	R10: Culture and NTE	R11: Public Houses	R12: Visitor accommodation	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	+	+	-	<p>Policy R10 will have a minor positive effect principally through seeking to support and manage a thriving and safe night time economy. Policy R10 provides detail on how the night time economy will respond with appropriate design which is high quality, safer and more inclusive potentially reducing crime and anti-social behaviour. In addition the agent of change principle is highlighted to ensure that the impact that other development has on culture and NTE is considered as well as the potential negative effect it can have on amenity. <b>New effects have been identified following review of the IIA as part of the examination process. The effect of Cultural Quarters could have a minor positive effect on the built environment by requiring development to enhance the cultural function whether that be through adaptable buildings or enhanced public realm for visitors.</b></p> <p><b>New effects have been identified for Policy R11 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policy R11 will have a minor positive effect by protecting pubs that contribute to the character and local distinctiveness of a variety of different areas including town centres, LSAs and areas of predominantly in residential use.</b></p> <p>There is a minor negative effect for policy R12 as it would likely increase the amount of visitor accommodation delivered; visitor accommodation is generally built to a unique specification which does not lend itself to be easily adapted for other uses, hence it is a less sustainable built form. For example, visitor accommodation has smaller room sizes, less or no outdoor</p>

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

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

wellbeing of the population and reduce health inequalities				<p><b>New effects have been identified for Policies R10 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policy R10 will have a minor positive effect in terms of encouraging social interaction and providing facilities for the community. This has benefits of improving mental health and combatting loneliness and social isolation.</b></p> <p>Policy R11 will have a minor positive effect. See assessment against objective 6.</p>
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	++	++	+	<p>Policy R10 will have a significant positive effect through optimising the use of developed land which focuses commercial, cultural and civic activity in town centres helping to balance land use needs through protection of existing cultural and Night Time Economy (NTE) venues and directing new cultural and NTE venues to these locations. An enhanced cultural NTE especially will increase employment opportunities and increase the boroughs contribution to the local economy.</p> <p>Policy R11 will have a minor positive effect, as it will help to protect pubs which contribute to the NTE.</p> <p>There is a minor positive effect for policy R12. It could provide opportunities for employment, particularly for local people, in this industry, albeit lower-skilled jobs at a relatively low employment density. Visitor accommodation can play a supporting role to other more economically important uses such as office; this more indirect economic benefit therefore limits the scale of any positive effect. Visitor accommodation may not be compatible with a range of other uses which may limit its ability to support a range of local business 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 sustainable connections and networks by road, public transport, cycling and walking	+	0	0	<p>No effect for policies R11 and R12</p> <p><b>New effects have been identified following review of the IIA as part of the examination process. Policy R10 particularly would see a positive effect from requiring cultural uses to locate in the CAZ or Town Centres. This takes advantage of the most accessible parts of the borough, especially for public transport at night.</b></p>
10. Protect and enhance open	0	0	0	No effect for policies R10, R11 and R12

spaces that are high quality, networked, accessible and multi-functional				
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	0	No effect for policies R10, R11 and R12
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	0	-	No effect for policies R10 and R11  There is a minor negative effect for policy R12. Visitor accommodation, especially larger hotels, are very energy and water intensive. A proliferation of visitor accommodation would be likely to increase energy and water intensive uses, even if other Local Plan policies – for example sustainable design policies – had requirements to mitigate the impact of this increased intensity of use.
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	-	No effect for policies R10 and R11  There is a minor negative effect for policy R12. Visitor accommodation, especially larger hotels, are very energy and water intensive. A proliferation of visitor accommodation would be likely to increase energy and water intensive uses, even if other Local Plan policies – for example sustainable design policies – had requirements to mitigate the impact of this increased intensity of use.
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	-	No effect for policies R10 and R11  There is a minor negative effect for policy R12. Visitor accommodation, especially larger hotels, are very energy and water intensive. A proliferation of visitor accommodation would be likely to increase energy and water intensive uses, even if other Local Plan policies – for

				example sustainable design policies – had requirements to mitigate the impact of this increased intensity of use.
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### **R10: Culture and Night-Time Economy**

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

### **R11: Public Houses**

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

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

The Sustainability Appraisal considered that the approach set out in Policy R12 would overall have a neutral impact – albeit with some minor negative environmental impacts recognised. Permitting more visitor accommodation reduces the availability of land to meet other more pressing development needs, therefore it would not effectively balance competing demands for land use. This is considered to outweigh potential benefits of increased footfall. There are many identified needs that take priority above visitor accommodation in Islington, principally housing and offices – it would also create additional pressure on land supply for other town centre uses. However, this effect is partially mitigated by the restrictive approach taken in R12 which limits hotel development to specific sites or the intensification of existing visitor accommodation in town centres and the CAZ. This restrictive approach is considered to balance the need to consider competing land use as it also allows other priorities to take precedent on existing hotel sites and optimise the use of previously developed land.

In regards the impact against the framework objective to create a high quality built environment visitor accommodation is generally built to a unique specification which does not lend itself to be easily adapted for other uses, hence it is a less sustainable built form. For example, visitor

accommodation has smaller room sizes, less or no outdoor private amenity space and reduced accessibility requirements which all contributes to less flexible buildings. This is partially mitigated through R12 requirement that the development or redevelopment/intensification of visitor accommodation must adhere to inclusive design requirement for 10% of rooms to be wheelchair accessible. As with land supply the reasonable alternative to policy R12 would increase the amount of less flexible accommodation.

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

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

## Green Infrastructure policy assessments

**Table 1.44: Assessment of Policies G1 to G3**

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)
				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.
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 and open space on housing estates. Whilst not formally designated open space the policy</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>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)
				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.
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	+	+	+	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.  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.

### 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 1.45: 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,	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)
affordable housing			
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	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)
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	+	+	<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	++	++	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

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)
enhance suitable wildlife habitats wherever possible and protect species and diversity.			<p>deficiencies in access to nature. This must be demonstrated through the submission of the Landscape Design Strategy. Biodiversity benefits and ecological connectivity must be maximised and support the council's Biodiversity Action Plan. As a result, this policy will have a direct impact on this objective, particularly increasing protection and improving opportunities for biodiversity, ensuring that development resulting in biodiversity net gain is given priority, improving access to nature, and improving connectivity. A key aim of the policy is to minimise impacts and damage to existing trees, hedges, shrubs and other significant vegetation, so this will also have direct impact on achieving this objective. The submission of the Landscape Design Strategy requires that appropriate maintenance arrangements will be put in place from the outset of the development, and this will help to support positive management of green infrastructure for biodiversity.</p> <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</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)
			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.
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

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)

## 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 1.46: Assessment of policies S1 to S5**

I/A Objective	S1: Delivering Sustainable Design	S2: Sustainable Design and Construction	S3: Sustainable Design Standards	S4: Minimising greenhouse gas emissions	S5: Energy Infrastructure	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	++	+	+	+	+	Policy S1 will have a significant positive effect 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	++	++	++	++	++	<p>Policies S1, S2, S3, S4 and S5 will have a significant positive effect and help to ensure that all residents have access to good quality housing by requiring that all housing meets high standards of energy efficiency and relevant</p>

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

IIA Objective	S1: Delivering Sustainable Design	S2: Sustainable Design and Construction	S3: Sustainable Design Standards	S4: Minimising greenhouse gas emissions	S5: Energy Infrastructure	<b>Commentary on assessment of likely significant effects of policies</b> (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
						<p><b>New text has been added following review of the IIA as part of the examination process.</b></p> <p><b>The 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	+	0	0	+	+	Policy S1 will support the development of green industries and a low-carbon economy through its promotion of zero carbon development and a circular economy approach to design and construction.

IIA Objective	S1: Delivering Sustainable Design	S2: Sustainable Design and Construction	S3: Sustainable Design Standards	S4: Minimising greenhouse gas emissions	S5: Energy Infrastructure	<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>
opportunities across a range of sectors and business sizes						<p><b>Text updated following review of the IIA as part of the examination process: Policy S4 and S5 will also support the development of green industries and a low-carbon economy by requiring on-site carbon emissions reductions in accordance with the energy hierarchy and the use of low and zero carbon heating options, including heat networks and secondary heat sources. The requirement to incorporate on-site renewable energy, such as air source heat pumps and solar panels, will also support this objective. A minor positive effect has therefore been identified.</b></p> <p>Policies S2 and S3 will have no effect.</p>
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	0	0	0	0	0	Policies S1 to S5 have no effect.
10. Protect and enhance open spaces	0	++	0	0	0	Policy S1, S3, S4 and S5 have no effect.

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

IIA Objective	S1: Delivering Sustainable Design	S2: Sustainable Design and Construction	S3: Sustainable Design Standards	S4: Minimising greenhouse gas emissions	S5: Energy Infrastructure	<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>borough's heat networks, The policy also promotes an integrated approach to water management, a circular economy approach and minimising the borough's contribution to air pollution, all of which will reduce the contribution of development in Islington to climate change and enhance community resilience to climate change impacts.</b></p> <p>Policies S2 and S3 will have a significant positive effect. Policy S2 requires developments to demonstrate how they directly contribute to reducing Islington's contribution to climate change and promote climate change adaptation by submitting a Sustainable Design and Construction Statement and accompanying information. Policy S3 requires developments to achieve the highest feasible level of the relevant sustainable design standard, such as BREEAM, in order to ensure high standards of sustainable design.</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</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>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.</p> <p>Policy S5 will have a significant positive effect. It will directly contribute to minimising Islington's contribution to climate change by ensuring that developments prioritise energy efficient low and zero carbon heating options. This will contribute to the decarbonisation of heat and the reduction of carbon emissions.</p>
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	++	++	+	+	+	<p>Policy S1 and S2 will have a significant positive effect. These policies contribute to the promotion of resource efficiency by enabling a circular economy approach that optimises resource use and minimises waste through requirement for developments to submit an Adaptive Design Strategy. New developments will reduce carbon emissions in accordance with the energy hierarchy, which includes a requirement to generate, store and use renewable energy on-site.</p> <p>Policy S3 will have a minor positive effect. The requirement for developments to achieve the highest feasible level of the relevant sustainable design standard includes standards relating to the sustainable procurement and use of materials, which will promote resource efficiency and a circular economy approach.</p> <p><b>Text has been revised following review of the IIA as part of the examination process: Policies S4 and S5 will</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)
						<p>have a minor positive effect. The policies will minimise the use of non-renewable energy sources by requiring developments to reduce carbon emissions in accordance with the energy hierarchy. The policies will promote the use of renewable sustainable energy sources by supporting the use of low and zero carbon heating options, including heat networks and secondary heat sources. The policies will also encourage the use of renewable energy including air source heat pumps and solar panels.</p>
14. Maximise protection and enhancement of natural resources including water, land and air	+	+	+	0	0	<p>Policy S1, S2 and S3 will have a minor positive effect. Policy S1 will promote the sustainable use of water resources and the protection of water quality, minimise air pollution and reduce exposure to poor air quality, especially among vulnerable people. Policies S2 and S3 will ensure all developments demonstrates the relevant sustainable design policies and standards have been met.</p> <p><b>New effects have been identified following review of the IIA as part of the examination process. Policy S5 adopts an integrated approach to energy supply to take into account that heat sources that use natural gas can impact on air pollution and so seeks to ensure that the selection of heat sources will result in low or zero emissions of carbon dioxide and NOx, with CHP and ultra-low NOx gas boiler communal or heat network systems designed to ensure they have no significant impact on local air quality. Overall a neutral effect has been identified.</b></p>

IIA Objective	S1: Delivering Sustainable Design	S2: Sustainable Design and Construction	S3: Sustainable Design Standards	S4: Minimising greenhouse gas emissions	S5: Energy Infrastructure	<b>Commentary on assessment of likely significant effects of policies</b> (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
						Policies S4 will have no effect

### 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 1.47: Assessment of policies S6 to S10**

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

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

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

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

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

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

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

IIA Objective	S6: Managing heat risk	S7: Improving Air Quality	S8: Flood Risk Management	S9: Integrated Water Management and Sustainable Drainage	S10: Circular Economy and Adaptive Design	<b>Commentary on assessment of likely significant effects of policies</b> (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste						Policy S10 have a significant positive effect by requiring developments to adopt a circular economy approach to building design and construction. It will ensure that development design is appropriate for the lifetime of a development by requiring developments to be designed to be flexible and adaptable to changing requirements and circumstances. The use of local, sustainable materials and resources will also be required, including the use of components and materials that can be reused or recycled. The volume of construction and deconstruction waste will be minimised by requiring materials to be re-used and/or recycled where demolition and remediation works are necessary.

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

### **S6: Managing heat risk**

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

### **S7: Improving Air Quality**

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

### **S8: Flood Risk Management**

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

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

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

### **S10: Circular Economy and Adaptive Design**

The assessment considered Policy S10 will reduce the contribution of development in the borough to climate change by requiring developments to adopt a circular economy approach which will have a positive effect against the framework objectives to reduce the contribution to climate change and promote resource efficiency save resources, including from the embodied energy of building

materials and components. This will also help developments to be flexible and adaptable to changing requirements over their lifetime which will contribute to ensuring the provision of housing that meets the diverse and changing needs of the population. The policy may also benefit the economy by supporting the development of local green industries. Policy S10 is also likely to have a minor positive effect on the protection and enhancement of natural resources through keeping materials in use as long as possible and requiring development to minimise environmental impact of materials.

## Transport and Public Realm policy assessment

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

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

**Table 1.48: Assessment of policies T1 to T5**

IIA Objective	T1: Enhancing the public realm and sustainable transport	T2: Sustainable Transport Choices	T3: Car free development	T4: Public realm	T5: Delivery, servicing & construction	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe 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.

built environment						<p>This will put people at the heart of the design process with a coherent and cohesive public realm identified as one of the key elements in delivering the Local plan objectives which will ensure people make more sustainable transport choices.</p> <p>Policy T2 has a significant positive effect on safety because it resists the use of shared space which can be detrimental to those with mobility, sensory and or cognitive impairments as these people find can find “shared space” schemes dangerous and difficult to navigate. <b>Update following review of the IIA as part of the examination process: T2 also supports high quality cycle parking which will allow more people to use that sustainable active mode.</b></p> <p>Policy T3 will have a significant positive effect. Car parking has negative impacts on the the built environment, particularly at street level where it reduces the ability to design multi-functional spaces which promote walking and cycling and other activities. T3 aims at 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	Policies T1 to T5 have no effect.
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	++	++	+	++	+	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>Policy T3 will have a minor positive effect. It will discourage car use through restricting car parking and therefore will reduce the impacts of pollution from vehicles.</p> <p><b>New effects have been identified for Policy T5 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policy T5 has a minor positive effect as developments must investigate more efficient, sustainable and non-motorised freight, 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></p>
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	0	0	0	0	<p>Policies T1 to T5 have no effect.</p>
6. Promote social inclusion, equality, diversity and community cohesion	+	+	+	+	0	<p><b>New effects have been identified for Policies T1, T2 and T4 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policies T1, T2 and T4 ensure that active travel and public transport users benefit from improved travel conditions. This supports equality as almost 70% of households in Islington do not have access to a private car. The policies aim at mitigating the negative impacts of private motorised transport on other transport modes. Together they have a minor positive impact on social inclusion, equality, diversity and community cohesion, by encouraging active, connected, strong and cohesive 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>

						T5 has no effect.
7. Improve the health and wellbeing of the population and reduce health inequalities	++	++	+	++	0	<p>Policies T1, T2 and T4 will have a significant positive effect through enabling and prioritising active travel and use of more sustainable transport modes, to help promote healthier lifestyles which will reduce health inequality among the residents. Policies T2 and T4 in particular will positively enhance the liveability of neighbourhoods and improve access through an improved public realm with permeability and legibility opening up new access routes and connections to existing facilities and services.</p> <p>Policy T3 will have a minor positive effect. It will discourage car usage and may therefore lead to an increase in the use of sustainable modes of travel.</p> <p>Policy T5 has no effect.</p>
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	0	0	0	0	+	<p>Policies T1 to T4 will have no effect.</p> <p>Policy T5 has minor positive effect as it will ensure that new development considers and mitigates where necessary through relevant modelling its impact on the wider transport system which will ensure that new development does not restrict or affect the economic function of a wider area. In particular, logistics in relation to LSIS industrial areas are identified.</p>
9. Minimise the need to travel and create accessible, safe and sustainable 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>

						Policy T5 requires Delivery and Servicing Plans which will assess the ongoing freight impact of the development and minimise and mitigate the impacts of this on the transport system, and investigate non-motorised modes. In addition, the use of low-emission vehicles and efficient and sustainable delivery systems which minimise motorised vehicle trips is encouraged which will have a positive effect.
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	0	+	0	<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,</p>

						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.
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	+	+	+	0	+	<p><b>New effects have been identified for Policies T1, T2, T3 and T5 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. Policies T1, T2, T3 and T5 could have a minor positive effect. This can help promote resource efficiency through reducing motor vehicle use and promote sustainable transport options, minimising the use of non-renewable resources such as petroleum-based fuels.</b></p> <p>Policy T4 has no effect.</p>
14. Maximise protection and enhancement of natural resources including water, land and air	++	++	++	++	+	<p><b>New effects have been identified for Policies T1, T2, T3 and T4 following review of the IIA as part of the examination and changed the effects from neutral to significant positive. Policies T1, T2, T3 and T4 will have a positive effect. They encourage active travel, including through improvements to the public realm which reduce transport related emissions which contribute to air pollution. Policy T3 requires car free development which will help to reduce the amount of travel 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</b></p>



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 1.49: Assessment of policies DH1 to DH4**

IIA Objective	Policy DH1: Fostering innovation ...	Policy DH2: Heritage assets	Policy DH3: Building heights	Policy DH4: Basement developmen t	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	++	++	++	+	Policy DH1 will have a significant positive effect. The policy promotes location sensitive density and design, noting that high density development can be accommodated throughout the borough, but the scale of development is dependent on a number of considerations, including design and heritage which would be considered on a case by case basis. The approach to tall buildings balances protection of local character with promotion of opportunities for development.

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

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

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

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

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

IIA Objective	Policy DH1: Fostering innovation ...	Policy DH2: Heritage assets	Policy DH3: Building heights	Policy DH4: Basement developmen t	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
					<p>There is no effect for policies DH2 and DH3.</p> <p>Policy DH4 will likely have minor positive effects on the health and wellbeing of the population in the short term by reducing the impact of construction. Basement development generally requires excavation works which create significant noise and vibration. These works can take years to complete. Some neighbourhoods may experience a number of basement excavations in succession leading to the effect of a continuous inappropriate disturbance in a residential area. This policy seeks to limit the effects of basement construction by limiting the size of basement developments and also by managing the construction impacts through Construction Management Plan.</p>
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	+	0	-	0	<p>Policy DH1 will have a minor positive effect. The policy supports innovative approaches to development as a means to increasing development capacity to meet needs, while simultaneously addressing any adverse heritage impacts and protecting and enhancing the unique character of the borough.</p> <p><b>New effects have been identified which changes the effects from neutral to minor negative following review of the IIA as part of the examination process. Policy DH3 may have a minor negative effects on economic development as the development of tall buildings will be directed to key locations where they are most appropriate, which may result in a lower overall quantum of floorspace delivery than an approach where tall buildings could be developed in more locations across the borough. These effects are minor as lower rise buildings will meet the vast</b></p>

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

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

IIA Objective	Policy DH1: Fostering innovation ...	Policy DH2: Heritage assets	Policy DH3: Building heights	Policy DH4: Basement 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 is likely to have significant positive effects on biodiversity by limiting the extent to which basements will be developed under private gardens and requiring minima soil depth. Basement development generally requires removal of the existing garden and any trees. The replacement garden often has less soil depth and less ability to support large trees. Replacement gardens also often have larger areas of hard standing, are less natural, and have a less diverse range of vegetation.
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	+	0	+	+	<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</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)
					result of climate change. The policy also preserves gardens from being entirely built beneath allowing more established and biodiverse gardens which will benefit the microclimate and reduce the urban heat island effect as well as storing some carbon through large trees.
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	+	+	<p>There are no effects for policies DH1 and DH2.</p> <p><b>New effects have been identified which changes the effects from neutral to minor positive following review of the IIA as part of the examination process. Policy DH3 will have minor positive effects by limiting the overall number of tall buildings, which are more resource intensive and less adaptable than low rise buildings with longer lifespans. The complex engineering and use specific design of tall buildings make repair and adaptation over time challenging or uneconomic, often resulting in demolition, and associated construction waste impacts.</b></p> <p><b>New effects have been identified which changes the effects from neutral to minor positive following review of the IIA as part of the examination process. Policy DH4 will have minor positive effects by reducing the overall size of some basement developments. Basement development, through the extensive excavation and structural engineering required are more wasteful than comparably size above ground developments.</b></p>
14. Maximise protection and enhancement of natural	0	0	+	+	There is no effect for policies DH1 and DH2.

IIA Objective	Policy DH1: Fostering innovation ...	Policy DH2: Heritage assets	Policy DH3: Building heights	Policy DH4: Basement developmen t	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
resources including water, land and air					<p><b>New effects have been identified which changes the effects from neutral to minor positive following review of the IIA as part of the examination process. Policy DH3 will have a minor positive effect by ensuring that development of tall buildings does not impact impacts on the wider environmental including watercourses and water bodies and their hydrology.</b></p> <p>Policy DH4 will have minor positive effects on natural resources by ensuring basement development does not harm the ground and groundwater conditions of the area. Basement development will only be permitted where it has been demonstrated by appropriately qualified engineers that no harm will be caused to the ground or water conditions of the area evidenced through a structural method statement.</p>

### 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 1.50: Assessment of policies DH5 to DH8**

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

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

IIA Objective	DH5: Agent of change, noise and vibration	DH6: Advertisements	DH7: Shopfronts	DH8: Public art	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	++	0	0	0	<p>Policy DH5 will have a significant positive effect as it aims to protect existing uses such as cultural use or night time economy use from proposals for new noise sensitive development which are in proximity to follow the 'agent-of-change' principle and ensure that suitable mitigation is applied. In addition, the policy will reduce the impacts of noise and vibration from new noise generating development which will help contribute to maintaining amenity of neighbourhoods. This will support enhancement of existing cultural and night time economy uses in particular where there are concentrations in town centres and cultural quarters.</p> <p>Policies DH6, DH7 and DH8 will have no effect</p>
5. Ensure that all residents have access to good quality, well-located, affordable housing	++	0	0	0	<p>Policy DH5 will have a significant positive effect. It will ensure that new housing mitigates noise impacts from both within a development and also from external sources such as cultural uses or other sources.</p> <p>Policies DH6, DH7 and DH8 will have no effect</p>

IIA Objective	DH5: Agent of change, noise and vibration	DH6: Advertisements	DH7: Shopfronts	DH8: Public art	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
6. Promote social inclusion, equality, diversity and community cohesion	0	0	+	+	<p>Policies DH5 and DH6 will have no effect.</p> <p><b>New effects have been identified which changes the effects from neutral to minor positive following review of the IIA as part of the examination process. Policy DH7 requires new or refurbished shopfronts to be accessible and inclusive, which will remove barriers to employment and use of public spaces.</b></p> <p><b>New effects have been identified which changes the effects from neutral to minor positive following review of the IIA as part of the examination process. Policy DH8 will help support active engagement of the wider community in decisions that affect their area by requiring consultation with the community on public art.</b></p>
7. Improve the health and wellbeing of the population and reduce health inequalities	++	+	0	+	<p>Policy DH5 will have a significant positive effect as it will ensure the health impacts of noise and vibration are mitigated. Both through the 'agent-of-change' principle ensuring suitable mitigation is applied and ensuring impacts of noise and vibration from new noise generating development are mitigated will help contribute to managing noise affects and the impact on individual health.</p> <p><b>New effects have been identified which changes the effects from neutral to minor positive following review of the IIA as part of the examination process. Policy DH6 will improve health and wellbeing by ensuring that advertisements do not cause light pollution into adjoining sensitive land uses, including residential.</b></p> <p>Policies DH7 and DH8 will have no effect.</p>

IIA Objective	DH5: Agent of change, noise and vibration	DH6: Advertisements	DH7: Shopfronts	DH8: Public art	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	+	0	0	0	<p>Policy DH5 will have a minor positive effect. It will support the enhancement of existing cultural and night time economy uses in particular where there are concentrations in town centres and cultural quarters through the application of the agent of change principle potentially helping these business to grow.</p> <p>Policies DH6, DH7 and DH8 will have no effect</p>
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	0	0	0	0	Policies DH5, DH6, DH7 and DH8 will have no effect
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	0	0	Policies DH5, DH6, DH7 and DH8 will have no effect

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

IIA Objective	DH5: Agent of change, noise and vibration	DH6: Advertisements	DH7: Shopfronts	DH8: Public art	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	0	0	Policies DH5, DH6, DH7 and DH8 will have no effect

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

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

### **Policy DH6: Advertisements**

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

### **Policy DH7: Shopfronts**

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

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

The Sustainability Appraisal considered Policy DH8 to have minor positive effect against the framework objective for efficient use of land as it makes clear that provision of public arts should not come at the cost of meeting other more important Local Plan priorities. In addition DH8 makes clear that new public art should not compromise inclusive design policy objectives and should consider impact on the local character.

Finally Policy DH8 will have a positive effect against objective 6 and help support active engagement of the wider community in decisions that affect their area by requiring consultation with the community on public art.

## Strategic Infrastructure

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

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

**Table 1.51: Assessment of Policies ST1 to ST4**

IIA Objective	ST1: Infrastructure Planning and Smarter City Approach	ST2: Waste	ST3: Telecommunications, communications and utilities equipment	ST4: Water and Wastewater infrastructure	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	+	++	+	+	<p>New effects have been identified following review of the IIA as part of the examination process. A minor positive effect has been identified for ST1 through the support provided for robust and adaptable buildings by supporting in-building infrastructure capable of exceeding building regulation standards for digital connectivity.</p> <p>Policy ST2 has a significant positive effect. It requires development to provide waste and recycling facilities which are accessible and designed to provide convenient access for all people in order to help people to recycle <b>which is positive and creates adaptable buildings which are more inclusive and contributes to a more 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>

IIA Objective	ST1: Infrastructure Planning and Smarter City Approach	ST2: Waste	ST3: Telecommunications, communications and utilities equipment	ST4: Water and Wastewater infrastructure	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
14. Maximise protection and enhancement of natural resources including water, land and air	0	+	0	++	<p>Policies ST1 and ST3 have no effect.</p> <p><b>New effects have been identified following review of the IIA as part of the examination process for policy ST2 which will have a minor positive effect as it reduces the need for household waste to be transported further afield by safeguarding the Hornsey Street Re-use and Recycling Centre which will contribute to improving air quality.</b></p> <p>Policy ST4 will have a significant positive effect as it states it will ensure adequate water supply, surface water, foul drainage and sewerage treatment capacity exists to serve all new developments. Thames Water has engaged in the Local Plan review and provided policy comments and comments on site allocations stating where there are capacity issues. These will be referenced in the Site Allocations, therefore the policy is considered to have a significant positive effect as it is balancing development needs of the borough and ensuring that water related infrastructure needs are met.</p>

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

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 1.52: Assessment of Policies BC1 and BC2**

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

IIA Objective	Policy BC1: Prioritising office use	Policy BC2: Culture, retail and leisure uses	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
			Policy BC2 will have a minor positive effect on the efficient use of land, buildings, and infrastructure by ensuring that cultural, retail, and leisure uses are developed in the most appropriate locations, improving positive agglomeration effects and the cultural, retail, and leisure offer of the area, while reducing harmful impacts between uses in particular the effects of noise, litter, and anti-social behaviour on residential uses.
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	0	Policies BC1 and BC2 will have no effect.
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	0	+	<p>Policy BC1 will likely have a neutral effect. While this policy requires that the majority proportion of new development is office, it does allow smaller proportions of other uses on site. In addition, there are number of sites are allocated for other (non-office) uses. These factors combined with the existing mixed use character of the area means the mix of uses which support liveable neighbourhoods will not be significantly affected.</p> <p>Policy BC2 will likely have a minor positive effect. It helps to ensure that retail, cultural, entertainment and food and drink uses are located in areas where they do not harm the amenity of the area. The policy also sets out that development cannot create harmful concentrations of night time economy uses, which would include impacts from noise, litter, and anti-social behaviour. The policy also directs cultural uses to the Clerkenwell / Farringdon Cultural Quarter helping expand the cultural role of this area and of London as a whole.</p>

IIA Objective	Policy BC1: Prioritising office use	Policy BC2: Culture, retail and leisure uses	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
5. Ensure that all residents have access to good quality, well-located, affordable housing	-	0	<p>Policy BC1 will likely have a minor negative effect on the provision of affordable housing. The policy requires that most new development in Bunhill and Clerkenwell is office-led. This will lead development of less housing as it will prevent some residential-led schemes coming forward. In addition, it also means that less affordable housing will be developed, as it is required to be provided as a proportion of new residential developments. However the Council has assessed future housing delivery and considers that it can meet its housing target with this policy in place.</p> <p>Policy BC2 will have no effect.</p>
6. Promote social inclusion, equality, diversity and community cohesion	+	0	<p>Policy BC1 will have a minor positive effect, in terms of social inclusion, equality, diversity, and community cohesion. The policy will strengthen the local economy and provide new jobs by encouraging development of employment floorspace which will meet demand and unlock potential economic growth. The Council has policies whereby new office developments must provide a proportion of affordable workspace. These policies will result in more office development and therefore more affordable workspace. The increase in businesses and employment in the area will also lead to a greater number of training and apprenticeships opportunities for local residents.</p> <p>Policy BC2 will have no effect.</p>
7. Improve the health and wellbeing of the population and reduce health inequalities	0	+	<p>Policy BC1 will have no effect.</p> <p>Policy BC2 will have a minor positive effect on the health and wellbeing of the population by directing uses with potential for negative effects on amenity to the most appropriate locations to minimise harmful effects. In particular, the policy ensures that retail, cultural, entertainment, and food and drink uses are located in predominately commercial areas and that they do not harm the amenity of the area. The policy also sets out that development cannot create harmful concentrations of night time economy uses, which would include impacts from noise, litter, and anti-social behaviour.</p>
8. Foster sustainable economic growth and	++	++	<p>Policy BC1 will have significant positive effects on economic growth and providing employment opportunities. The policy will provide much needed floorspace for employment uses, in particular office uses. There is high demand in Islington for office floorspace, which is projected to exceed supply, restricting economic growth and employment in the borough. The biggest threat to the supply of</p>

IIA Objective	Policy BC1: Prioritising office use	Policy BC2: Culture, retail and leisure uses	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
increase employment opportunities across a range of sectors and business sizes			<p>employment land is likely to be from restricted supply caused by a lack of sites as they are outbid by residential developments. In addition, the loss of office stock within the CAZ to residential development has the potential to undermine the strategic functions of the CAZ and East London Tech City. As part of office development, other Local Plan policies will ensure that these developments also provide affordable workspace and space suitable for small and medium enterprises, helping to diversify the employment opportunities in the borough.</p> <p>Policy BC2 will have a significant positive effect. It will prevent some development of cultural, retail, and entertainment uses in locations that are deemed inappropriate. However, the policy will have overall positive effects on economic growth by directing growth of cultural, retail, and leisure uses to the most appropriate locations, and supporting the important economic role these uses play in Bunhill and Clerkenwell, and London as a whole.</p>
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	+	+	Policies BC1 and BC2 will have a minor positive effect. Both policies promote development in areas with excellent public transport accessibility, including to the underground and Crossrail, as well as excellent conditions for walking and cycling.
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	Policies BC1 and BC2 will have no effect.

IIA Objective	Policy BC1: Prioritising office use	Policy BC2: Culture, retail and leisure uses	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	Policies BC1 and BC2 will have no effect.
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	0	Policies BC1 and BC2 will have no effect.
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that	0	0	Policies BC1 and BC2 will have no effect.

IIA Objective	Policy BC1: Prioritising office use	Policy BC2: Culture, retail and leisure uses	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
optimises resource use and minimises waste			
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	Policies BC1 and BC2 will have no effect.

### 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 1.53: Assessment of Policies BC3 to BC8**

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

IIA Objective	Policy BC3: City Fringe Opportunity Area	Policy BC4: City Road	Policy BC5: Farringdon	Policy BC6: Mount Pleasant and Exmouth Market	Policy BC7: Central Finsbury	Policy BC8: Historic Clerkenwell	<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><b>BC7: Development to protect character including of the Spa Green Estate, provision of high quality and connected public realm, better pedestrian and cycle access.</b></p> <p><b>BC8: Preservation of the fine grained historic character, active ground floor uses.</b></p>
2. Ensure efficient use of land, buildings and infrastructure	+	+	+	+	+	+	<p><b>New positive effects have been identified following review of the IIA as part of the examination for these policies which does not change the overall effect. There is a minor positive effect for policies BC3 to BC8. The spatial policies set out the locations which are considered to be the most appropriate locations for larger scale development such as some areas within the City Fringe Opportunity Area as well as guiding more moderate development in sensitive areas such as Historic Clerkenwell. These policies will ensure development makes the best use of the qualities of different areas across the AAP area, making efficient use of the land.</b></p>
3. Conserve and enhance the significance of heritage	+	+	+	+	+	++	<p>All spatial strategy areas include area specific policies which protect the historic environment in that area. The effects are likely to be minor in scale for all areas except for BC8 where</p>

IIA Objective	Policy BC3: City Fringe Opportunity Area	Policy BC4: City Road	Policy BC5: Farringdon	Policy BC6: Mount Pleasant and Exmouth Market	Policy BC7: Central Finsbury	Policy BC8: Historic Clerkenwell	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
assets and their settings, and the wider historic and cultural environment.							<p>development is to be heritage led, and this area has been recorded as a significant positive effect for this objective. The key policy points for these areas are set out below:</p> <p><b>New positive effects have been identified following review of the IIA as part of the examination for Policy BC3 to BC7 which does not change the overall effect.</b></p> <p><b>BC3: Development proposals must preserve or enhance heritage assets, Bunhill Fields, Wesley’s Chapel, the Honourable Artillery Company grounds and the area’s three protected local landmarks.</b></p> <p><b>BC4: Preservation of the waterway and Graham Street Gardens.</b></p> <p><b>BC5: Preservation of the history and heritage of the wider area (including the Smithfield Market in the City of London), preservation of the open character across the railway lines.</b></p> <p><b>BC6: Preservation of the listed Clerkenwell Fire Station, the Rosebery Avenue Conservation Area, the Church of the Holy Redeemer, various shopfronts on Exmouth Market and Rosebery Avenue, and the listed Finsbury Health Centre.</b></p>

IIA Objective	Policy BC3: City Fringe Opportunity Area	Policy BC4: City Road	Policy BC5: Farringdon	Policy BC6: Mount Pleasant and Exmouth Market	Policy BC7: Central Finsbury	Policy BC8: Historic Clerkenwell	<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><b>BC7: Design to respond to local context, to be human in scale, following predominant building heights, re-establish traditional building lines. Preservation of the Grade II* listed Spa Green Estate.</b></p> <p>BC8. Preserving heritage assets is the starting point for development in this area, reflecting character and historic value. The area has a rich historic townscape pattern of development and includes Conservation Areas, a scheduled ancient monument, listed buildings, historic shopfronts, and strategic and local views to St. Paul's Cathedral.</p>
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	+	+	0	+	+	0	<p><b>New positive effects have been identified following review of the IIA as part of the examination for Spatial strategy areas BC3, BC4, BC6, and BC7 which changes the effect from neutral to minor positive. Spatial strategy areas BC3, BC4, BC6, and BC7 include area specific policies to promote liveable neighbourhoods in that area. They key policy points for these areas are set out below. The effects for these policies are considered likely to have minor positive effects against this objective.</b></p> <p><b>BC3: Provision of the Moorfields Eye Hospital and Institute of Ophthalmology legacy eye</b></p>

IIA Objective	Policy BC3: City Fringe Opportunity Area	Policy BC4: City Road	Policy BC5: Farringdon	Policy BC6: Mount Pleasant and Exmouth Market	Policy BC7: Central Finsbury	Policy BC8: Historic Clerkenwell	<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><b>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>
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	+	0	+	+	0	<p>There is no effect for policy BC3. See response to IIA Objective 3.</p> <p>There is a minor positive effect for policy BC4. The policy sets out criteria for residential moorings, which will help address the housing need for boat dwellers identified in Local Plan evidence.</p> <p><b>New effects have been identified for Policy BC6 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. BC6 will have minor</b></p>

IIA Objective	Policy BC3: City Fringe Opportunity Area	Policy BC4: City Road	Policy BC5: Farringdon	Policy BC6: Mount Pleasant and Exmouth Market	Policy BC7: Central Finsbury	Policy BC8: Historic Clerkenwell	<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><b>positive effects through development of affordable housing at site allocation site BC24 the Clerkenwell Fire Station.</b></p> <p>Policy BC7 will have minor positive effects. The redevelopment of Finsbury Leisure Centre referenced in the policy will deliver a significant amount of affordable housing. Finsbury Leisure Centre is also assessed as site allocation BC4.</p> <p>There is no effect for policies BC5, and BC8. See response to IIA Objective 1.</p>
6. Promote social inclusion, equality, diversity and community cohesion	0	0	0	0	0	0	<p>There is no effect for policy BC3. See response to IIA Objective 3.</p> <p>There is no effect for policies BC4 to BC8. See response to IIA Objective 1. There are opportunities for cross boundary working exist with the City of London and the Cultural Mile for BC5.</p>
7. Improve the health and wellbeing of the population and reduce health inequalities	+	+	+	+	+	+	<p><b>New positive effects have been identified following review of the IIA as part of the examination for Spatial strategy areas which changes the effect from neutral to minor positive. The Spatial Strategy areas contribute minor positive effects for health and wellbeing through improvements to open space and also through improvements to the public realm to improve opportunities for walking and cycling.</b></p>

IIA Objective	Policy BC3: City Fringe Opportunity Area	Policy BC4: City Road	Policy BC5: Farringdon	Policy BC6: Mount Pleasant and Exmouth Market	Policy BC7: Central Finsbury	Policy BC8: Historic Clerkenwell	<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><b>Refer to objectives 9 and 10 for the summaries of these policies.</b></p> <p>In addition Policy BC7 will have minor positive effects. The redevelopment of Finsbury Leisure Centre referenced in the policy will deliver improved sporting facilities which will benefit local people and encourage more sporting activity. Finsbury Leisure Centre is also assessed as site allocation BC4.</p>
<p>8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes</p>	<p>++</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>There is a significant positive effect for policy BC3. This area is the most significant location for new office floorspace in the borough and correlates with the London Plan Opportunity Area. There is specific reference to the Moorfields site which will deliver a significant quantum of office space and which reinforces the policy position set out in policy B2 and helps contribute to economic growth. The Opportunity Area reflects the importance of cross boundary working with neighbouring London Borough of Hackney and the City of London.</p> <p>There is a minor positive effect for policies BC4 to BC8. There is specific reference to the economic/commercial importance of these areas which reinforces the policy position set out in other Local Plan policies including policy B2, and helps contribute to economic growth.</p>

IIA Objective	Policy BC3: City Fringe Opportunity Area	Policy BC4: City Road	Policy BC5: Farringdon	Policy BC6: Mount Pleasant and Exmouth Market	Policy BC7: Central Finsbury	Policy BC8: Historic Clerkenwell	<b>Commentary on assessment of likely significant effects of policies</b> (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	+	+	+	+	+	+	<p><b>New positive effects have been identified following review of the IIA as part of the examination for Spatial strategy areas which changes the effect from neutral to minor positive.</b></p> <p><b>All Spatial Strategy Areas include policies to improve the public realm to create a safe and convenient network for walking and cycling. The key policies for each area are:</b></p> <p><b>BC3: Major public realm scheme at Old Street Roundabout to remove the gyratory and improve conditions for walking and cycling. All development to improve permeability.</b></p> <p><b>BC4: Improve City Road corridor with active frontages, enhanced public realm, new pedestrian crossings, and tree planting.</b></p> <p><b>BC5: Improved interchange between modes at Farringdon Station and surrounding area, a single station environment, improved public realm in surrounding streets linking to Smithfield Market and Clerkenwell Green.</b></p> <p><b>BC6: Public realm improvements at Exmouth Market improving the pedestrian priority, improvements to Farringdon Road and</b></p>

IIA Objective	Policy BC3: City Fringe Opportunity Area	Policy BC4: City Road	Policy BC5: Farringdon	Policy BC6: Mount Pleasant and Exmouth Market	Policy BC7: Central Finsbury	Policy BC8: Historic Clerkenwell	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
							<p>Rosebury Avenue to make walking and cycling easier and safer, provision of green infrastructure. Improved routes to Spa Fields.</p> <p><b>BC7: Public realm improvements to facilitate easy pedestrian and cyclist access through and within the area, in line with pedestrian and cycle desire lines.</b></p> <p><b>BC8: Development to positively reinforce the street space, increased permeability, active uses at ground floor.</b></p> <p>These improvements are likely to have significant positive effects on this objective however they have been marked as minor positive under this assessment as these policies will also rely on other mechanisms including action through the Council’s Local Implementation Plan (including funding) for implementation.</p>
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	+	+	0	+	+	+	<p><b>New positive effects have been identified following review of the IIA as part of the examination for Spatial strategy areas BC3, BC6, BC7 and BC8 which changes the effect from neutral to minor positive. All Spatial Strategy Areas apart from BC5 include policies to improve the open spaces. The key policies for each area are set out below. Each of these have been marked as minor positive.</b></p>

IIA Objective	Policy BC3: City Fringe Opportunity Area	Policy BC4: City Road	Policy BC5: Farringdon	Policy BC6: Mount Pleasant and Exmouth Market	Policy BC7: Central Finsbury	Policy BC8: Historic Clerkenwell	<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</b></p>

IIA Objective	Policy BC3: City Fringe Opportunity Area	Policy BC4: City Road	Policy BC5: Farringdon	Policy BC6: Mount Pleasant and Exmouth Market	Policy BC7: Central Finsbury	Policy BC8: Historic Clerkenwell	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
							parking areas into pedestrian use. Proposal to create a green space at Clerkenwell Green in place of car parking.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	+	+	+	+	+	+	<p><b>New positive effects have been identified following review of the IIA as part of the examination for Spatial strategy areas BC3, BC5, BC6, BC7 and BC8 which changes the effect from neutral to minor positive. All Spatial Strategy Areas include policies which will improve biodiversity and introduce more green infrastructure and habitat for wildlife. The key policies for each area are set out below. Each of these have been marked as minor positive.</b></p> <p><b>BC3: Improvements to the quality of Finsbury Square, particularly in terms of green infrastructure. New green infrastructure along Old Street and at Old Street Roundabout.</b></p> <p>BC4: Protection of the Regent’s Canal, a designated open space, to protect use and function of this space. Protection of the biodiversity value of Graham Street Gardens.</p> <p><b>BC5: Greening of public spaces.</b></p> <p><b>BC6: Greening of Farringdon Road and Rosebery Avenue. Protection of Spa Fields and links to the space.</b></p>

IIA Objective	Policy BC3: City Fringe Opportunity Area	Policy BC4: City Road	Policy BC5: Farringdon	Policy BC6: Mount Pleasant and Exmouth Market	Policy BC7: Central Finsbury	Policy BC8: Historic Clerkenwell	<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>BC7: Preservation of existing green spaces including parks and the grounds of housing estates, improved connections between these spaces from new developments. Provision of new open spaces including pocket parks. Incorporation of new tree planting to reinforce the street hierarchy.</b></p> <p><b>BC8: Increased biodiversity and green infrastructure in the public realm. Conversion of carriageway space and car parking to green space. Conversion of the car parking at Clerkenwell Green to green space.</b></p>
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	+	0	0	0	0	<p>There is no effect for policy BC3. See response to IIA Objective 3.</p> <p><b>New positive effects have been identified following review of the IIA as part of the examination for BC4. There is a minor positive effect for policy BC4. The spatial strategy sets out that the City Road Basin is a potential location for the expansion of Islington’s Heat Network, and supports delivery of the Bunhill Phase 2 energy centre at the Junction of City Road and Central Street, and the delivery of Bunhill Phase 3 at the City Road Basin. These actions will help to reduce carbon emissions and assist with the transition to zero carbon.</b></p>

IIA Objective	Policy BC3: City Fringe Opportunity Area	Policy BC4: City Road	Policy BC5: Farringdon	Policy BC6: Mount Pleasant and Exmouth Market	Policy BC7: Central Finsbury	Policy BC8: Historic Clerkenwell	Commentary on assessment of likely significant effects of policies  (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
							There is no effect for policies BC5 to BC8. See response to IIA Objective 1.
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	0	0	0	0	There is no effect for policy BC3. See response to IIA Objective 3.  There is no effect for policies BC4 to BC8. See response to IIA Objective 1.
14. Maximise protection and enhancement of natural resources including water, land and air	0	+	0	0	0	0	There is no effect for policy BC3. See response to IIA Objective 3.  There is a minor positive effect for policy BC4 as the policy sets out specific criteria for residential moorings on Regent's Canal in relation to air pollution which can be an issue with residential moorings.

IIA Objective	Policy BC3: City Fringe Opportunity Area	Policy BC4: City Road	Policy BC5: Farringdon	Policy BC6: Mount Pleasant and Exmouth Market	Policy BC7: Central Finsbury	Policy BC8: Historic Clerkenwell	<b>Commentary on assessment of likely significant effects of policies</b>  <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
							There is no effect for policies BC5 to BC8. See response to IIA Objective 1.

## **Bunhill and Clerkenwell AAP**

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.

# Part 1: Updated Assessment of Site Allocations

## Introduction

This section sets out the assessment of site allocations and where relevant the alternatives to those site allocations. The presentation of the site assessment has been revised and includes assessment against the full set of appraisal objectives as requested by the Inspectors. Reasonable alternatives are considered alongside site assessments where relevant or explanations of where there are no alternatives. The assessment of site allocations has been revised and the text updated where relevant. This section replaces the assessment of site allocations in appendix 7 of the submission IIA.

All modifications to the site allocations made since the submission IIA are addressed in part 2 of the examination IIA. There are several sites where updates have been made which are assessed in part 2 – these are:

- 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 1.55: Site Assessment KC1: King’s Cross Triangle Site**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>KC1: King’s Cross Triangle Site, bounded by York Way, East Coast Main Line &amp; Channel Tunnel Rail Link, N1</b>	+	++	0	+	+	+	+	+	0	+	-	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>KC1 is allocated for mixed use development including residential, business, retail, leisure and community uses. The intensification/provision of business floorspace is a priority in this location but the site has extant planning permission for a residential-led, mixed use scheme providing leisure, community and retail uses as well as open space. The allocation also identifies that the northern part of the site overlaps with land deemed suitable for a district landmark building of up to 20 storeys, although the land is currently operational railway land and unlikely to come forward for development in the foreseeable future.</p> <p>The development considerations 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 1.56: Site Assessment KC2: 176-178 York Way**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
KC2: 176-178 York Way, N1 0AZ	+	++	0	0	+	+	0	++	0	0	0	0	0	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>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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

<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 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>													
<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: residential-led development</b></p>	<p>+</p>	<p>0</p>	<p>0</p>	<p>+</p>	<p>++</p>	<p>+</p>	<p>+</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 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.</p> <p>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.</p>													

	<p>A residential-led allocation for this site could have a positive effect on the promotion of liveable neighbourhoods, as it would bring more housing close to facilities such as shops and other leisure activities.</p> <p>The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. Improved housing options would also have a positive effect in terms of social inclusion and on health and wellbeing by helping people out of overcrowded or poor quality housing, combatting some of the negative consequences of relative poverty.</p> <p>Whilst residential-led development could bring residents into town centres, potentially improving footfall for local businesses, it is considered that alternative 2 is likely to have a significant negative effect on economic growth. If developed for residential purposes, the site – which is in existing business and employment use – will no longer be contributing towards the borough’s economy or supporting a range of jobs.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>
<b>Conclusion</b>	<p>The proposed allocation allows for an element of housing, whilst recognising the 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.</p>

**Table 1.58: 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</b>	KC3 is allocated for retention and reprovision of business floorspace, with potential for limited intensification of business use, and small scale commercial uses at ground floor level. The site has planning permission for additional business floorspace with flexible A1/A3/B1/D1/D2 ground floor uses.													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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	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.													
Reasonable alternative summary	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.													

**Table 1.59: Site Assessment KC4: Former York Road Station**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
KC4: Former York Road Station, 172-174 York Way, N1	+	+	+	+	+	+	+	+	0	+	0	+	+	0
Commentary on assessment of likely significant effects of site allocations	<p>KC4 is allocated for business-led development with an element of residential use.</p> <p>The allocation states that the locally listed former underground station should be retained on site, which will likely have positive effects on the historic environment and built environment. There will also be potential for creation of a safer and more inclusive built environment with creation of new public open space, which could also be positive for health and wellbeing. The allocation for business led use will have positive effects on economic growth, and positive effects on housing quality and social inclusion if it includes an element of residential use which will also deliver affordable housing. The allocation should have positive effects on the efficient use of land by bringing a vacant building back into use and the development considerations recognise the opportunity for site assembly with the neighbouring site. This site may also have a positive effect in terms of reducing the effects of climate change and increasing resource efficiency as there is potential for the site to support the expansion of the council's decentralised energy network.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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
<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 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

<b>Reasonable Alternative 2: residential-led development</b>	+	0	+	+	++	+	0	-	0	+	0	+	+	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>This alternative is for residential-led development.</p> <p>The other provisions of policy KC4 remain unchanged, for example, the retention of the existing locally listed station, potential for connection to a decentralised energy network and incorporation of public open space.</p> <p>The intensification of the site for residential could help to make more efficient use of the site, however the site is partially within the CAZ where employment uses are prioritised and there are existing employment uses on the site and so residential development may not help to focus development in the most appropriate locations. On balance a neutral effect on the efficient use of land has been identified.</p> <p>A residential-led allocation for this site could have a positive effect on the promotion of liveable neighbourhoods, as it would bring more housing close to facilities such as shops and other leisure activities. However, having no commercial uses it could also have a minor negative effect on economic growth.</p> <p>The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>													
<b>Conclusion</b>	<p>Two reasonable alternatives to the business-led allocation for KC4 were identified: mixed-use residential and commercial development and residential-led development. Whilst mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development would have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business-led development was most appropriate for this site given its proximity to King's Cross and the CAZ and the borough's need for additional employment floorspace.</p>													

**Table 1.60: Site Assessment KC5: Belle Isle Frontage**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>KC5: Belle Isle Frontage, land on the east side of York Way</b>	+	+	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
<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 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>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 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
Commentary on assessment of likely significant effects of Alternative 2	<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>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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. 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 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.													

**Table 1.61: Site Assessment KC6: 8 All Saints Street**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>KC6: 8 All Saints Street, N1 9RJ</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>	KC6 is allocated for retention and reprovision of business floorspace, and potential for limited intensification of business use. Small scale commercial uses at ground floor level.  The existing building is an acceptable context building. The allocation will likely have positive effects on economic development by providing additional employment floorspace. 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.													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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
Commentary on assessment of likely significant effects of Alternative 1	<p>Allocating this site for mixed-use commercial and residential development could have a minor positive effect in terms of the efficient use of land. However, the flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. It is considered alternative 1 has the potential to have a negative effect on the borough's economic growth as certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace needed to support Islington's projected economic growth. Given the site is already wholly in use as offices, a mix of uses on the site would lead to a reduction in employment use on the site which could also be damaging to the wider King's Cross Priority Employment Location within which the site sits and where employment uses are prioritised.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>Allocating this site for mixed-use development should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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>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 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.</p>													

**Table 1.62: Site Assessment KC7: All Saints Triangle**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>KC7: All Saints Triangle, Caledonian Road, N1 9RR</b>	+	+	0	+	0	0	0	+	0	+	+	0	0	0
<b>Commentary on assessment of likely significant</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</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>inclusive environment. The current use is quite low density and additional floorspace could be created on site making a more efficient use of land. A new larger building would have positive effects on economic development by providing more employment floorspace; 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
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>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 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
<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> <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 ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 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 1.63: Site Assessment VR1: Fayers Site, 202-228 York Way

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<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
<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>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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>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>													
Reasonable alternative summary	No reasonable alternative was identified. The site is allocated for retention and intensification for industrial uses and has planning permission that accords with the uses proposed in the draft allocation.													

**Table 1.64: Site Assessment VR2: 230-238 York Way**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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>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	-
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>This alternative is for housing to be co-located alongside industrial use. The other provisions of policy VR2 remain unchanged, for example, that building height will be limited to 5 storeys 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.</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>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 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 effects of Alternative 2	<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> <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</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>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.</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 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 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</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>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 1.65: Site Assessment VR3: Tileyard Studios**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
VR3: Tileyard Studios, Tileyard Road, N7 9AH	+	++	+	0	0	+	0	++	0	0	0	0	0	0
<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.</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>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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.</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 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	-

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 2</b></p>	<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 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.</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 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
<b>Reasonable Alternative 3</b> <b>Office and housing co-location</b>	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 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>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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>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 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>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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>	Three reasonable alternatives to the allocated use (industrial consolidation and intensification) were identified for site VR3: the co-location of industrial uses with housing, the co-location of industrial uses with offices and the co-location of industrial uses with both housing and offices. Although each of these alternative uses would have some positive effects - such as the provision of additional housing or the provision of additional business floorspace to support the borough's economic growth – on balance it was considered that the consolidation and intensification of industrial uses was most appropriate for this site given its location within the LSIS and the contribution this could make to its industrial function 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 1.66: Site Assessment VR4: 20 Tileyard Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>VR4: 20 Tileyard Road, N7 9AH</b>	+	++	+	0	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>The site is allocated for retention and intensification for industrial uses (B1c, B2 and B8). The allocation also sets out that office floorspace will only be acceptable as part of a hybrid workspace scheme.</p> <p>The 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</p>													

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	<p>uses (not just residential, but office too). By prioritising industrial development the allocation ensures that much needed industrial space is also delivered.</p> <p>The site is within a protected viewing corridor. The allocation sets out that building height will be limited to 5 storeys, this will ensure that views towards heritage assets are maintained.</p> <p>The development of the site will support economic growth in the borough. The delivery of additional industrial floorspace is much needed as a significant amount of industrial floorspace has been lost in recent years. Such space, in such a central location, will play a key role in supporting the Central London economy 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
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>													

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	<p>The provision of new housing, contributing to the borough’s significant evidenced need for new homes, would be a minor positive effect of widening the allocations to include residential use and should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses.</p> <p>Although residential uses can be accommodated elsewhere in the borough to meet the borough’s housing targets, locations suitable for industrial uses are significantly more constrained given land values in the borough and the potential for such uses to be viewed as ‘bad neighbours’. For alternative 1 co-location of industrial space with residential uses would help to achieve an effective use of land. Whilst this intensification of uses could bring some additional industrial floorspace to the LSIS, there needs to be a balance with protecting the full range of industrial functions that make the LSIS a successful industrial cluster. The co-location of industrial floorspace with housing would lead to the exclusion of more traditional industrial uses in the LSIS in favour of light industrial activities which can coexist with residential development. This will have a minor negative effect on the balance of uses and industrial activities in the LSIS particularly in terms of focusing development in the most appropriate locations.</p> <p>Opening the LSIS up to residential development increases opportunities for conflict between industrial occupiers, who may operate long hours, generating noise and frequent vehicle movements, and new residential occupiers. As such alternative 1 is assessed as having a minor negative effect on the promotion of liveable neighbourhoods, as set out in objective 4.</p> <p>Whilst a minor positive effect in relation to the provision of housing that would contribute towards the borough’s evidenced need for housing is recognised, the effect of alternative 1 on social inclusion is considered to be neutral 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</p>													

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	lessened and the range of industrial uses could lead to the displacement of industrial businesses to Outer London industrial locations while still needing to travel to central London to access their markets. This could increase vehicle mileage through Islington, which risks increased congestion and emissions, and have negative impacts on climate change and air quality. The alternatives would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expanded in this location. In this way alternative 1 is considered to also have a minor negative effect in terms of reducing contributions to climate change (objective 12) and in relation to objective 14 (maximising protection of natural resources including water, land and air).													
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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' distribution/logistics and 'just in time' servicing. Without the policy protection industrial</p>													

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	<p>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>													

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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 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> <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</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>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>													
<b>Conclusion</b>	<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 1.67: 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.</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>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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.</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 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	-

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 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 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>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 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> <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>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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>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 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>													

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>	<p>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.</p>													

**Table 1.68: Site Assessment VR6: The Fitzpatrick Building**

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>VR6: The Fitzpatrick Building, 188 York Way, N7 9AD</b>	+	++	+	0	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>The site has planning permission for 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</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
	such as this are under pressure for the development of other uses (not just residential, but office too). By prioritising industrial development the allocation ensures that much needed industrial space is also delivered.													
	The 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													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified. The site has an extant, implemented planning permission for a mix of B1(a) and flexible B1 floorspace. The allocation seeks to retain and intensify industrial uses should the permitted scheme be subject to amendment.													

**Table 1.69: Site Assessment VR7: 43-53 Brewery Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>VR7: 43-53 Brewery Road, N7 9QH</b>	+	++	+	0	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	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.													
	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													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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>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
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 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>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 provision of new housing, contributing to the borough’s significant evidenced need for new homes, would be a minor positive effect of widening the allocations to include residential use and should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses.</p> <p>Although residential uses can be accommodated elsewhere in the borough to meet the borough’s housing targets, locations suitable for industrial uses are significantly more constrained given land values in the borough and the potential for such uses to be viewed as ‘bad neighbours’. For alternative 1 co-location of industrial space with residential uses would help to achieve an effective use of land. Whilst this intensification of uses could bring some additional industrial floorspace to the LSIS, there needs to be a balance with protecting the full range of industrial functions that make the LSIS a successful industrial cluster. The co-location of industrial floorspace with housing would lead to the exclusion of more traditional industrial uses in the LSIS in favour of light industrial activities which can coexist with residential development. This will have a minor negative effect on the balance of uses and industrial activities in the LSIS particularly in terms of focusing development in the most appropriate locations.</p> <p>Opening the LSIS up to residential development increases opportunities for conflict between industrial occupiers, who may operate long hours, generating noise and frequent vehicle movements, and new residential occupiers. As such alternative 1 is assessed as having a minor negative effect on the promotion of liveable neighbourhoods, as set out in objective 4.</p> <p>Whilst a minor positive effect in relation to the provision of housing that would contribute towards the borough’s evidenced need for housing is recognised, the effect of alternative 1 on social inclusion is considered to be neutral 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 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</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
	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).													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 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 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</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>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, 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).</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	-	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> <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.</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 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 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 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).</p>													
<b>Conclusion</b>	<p>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.</p>													

**Table 1.70: Site Assessment VR8: 55-61 Brewery Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
VR8: 55-61 Brewery Road, N7 9QH	+	++	+	0	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>The site has planning permission for the provision of additional B1 floorspace, including B1c. Should the site be subject to further amendments or new applications, any proposal should seek to retain and intensify industrial uses (B1c, B2 and B8). Office floorspace will only be acceptable as part of a hybrid workspace scheme.</p> <p>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>	No reasonable alternative was identified. The site is allocated for retention and intensification for industrial uses and has planning permission that accords with the uses proposed in the draft allocation.													

**Table 1.71: Site Assessment VR9: Rebond House**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
VR9: Rebond House, 98-124 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.</p> <p>Development of the site will optimise the use of previously developed land. The Local Plan directs industrial development to Locally Significant Industrial Sites (LSIS). The site is located in an LSIS, therefore, this is an appropriate location for such development. The development of industrial floorspace balances the competing demands between land uses as sites such as this are under pressure for the development of other uses (not just residential, but office too). By prioritising industrial development the allocation ensures that much needed industrial space is also delivered.</p> <p>There is a locally listed building nearby, as such, Local Plan policies will apply and any development will be required to respect the heritage asset 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>	No reasonable alternative was identified. The site is allocated for retention and intensification for industrial uses and has planning permission that accords with the uses proposed in the draft allocation.													

**Table 1.72: Site Assessment VR10: 34 Brandon Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
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.</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 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	-

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 2</b></p>	<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 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.</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</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
	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).													
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 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>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 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 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 1.73: Site Assessment AUS1: Royal Bank of Scotland**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 1.74: Site Assessment AUS2: Pride Court, 80-82 White Lion Street**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<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	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>	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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: Residential-led development</b>	0	-	0	+	++	+	+	+	0	0	0	0	0	0	0

<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>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 1.75: 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</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.;</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>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
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 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, 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
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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>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.</p> <p>Although development of this underutilised site for housing would help to make more efficient use of the site, this could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. The site is located within Angel Town Centre and the CAZ where employment uses are prioritised. Whilst residential-led development on this site could bring more residents into the town centre, potentially improving footfall for local businesses, it is considered that alternative 2 is likely to have a significant negative effect on economic growth. If developed for residential purposes, this site will no longer be contributing towards the borough's economy or supporting a range of jobs. 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>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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	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.													

**Table 1.76: 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
AUS4: Land at 90-92 White Lion Street, N1 9PF	+	++	0	0	0	+	0	+	0	0	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	<p>AUS4 has extant planning permission for mixed-use development. Should the planning permission be subject to further amendments, or new applications submitted, the priority use of the site should be intensification of office uses on upper floors with some active ground floor town centre uses.</p> <p>The development of the site will have a positive effect in optimising use of previously vacant land located in a central part of the town centre with good public transport connections. The allocation would contribute to the provision of business floorspace needed for economic growth and provide more opportunity for residents to access employment in the borough, which could have a minor positive effect in terms of social inclusion objectives. Also, it should have a positive effect on the quality of the environment given it is currently a vacant and cleared plot and through the provision of active frontages it will make the town centre a safer and more inclusive place to visit.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<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>													
<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: 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>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 1.77: Site Assessment AUS5: 94 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
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</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>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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	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.													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 minor positive effect in terms of the efficient use of land and buildings. Development of the site can help to enhance the local character of the area and promote a high quality built environment.</p> <p>The flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. This has the potential to have a minor negative effect on the borough's economic growth as certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace needed to support Islington's projected economic growth. The site is located within Angel Town Centre and the CAZ where employment uses are prioritised. Given the current business use of the site and depending on intensification, mixed use development could see the loss of employment floorspace.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access for residents to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>Allocating this site for mixed-use development should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 this site for housing could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. The site is located within Angel Town Centre and the CAZ where employment uses are prioritised. Whilst residential-led development on this site could bring more residents into the town centre, potentially improving footfall for local businesses, it is considered that Alternative 2 is likely to have a significant negative effect on economic growth. If developed for residential purposes, the site will lead to a loss of employment floorspace and not contribute towards economic growth.</p> <p>A residential-led allocation could have a positive effect on the promotion of liveable neighbourhoods, as it would bring more housing in to Angel Town Centre where residents can be close to facilities such as shops and other leisure activities.</p> <p>The most significant positive effect of alternative 2 would be on the delivery of housing, and particularly affordable housing, which would be required through policy for residential developments. 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 1.78: 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:</b> Sainsbury's, 31-41 Liverpool Road, N1 0RW	++	++	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 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
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 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
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>This alternative is for business-led development. The other provisions of policy AUS6 remain unchanged for example in relation to permeability and re-provision of storage units for Chapel Market stallholders.</p> <p>There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. The site is located within the CAZ, where the delivery of business floorspace is a priority. Allocating this site for business-led development could help the towards meeting identified needs for business floorspace, and foster sustainable economic growth in the borough. This would help create employment opportunities that would support the council's social inclusion objectives.</p> <p>The site is located within the CAZ and Angel Town Centre (including Primary Shopping Area) where competing demands for land have to be carefully balanced, and non-residential uses are likely to be necessary to meet the needs of residents for services and facilities. If no retail use is re-provided on the site this could have a minor negative effect on the promotion of liveable neighbourhoods</p>													
<b>Conclusion</b>	<p>Two reasonable alternatives to the mixed retail and business use allocation for AUS6 were identified: residential-led and business-led development. Whilst business-led development could have positive effects by supporting a specific identified development need, and residential-led development could have positive effects in terms of the delivery of good-quality housing, on balance it was considered that a mix of business and retail development was most appropriate for this site given its location within Angel Town Centre and the CAZ and the borough's need for a significant amount of additional employment floorspace.</p>													

**Table 1.79: Site Assessment AUS7: 1-7 Torrens Street**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
AUS7: 1-7 Torrens Street, EC1V 1NQ	+	+	0	++	0	+	+	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>AUS7 is allocated for refurbishment for town centre uses such as retail, offices, cultural and community uses. The existing arts space should be retained. The refurbishment of the buildings can help to retain and enhance the local character of the area and promote a high quality built environment.</p> <p>Development of the site should have a positive effect in optimising use of a previously developed building. It will positively contribute to the provision of business floorspace needed for economic growth. The most significant positive effect will be on liveable neighbourhoods and the quality of the environment by protecting the existing community and cultural uses and promoting other town centre uses with active ground floor frontages encouraged. Cultural and community uses can have a positive impact on social inclusion, and support the mental and physical health and wellbeing of their patrons.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 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> <p>The development of this site for housing could have a minor negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs.</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	<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>													
Conclusion	Two reasonable alternatives to the mixed-use allocation for AUS7 were identified: residential-led development and business-led development. Although positive effects could be realised through both residential-led and business-led development.. The assessment of the site is finely													

I/A Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	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 1.80: Site Assessment AUS8: 161-169 Essex Road**

I/A Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
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>													
I/A Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES

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	+
Commentary on assessment of likely significant effects of Alternative 1	<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
Reasonable Alternative 2: Business-led development	+	+	++	-	0	+	0	++	+	0	0	+	0	+
Commentary on assessment of likely significant	<p>Business led development would have a positive effect on economic growth and optimise use of the site for employment use in a town centre location. There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036.</p>													

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 2	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.													
Conclusion	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. <b>This allocation is subject to a modification which has been assessed separately in part 2.</b>													

**Table 1.81: 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
AUS9: 10-14 White Lion Street, N1 9PD	0	+	0	0	0	+	0	++	0	0	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	AUS9 is allocated for, and has planning permission for, the intensification of business use. The allocation should have a positive effect in optimising the use of previously developed land and buildings. The intensification of business uses on site supports the economic growth of the Angel Town Centre and wider borough and a range of employment types and opportunities will reduce barriers to employment and have a minor positive effect in relation to social inclusion.													
Conclusion	No reasonable alternative was identified, the allocation reflects the extant planning permission for the site.													

**Table 1.82: Site Assessment AUS10: 1-9 White Lion Street**

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>AUS10: 1-9 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>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>													
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>Reasonable Alternative 1: Mixed-use commercial and residential development</b>	0	+	0	+	+	0	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>Allocating this site for mixed-use commercial and residential development could have a minor positive effect in terms of the efficient use of land and buildings.</p> <p>The flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. This has the potential to have a minor negative effect on the borough's economic growth as certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace needed to support Islington's projected economic growth. The site is located within Angel Town Centre and the CAZ where employment uses are prioritised. Given the current business use of the site and depending on intensification, mixed use development could see the loss of employment floorspace.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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> <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>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 AUS10 were identified: mixed-use residential and commercial development and residential-led development. Whilst mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development could have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business-led development was most appropriate for this site given its location within Angel Town Centre and the CAZ and the borough's need for a significant amount of additional employment floorspace.													

**Table 1.83: Site Assessment AUS11: Collins Theatre**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<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.													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified. The allocation supports the permitted theatre use of the site with the intention of securing and protecting a cultural use for the benefit of the borough in accordance with Local Plan policy.													

**Table 1.84: Site Assessment AUS12: Public Carriage Office, 15 Penton Street**

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>AUS12: Public Carriage Office, 15 Penton Street, N1 9PU</b>	+	++	0	+	+	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>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.</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 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>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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>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
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 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>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 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.													

**Table 1.85: Site Assessment AUS13: N1 Centre, Parkfield 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>AUS13: N1 Centre, Parkfield Street, N1</b>	+	+	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 1.86: Site Assessment AUS14: 46-52 Pentonville Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
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 effects of site allocations</b>	AUS14 has extant permission for intensification of business and business related education uses. Should the permission be subject to amendment or a new application submitted, business floorspace should be prioritised. The provision of B1a uses should have a positive impact 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
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	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.													
<b>Conclusion</b>	The site has planning permission for intensification of business and business-related education uses. The allocation states that if the planning permission is subject to further amendment, or new proposals are submitted for the site, business floorspace should be prioritised. The reasonable alternative to the allocation for business-led development is considered to be an allocation for education use of the site. The site is within the CAZ, 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 1.87: Site Assessment AUS15: Windsor Street Car Park**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
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 1.88: Site Assessment AUS16: Angel Square**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
AUS16: Angel Square, EC1V 1NY	+	+	0	+	0	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>AUS16 is allocated for intensification of office use.</p> <p>The allocation protects the business use of the site which positively contributes to economic growth; 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 ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 effects of Alternative 1</b>	<p>This alternative is for mixed-use commercial and residential development. The other provisions of policy AUS16 remain unchanged, for example, improvements to the façade and improved connectivity.</p> <p>Allocating this site for mixed-use commercial and residential development could have a minor positive effect in terms of the efficient use of land and buildings.</p> <p>The flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. This has the potential to have a minor negative effect on the borough's economic growth as certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace needed to support Islington's projected economic growth. Flexibility is appropriate for some sites in the borough but in order to meet identified development needs it is necessary for some allocations to be more specific in their requirements. The site is located within the CAZ where employment uses are prioritised. Given the current business use of the site and depending on intensification, mixed use development could see the loss of employment floorspace.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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
Commentary on assessment of likely significant effects of Alternative 2	<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>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 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 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.</p>													

## Nag's Head and Upper Holloway

**Table 1.89: Site Assessment NH1: Morrison's supermarket and adjacent car park**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>NH1: Morrison's supermarket and adjacent car park, 10 Hertslet Road, and 8-32 Seven Sisters Road, N7 6AG</b>	++	++	0	++	+	+	+	++	0	+	0	0	0	0
<b>Commentary on assessment of</b>	<p>NH1 is allocated for mixed-use development, with residential use, retention of and improvements to existing retail floorspace and a significant amount of new office floorspace. Existing site permeability through to Seven Sisters Road and the market should be maintained. Retention and</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	<p>enhancement of the covered market will be supported. The allocation also identifies that the site offers the opportunity for the development of a local landmark building up to 15 storeys.</p> <p>The allocation offers an opportunity to improve retail provision and add business and residential floorspace in a central location in the town centre. This should help meet resident's needs and improve access to town centre uses, foster economic growth through providing additional opportunity for employment as well as increase the supply of residential floorspace all of which result in positive effects. The site would provide affordable housing as part of any residential element 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</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 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
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>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.</p> <p>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.</p>													
Conclusion	<p>Two reasonable alternatives to the mixed-use allocation for NH1 were identified: residential-led development and business-led development. Although positive effects could be realised through both residential-led and business-led development, it is considered that a mixed-use allocation including retail, office and residential uses is appropriate for this prominent site in the Nag's Head Town Centre.</p> <p><b>This allocation is subject to a modification which has been assessed separately in part 2.</b></p>													

Table 1.90: Site Assessment NH2: 368-376 Holloway Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
NH2: 368-376 Holloway Road (Argos and adjoining shops), N7 6PN	++	+	0	++	+	+	+	++	0	0	0	0	0	0
<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
<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 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</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>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
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 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 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.</p>													
Conclusion	<p>Two reasonable alternatives to the mixed-use allocation for NH2 were identified: residential-led development and business-led development. Although positive effects could be realised through both residential-led and business-led development, it is considered that a mixed-use allocation including retail, business and residential uses is appropriate in this instance for this prominent town centre site to support its delivery.</p>													

**Table 1.91: Site Assessment NH3: 443-453 Holloway Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
NH3: 443-453 Holloway Road, N7 6LJ	+	+	+	+	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
Reasonable Alternative 1: Residential-led development	+	-	+	-	++	+	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	This alternative is for residential-led development. The other provisions of policy NH3 remain unchanged, for example, public realm improvements.  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.													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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	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 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 1.92: 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
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>NH4 is allocated, and has planning permission, for residential development. Any proposal should ensure continued Ministry of Defence use on part of the site (for cadets).</p> <p>The allocation is for redevelopment of a redundant territorial army centre. The most significant positive effect will be to optimise use of previously developed land and buildings providing residential use in an appropriate location, and depending on the final design this should have a positive effect on enhancing local character and distinctiveness. There will be a positive effect on both liveable neighbourhoods and inclusion/equality through re-provision of the cadet facility on the site. The site would provide affordable housing as part of any residential element which is considered likely to have positive effects on social inclusion.</p>													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified. The draft allocation reflects the extant planning permission for residential development of the site.													

**Table 1.93: Site Assessment NH5: 392A Camden Road and 1 Hillmarton Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
NH5: 392A Camden Road and 1 Hillmarton Road, N7 and 394 Camden Road, N7	++	+	0	0	+	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant</b>	<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</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	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.													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 1.94: Site Assessment NH6: 11-13 Benwell Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
NH6: 11-13 Benwell Road	0	+	0	0	+	0	0	+	0	0	0	0	0	0

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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>	NH6 is allocated for retention and re-provision of business floorspace. An element of residential use may be acceptable. Intensification of the former warehouse for office use will have a positive effect in optimising the use of previously developed land and buildings, and on economic growth, through increasing density of business floorspace on the site. Residential development on the site could contribute towards meeting housing need in the borough. Given the small scale of the site it is unlikely the allocation will affect other objectives. The site has constrained access from Benwell Road.													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	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
<b>Reasonable Alternative 2: Business-led development</b>	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 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, and 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 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 1.95: Site Assessment NH7: Holloway Prison**

I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>NH7: Holloway Prison, Parkhurst Road, N7 0NU</b>	++	++	0	++	++	++	+	+	0	+	0	+	+	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	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 1.96: 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.</p> <p>The allocation is for redevelopment of existing offices and sensitive refurbishment of a locally listed building. The allocation will have a positive effect on optimising use of previously developed land and buildings and will enhance local character and distinctiveness, depending on final scheme – the development considerations highlight the various inappropriate and unsympathetic additions/actions which affect and detract from the existing buildings’ contribution to the conservation area so there would be a significant positive effect if sympathetic development were implemented. The allocation will have a positive effect on economic growth in the borough through retaining existing employment uses. The site would provide affordable housing as part of any residential element 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
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 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>													
Conclusion	<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 1.97: Site Assessment NH9: Islington Arts Factory**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
NH9: Islington Arts Factory, 2 and 2a Parkhurst Road, N7	+	+	+	++	+	+	0	+	0	0	0	0	0	0

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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>NH9 is allocated for provision of replacement community floorspace, residential use and an element of office floorspace.</p> <p>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>													
<b>IIA Objective / Site</b>	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<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>													

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
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 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.</p> <p>Allocating this site for business-led development could help towards meeting identified needs for business floorspace, and foster sustainable economic growth in the borough and contribute to the 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>													
Conclusion	<p>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.</p>													

**Table 1.98: Site Assessment NH10: 45 Hornsey Road and 252 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
NH10: 45 Hornsey Road and 252 Holloway Road	+	++	0	+	0	0	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>NH10 is allocated for redevelopment for conventional housing, however, given its location adjacent to London Metropolitan University, 45 Hornsey Road may also be considered as a site suitable for student accommodation. Commercial uses, particularly light industrial uses, should be maintained under the railway arches. The north eastern corner portion of the site is considered appropriate to develop a local landmark building of up to 12 storeys.</p> <p>The allocation will have a significant positive effect on optimising use of previously developed land and buildings and is currently used for storage and warehousing so would represent an intensification of the site, although it would have a negative effect on the delivery of affordable housing if student accommodation was delivered. 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>	<p>No reasonable alternative was identified. The draft allocation is flexible and supports a mix of uses, suggesting the site could be suitable for conventional housing or student accommodation with the retention of commercial uses under the railway arches. Given this flexibility it is considered there would be limited benefit in assessing alternative uses. Related to this site allocation assessment is the assessment of a more permissive approach to Policy H6: Purpose-built student accommodation.</p>													

**Table 1.99: 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

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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>NH11 is allocated for the intensification of business use with replacement warehouse space and other business use above.</p> <p>The allocation is for redevelopment of an existing single storey warehouse and will have a minor positive effect on optimising use of previously developed land and buildings, and economic growth, through increasing density of business floorspace on the site. Given the small scale of the site it is unlikely the allocation will affect other objectives. The site has constrained access from Holloway Road and adjacent site allocation NH12 identifies the possibility of improving this access as part of comprehensive development which could potentially lead to a positive impact on improving neighbourhood connectivity depending on both sites being delivery as part of a comprehensive proposal. The development considerations highlight the adjacent conservation area designation.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>Allocating this site for mixed-use commercial and residential development could have a minor positive effect in terms of the efficient use of land and buildings.</p> <p>The flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. This has the potential to have a minor negative effect on the borough's economic growth as certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace needed to support Islington's projected economic growth. Given the current business use of the site and depending on intensification, mixed use development could see the loss of employment floorspace.</p> <p>Allocating this site for mixed-use development should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>Redevelopment of an existing single storey warehouse will have a minor positive effect on optimising use of previously developed land. However, this could also have a negative effect as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. The site is located within Nag's Head Town Centre. Whilst residential-led development on this site could bring more residents into the town centre, potentially improving footfall for local businesses, it is considered that the alternative is likely to have a significant negative effect on economic growth. If developed for residential purposes, this site will no longer be contributing towards the borough's economy or supporting a range of jobs.</p> <p>A residential-led allocation could have a positive effect on the promotion of liveable neighbourhoods, as it would bring more housing in to Nag's Head Town Centre where residents can be close to facilities such as shops and other leisure activities. 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 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.</p>													

**Table 1.100: Site Assessment NH12: 379-391 Camden Road and 341-345 Holloway Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<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 reprovision and intensification of commercial and residential uses including no net loss of retail floorspace with some intensification of business floorspace. The allocation also identifies that the site offers the opportunity for the development of a local landmark building up to 12 storeys.</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 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.</p>													
<b>Reasonable Alternative 1: Residential-led development</b>	++	-	0	-	++	+	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>This alternative is where this site would be amended so that the allocation is for residential-led use. The other provisions of policy 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</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>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
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 its location in the Nag's Head Town Centre and the current uses on the site.</p>													

**Table 1.101: Site Assessment NH13: 166-220 Holloway Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
NH13: 166-220 Holloway Road	+	++	0	++	0	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>NH13 is allocated for improvements to the internal layout of the London Metropolitan University (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 1.102: Site Assessment NH14: 236-250 Holloway Road and 29 Hornsey Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
NH14: 236-250 Holloway Road and 29 Hornsey Road	+	+	0	++	0	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant</b>	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.													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 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.													
<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>	One reasonable alternative to the proposed allocation for NH14 (consolidation and improvement of existing education uses) was identified: education use including student accommodation. Whilst the alternative provides some positives in relation to economic growth social inclusion and liveable neighbourhoods, the provision of additional student accommodation would lead to potential less efficient provision of education floorspace, and in addition this is not considered a priority need given the borough's previous high delivery of student 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.													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES

## Finsbury Park

**Table 1.103: Site Assessment FP1: City North Islington Trading Estate**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<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>	<p>The site allocation for FP1 aligns with the extant planning permission for two 21-storey towers and 3 and 10 storey buildings containing 355 residential dwellings, offices, restaurant and café floorspace and flexible (A1-A4/D2/B1 use) floorspace. A new western entrance to Finsbury Park station will be created along with step-free access to the platforms. Should the site be subject to further amendments or new applications suitable uses should be provided aligning with the adjacent Fonthill Road Specialist Shopping Area and Finsbury Park Spatial Strategy and should seek to protect and enhance the public realm.</p> <p>The allocation is an opportunity to increase retail and business floorspace and add residential floorspace in a central and highly accessible location in the town centre. This should help meet resident's needs, improve access to town centre uses, foster economic growth through providing additional opportunity for employment and increase the supply of residential floorspace, all of which result in positive effects. As well as providing B1 floorspace which is a main driver of economic growth, modern retail floor space will create a new attraction to Finsbury Park. The modernised public realm should also benefit the Specialist Shopping Area of Fonthill Road, further boosting economic growth. The site will provide affordable housing as part of the residential element. Permeability improvements and the provision of step-free access to the station promote more sustainable neighbourhoods which are more inclusive and safer and improve residents' connection to facilities and amenities. An</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
	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.													
Reasonable alternative summary	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.													

**Table 1.104: Site Assessment FP2: Morris Place/Wells Terrace**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
FP2: Morris Place/Wells Terrace (including Clifton House)	++	++	0	+	+	+	0	++	0	0	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	<p>FP2 is allocated for mixed-use development to include retail floorspace at ground floor level and residential uses and business floorspace, including affordable workspace and SME space, on upper floors. The allocation identifies that the site offers the opportunity for the development of a local landmark building up to 15 storeys.</p> <p>The allocation provides an opportunity to increase retail floorspace and add business and residential floorspace in a central location in the town centre. This should help meet residents needs and improve access to town centre uses, foster economic growth through providing additional opportunities for employment as well as increase the supply of residential floorspace, all of which result in positive effects, 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</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 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
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 FP2 remain unchanged, for example the opportunity for a landmark tall building of up to 15 storeys.</p> <p>The site is located in Finsbury Park Town Centre and a Primary Shopping Area where competing demands for land have to be carefully balanced, and non-residential uses are likely to be necessary to meet the needs of residents for services and facilities and promote diverse, vibrant and economically thriving town centres. Development of this site for housing could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. A residential led development would not contribute towards the provision of retail, employment or other uses which contribute towards the town centre and this is likely to have a minor negative effect on economic growth and the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services.</p> <p>Allocating this site for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 FP2 remain unchanged, for example the opportunity for a landmark tall building design response which creates a more appealing frontage than currently exists.</p> <p>There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. Allocating this site for business-led development could help the council work towards meeting its targets for business floorspace, and foster sustainable economic growth in the borough. 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.</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 site close to Finsbury Park Station although it is recognised that it is finely balanced with the alternative for business-led development.</p>													

**Table 1.105: Site Assessment FP3: Finsbury Park Station and Island**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
FP3: Finsbury Park Station and Island, Seven Sisters Road	++	+	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>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 due to the close proximity to the rail line, which would need to be managed through design. Given the need to weigh the benefits of housing delivery against the constraints and potential negative effects presented by this location, a neutral effect has been identified in relation to housing quality.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 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
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 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>													
<b>Conclusion</b>	<p>Two reasonable alternatives to the mixed-use allocation for FP2 were identified: residential-led development and business-led development. Although positive effects could be realised through both residential-led and business-led development, it is considered that a mixed-use allocation including business, residential and retail uses is appropriate in this instance for this well-located that includes Finsbury Park Station.</p>													

**Table 1.106: 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
<b>FP4: 129-131 &amp; 133 Fonthill Road and 13 Goodwin Street</b>	+	+	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</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
	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.													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 use. The other provisions of policy FP3 remain unchanged, for example the opportunity for a landmark tall building design response which creates a more appealing frontage than currently exists.</p> <p>Business led development would have a positive effect on economic growth and optimise use of the site for employment use in a town centre location. There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. 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.</p>													
<b>Conclusion</b>	<p>Two reasonable alternatives to the mixed-use allocation for FP4 were identified: residential-led development and business-led development. Although positive effects could be realised through both residential-led and business-led development, it is considered that a mixed-use allocation providing retail and office floorspace including workshop space designed to support the specialist retail functions on the ground floor of the site is appropriate given its location within the designated Fonthill Road Specialist Shopping Area.</p>													

**Table 1.107: Site Assessment FP5: Conservative Club, 1 Prah Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
FP5: Conservative Club, 1 Prah Road	++	+	0	0	0	+	0	++	0	0	0	0	0	0
-Commentary on assessment of likely significant effects of site allocations	<p>FP5 is allocated for business floorspace, particularly workspace suitable for SMEs</p> <p>The allocation provides an opportunity to bring an unused site back into use, making more efficient use of the site and improving natural surveillance in an area with high crime levels. The development of SME workspace takes advantage of the site's well connected location and provides floor space for an expanding business function of Finsbury Park. Development of the site will bring land back into use that can be utilised for uses that will benefit the town centre and support potentially local SME businesses. 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.</p>													
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>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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: 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>	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													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 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.													
	<b>This allocation is subject to a modification which has been assessed separately in part 2.</b>													

**Table 1.108: Site Assessment FP6: Cyma Service Station, 201A Seven Sisters Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>FP6: Cyma Service Station, 201A Seven Sisters 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>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
Commentary on assessment of likely significant effects of Alternative 2	<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>													
Conclusion	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													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 town centre location and the borough's need for additional employment floorspace and its promotion in Finsbury Park SP6 area spatial strategy.													

**Table 1.109: Site Assessment FP7: Holloway Police Station**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>FP7: Holloway Police Station, 284 Hornsey Road</b>	++	+	0	+	++	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>FP7 is allocated for redevelopment of the police station (subject to justifying the loss of social infrastructure) for residential-led mixed use development, with office/workspace uses on the ground floor.</p> <p>A mixed use scheme involving residential and office/workspace is appropriate given the location is outside the town centre. The wide pavements bordering the site present an opportunity for enhancements to the public realm with the potential for urban greening. The development will be residential led and provide affordable housing. This could have positive effects in helping to address issues surrounding social exclusion - 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

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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
<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
Reasonable Alternative 2: Retention of social and community infrastructure	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.													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 FP7 were identified: business-led mixed use development and the retention of social and community infrastructure at the site. Whilst both these alternatives have their merits it is considered that as the site is outside of the town centre it is not in the most appropriate location for a business-led mixed use redevelopment. , whilst a failure to secure an alternative social and community infrastructure use for the site would not make the most efficient use of the land. Subject to justifying the loss of social and community infrastructure at the site, a residential-led development would contribute towards meeting the borough's significant housing need.													

**Table 1.110: Site Assessment FP8: 113-119 Fonthill Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>FP8: 113-119 Fonthill Road</b>	++	++	0	+	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>FP8 is allocated for retention of retail floorspace and provision of a significant amount of business floorspace on upper floors. The allocation also identifies that the site offers an opportunity for the development of a local landmark building of up to 12 storeys. The site is identified as having potential for a tall building which would help to visually mediate between the City North development and lower surrounding context heights as well as helping to optimise use of the site and make the most efficient use of land.</p> <p>Retention of retail on the ground floor will help support the town centre's vibrancy and provide good quality trading space for many of the local businesses on Fonthill Road. Significant amounts of business floor space will be provided, supporting the approach set out in policy SP6 which identifies the positive contribution to employment growth and the economy Finsbury Park can make, given its potential to develop as a satellite location for 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

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 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>													
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
<p><b>Commentary on assessment of likely significant effects of Alternative 2</b></p>	<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>													
<p><b>Conclusion</b></p>	<p>Two reasonable alternatives to the business-led allocation for FP8 were identified: mixed-use residential and commercial development and residential-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development could have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business-led development was most appropriate for this site given its town centre location and the borough's need for additional employment floorspace.</p>													

**Table 1.111: Site Assessment FP9: 221-233 Seven Sisters Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<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>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 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
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 FP9 remain unchanged, for example for example the re-provision of community opportunity for the development of a local landmark building of up to 15 storeys.</p> <p>Business led development would have a positive effect on economic growth and optimise use of the site for employment use in a town centre location. There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036.</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 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 1.112: 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
<b>Commentary on assessment of likely significant effects of site allocations</b>	FP10 is allocated for hotel use with some business floorspace including affordable workspace. 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.													

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
	As development of this site was completed in late 2019 it is proposed to remove the allocation from the Site Allocations DPD.													
Reasonable alternative summary	No reasonable alternative was identified.													

**Table 1.113: Site Assessment FP11: 139-149 Fonthill 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
FP11: 139-149 Fonthill Road	++	+	+	+	+	+	0	++	+	0	0	+	0	+
Commentary on assessment of likely significant effects of site allocations	<p>FP11 is allocated for commercial-led mixed use development to include retail and office floorspace with an element of residential.</p> <p>A mix of retail, office and residential development could contribute to the vitality and viability of the specialist shopping area on Fonthill Road. Development should protect and enhance the locally listed building within the site at 141-149 Fonthill Road. The development will promote sustainable neighbourhoods by providing replacement retail space and office space that can potentially be used by local businesses and those involved with the fashion industry on Fonthill Road. An element of residential use will make a small contribution to the housing supply and affordable housing supply in a highly accessible location. Redeveloped business floor space will benefit the economy and contribute to the significant amount of new business floor space around the station. 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.</p>													
Reasonable alternative summary	No reasonable alternative was identified. The site has planning permission that accords with the uses proposed in the draft allocation.													

**Table 1.114: Site Assessment FP12: 179-199 Hornsey Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
FP12: 179-199 Hornsey Road	+	++	++	+	+	+	0	0	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>FP12 is allocated for mixed use development with the retention of some D1 floorspace where necessary and has planning permission for residential use with the provision of D1/D2 floorspace.</p> <p>The allocation seeks to optimise the use of the listed building. The retention of some D1 community use floor space should allow the creation of space that is better able to adapt to changing needs. D1 community use will complement any residential use and provide social infrastructure for an increasing residential population. The site has significant heritage considerations and development should protect and enhance the locally listed building on site and the Grade II listed building opposite the site at 254, 256 and 260 Hornsey Road. Re-provision of community uses will sustain and improve the area as a liveable neighbourhood. The site would provide affordable housing as part of any residential element.</p>													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified. The site has planning permission that accords with the uses proposed in the draft allocation.													

**Table 1.115: Site Assessment FP13: Tesco, 103-115 Stroud Green Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
FP13: Tesco, 103-115 Stroud Green Road	+	++	0	+	++	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant</b>	<p>FP13 is allocated for the re-provision of retail floorspace and D1 uses with scope for residential development at upper levels.</p> <p>The allocation is an opportunity to re-provide retail floorspace and add residential floorspace in Finsbury Park town centre. The re-provision of retail floorspace is important in serving the needs of local residents. Intensification to provide housing is appropriate, taking advantage of the residential and retail context of the street and its good transport links. The site would provide affordable housing as part of any residential</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	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.													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 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 1.116: Site Assessment FP14: Andover Estate**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
FP14: Andover Estate	++	++	0	++	++	+	+	++	0	0	0	0	0	0
Commentary on assessment of likely significant	FP14 is allocated for residential development with retail, business and community floorspace including affordable workspace and public realm improvements. 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													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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	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 1.117: Site Assessment FP15: 216-220 Seven Sisters Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
FP15: 216-220 Seven Sisters Road	++	++	0	+	0	+	0	+	0	0	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	<p>FP15 is allocated for office/business-led development with retail at ground floor level.</p> <p>Retail and office uses are well placed on this site taking advantage of its excellent transport links. The allocation would optimise and make more efficient use of a town centre site previously used for B8 storage by developing a mix of uses that contribute to the commercial offer of the town centre. The intensification of office space supports the approach set out in SP6 which identifies the positive contribution to employment growth and the wider economy that Finsbury Park could make, given its potential to develop as a satellite location for 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 Rainbow Theatre. More retail space will have a positive effect on promoting a liveable neighbourhood, providing main town centre uses and services for residents.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 effects of Alternative 1</b>	<p>Alternative 1 is for mixed use commercial and residential development. New development would also help to improve the street scene, contributing to a better quality environment and the wider character of the area.</p> <p>Although the alternative would have a positive effect in terms of the efficient use of land and buildings, the flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. because certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace on site, thereby impacting on potential employment growth and Finsbury Park's potential to develop as a satellite location for 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
Commentary on assessment of likely significant effects of Alternative 2	<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>													
Conclusion	<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 1.118 Site Assessment ARCH1: Vorley Road/Archway Bus Station

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>ARCH1: Vorley Road/Archway Bus Station, N19</b>	++	++	0	+	++	+	+	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>ARCH1 is allocated for residential-led development with an element of business floorspace including affordable workspace and space suitable for SMEs. The allocation identifies that the northern part of the site presents an opportunity for the development of a local landmark building of up to 15 storeys, forming part of an Archway cluster of tall buildings.</p> <p>The allocation is an opportunity to develop residential and business floorspace in a central and highly accessible location in the town centre and optimise the use of previously developed land and buildings. This should improve access to town centre uses, foster economic growth through providing additional opportunity for employment and increase the supply of residential floorspace all of which result in positive effects. The site would provide affordable housing as part of any residential element. Permeability improvements at the site, would promote liveable neighbourhoods by improving residents connection to facilities and amenities.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 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>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	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.													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 where this site would be amended so that the allocation is for business-led development. The other provisions of policy ARCH1 remain unchanged, for example for example the opportunity for the development of a local landmark building of up to 15 storeys and permeability improvements.</p> <p>Business led development would have a positive effect on economic growth and contribute towards the wider economy of Archway Town Centre. There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. Allocating this site for business-led development could help towards meeting targets for business floorspace, and foster sustainable economic growth in the borough. This would help create employment opportunities that would support the council’s social inclusion objectives. Whilst the provision of business space would be an appropriate town centre use, the focus on business-led development could however may not help to balance other competing demands for uses within town centres, including the provision of retail and leisure space, a minor negative for liveable neighbourhoods has therefore been identified.</p>													
<b>Conclusion</b>	<p>Two reasonable alternatives to the residential-led allocation for ARCH1 were identified: mixed-use development and business-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough’s identified development needs, and business-led development could have positive effects in terms of supporting economic growth, the site is considered to provide an opportunity to deliver a significant amount of new housing to contribute towards meeting the borough’s identified need in an accessible town centre location. 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</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
	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 1.119 Site Assessment ARCH2: 4-10 Junction Road (buildings adjacent to Archway Underground 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
ARCH2: 4-10 Junction Road (buildings adjacent to Archway Underground Station), N19 5RQ	+	+	0	+	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>ARCH2 is allocated for intensification of business use with retail on the ground floor.</p> <p>The allocation will contribute positively to the vitality and viability of the town centre, optimising the use of previously developed land and contributing to the economic growth of the borough. This should provide more opportunity for residents to access employment in the borough, in line with the social inclusion objective. The site is in a highly accessible location, adjacent to Archway Station. An improved shopfront design which takes advantage of adjacent public space would help to enhance the quality of the environment and enhance local character.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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. 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
Reasonable Alternative 2: 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
<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 residentialled 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 1.120 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</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>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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	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.													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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
Commentary on assessment of likely significant effects of Alternative 1	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 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.													
Conclusion	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 1.121 Site Assessment ARCH4: Whittington Hospital Ancillary Buildings

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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>	<p>ARCH4 is allocated for the provision of health uses with an element of residential development.</p> <p>The allocation has a cumulative impact on the provision of social infrastructure in the borough. The relocation of St Pancras Mental Health Hospital is a significant positive benefit in terms of creating liveable neighbourhoods by providing essential social services and supporting the economy by providing employment opportunities. It will also have significant positive health impacts. There is also a provision of residential units which has a positive contribution to the overall housing target. Part of the site is listed, therefore any development must consider and respond to this.</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: Residential-led development</b>	0	0	0	-	++	+	-	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>This alternative is for 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>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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	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.													
Conclusion	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 1.122 Site Assessment ARCH5: Archway Campus, Highgate Hill

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
ARCH5: Archway Campus, Highgate Hill, N19	+	++	0	+	++	+	0	0	0	0	0	0	0	0
Commentary on assessment of likely significant	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													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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	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.													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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	<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 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>													
Conclusion	<p>Two reasonable alternatives to the residential-led allocation for ARCH5 were identified: mixed-use development and business-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and business-led development could have positive effects in terms of supporting economic growth, the site is considered to provide an opportunity to deliver a significant amount of new housing to contribute towards meeting the borough's identified need in an accessible location.</p> <p><b>This allocation is subject to a modification which has been assessed separately in part 2.</b></p>													

Table 1.123 Site Assessment ARCH6: Job Centre, 1 Elthorne Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
ARCH6: Job Centre, 1 Elthorne Road , N19 4AL	+	++	0	+	+	+	0	++	0	0	0	0	0	0
Commentary on assessment of	ARCH6 is allocated for business led mixed-use development, including provision of SME workspace, with an element of residential use.													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 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
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>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 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.													
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 1.124 Site Assessment ARCH7: 207A Junction Road

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
ARCH7: 207A Junction Road, N19 5QA	+	++	0	+	+	0	0	0	0	0	0	0	0	0
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													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	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
Reasonable Alternative 1: Mixed-use 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 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>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 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.													
Conclusion	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 1.125 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
ARCH8: Brookstone House, 4-6 Elthorne Road, N19 4AJ	0	+	0	0	0	+	0	+	+	0	0	+	0	+
Commentary on assessment of likely significant	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,													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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	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
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. 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
<b>Reasonable Alternative 2: Residential-led development</b>	0	+	0	+	++	+	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>The development of this site for housing could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. The site is located within Archway Town Centre where competing demands for land have to be carefully balanced, and non-residential uses are likely to be necessary to meet the needs of residents for services and facilities and promote diverse, vibrant and economically thriving town centre. Whilst residential-led development on this site could bring more residents into Archway town centre, potentially improving footfall for local businesses, it is considered that the alternative is likely to have a significant negative effect on economic growth. If developed for residential purposes, this site will no longer be contributing towards the borough's economy or supporting a range of jobs. The site is currently fully in employment use, a 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 1.126 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
<b>Commentary on assessment of likely significant effects of site allocations</b>	ARCH9 is allocated for office led development with main town centre uses at ground floor level. The allocation aims to achieve a limited increase in business floorspace which will contribute to the overall provision of business floorspace in the borough, which is a main driver of economic growth. This should provide more opportunity for residents to access employment in the borough, in line with the social inclusion objective.													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified. The site has planning permission that accords with the uses proposed in the draft allocation.													

**Table 1.127 Site Assessment ARCH10: Elthorne Estate, Archway**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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
<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 1.128 Site Assessment ARCH11: Dwell House, 619-639 Holloway Road

I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
ARCH11: Dwell House, 619-639 Holloway Road, N19 5SS	+	++	0	+	+	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>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 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.</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: 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
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>The site is located in Archway Town Centre where competing demands for land have to be carefully balanced, and non-residential uses are likely to be necessary to meet the needs of residents for services and facilities and promote diverse, vibrant and economically thriving town centres. The development of this could have a negative effect with regards to the efficient use of land as it may not focus development in the most appropriate locations and balance competing demands for land in the borough to provide for a full range of development needs. Whilst residential-led development on this site could bring more residents into the town centre, potentially improving footfall for local businesses, it is considered that the alternative is likely to have a significant negative effect on economic growth. If developed for residential purposes, this site will no longer be contributing towards the borough's economy, supporting a range of jobs or contribute towards future economic growth. This alternative has also been assessed as having a minor negative effect on the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services, and in relation to economic growth.</p> <p>Allocating the site for residential-led development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 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.</p>													
<b>Conclusion</b>	<p>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</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
	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 1.129 Site Assessment ARCH12: 798-804 Holloway Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<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>	No reasonable alternative was identified. The site has planning permission that accords with the uses proposed in the draft allocation.													

Table 1.130 Site Assessment HC1: 12, 16-18, 20-22 and 24 Highbury Corner

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
HC1: 12, 16-18, 20-22 and 24 Highbury Corner	+	+	0	+	0	+	0	+	+	0	0	0	0	0
<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><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 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 1.131 Site Assessment HC2: Spring House, 6-38 Holloway Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
HC2: Spring House, 6-38 Holloway Road	0	+	0	+	0	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>HC2 is allocated for intensification for commercial/higher education uses.</p> <p>The allocation is an opportunity to increase commercial or higher education use in a Priority Employment Location and will have a positive effect on optimising use of previously developed land and buildings. Both uses support economic growth and provide opportunities for residents to develop skills and access employment in the borough, which accords with the social inclusion objective. The site is located in close proximity to Highbury and Islington Station. This good level of connectivity should have a positive effect with regards to reducing the need to travel by non-sustainable modes of transport, which in turn should help with the borough's aims of reducing contributions to climate change and improving air quality.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 effects of Alternative 1</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 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>													

	Overall, given the loss of education use, the alternative is considered to have a neutral effect on social inclusion.
<b>Conclusion</b>	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.

**Table 1.132 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
<b>Reasonable Alternative 1: Residential-led development</b>	++	-	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 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>													
<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 2: Business-led development</b></p>	<p>++</p>	<p>++</p>	<p>0</p>	<p>0/+</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><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 HC3 remain unchanged, for example a significant element of open space, public realm and station forecourt improvements with the station retained.</p> <p>There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. The site is within a PEL where the delivery of business floorspace is a priority. Allocating this site for business-led development could help towards meeting targets for business floorspace, and foster sustainable economic growth in the borough. This would help create employment opportunities that would support the council's social inclusion objectives. A business-led development could result in a minor negative effect on the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services; balanced against the wider public realm improvements this is likely to lead to a neutral/minor positive score overall.</p>													
<p><b>Conclusion</b></p>	<p>Two reasonable alternatives to the mixed-use allocation for HC3 were identified: residential-led development and business-led development. Although positive effects could be realised through both residential-led and business-led development, it is considered that a mixed-use allocation</p>													

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 1.133 Site Assessment HC4: Dixon Clark Court, Canonbury 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
HC4: Dixon Clark Court, Canonbury Road	+	++	0	+	++	+	+	0	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	HC4 is allocated for additional housing, community space and public realm improvements. The allocation aims to optimise the use of the site by providing additional housing units. Affordable housing would be provided as part of any residential element, contributing towards meeting Islington's housing need 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.													
<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 1.134 Site Assessment HC5: 2 Holloway Road, N7 8JL and 4 Highbury Crescent, London**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
HC5: 2 Holloway Road, N7 8JL and 4 Highbury Crescent, London	+	+	+	+	+	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of</b>	HC5 is allocated for mixed use commercial and residential redevelopment.													

likely significant effects of site allocations	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.													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 HC5 remain unchanged, for example in relation the potential for intensification of the site, and the need for proposals to be sensitively designed with regards to the adjacent Grade II listed building,</p> <p>The site is within the Highbury Corner Priority Employment Location (PEL) and partially within Lower Holloway Local Shopping Area where non-residential uses are likely to be necessary to meet the needs of residents for services and facilities and where employment provision is prioritised. This 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>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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
Commentary on assessment of likely significant effects of Alternative 2	<p>This alternative is for business-led development. The other provisions of policy HC5 remain unchanged, for example in relation the potential for intensification of the site, and the need for proposals to be sensitively designed with regards to the adjacent Grade II listed building,</p> <p>There is a significant development need for additional business floorspace in the borough to meet projected economic growth to 2036. The site is within a PEL where the delivery of business floorspace is a priority. Allocating this site for business-led development could help towards meeting targets for business floorspace, and foster sustainable economic growth in the borough. This would help create employment opportunities that would support the council's social inclusion objectives. A business-led development could result in a minor negative effect on the promotion of liveable neighbourhoods, which seeks improved access for all residents to essential services. Given the existing residential use on the site a business-led development could see a loss of housing which would have a significant negative effect in relation to objective 4.</p>													
Conclusion	<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 1.135 Site Assessment HC6: Land adjacent to 40-44 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
HC6: Land adjacent to 40-44 Holloway Road	+	++	0	0	0	+	0	+	0	0	0	0	0	0
Commentary on assessment of	<p>HC6 is allocated for business-led development in line with its Priority Employment Location designation.</p>													

<b>likely significant effects of site allocations</b>	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.													
<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>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>													
<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	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>Alternative 1 is for residential-led development. This would continue to have a positive effect on the quality of the built environment and had a positive effect on optimising the use of land given the site is currently a vacant plot</p> <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>													
<b>Conclusion</b>	<p>Two reasonable alternatives to the business-led allocation for HC6 were identified: mixed-use residential and commercial development and residential-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development could have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business-led development was most appropriate for this site given its PEL designation and the borough's projected need for a significant amount of additional employment floorspace.</p>													

## Other Important Sites

**Table 1.136 Site Assessment OIS1: Leroy House, 436 Essex Road**

<b>IIA Objective / Site</b>	<b>1. HIGH QUALITY ENVIRON</b>	<b>2. EFFICIENT USE OF LAND</b>	<b>3. HERITAGE</b>	<b>4. LIVEABLE NEIGHBOURHOODS</b>	<b>5. HOUSING QUALITY</b>	<b>6. SOCIAL INCLUSION</b>	<b>7. HEALTH AND WELLBEING</b>	<b>8. ECONOMIC GROWTH</b>	<b>9. NEED TO TRAVEL</b>	<b>10. OPEN SPACE</b>	<b>11. BIODIVERSITY</b>	<b>12. CLIMATE CHANGE</b>	<b>13. RESOURCE EFFICIENCY</b>	<b>14. NATURAL RESOURCES</b>
<b>OIS1: Leroy House, 436 Essex Road, N1 3QP</b>	+	+	0	0	0	+	0	++	0	0	0	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.
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**Table 1.137 Site Assessment OIS2: The Ivories, 6-8 Northampton Street,**

<b>IIA Objective / Site</b>	<b>1. HIGH QUALITY ENVIRON</b>	<b>2. EFFICIENT USE OF LAND</b>	<b>3. HERITAGE</b>	<b>4. LIVEABLE NEIGHBOURHOODS</b>	<b>5. HOUSING QUALITY</b>	<b>6. SOCIAL INCLUSION</b>	<b>7. HEALTH AND WELLBEING</b>	<b>8. ECONOMIC GROWTH</b>	<b>9. NEED TO TRAVEL</b>	<b>10. OPEN SPACE</b>	<b>11. BIODIVERSITY</b>	<b>12. CLIMATE CHANGE</b>	<b>13. RESOURCE EFFICIENCY</b>	<b>14. NATURAL RESOURCES</b>
<b>OIS2: The Ivories, 6-8 Northampton Street, N1 2HY</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>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>													
<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</p>													

	<p>potential employment growth. Given the current employment use of the site a mixed use development could also lead to the loss of existing business floorpace which would also have a negative impact on economic growth.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access for residents to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>Allocating this site for mixed-use development should have a positive effect on the provision of affordable housing, which would be required from schemes incorporating residential uses. Improved housing options would also have a positive effect in terms of social inclusion.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 Northhampton 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</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 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 1.138 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
<b>Commentary on assessment of likely significant effects of site allocations</b>	OIS3 is allocated for refurbishment of business space for small/medium sized enterprises. There may be some scope for intensification of business space, to provide improved quality and quantity of spaces for small/medium sized enterprises. The allocation will help support economic growth and in particular the cultural and third sectors in a designated Priority Employment Location, and provide more opportunity for residents to access employment in the borough in line with the social inclusion objective. Intensification of the site will optimise use of previously developed land.													
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
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	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													

	<p>potential employment growth. Given the current employment use of the site a mixed use development could also lead to the loss of existing business floorpace which would also have a negative impact on economic growth.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access for residents to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>Residential development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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>	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.
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**Table 1.139 Site Assessment OIS4: The BT Telephone Exchange, Kingsland Green**

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>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 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.</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 1: Residential-led development</b>	+	-	0	-	++	+	0	-	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	<p>This alternative is for residential-led development. The other provisions of policy OIS4 remain unchanged, for example improving permeability.</p> <p>The site is within the Balls Pond Road East PEL where employment uses are prioritised. The sites is also in existing employment use. A residential-led allocation in this 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>													
<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	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>	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.

**Table 1.140 Site Assessment OIS5: Bush Industrial Estate, Station Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
OIS5: Bush Industrial Estate, Station Road, N19 5UN	0	+	0	0	0	+	0	++	0	0	0	0	0	0
<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	-

**Commentary on  
assessment of  
likely significant  
effects of  
Alternative 1**

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.

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.

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.

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.

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.

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).

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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	-
Commentary on assessment of likely significant effects of Alternative 2	<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 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
<b>Reasonable Alternative 3</b> <b>Office and housing co-location</b>	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 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> <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.</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 would likely limit the capacity for the existing business sectors to expand. 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 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.</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. 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).</p>
<b>Conclusion</b>	<p>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.</p>

**Table 1.141 Site Assessment OIS6: 100 Hornsey Road, N7 7NG**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
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<b>OIS6: 100 Hornsey Road, N7 7NG</b>	+	+	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 of nursery open space, and public realm improvements.</p> <p>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>	No reasonable alternative was identified. The site has planning permission that accords with the uses proposed in the draft allocation.													

**Table 1.142 Site Assessment OIS7: Highbury Delivery Office, 2 Hamilton Lane**

<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>OIS7: Highbury Delivery Office, 2 Hamilton Lane, N5 1SW</b>	0	+	0	0	+	+	0	++	0	0	0	0	0	0
<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.</p> <p>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>

Reasonable Alternative 1: Mixed-use commercial and residential development	0	+	0	+	+	0	0	-	0	0	0	0	0	0
Commentary on assessment of likely significant effects of Alternative 1	<p>Allocating this site for mixed-use commercial and residential development could have a limited positive effect in terms of the efficient use of land and buildings, as the site could accommodate a wider range of uses.</p> <p>The flexibility offered by a mixed-use allocation could also constrain the ability to balance competing demands between land uses to meet the borough's identified development needs. The alternative has the potential to have a negative effect on economic growth because certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace on the site, thereby impacting on potential employment growth. Given the current employment use of the site a mixed use development could also lead to the loss of existing business floorpace which would also have a negative impact on economic growth.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access for residents to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>Residential development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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	<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>													

<b>effects of Alternative 2</b>	<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 1.143 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 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	<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</p>													

<b>effects of Alternative 2</b>	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 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.

**Table 1.144 Site Assessment OIS9: Ladbroke House, 62-66 Highbury Grove**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>OIS9: Ladbroke House, 62-66 Highbury Grove</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>	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.													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified. As development of this site was completed in late 2019 it is proposed to remove the allocation from the Site Allocations DPD.													

**Table 1.145 Site Assessment OIS10: Hornsey Road and Grenville Works, 2A Grenville Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
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<b>OIS10:</b> <b>Hornsey Road and Grenville Works, 2A Grenville Road</b>	+	+	0	0	0	+	0	+	0	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>OIS10 is allocated for business-led redevelopment with re-provision and intensification for business use (particularly B1c). Development of the site can help to enhance the local character of the area and promote a high quality built environment.</p> <p>The allocation optimises the use of previously developed land and the provision of business floorspace would have a positive impact on local economic growth in a Priority Employment Location, providing opportunities for residents to access employment in the borough in line with the social inclusion objective.</p>														
<b>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>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 1.146 Site Assessment OIS11: Park View Estate, Collins 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
OIS11: Park View Estate, Collins Road	+	+	0	0	+	+	+	0	0	+	+	0	0	0
Commentary on assessment of likely significant effects of site allocations	<p>The site is allocated for residential development including the provision/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>													
Reasonable alternative summary	<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 1.147 Site Assessment OIS12: 202-210 Fairbridge 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
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<b>OIS12: 202-210 Fairbridge Road</b>	0	+	0	0	0	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>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>													
<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>This alternative is for mixed-use business and residential development reflective of the planning consent for the site.</p> <p>The alternative would provide affordable housing as part of any residential element, contributing towards meeting Islington's housing need as well as addressing objectives relating to social inclusion.</p> <p>Allocating this site for mixed-use commercial and residential development could have a limited positive effect in terms of the efficient use of land and buildings, as the site could accommodate a wider range of uses.</p> <p>The alternative has the potential to have a negative effect on economic growth because certain uses, particularly high-value residential uses, may be chosen at the expense of delivering the employment floorspace on the site, thereby impacting on potential employment growth. Given the site is within the Hornsey Road/Marlborough Road Priority Employment Location and the current employment use of the site a mixed use development could lead to the loss of existing business floorpace. A minor negative effect in relation to economic growth has been identified.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													
<b>Conclusion</b>	<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</p>													

borough's identified development needs, and residential-led development could have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business intensification is appropriate for this site given its existing use, it's location within a PEL and the borough's projected need for a significant amount of additional employment floorspace.

**Table 1.148 Site Assessment OIS13: Highbury Roundhouse Community Centre, 71 Ronald's Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>OIS13: Highbury Roundhouse Community Centre, 71 Ronald's Road</b>	0	+	0	++	+	+	+	0	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>OIS13 is allocated for re-provision of the community centre. Residential development may be acceptable on the Ronalds Road frontage of the site.</p> <p>The most significant positive effect of the allocation is retention of the community centre, which provides a variety of services for residents including childcare, lunch and social clubs for older people, and health and fitness activities for all ages. In addition there will be a positive effect from any residential development at the site which would provide affordable housing and contribute towards meeting Islington's housing need. The allocation will also make more efficient use of the site.</p>													
<b>Reasonable alternative summary</b>	<p>No reasonable alternative was identified. The site has planning permission for the construction of a community centre that is close to completion, and the introduction of uses other than residential is not considered feasible in this primarily residential location.</p>													

**Table 1.149 Site Assessment OIS14: 17-23 Beaumont Rise**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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>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>	<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 1.150 Site Assessment OIS15: Athenaeum Court, 94 Highbury New Park**

<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>OIS15: Athenaeum Court, 94 Highbury New Park</b>	+	+	0	0	+	+	0	0	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>OIS15 is allocated for infill residential development.</p> <p>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.</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. 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 1.151 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 effects of site allocations</b>	OIS16 is allocated for residential development with associated amenity space and improvements to the public realm. This is considered to have a positive impact on housing provision, optimising the use of land previously used as a car park and improving the quality of the environment. Affordable housing would be provided as part of the development of the site, contributing towards meeting Islington's housing need as well as addressing objectives relating to social inclusion. 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 1.152 Site Assessment OIS17: Hathersage and Besant Courts, Newington 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>OIS17:</b> Hathersage and Besant Courts, Newington Green	+	+	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.
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**Table 1.153 Site Assessment OIS18: Wedmore Estate Car Park**

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>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>	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 1.154 Site Assessment OIS19: 25-27 Horsell 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>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 floorpace which would also have a negative impact on economic growth.</p> <p>The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access for residents to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p> <p>Residential development would have a positive effect in terms of meeting one of the borough's priority development needs, by providing additional housing. Affordable housing will be required as part of residential-led development, which is likely to have positive effects on social inclusion.</p> <p>It is considered that alternative 1 would have a neutral effect with regards to the other IIA objectives.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 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>													
Conclusion	<p>Two reasonable alternatives to the business-led allocation for OIS19 were identified: mixed-use residential and commercial development and residential-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and residential-led development could have positive effects in terms of the delivery of good-quality housing, on balance it was considered that business use was most appropriate for this site given its existing use and the borough's projected need for a significant amount of additional employment floorspace.</p>													

Table 1.155 Site Assessment OIS20: Vernon Square, Penton Rise

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
OIS20:	0	+	0	0	0	+	0	+	0	0	0	0	0	0

Vernon Square, Penton Rise															
<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>														
<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 Office co-location</b>	0	+	0	+	0	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 2</b>	<p>The site is in temporary educational use, but is expected to be vacant again in 2023/24 when the current occupier moves to new premises. An allocation requiring retention of social and community infrastructure on site could help to balance competing demands between land uses, and therefore make efficient use of the site. However, the site is within the CAZ and would also be appropriate for employment use.</p> <p>Social infrastructure supports liveable neighbourhoods by providing access to essential services, and can promote social inclusion and economic growth by improving opportunities for learning and skills development which reduces barriers to employment.</p> <p>It is considered that alternative 2 would have a neutral effect with regards to the other IIA objectives.</p>													
<b>IIA Objective / Site</b>	<b>1. HIGH QUALITY ENVIRONMENT</b>	<b>2. EFFICIENT USE OF</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 3: Mixed use and commercial development</b>	0	+	0	+	+	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 3</b>	<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>													
<b>Conclusion</b>	<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 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.</p>													

Table 1.156 Site Assessment OIS21: Former railway sidings adjacent to Caledonian Road 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
OIS21: Former railway sidings adjacent to Caledonian Road Station	+	++	-	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>													
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 development	+	++	-	+	+	+	0	+	0	0	-/0	0	0	0
<b>Commentary on assessment of likely significant</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>													

<b>effects of Alternative 1</b>	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.													
<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>	Two reasonable alternatives to the residential-led allocation for OIS21 were identified: mixed-use development and business-led development. Whilst it was felt that mixed-use development could have positive effects by supporting a range of the borough's identified development needs, and business-led development could have positive effects in terms of supporting economic growth, the site is considered to provide an opportunity to deliver new housing to contribute towards meeting Islington's significant identified need in an appropriate location outside of designated priority employment areas.													

**Table 1.157 Site Assessment OIS22: 114 Balls Pond Road and 1 King Henry's Walk**

<b>IIA Objective / Site</b>	<b>1. HIGH QUALITY ENVIRON</b>	<b>2. EFFICIENT USE OF LAND</b>	<b>3. HERITAGE</b>	<b>4. LIVEABLE NEIGHBOURHOODS</b>	<b>5. HOUSING QUALITY</b>	<b>6. SOCIAL INCLUSION</b>	<b>7. HEALTH AND WELLBEING</b>	<b>8. ECONOMIC GROWTH</b>	<b>9. NEED TO TRAVEL</b>	<b>10. OPEN SPACE</b>	<b>11. BIODIVERSITY</b>	<b>12. CLIMATE CHANGE</b>	<b>13. RESOURCE EFFICIENCY</b>	<b>14. NATURAL RESOURCES</b>
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<b>OIS22: 114 Balls Pond Road and 1 King Henry's Walk</b>	0	++	0	0	++	+	0	0	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	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.													
<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 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, 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 1.158 Site Assessment OIS23: 1 Lowther 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>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>	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.
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**Table 1.159 Site Assessment OIS24: Pentonville Prison, Caledonian Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<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>													
<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
<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, 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>													
<b>Conclusion</b>	<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</p>													

new housing to contribute towards meeting Islington's significant identified need in an appropriate location outside of designated priority employment areas.

**Table 1.160 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
OIS25: Charles Simmons House, 3 Margery Street	+	+	0	+	+	+	0	+	0	0	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	<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>													
Reasonable alternative summary	<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 1.161 Site Assessment OIS26: Amwell Street Water Pumping Station**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
OIS26:	0	+	++	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
Amwell Street Water Pumping Station														
Commentary on assessment of likely significant effects of site allocations	OIS26 is allocated for conservation of heritage assets and sensitive re-use of existing buildings for residential or office use. The allocation aims to preserve a Grade II listed site which will positively contribute to the historical character of the borough. The allocation will also make more efficient use of the site. It is likely that only either residential or office uses can be realised, hence the allocation may have no effect or a minor positive effect relating to objectives 5 and 8.													
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 1.162 Site Assessment BC1: City Barbican Thistle Hotel, Central Street

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
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	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.													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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>The allocation aims to provide business floorspace within the CAZ which will have a significant positive effect on the economic growth of the borough. Lack of office floorspace is a barrier to economic growth in the area. The Local Plan strategy is that new business floorspace will be focused in the CAZ, Bunhill and Clerkenwell AAP area, the CAZ Fringe Spatial Strategy Areas and the Locally Strategic Industrial Sites. Given land constraints and high need (400,000sqm up to 2036) needs will not be met without prioritising business space in these areas, including the BCAAP area. The location of Bunhill and Clerkenwell is particularly suited to development of employment uses, with easy access to the major centres of employment and business of the London's West End, the City of London, Canary Wharf, as well as the emerging clusters of the City Fringe, Tech City, King's Cross and the Knowledge Quarter. The Local Plan prioritises employment floorspace in the BCAAP in BC1 and also by allocating the majority of site allocation sites in the BCAAP for employment (office) uses, to the exclusion of housing development on these sites. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.</p> <p>Retaining the hotel will have a minor positive effect on economic development. Redevelopment of these buildings offers an opportunity to improve the local environment as both buildings are of unremarkable design and merit and contribute little to the street or townscape. Provision of active frontages will help create a safer and more inclusive local environment.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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. The Employment Land Study identifies the arc between Shoreditch and King's Cross including along City Road the focus of priority for site assembly and for provision of Grade A office space, to maintain and enhance the area's role in supporting London's strategic business role. This site lies broadly within this corridor.</p> <p>The alternative would have minor negative impacts on reducing the need to travel by locating residential in the CAZ, rather than high trip generating office uses which can take advantage of the high accessibility by public transport and active travel, reducing trips by car.</p>													
<b>Conclusion</b>	<p>The preferred approach will support economic development 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.</p>													

**Table 1.163: 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>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 1.164 Site Assessment BC3: Islington Boat Club, 16-34 Graham Street,**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
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 amenity for residential uses for a central London location with low levels of traffic noise and pollution, and the site adjoins Graham Street Gardens, and benefits from views across the City Road Basin. The Bunhill and Clerkenwell AAP directs commercial uses to busier, more accessible locations including along City Road and around the Old Street roundabout and surrounding area.</p>													

**Table 1.165: 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 allocations maximises the amount of residential development reasonably possible on site, while reprovding and improving the leisure centre, as well as providing a new nursery and energy centre on site.</p> <p>The allocation for this site is demanding as redevelopment must meet a number of needs in a relatively small area. The allocation is for redevelopment to provide new high quality leisure facilities and meet increased demand, as well as a nursery, energy centre, housing (including a significant amount of genuinely affordable housing) and public open space. Permeability must also be improved across the site.</p> <p>Surrounding the site are predominantly residential buildings and development in this location should preserve amenity for local residents. The Bunhill and Clerkenwell AAP directs commercial uses to areas with higher accessibility and a busier more commercial context, including along City Road and around the Old Street Roundabout.</p> <p>The Council has developed detailed designs for the site, which have been evolved over a number of years, have been subject to extensive consultation, and have been revised and improved based on local feedback. The plans are at an advanced stage of development. For the above reasons no alternative allocations were considered reasonable for this site.</p>													

**Table 1.166: 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. 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	This alternative is where this site allocation would be amended to allow an element of housing to be provided on site.													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>likely significant effects of alternative</b>	<p>The alternative will have minor positive effects against the efficient use of land objective as it will lead to more development on previously developed land in an accessible location, however it will not be as efficient as the preferred approach as the Bunhill and Clerkenwell Area is the most efficient location to locate offices as it is the accessible and connected as well as being the most valuable for office development due to close proximity to London's office markets. Offices can take advantage of the agglomeration benefits of the central London location and will have close access to the wide range of supporting services.</p> <p>As with the preferred approach the alternative would have minor positive impacts on heritage as the allocation details designations relevant to the site which much be considered carefully in development proposals, including locally listed status and location within the St. Luke's conservation area.</p> <p>The alternative would have minor positive effects against the objective for providing affordable housing as it would allow more housing to be developed which would include a proportion of affordable housing. The affordable housing will have positive effects on social inclusion.</p> <p>The alternative would have significant negative effects on economic growth. The additional housing would displace office floorspace, which is needed to meet demand from businesses, grow the economy, and provide employment and training opportunities.</p> <p>The alternative would have minor negative impacts on reducing the need to travel by locating residential in the CAZ, rather than high trip generating office uses which can take advantage of the high accessibility by public transport and active travel, reducing trips by car.</p>													
<b>Conclusion</b>	<p>The preferred approach will support economic development 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.</p>													

**Table 1.167 : 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
BC6: Redbrick Estate: Vibast Centre, garages and car park, Old Street, EC1V 9NH	+	+	0	+	++	+	0	0	+	0	0	+	0	+
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>BC6 is allocated for residential development.</p> <p>The site has planning permission for the construction of 55 new homes, a community centre, two flexible A1/A2 use units and the provision of a new amenity space. There will be significant positive effects on the housing objective by providing 55 additional homes, 70% of which will be affordable. The development optimises density on a previously developed site and will therefore have minor positive effects on the efficient use of land objective. The development will have minor positive effects on the liveable neighbourhoods objective and the high quality environment objective by improvements to the public realm, access, and passive surveillance. There will be minor positive effects on the social inclusion objective by provision of the community centre. Planning permission P2015/0709/FUL involves a significant reduction in car parking on site. This will help shift trips to more sustainable form of transport with minor positive effects on the objectives for transport, climate change, and natural resources (air quality).</p>													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified for this allocation. The site has planning permission which is currently under construction.													

**Table 1.168: BC7: 198-208 Old Street (petrol station)**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC7: 198-208 Old Street (petrol station), EC1V 9FR	+	++	+	+	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant</b>	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.													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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>This allocation will remove the petrol station use which provides a poor quality urban environment with large areas of hard standing and large areas of advertising signage and lighting. This change will have significant positive effects on the efficient use of land objective, and minor positive effects on the objectives for a high quality environment, heritage, and liveable neighbourhoods.</p> <p>The allocation will have significant positive effects on economic development by providing business / employment uses which will benefit economic growth. Lack of office floorspace is a barrier to economic growth in the area. The Local Plan strategy is that new business floorspace will be focused in the CAZ, Bunhill and Clerkenwell AAP area, the CAZ Fringe Spatial Strategy Areas and the Locally Strategic Industrial Sites. Given land constraints and high need (400,000sqm up to 2036) needs will not be met without prioritising business space in these areas, including the BCAAP area. The location of Bunhill and Clerkenwell is particularly suited to development of employment uses, with easy access to the major centres of employment and business of the London's West End, the City of London, Canary Wharf, as well as the emerging clusters of the City Fringe, Tech City, King's Cross and the Knowledge Quarter. The Local Plan prioritises employment floorspace in the BCAAP in BC1 and also by allocating the majority of site allocation sites in the BCAAP for employment (office) uses, to the exclusion of housing development on these sites. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>Reasonable alternative: mixed use</b>	+	+	+	+	+	+	0	-	-	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of alternative</b>	<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>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 could have significant negative effects on economic growth. Additional housing would displace office floorspace, which is needed to meet demand from businesses, grow the economy, and provide employment and training opportunities. The site is located within the City Fringe Opportunity Area, fronting the busy Old Street and only 50m from the Old Street roundabout (the approximate centre for East London Tech City) and next to the landmark White Collar Factory office development. The site has very close access to the Old Street Station and close access to the shops, cafes, and restaurants of the area including within the Old Street Local Shopping Area, along Old Street, and at the Bower development across the road. The site is located on the arc between King's Cross and Shoreditch which the Employment Land Study identifies as the focus and priority for provision of Grade A office floorspace, but also for space for SMEs, tech city-looking businesses and business service uses, which may be more appropriate due to the size of this site. This highly prominent address is valuable for an office use and would provide good access and local services for its staff. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.</p> <p>The alternative would have minor negative impacts on reducing the need to travel by locating residential in the CAZ, rather than high trip generating office uses which can take advantage of the high accessibility by public transport and active travel, reducing trips by car.</p> <p>Residential uses may have challenges in providing protection from the noise and air pollution in this location (although air quality problems will decrease following public realm improvements in this area). It may also be challenging to provide an adequate outlook for homes toward the south and west of the site due to the blank walls of abutting buildings. There is some uncertainty about the likelihood of these impacts as good design may be able to overcome the limitations of the site for residential development which is why the scoring has been maintained as a minor positive effects against the objective for housing, nevertheless this is a highly constrained location for residential development.</p>													
<b>Conclusion</b>	<p>The preferred approach will support economic development 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.</p>													

**Table 1.169 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	+

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>BC8 is allocated for removal of the gyratory alongside public realm improvements, new public open space with potential for some small-scale commercial use, improvements to station access and facilities including enhanced retail provision.</p> <p>The allocation will have significant positive effects on the high quality environment objective and minor positive effects on the transport and climate change objectives by improving the area for walking and cycling and making it easier to enter and exit the station including providing step free access. The allocation will reduce the impacts of traffic including noise and air pollution which will have minor positive effects on the natural resources (air quality) objective. The allocation will transform carriageway space for pedestrianised public space with minor positive effects on the open space objective.</p>													
<b>Reasonable alternative summary</b>	<p>No reasonable alternative was identified for this allocation as the site is allocated predominantly as a public realm improvement scheme with related small scale commercial uses. The Old Street Roundabout is a TfL led and predominantly a scheme which improves the public realm with a small amount of related supporting retail. There are no larger buildings proposed which could be allocated for the development of housing. This site is already at an advanced stage of construction.</p>													

**Table 1.170: BC9: Inmarsat, 99 City Road (east of roundabout),**

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</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
	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
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 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</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>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 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 1.171: Site Assessment BC11: Longbow House, 14-20 Chiswell Street**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<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
likely significant effects of site allocations	<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
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 for more housing to be developed, allowing up to 50% of the uplift to be provided as housing with the other 50% office use.</p> <p>As with the preferred approach the alternative requires development to consider the impacts on the surrounding heritage assets including the Grade II* headquarters at Armoury House and the Honourable Artillery Company's training grounds and will therefore have minor positive effects on the heritage objective.</p> <p>The alternative will have minor positive effects against the efficient use of land objective as it will lead to more development on previously developed land in an accessible location, however it will not be as efficient as the preferred approach as the Bunhill and Clerkenwell Area is the most efficient location to locate offices as it is the accessible and connected as well as being the most valuable for office development due to close proximity to London's office markets. Offices can take advantage of the agglomeration benefits of the central London location and will have close access to the wide range of supporting services.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 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 1.172: 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

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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>	BC12 is allocated for limited intensification of education floorspace. This allocation will improving access to educational services which will have minor positive effects on the economic growth objective, liveable neighbourhoods, and social inclusion objectives. The allocation will likely have no other significant effects as the site already has full site coverage and is not a site allocated for a tall building so any development could only be a small upward extension.													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified for this allocation as the site is allocated for expansion of the social infrastructure (education) use. The Cass Business School has full site coverage and accommodating residential uses on site would be difficult with regard to space, access, and conflict between the homes and the education use.													

**Table 1.173: 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	+
<b>Commentary on assessment of likely significant effects of site allocations</b>	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.													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 development with office and hotel use</b>	+	+	0	0	+	+	0	+	+	0	0	+	0	+
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>This alternative is for an allocation for a mixed use development including office and hotel use. This reflects the scheme permitted on this site (P2016/0488/FUL) for the development of a 61 bedroom hotel, 35 residential units, 1,954sqm of office, 80sqm of retail, 1,536sqm of restaurant use, and 263sqm of leisure floorspace.</p> <p>The alternative will have mostly the same effects as the preferred approach. The removal of car parking will encourage more sustainable forms for transport resulting in minor positive effects on the objectives for climate change, transport, and natural resources (improved air quality). The 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 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.</p>													
<b>Conclusions</b>	<p>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,</p> <p><b>This allocation is subject to a modification which has been assessed separately in part 2.</b></p>													

**Table 1.174: Site Assessment BC14: Peabody Whitecross Estate, Roscoe 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>BC14: Peabody Whitecross Estate, Roscoe Street, EC1Y 8SX</b>	+	+	0	+	+	+	+	0	0	+	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>BC14 is allocated for improved public open space and design measures to improve the definition between public and private space, alongside some new housing.</p> <p>The allocation will have minor positive effects on the housing objective by providing new homes (4 family homes is feasible). The additional housing i positive effects on social inclusion by reducing overcrowding. The allocation will create a safer and more inclusive neighbourhood and public realm by improving the open space and providing areas for sports and play with minor positive effects on the high quality environment, open space, liveable neighbourhoods, and health and wellbeing objectives. The allocation will make more efficient use of land by improving amenity spaces into multi-function open spaces, resulting in minor positive effects on the efficient use of land objective.</p>													
<b>Reasonable alternative summary</b>	<p>No reasonable alternative was identified for this allocation as the site is allocated primarily as a public realm scheme with a small amount of housing, introducing other uses on this site would not be appropriate.</p> <p>This allocation is for improved public open space and design measures to improve the definition between public and private space, alongside some new housing. The owners, Peabody, have ambitions to improve the public realm across the estate to improve amenity, biodiversity, 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.</p>													

**Table 1.175: Site Assessment BC15: Richard Cloudesley School, 99 Golden Lane**

I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<b>BC15: Richard Cloudesley</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
School, 99 Golden Lane, EC1Y 0TZ														
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>The allocation is for redevelopment of the former Richard Cloudesley school building to provide a new school, residential development, play and sports facilities.</p> <p>The scheme will have significant positive effects on affordable housing delivery by providing 66 social rented homes, and on liveable neighbourhoods through provision of a new school. It will have minor positive effects on economic growth by providing a small amount of affordable workspace. The education use will have minor positive effects social inclusion by providing opportunities for learning. The additional affordable housing is likely to have positive effects on social inclusion. The scheme makes efficient use of land by providing all of this along with additional school floorspace on site. The residential building is a taller building (10 storeys on a 4 storey podium). There will be minor positive effects on the health and wellbeing objective by provision of sport facilities (a MUGA), which will also be available to residents outside of school hours.</p>													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified for this allocation. The site has planning permission which is currently under construction.													

**Table 1.176: 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
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>BC16 is allocated for refurbishment or extension of the existing building to provide office development.</p> <p>There is likely to be positive effects on economic development by providing additional employment floorspace, and on the efficient use of land through the optimisation of development on site through potential extensions. Lack of office floorspace is a barrier to economic growth in the area. The Local Plan strategy is that new business floorspace will be focused in the CAZ, Bunhill and Clerkenwell AAP area, the CAZ Fringe Spatial Strategy Areas and the Locally Strategic Industrial Sites. Given land constraints and high need (400,000sqm up to 2036) needs will not be met without prioritising business space in these areas, including the BCAAP area. The location of Bunhill and Clerkenwell is particularly suited to</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 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
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>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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>	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.													

**Table 1.177: 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
<b>BC17: Caxton House, 2 Farringdon Road, EC1M 3HN</b>	+	+	0	+	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	Formerly in office and retail use, buildings were demolished to facilitate Elizabeth Line (Crossrail) construction works. The site has planning permission for the development of 27,100sqm commercial/retail floorspace. BC17 allocation reflects the consent and is for office development with ground floor active retail/leisure floorspace. The allocation will have a significant positive effect on economic growth 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.													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified for this allocation. The site has planning permission which is currently under construction.													

**Table 1.178: 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 Farringdon Road and 48-50 Cowcross Street, EC1M 3HP	+	+	0	+	0	+	0	++	0	0	0	0	0	0
<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 1.179: 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
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>BC19 is allocated for intensification of business use and improved pedestrian connections to Turnmill Street and Farringdon Station. Only a smaller upward extension is likely, as such the effect of this allocation is minor positive effects on economic growth by providing additional employment floorspace and an improved and more inclusive public realm. Lack of office floorspace is a barrier to economic growth in the area. The Local Plan strategy is that new business floorspace will be focused in the CAZ, Bunhill and Clerkenwell AAP area, the CAZ Fringe Spatial Strategy Areas and the Locally Strategic Industrial Sites. Given land constraints and high need (400,000sqm up to 2036) needs will not be met without prioritising business space in these areas, including the BCAAP area. The location of Bunhill and Clerkenwell is particularly suited to development of employment uses, with easy access to the major centres of employment and business of the London's West End, the City of London, Canary Wharf, as well as the emerging clusters of the City Fringe, Tech City, King's Cross and the Knowledge Quarter. The Local Plan prioritises employment floorspace in the BCAAP in BC1 and also by allocating the majority of site allocation sites in the BCAAP for employment (office) uses, to the exclusion of housing development on these sites. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.</p> <p>The allocation will have a minor positive effects on the efficient use of land and objective by providing additional floorspace on site in a highly accessible central London location.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 an element of residential to be provided on site, with no net loss of office floorspace.</p> <p>This alternative will have a positive effect on the local environment through improved public realm and pedestrian connections as with the preferred approach.</p> <p>The alternative will have minor positive effects against the efficient use of land objective as it will lead to more development on previously developed land in an accessible location, however it will not be as efficient as the preferred approach as the Bunhill and Clerkenwell Area is the most efficient location to locate offices as it is the accessible and connected as well as being the most valuable for office development due to close proximity to London's office markets. Offices can take advantage of the agglomeration benefits of the central London location and will have close access to the wide range of supporting services.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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. 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 1.180: 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	+	+	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, EC1M 3NH														
<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 effects of alternative</b>	<p>This alternative is where this site allocation would be amended for more housing to be developed, allowing an element of residential to be provided on site, with no net loss of office floorspace.</p> <p>The alternative will have minor positive effects against the efficient use of land objective as it will lead to more development on previously developed land in an accessible location, however it will not be as efficient as the preferred approach as the Bunhill and Clerkenwell Area is the most efficient location to locate offices as it is the accessible and connected as well as being the most valuable for office development due to close proximity to London's office markets. Offices can take advantage of the agglomeration benefits of the central London location and will have close access to the wide range of supporting services.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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. 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 1.181: 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
<b>BC21: 2, 4-10 Clerkenwell Road, 29-39 Goswell Road &amp; 1-4 Great</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
Sutton Street, Islington, London EC1M 5PQ														
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>BC21 is allocated for office-led redevelopment with retail and leisure uses at ground floor fronting Clerkenwell Road and Goswell Road. Development should provide units suitable for SMEs.</p> <p>The allocation will likely have minor positive effects on the local environment and significant positive effects on the efficient use of land by developing a ground level car park into a quality contextual building with active uses on the ground floor. The removal of car parking will have minor positive effects against the transport, climate change, and natural resources (air quality) objectives by encouraging more sustainable forms of travel. The allocation will also have significant positive effects on economic growth by providing a large amount of office floorspace as well as retail and leisure floorspace. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.</p>													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified for this allocation. The site has planning permission which is currently under construction.													

**Table 1.182: 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
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>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.</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 summary</b>	No reasonable alternative was identified for this allocation because it is allocated for public realm and the development on this site of a building is not appropriate on this site. Vine Street Bridge is conversion of carriageway to open space with no buildings proposed. The Council does not consider it appropriate to develop this site for a building due to the harm this would cause to the character, amenity, views, and permeability of the area.													

**Table 1.183: 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.													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified for this allocation as the site has planning permission. The planning permission (P2016/4807/FUL) is for demolition of the existing office and replacement with a new office building, in accordance with the allocation.													

**Table 1.184: 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
BC24: Clerkenwell Fire Station, 42-44 Rosebery Avenue, EC1R 4RN	+	++	++	+	++	+	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 station and the yard space would not allow development of large floorplate open plan offices. For the above reasons the Council did not consider it reasonable to assess for commercial uses on this site.													

**Table 1.185: 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
BC25: Mount Pleasant Post Office, 45	+	++	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
Rosebery Avenue, EC1R 4TN														
<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>													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified for this allocation as the site has planning permission which is currently under construction.													

**Table 1.186: 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	+

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 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>													
<b>Commentary on assessment of likely significant effects of alternative</b>	No reasonable alternative was identified for this allocation. The site has planning permission which is currently under construction.													

**Table 1.187: 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
<b>BC27: Finsbury Health Centre and Pine Street Day Centre, EC1R 0LP</b>	+	0	++	++	0	0	+	0	0	0	0	0	0	0
<b>Commentary on assessment of likely significant</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</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
effects of site allocations	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.													
Reasonable alternative summary	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.													

**Table 1.188: Site Assessment BC28: Angel Gate, Goswell Road,**

I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC28: Angel Gate, Goswell Road, EC1V 2PT	+	++	0	0	0	+	0	++	0	0	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	<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</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. Heritage impacts are neutral, as development would need to prevent impacts on the listed buildings fronting City 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>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, 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>	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.													

**Table 1.189: Site Assessment BC29: Taylor House, 88 Rosebery Avenue**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC29: Taylor House, 88 Rosebery Avenue, EC1R 4QU	0	+	0	0	0	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<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
<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>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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	<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 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>													
Conclusion	<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 1.190: 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
Commentary on assessment of likely significant effects of site allocations	<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 1.191: 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 1.192: 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 1.193: 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 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
	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.													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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. 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> <p>The alternative would have minor negative impacts on reducing the need to travel by locating residential in the CAZ, rather than high trip generating office uses which can take advantage of the high accessibility by public transport and active travel, reducing trips by car.</p>													
Conclusion	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													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
	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 1.194: 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 1.195: 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 1.196 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 effects of site allocations</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 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													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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>City, King's Cross and the Knowledge Quarter. The Local Plan prioritises employment floorspace in the BCAAP in BC1 and also by allocating the majority of site allocation sites in the BCAAP for employment (office) uses, to the exclusion of housing development on these sites. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.</p> <p>The allocation would also make more efficient use of land by adding floorspace to a previously developed site. The allocation will have minor positive effects on the liveable neighbourhoods objective as the allocation ensure that the ongoing operation of the London Metropolitan Archives must not be affected by any development on site, preserving this important cultural asset.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable alternative: mixed use	0	-	0	0	+	+	0	-	-	0	0	0	0	0
Commentary on assessment of likely significant effects of alternative	<p>This alternative is where this site allocation would be amended for more housing to be developed, allowing up to 50% of the uplift to be provided as housing with the other 50% office use.</p> <p>The alternative would have minor negative effects against the efficient use of land as the Bunhill and Clerkenwell Area is the most efficient location to locate offices as it is the accessible and connected as well as being the most valuable for office development due to close proximity to London's office markets. Offices can take advantage of the agglomeration benefits of the central London location and will have close access to the wide range of supporting services.</p> <p>The alternative would have minor positive effects against the objective for providing affordable housing as it would allow more housing to be developed which would include a proportion of affordable housing. The additional affordable housing is likely to have positive effects on social inclusion.</p> <p>The alternative would have significant negative effects on economic growth. The additional housing would displace office floorspace, which is needed to meet demand from businesses, grow the economy, and provide employment and training opportunities. The Finsbury Business Centre Site provides flexible workspace and collaboration space for small and medium enterprises, and development on this site offers an opportunity to expand this role. The site is allocated to allow for the expansion of the existing cultural uses linked to the operation of the London Metropolitan Archives also requires that any development does not affect the operation of the London Metropolitan Archives. A larger scale residential use will not support the expansion of cultural uses on site or the expansion of provision for SMEs.</p>													

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
	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 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.													

**Table 1.197 Site Assessment BC37: Triangle Estate, Goswell Road/Compton Street/Cyrus 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
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>	BC37 is allocated for residential development and re-provision of retail floorspace. The extension and improvement of the Triangle Estate has planning permission and implementation will result in significant positive effects on housing by providing 54 new dwellings including 27 social rented units. The additional affordable housing is likely to have positive effects on social inclusion. Redevelopment will also have minor positive effects on the efficient use of land by infilling on an existing housing estate, and minor positive effects through associated improvements to access and common areas on the estate contributing to a safer and more inclusive environment.													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified for this allocation as the site has planning permission.													

**Table 1.198: 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
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>BC38 is allocated to deliver a very substantial quantum of office floorspace, a large proportion of which is expected to be Grade A office space. A range of unit types and sizes, including a significant proportion of small units, particularly for SMEs, must be provided and a substantial amount of affordable workspace at peppercorn rent will be delivered as part of the office floorspace. An element of social infrastructure will also be required, potentially consisting of two elements: Eye hospital/Institute of Ophthalmology “legacy” eye clinic facility and a GP/community health hub. Active shops, cafes, and restaurants, or drinking establishment uses on the ground floor will be sought as part of any future development proposal and a proportion will be affordable retail units.</p> <p>The redevelopment of the Moorfields Eye Hospital site will result in significant positive effects on economic growth by providing large scale high quality office floorspace in the City Fringe Opportunity Area. Lack of office floorspace is a barrier to economic growth in the area. The Local Plan strategy is that new business floorspace will be focused in the CAZ, Bunhill and Clerkenwell AAP area, the CAZ Fringe Spatial Strategy Areas and the Locally Strategic Industrial Sites. Given land constraints and high need (400,000sqm up to 2036) needs will not be met without prioritising business space in these areas, including the BCAAP area. The location of Bunhill and Clerkenwell is particularly suited to development of employment uses, with easy access to the major centres of employment and business of the London’s West End, the City of London, Canary Wharf, as well as the emerging clusters of the City Fringe, Tech City, King’s Cross and the Knowledge Quarter. The Local Plan prioritises employment floorspace in the BCAAP in BC1 and also by allocating the majority of site allocation sites in the BCAAP for employment (office) uses, to the exclusion of housing development on these sites. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.</p> <p>The allocation recognises the unique opportunity presented by this site which will make a significant contribution to both London and the national economy. It will also have positive economic effects by requiring SME space and affordable workspace which broadens the range of space for local businesses potentially providing more opportunity for local people tackling worklessness. The retail space also provides opportunities for employment. The hospital use is relocating within central London to a modern purpose built building so this clinical provision will not be lost maintaining a sub-regional service provision for residents.</p> <p>Redevelopment must retain key historic buildings fronting City Road therefore the allocation will have minor positive effects on the heritage objective. The increase in development on the site will have minor positive effects on the efficient use of land objective. There will be minor positive effects on the objective for open space by provision of a public open space. Newlinks, 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>													
Conclusion	<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</p>													

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.

**Table 1.199: Site Assessment BC39: Laser House, 132-140 Goswell Road,**

I/A Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC39: Laser House, 132-140 Goswell Road, EC1V 7DY	0	+	0	0	0	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	BC39 is allocated for intensification of business use. This allocation will have positive effects on economic growth by providing employment (office) floorspace and will ensure the efficient use of land. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified for this allocation. The site has planning permission which is currently under construction.													

**Table 1.200: 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
BC40: The Pentagon, 48 Chiswell Street, EC1Y 4XX	0	+	0	0	0	+	0	++	0	0	0	0	0	0
<b>Commentary on assessment of likely significant</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													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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	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
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>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 negative impacts on reducing the need to travel by locating residential in the CAZ, rather than high trip generating office uses which can take advantage of the high accessibility by public transport and active travel, reducing trips by car.</p> <p>In addition, while the surrounding area is mixed use (including significant residential and the Barbican and the Whitbread Estate) the site is less suited to residential use due the high density and a high site coverage built form of the site and surrounding context, which will present challenges for providing adequate amenity, outdoor space, and outlook for homes. There is some uncertainty about the likelihood of these impacts as good design may be able to overcome the limitations of the site for residential development which is why the scoring has been maintained as a minor positive effects against the objective for housing, nevertheless this is a highly constrained location for residential development.</p>													
<b>Conclusion</b>	<p>The preferred approach will support economic development and make the most efficient use of land,s 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.</p>													

**Table 1.201: 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 1.202: 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	+
<b>Commentary on assessment of likely significant</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</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	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).													
Reasonable alternative summary	No reasonable alternative was identified for this allocation. The site has planning permission which is currently under construction.													

**Table 1.203: Site Assessment BC43: Easy Hotel, 80-86 Old Street**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC43: Easy Hotel, 80-86 Old Street, EC1V 9AZ	0	0	0	0	0	0/+	0	+	0	0	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	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 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.													
Reasonable alternative summary	No reasonable alternative was identified for this allocation as the site has planning permission.													

**Table 1.204 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
<b>Commentary on assessment of likely significant effects of site allocations</b>	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
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 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. 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.													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 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 1.205: 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
<b>BC45: 27 Goswell Road, EC1M 7AJ</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>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.</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
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 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>													
Conclusion	<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 1.206: 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 effects of site allocations</b>	<p>BC46 is allocated for refurbishment and redevelopment of buildings to provide improved education floorspace, teaching facilities and uses ancillary to teaching. Increased teaching facilities may be suitable where they can be accommodated in line with other Local Plan policies. 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 1.207: BC47: Braithwaite House and Quaker Court, Bunhill Row,**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
BC47: Braithwaite House and Quaker Court, Bunhill Row, EC1Y 8NE	+	+	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>BC47 is allocated for residential development. LB Islington's Housing Service are proposing to provide 38 new homes at the estate by demolishing and redeveloping the Braithwaite House podium and garages, adding two storeys to Quaker Court and constructing a new block adjacent to Braithwaite House. Possible landscaping improvements to Quaker Gardens which may include benefit to biodiversity.</p> <p>The allocation will have significant positive effects on housing by providing new homes including affordable housing. It will also ensure efficient use of land and improve the public realm. The additional affordable housing is likely to have positive effects on social inclusion.</p>													
<b>Reasonable alternative summary</b>	<p>No reasonable alternative was identified for this allocation. This allocation maximises the amount of residential development reasonably possible on site.</p> <p>This site is a Council housing estate and has been allocated to provide new homes at the estate through redevelopment, upwards extensions, and a new block. It was not considered reasonable to develop this site for other uses as development in the estate needs to preserve amenity for the existing residents and should complement the existing residential character and function of the estate. Furthermore development in this estate and the associated disruption caused by construction is justified by the additional housing and affordable housing that can be provided as well as improvements for existing residents. The Council will not make the site available for non-residential development as this would not align with the Council's objectives for the estate</p>													

**Table 1.208: Site Assessment BC48: Castle House, 37-45 Paul Street and Fitzroy House, 13-17 Epworth Street and 1-15 Clere Street**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
<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

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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>BC48 is allocated for intensification of office use. This allocation will have significant positive effects on economic development by providing employment (office) floorspace with potential for additional floorspace. Lack of office floorspace is a barrier to economic growth in the area. The Local Plan strategy is that new business floorspace will be focused in the CAZ, Bunhill and Clerkenwell AAP area, the CAZ Fringe Spatial Strategy Areas and the Locally Strategic Industrial Sites. Given land constraints and high need (400,000sqm up to 2036) needs will not be met without prioritising business space in these areas, including the BCAAP area. The location of Bunhill and Clerkenwell is particularly suited to development of employment uses, with easy access to the major centres of employment and business of the London's West End, the City of London, Canary Wharf, as well as the emerging clusters of the City Fringe, Tech City, King's Cross and the Knowledge Quarter. The Local Plan prioritises employment floorspace in the BCAAP in BC1 and also by allocating the majority of site allocation sites in the BCAAP for employment (office) uses, to the exclusion of housing development on these sites. The additional office floorspace in this central London location will support the economy and a range of employment types and opportunities in the borough that will reduce barriers to employment and have a minor positive effect in relation to social inclusion.</p> <p>It will also have significant positive effects on the efficient use of land. In addition, introducing active frontages will help to contribute to creating a safer and more inclusive environment with minor positive effects on the high quality environment objective.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
Reasonable alternative: mixed use	+	+	0	0	+	+	0	-	-	0	0	0	0	0
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>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 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 1.209: 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

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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>BC49 is allocated for intensification of business use particularly light industrial uses. The building is a former escalator workshop and has an industrial appearance with no external windows. Redevelopment could have positive effects on the local environment by providing a building with more active frontages and an improved relationship with the street and area.</p> <p>This allocation will have significant positive effects on economic growth by providing employment floorspace, and minor 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
<b>Reasonable alternative: mixed use</b>	+	+	0	0	+	+	0	-	-	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of alternative</b>	<p>This alternative is where this site allocation would be amended to allow more housing to be developed, allowing up to 50% of the uplift to be provided as housing with the other 50% office or light industrial use.</p> <p>As with the preferred approach the alternative will have positive effects on the local environment by redevelopment providing a building with more active frontages and an improved relationship with the street and area.</p> <p>The alternative will have minor positive effects against the efficient use of land objective as it will lead to more development on previously developed land in an accessible location, however it will not be as efficient as the preferred approach as the Bunhill and Clerkenwell Area is the most efficient location to locate offices as it is the accessible and connected as well as being the most valuable for office development due to close proximity to London's office markets. Offices can take advantage of the agglomeration benefits of the central London location and will have close access to the wide range of supporting services.</p> <p>The alternative would have minor positive effects against the objective for providing affordable housing as it would allow more housing to be developed which would include a proportion of affordable housing. The additional affordable housing is likely to have positive effects on social inclusion.</p> <p>The alternative would have significant negative effects on economic growth. The additional housing would displace office or light industrial floorspace, which is needed to meet demand from businesses, grow the economy, and provide employment and training opportunities. The site is valuable for office or light industrial development due to its prominent location near the junction of Farringdon Road and Clerkenwell Road, both roads which are home to a large number of commercial uses along these corridors. In addition Farringdon Lane is predominantly commercial uses.</p>													

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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 negative impacts on reducing the need to travel by locating residential in the CAZ, rather than high trip generating office uses which can take advantage of the high accessibility by public transport and active travel, reducing trips by car.</p> <p>There are also some characteristics of this prominent location which may make residential uses less suitable. Traffic noise and air pollution from Farringdon Road and Clerkenwell Road will have some impacts on this site. Immediately adjoining the site to the west is a railway cutting for London Underground lines. Furthermore there is a night time economy role of this area and there are three pubs in close vicinity. It may be challenging to mitigate the noise impacts for residential schemes on this relatively small site. There is some uncertainty about the likelihood of these impacts as good design may be able to overcome the limitations of the site for residential development which is why the scoring has been maintained as a minor positive effects against the objective for housing, nevertheless this is a highly constrained location for residential development.</p>													
<b>Conclusion</b>	<p>The preferred approach will support economic development 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.</p>													

**Table 1.210: 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>	<p>BC50 is allocated for higher education and medical and research uses, alongside improvements to increase permeability through the site. Development on the site may include some office space and research space linked to overarching higher education, medical, and/or research uses.</p> <p>The allocation seeks to optimise the use of the site to accommodate uses which are beneficial to the health of the borough's residents and the wider population. The uses also support economic growth in the borough. Further development on the existing campus will have minor positive</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 against the objective for making efficient use of land. The allocation is clear that the capacity to intensify the use of the site is constrained by the historic nature of the buildings and their surroundings. The allocation promotes a high quality environment and a safer and more inclusive neighbourhood by encouraging permeability improvements at the site and explicitly stating that the development of a new pedestrian route through the site from Charterhouse Buildings to Rutland Place should be a priority of development. The increased permeability created by this route will have minor positive effects against the objective for transport, by providing more direct routes for walking and potentially cycling. The education use will have minor positive effects social inclusion by providing opportunities for learning.													
<b>Reasonable alternative summary</b>	No reasonable alternative was identified for this allocation as the site is allocated for expansion of the social infrastructure use and other uses cannot be practically accommodated on site. The priority for the site is to retain and improve the university. There are no opportunities to provide other uses on site without comprising the function of these university.													

**Table 1.211: 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>													
<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</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>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>													

# Part 1: Review of Cumulative Effects

The approach taken in the interim IIA was to present the cumulative and synergistic effects at the end of each of the Local Plan sections in Section 4 of the report. This was done in a pragmatic way and to reflect an implicit consideration that individual policy and site assessments will have a variety of potential effects; therefore, while these were not all explicitly noted in individual assessments, there had been a detailed consideration of the effects undertaken. As part of the examination process the Inspectors requested further clarity on the assessment of cumulative effects raising concern in particular that a combination of minor effects could result in a significant cumulative effect. The review of cumulative effects in the addendum has drawn the consideration of cumulative effects together into one place and presented them more transparently with a fuller assessment of effects.

The approach has been clarified to consider that cumulative effects can arise when two or more impacts occur simultaneously, or have a significant effect when on its own may combine with another to produce a cumulative effect that is more significant.

There are two areas where cumulative effects will be considered; draft Local plan effects that could result from policies in the Plan working in combination; and inter-plan effects – synergistic effects, where effects of other strategies, plans or programmes act in combination with the draft Local Plan.

## **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 1.212: Consideration of cumulative and other effects for Local Plan objectives

TOPIC / POLICY	BUILT ENV	USE OF LAND	HERITAGE	LIVEABLE	AFFORDABLE	INCLUSION	HEALTH	ECONOMIC	NEED TO TRAVEL	OPEN SPACE	BIODIVERSITY	CLIMATE CHANGE	RESOURCE EFFICIENCY	NATURAL RESOURCES
Objective 1: Homes - Delivering decent and genuinely affordable homes for all	0	++	0	0	++	++	++	0	0	0	0	++	0	0
Objective 2: Jobs and money - Delivering an inclusive economy, supporting people into work and helping them with the cost of living	0	++	0	0	0	++	++	++	+	0	0	+	0	0
Objective 3: Safety - Creating a safe and cohesive borough for all	++	0	0	++	0	++	++	0	++	+	0	+	0	0
Objective 4: Children and Young People - Making Islington the best place for all young people to grow up	++	0	0	++	+	++	++	0	+	++	0	0	0	0
Objective 5: Place and environment - Making Islington a welcoming and attractive borough and creating a healthier environment for all	++	++	++	++	0	++	++	+	+	++	++	++	+	+
Objective 6: Health and independence - Ensuring our residents can lead healthy and independent lives	+	0	0	++	++	0	++	0	++	++	+	+	0	0
Objective 7: Well run council - Continuing to be a well-run council and making a difference despite reduced resources	0	0	0	+	0	+	+	0	0	0	++	++	+	+
<b>CUMULATIVE</b>	++	+	0	++	+	++	++	0	+	++	+	+	0	0

The Plan's objectives will have significant positive cumulative impacts. In particular against the Sustainability Framework objectives for Built Environment, Liveable Neighbourhoods, Inclusion and Equality, Health and Wellbeing and Open Space.

In relation to both the Built Environment and Liveable Neighbourhood sustainability framework objectives the Local Plan objectives for safety, place and environment and health combine with particular focus on making the built environment, including open spaces, feel safer. This helps encourage people to use more sustainable modes of transport, have more healthy lifestyles and better enables access to local facilities and services. This will have a positive effect on reducing emissions both for air quality and contribution to climate change. This combines well with Objective 2: Jobs and Money which seeks to create more jobs locally which will have cumulative positive impacts against the Sustainability Framework objective for need to travel helping people into employment locally.

With regards Inclusion and Equality the delivery of genuinely affordable housing is a key aspect of the Local Plan under objective 1: Homes, which in combination with objective 2: Jobs and Money, aims to create an inclusive economy which will help improve opportunity for Islington residents. These will bring long term positive effects to borough residents with positive impacts on peoples' health and wellbeing through the Local Plan creating better employment opportunities and helping meet housing need through addressing the priorities for the competing demands for the use of the limited land resource in the borough.

There will also be cumulative benefits to Sustainability Framework objectives for Health and Wellbeing of residents arising from the effect of various objectives combining; Objective 3: Safety, Objective 4: Children and Young People, Objective 5: Place and environment and Objective 6: Health and independence which will all provide a healthier living environment for residents. This will work with the health benefits created by delivering high quality housing under objective 1: homes. For example having a safer environment (objective 3) will assist with making the borough the best place for children to grow up (objective 4) which will be supported by a welcoming and attractive environment (objective 5) which is inclusive. In addition ensuring residents lead healthy and independent (objective 6) lives with good access to services and opportunities for play and outdoor leisure will help children grow up fit and active.

### **Synergistic effects**

There is a clear link with the Islington Corporate Plan 2018 – 2022 which shares the same seven objectives with the Local Plan. The Corporate Plan sets how the Council will deliver on these objectives from the service point of view setting various targets and aims for the objectives, some of which relate directly to policy in the Local Plan. For example under the Place and Environment objective there is a commitment to work with TfL to remodel gyratories at Highbury Corner, Nags Head, Old Street and King's Cross. Apart from King's Cross three of these are set out in policy in the Local Plan. The emerging Islington Transport Strategy and other policies in the plan such as the car-free policy approach set out in T3: Car-free development, also helps with objective 5: Place and environment as it will help people make more sustainable transport choices in particular when combined with the various public realm improvements. Finally, the Council published the Islington Zero Carbon strategy in 2020 and the Local Plan will help to achieve the ambitious carbon reductions set out in Strategy.

## Consideration of cumulative and other effects for PLAN1

Policy PLAN1 has a number of cross-cutting elements which will help to deliver synergistic effects across objectives. For example:

- the contextual principle helps to deliver benefits in relation to the built environment, heritage and use of land ensuring that development is high quality and makes a positive contribution to local character, legibility and distinctiveness of an area, based upon an up-to-date understanding and evaluation of the defining characteristics of an area. This would include reflecting heritage assets.
- the connected principle has benefits in terms of liveable neighbourhoods, need to travel and health. The policy states that development must improve permeability and movement through areas and the quality, clarity and sense of spaces around and between buildings; and should sustain and reinforce a variety and mix of uses in line with any relevant land use priorities of the Local Plan.
- the inclusive principle assists with achieving objectives on liveable neighbourhoods, affordable housing and housing, inclusion and health through sustaining and reinforcing a variety and mix of uses in line with relevant land use priorities of the Local Plan.
- the sustainable principle has benefits in terms of use of land, health, climate change, resource efficiency and natural resources requiring development to respond to the principle which underpins the whole planning system.

The overarching nature of PLAN1 means that it can deliver cumulative impacts when considered alongside other policies in the plan.

The **contextual principle** aligns closely with the design and heritage policies within the plan and will complement their delivery, however it will also assist with delivering high quality housing, delivery of new employment and retail floorspace, the delivery of green infrastructure and sustainable design. The approach works together with other policies in the plan which deal with amenity and noise including Policy H4 which sets out detail on housing quality including noise impacts and Policy DH5 which deals with noise and vibration but also the agent of change aspect of policy. In addition retail policies make clear the need for residential or other uses to ensure the vitality and retail function of town centres and local centres is not impacted which helps contribute to economic growth and liveable neighbourhoods.

The **connected principle** will help with achieving access to services and facilities and through encouraging permeability and movement through areas which links well with other policies in the including H1, H7, H9, SC1 and R1. This will not only assist with helping to achieve social infrastructure and economic growth objectives in terms of delivering development in accessible locations, it will also assist with delivery of the transport policies. The clear connection with Policy T1 and T4 in terms of a developments connection with public realm reinforces the approach expected through PLAN1, adding detail on methodology and tools which could be used by designers. In addition, it will help development respond to site specific issues such as safety, crime and fear of crime.

The **inclusive principle** is crosscutting and supports policies across the plan both in terms of the mix of uses but also the design of development and the broader built environment. A mix of uses can respond to economic as well as social needs and is represented by policies in the Thriving Communities and Inclusive Economy sections of the plan. The inclusive approach supports development which is adaptable and meets changing and needs of the population which works with policy H4 and B2 which both seek flexibility of new housing and employment floorspace. Other aspects of inclusive require a policy response from development in terms of a developments function and requirements such as landscape design set out in Policy G4 will respond to safety and useability.

Finally the **sustainable principle** assists with balancing social, economic and environmental objectives and is therefore relevant to policies across the plan as well as the sustainability policies. Policies through the plan contribute to this principle, not just those which respond to climate change but those which encourage re-use and renovation of buildings. Consideration of infrastructure provision is also part of the process of developing and designing a proposal which addresses this and other development principles.

More detailed considerations of PLAN 1 are set out under the site appraisal criteria – some of these criteria will specifically help with delivering specific policies in the plan (for example surface water flows) where as others will help with delivering cumulative benefits across policies (for example design quality).

## Consideration of cumulative and other effects for Area Spatial Strategies Section

Table 1.213: Consideration of cumulative and other effects for Area Spatial Strategies Section

TOPIC / POLICY	BUILT ENV	USE OF LAND	HERITAGE	LIVEABLE	AFFORDABLE	INCLUSION	HEALTH	ECONOMIC	NEED TO TRAVEL	OPEN SPACE	BIODIVERSITY	CLIMATE CHANGE	RESOURCE EFFICIENCY	NATURAL RESOURCES
Policy SP1: Bunhill and Clerkenwell	0	+	0	0	0	0	0	+	0	0	0	0	0	0
Policy SP2: King's Cross and Pentonville Road	+	+	+	+	+	0	+	+	+	+	+	0	0	+
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 1.214: 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>	++	0	0	++	++	++	++	0	0	0	0	0	0	0

Policies in the Thriving Communities section are focused on the societal objectives contained in the Sustainability Framework. When the policies within the section are considered together, they will have a particularly positive cumulative effect on the objectives including affordable housing, inclusion and equality, health and wellbeing, liveable neighbourhoods and the built environment.

Policies which address the health and wellbeing objective, in particular Policy H4, which determines housing quality within a development will combine 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 1.215: Consideration of cumulative and other effects for Inclusive Economy section**

TOPIC / POLICY	BUILT ENV	USE OF LAND	HERITAGE	LIVEABLE	AFFORDABLE HOUSING	INCLUSION	HEALTH	ECONOMIC GROWTH	NEED TO TRAVEL	OPEN SPACE ACCESSIB	BIODIVERSITY	CLIMATE CHANGE	RESOURCE EFFICIENCY	NATURAL RESOURCES
B1: Delivering business floorspace	+	++	0	+	0	++	+	++	++	0	0	+	0	+
B2: New business floorspace	+	++	0	+	0	+	+	++	++	0	0	+	0	+
B3: Existing business floorspace	0	+	0	+	0	+	+	+	+	0	0	+	0	+
B4: Affordable workspace	+	+	0	+	0	++	+	++	+	0	0	+	0	+
B5: Jobs and training opportunities	+	0	0	0	0	++	+	++	+	0	0	+	0	+
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	BIODIVER SITY	CLIMATE CHANGE	RESOURC E EFFICIENCY	NATURAL RESOURCES
CUMULATIVE	+	++	0	++	0	+	+	++	+	0	0	+	0	0

Policies in the Inclusive Economy section are focused on economic aspects with the Local Plan objective to deliver an inclusive economy which the 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 1.216: Consideration of cumulative and other effects for Green Infrastructure section**

TOPIC / POLICY	BUILT ENV	USE OF LAND	HERITAGE	LIVEABLE	AFFORDABLE HOUSING	INCLUSION	HEALTH	ECONOMIC GROWTH	NEED TO TRAVEL	OPEN SPACE ACCESSIBILITY	BIODIVERSITY	CLIMATE CHANGE	RESOURCE EFFICIENCY	NATURAL RESOURCES
G1: Green Infrastructure	++	+	0	++	0	0	++	0	0	++	++	++	0	+
G2 Protecting open space	++	+	+	++	-	+	++	0	0	++	++	++	0	+
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 1.217: Consideration of cumulative and other effects for Sustainable Design section**

TOPIC / POLICY	BUILT ENV	USE OF LAND	HERITAGE	LIVEABLE	AFFORDABLE HOUSING	INCLUSION	HEALTH	ECONOMIC GROWTH	NEED TO TRAVEL	OPEN SPACE ACCESSIB	BIODIVERSITY	CLIMATE CHANGE	RESOURCE EFFICIENCY	NATURAL RESOURCES
S1: Delivering Sustainable Design	++	+	0	+	++	+	++	+	0	0	0	++	++	+
S2: Sustainable Design and Construction	+	+	0	+	++	+	++	0	0	++	++	++	++	+
S3: Sustainable Design Standards	+	0	0	+	++	+	++	0	0	0	+	++	+	+
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 1.218: Consideration of cumulative and other effects for the Public Realm and Transport section**

TOPIC / POLICY	BUILT ENV	USE OF LAND	HERITAGE	LIVEABLE	AFFORDABLE HOUSING	INCLUSION	HEALTH	ECONOMIC GROWTH	NEED TO TRAVEL	OPEN SPACE ACCESSIB	BIODIVERSITY	CLIMATE CHANGE	RESOURCE EFFICIENCY	NATURAL RESOURCES
T1: Enhancing the public realm and sustainable transport	++	+	0	++	0	+	++	0	++	0	0	++	+	++
T2: Sustainable Transport Choices	++	+	0	++	0	+	++	0	++	0	0	++	+	++
T3: Car free development	++	++	0	+	0	+	+	0	+	0	0	++	+	++
T4: Public realm	++	0	0	++	0	+	++	0	++	+	0	++	0	++
T5: Delivery, servicing & construction	+	+	0	+	0	0	0	+	+	0	0	+	+	+
<b>CUMULATIVE</b>	++	+	0	++	0	+	++	0	++	0	0	++	+	++

The Public Realm and Transport policies when considered together will have significant positive cumulative effects against objectives for built environment, liveable neighbourhoods, health inequality and climate change by prioritising more active travel and use of more sustainable transport modes which will help promote a healthier lifestyle and which will have positive impacts against health inequality objective for residents and reducing carbon emissions objective.

The policies also have a positive impact on inclusion as they aim to improve transport for those with no access to private motor vehicles whilst providing wheelchair accessible parking for disabled people. As previously identified this is linked to the reduction in emissions and fuel consumption from land-use benefits of focusing and maximising development in the most accessible locations in the borough enabling more sustainable travel. There are also cumulative impacts with policies B2 and SP3 in reducing the negative impacts of transport relating to freight, servicing, delivery and construction. The transport policies (T1 and T4) also work in concert with spatial policies in helping to promote sustainable transport and deliver development in locations and combine well with other policies in the plan such as policies PLAN1 and G4 which will help a proposal fully integrate within, and relate positively to, their immediate locality.

There is a positive effect against the built environment objective with Public realm and transport policy T1 prioritising practical, safe and convenient access to the public realm which will help to create a sustainable public realm , which combines with Policy T2 which seeks the same factors for provision of sustainable transport infrastructure. This helps ensure the built environment is sufficiently flexible and adaptable to accommodate evolving social and economic needs. This also contributes to making neighbourhoods more liveable. Both T2 and T4 in combination ensure neighbourhoods are more liveable neighbourhoods with more permeable and legible public realm which helps people access existing facilities and services by walking and cycling in particular. In addition these policies can be considered to contribute to economic growth through reducing congestion, which improves freight deliveries and an improved built environment which is more accessible and attractive to visit, particularly town centres.

### **Synergistic effects**

The public realm and transport policies have positive synergistic effects with Islington's 2020 Transport Strategy which aims at increasing the number of trips made by walking, cycling and public transport, whilst reducing the number of car trips. The promotion of Low Traffic Neighbourhoods is also a key component of the Transport Strategy, which is also supported by the Local Plan. In addition, the Council has published its 2020 Zero Carbon Strategy, which identifies transport as a key priority to minimise emissions and reach carbon neutrality. There are also synergistic effects with the London Plan, the Mayor's 2018 Transport Strategy's Healthy Streets, and TfL's Action plans. For instance, the ambition of T2 and T5 to de-motorise and optimise freight, delivery and service movements reflect TfL's 2019 Freight Action Plan. The transport policies also work in combination with the Mayor's Ultra Low Emission Zone (ULEZ), which will be extended in October 2021. Finally, the Government's 2020 Energy White Paper identifies the shift towards active travel and public transport as a key strategic priority for the decarbonisation of transport.

## Consideration of cumulative and other effects for the Design and Heritage section

The following section deals with policies dealing with design and heritage, building heights, basements, noise and advertisements

**Table 1.219: Consideration of cumulative and other effects for the Design and Heritage section**

TOPIC / POLICY	BUILT ENV	USE OF LAND	HERITAGE	LIVEABLE	AFFORDABLE HOUSING	INCLUSION	HEALTH	ECONOMIC GROWTH	NEED TO TRAVEL	OPEN SPACE ACCESSIB	BIODIVERSITY	CLIMATE CHANGE	RESOURCES	NATURAL RESOURCES
DH1: Fostering innovation and conserving and enhancing the historic environment	++	++	+	+	+	+	+	+	0	0	0	+	0	0
DH2: Heritage assets	++	+	++	0	0	0	0	0	0	+	+	0	0	0
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 1.220: Consideration of cumulative and other effects for the the Strategic Infrastructure section**

TOPIC / POLICY	BUILT ENV	USE OF LAND	HERITAGE	LIVEABLE	AFFORDABLE HOUSING	INCLUSION	HEALTH	ECONOMIC GROWTH	NEED TO TRAVEL	OPEN SPACE ACCESSIBILITY	BIODIVERSITY	CLIMATE CHANGE	RESOURCE EFFICIENCY	NATURAL RESOURCES
ST1: Infrastructure Planning and Smarter City Approach	+	++	0	++	0	++	++	+	++	++	0	++	0	0
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 1.221: Consideration of cumulative and other effects for the Bunhill and Clerkenwell AAP**

TOPIC / POLICY	BUILT ENV	USE OF LAND	HERITAGE	LIVEABLE	AFFORDABLE HOUSING	INCLUSION	HEALTH	ECONOMIC GROWTH	NEED TO TRAVEL	OPEN SPACE ACCESSIB	BIODIVERSITY	CLIMATE CHANGE	RESOURCE EFFICIENCY	NATURAL RESOURCES
BC1 Prioritising office use	0	++	0	0	-	+	0	++	+	0	0	0	0	0
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 SINC)s – 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 importance 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.

# Part 2: Appraisal of pre hearing modifications

## Introduction

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

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

The modifications made in response to **issues raised by the Inspectors** relate to housing supply and matters associated with the Sustainability Appraisal. These have resulted in additional site allocations. The changes proposed to the Site Allocations document include 9 additional sites for housing, this includes:

- Six London Borough Islington sites (Drakeley and Aubert Court, Bemerton Estate South, Kerridge Court, New Orleans Estate, Cluse Court, and Hillside); and three other sites (Barnsbury Estate, York Way Estate and Highbury Quadrant Congregational Church).

Changes are also proposed to a small number of existing site allocations to provide additional housing – this includes:

- AUS8: 161-169 Essex Road, N1 2SN: the proposed modification changes part of the allocation to incorporate residential use on the car park to the rear of the site, rather than prioritise business floorspace.
- NH1: Morrison's supermarket and adjacent car park, 10 Hertslet Road, and 8-32 Seven Sisters Road, N7 6A: changed from retail-led mixed use to mixed-use development with a greater proportion of housing.
- 1 Prah Road, N4 2RA (site reference FP5): changed from business use to residential use
- OIS10: 500- 502 Hornsey Road and Grenville Works, 2A Grenville Road : changed from business-led redevelopment to mixed use office and residential development. This reflects the recent grant of planning permission for the site on appeal.
- ARCH5: Archway Campus, Highgate Hill, N19: the potential introduction of an element of student accommodation to increase flexibility.
- BC13: Car park at 11 Shire House, Whitbread Centre, Lamb's Passage: the proposed modification amends the allocation to introduce a mixed use development where additional residential may be acceptable, in addition to a significant amount of office floorspace

The **representations made at Regulation 19** stage of consultation have resulted in a number of changes which were considered necessary to ensure a sound plan or helpful in terms of improving clarity of the plan.

The **Modifications made** in response to wider changes in the planning system are significant changes in response to the UCO Class E changes and the publication of the London Plan. The Use Class changes are the only area of modifications where alternatives were considered and span three areas of policy covering business floorspace, retail and social infrastructure. The changes made in response to the publication of the London Plan are in response to removal of the definition of the gypsies and travellers.

### **Use Class changes**

On 1 September 2020 the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 came into force changing aspects of the Town and Country Planning (Use Classes) Order 1987. The Regulations amend and seek to simplify the system of Use Classes. The Inspectors wrote to the Council requesting the Council's view on the potential soundness implications that the changes to the Use Classes will have on the Plan's policies and allocations and the Council responded to confirm that policy changes are necessary to address these and that the IIA will consider them holistically.

The changes of use within Class E are not classed as development so do not require planning permission, meaning that the Council no longer has the ability to resist the loss of existing the various uses that fall within Class E. The following tables sets these uses out.

**Table 2.1 Use Class Order changes**

Use Class before 31 August 2020	Use Class after 31 August 2020	Note
A1 – shops up to 280sqm selling essential goods, and no other such use within 1 km	Class F.2	Not likely in Islington and most of London
A1 – shops	Class E	Can change to any of the activities with new Class E use. NOT DEVELOPMENT and hence no permission needed.
A2 – financial services eg. bank, estate agents	Class E	
A3 – cafes and restaurants	Class E	
B1a – offices	Class E	
B1b – research and development	Class E	
B1c – light industrial	Class E	
D1 – clinics, health centres, crèches, day nurseries	Class E	
D2- gyms, indoor recreation	Class E	
A4 – drinking establishments	Sui Generis	
A5 – hot food takeaways	Sui Generis	

<b>D1 – education provider, art gallery, museum, public library or reading room, public hall or exhibition hall, public worship or religious instruction, law court</b>	<b>F.1 – learning and non-residential institutions</b>
<b>D1 – hall or meeting place for the principal use of the local community</b>	<b>F.2 – local community</b>
<b>D2 – swimming bath, skating rink, area for outdoor sports or recreation (not involving motorised vehicles or firearms)</b>	<b>F.2 – local community</b>

The justification from the Government for the scale of these changes was the need to provide the flexibility for businesses to adapt and diversify to meet changing demands which was considered particularly important for town centres to seek to recover from the economic impact of Coronavirus. In terms of the impacts for the draft Local Plan it was recognised that certain policies which seek to manage uses which are now subsumed into the broader Class E are affected. For example:

- Retail policies (Town Centres and Local Shopping Areas) – can't limit other uses within class E and preserve retail as per the submission draft policy.
- Employment policies – can't specifically protect B1 as per the submission draft however we still need to plan for new employment floorspace
- Affordable workspace – parts specifically written in relation to B1 use will need to be updated

Whilst the exact impacts of class E are uncertain, it is likely that there will be losses within certain uses in certain locations where they were previously priorities.

## Modifications Screening

All the modifications made to the draft Local Plan have been screened to consider which changes need to be assessed and where alternatives need to be considered. The screening tables below describes the change and provides a screening assessment by chapter order. Both main and minor modifications were considered, but the focus is on the main modifications.

Prior to the Regulation 19 consultation two further changes were made to the draft Strategic and Development Management Policies document under delegated authority. Further changes were made to reflect updated evidence relating to Gypsy and Traveller accommodation need; and the Council declaration of an environment and climate emergency and the associated aim to achieve net zero carbon by 2030 ahead of the formal 2050 target set out in the draft Local Plan. Both changes are considered factual, the first corrected a mistake and the second was factual and did not change the target set out in the draft Local plan.

**Table 2.2: Screening of Area Spatial Strategies main modifications**

Modification reference(s)	Policy	Description	Screening Assessment
SDM-MO1		Minor changes	No assessment necessary
SDM-MO2		Minor changes	No assessment necessary
SDM-MO3	Policy SP2: King's Cross and Pentonville Road	Part B contains a proposed modification to clarify the Council's approach following the 2020 amendments to the Use Classes Order and the introduction of Class E.	The screening has identified this policy change and related supporting text needs assessment alongside but this will be covered by assessment of Policy B2.
SDM-MO4 and SDM-MO5	Policy SP2: King's Cross and Pentonville Road	Proposed change in response to the representation from the Canal and River Trust who are seeking further flexibility in relation to residential moorings and moorings for leisure use on Regent's Canal and facilities to support moorings, including in relation to policy G2 on open space. The modifications proposed span three policies in the Local Plan (SP2, BC4 and G2) and provide clarification on how proposals for moorings and facilities to support moorings should be approached in the context of the canal as public open space.	The screening has identified this policy change and related supporting text needs assessment alongside the related proposed changes elsewhere in the Local Plan (Policies BC4 and G2).

Modification reference(s)	Policy	Description	Screening Assessment
SDM-MO6		Minor changes	No assessment necessary
SDM-MO7 to SDM-MO12	Policy SP3: Vale Royal/Brewery Road Locally Significant Industrial Site,	Part A contains a proposed modification to clarify the Council's approach following the 2020 amendments to the Use Classes Order and the introduction of Class E. The modification takes into account specific implications of Class E by securing light industrial floorspace for this purpose to protect the industrial function of the area.	The screening has identified this policy change and related supporting text needs assessment alongside the related proposed changes elsewhere in the Local Plan (Policy B1).
SDM-M13 to SDM-M14		Minor changes	No assessment necessary
SDM-M15	Policy SP4: Angel and Upper Street	Part I contains a proposed modification to clarify the Council's approach following the 2020 amendments to the Use Classes Order and the introduction of Class E.	The screening has identified this policy change and related supporting text needs assessment alongside but this will be covered by assessment of Policy B2.
SDM-MO16 to SDM-MO17		Minor changes	No assessment necessary
SDM-MO18 and SDM-MO20	Policy SP5: Nag's Head and Holloway,	Part E contains a change to ensure consistency with modification to Site Allocation NH1. The modification recognises the potential of the site to deliver a significant amount of housing now as well as office floorspace alongside the retention and enhancement existing floorspace.	The screening has identified this policy change and related supporting text needs assessment and this is covered by assessment of the proposed changes elsewhere in the Local Plan (site allocation NH1).
SDM-MO19 and SDM-MO21		Minor changes	No assessment necessary
SDM-MO22	Policy SP6: Finsbury Park	Part D contains a proposed modification to clarify the Council's approach following the 2020 amendments to the Use Classes Order and the introduction of Class E.	The screening has identified this policy change and related supporting text needs assessment alongside but this will be covered by assessment of Policy B2.
SDM-MO23	Policy SP6: Finsbury Park,	Part M is a main modification resulting from Statement of Common Ground with London Borough of Hackney which identifies the need to	The screening has identified this additional criteria to the policy <b>does not need assessment</b> , the change is considered

Modification reference(s)	Policy	Description	Screening Assessment
		conserve or enhance heritage assets including those in neighbouring boroughs, where these are impacted by proposals.	descriptive adding a reference to heritage assets outside the borough.
SDM-MO24 to 30		Minor changes	No assessment necessary

**Table 2.3 Screening of Thriving Communities policies main modifications**

Modification reference(s)	Policy	Description	Screening Assessment
SDM-MO31 to 35		Minor changes	No assessment necessary
SDM-MO36	Policy H7: Meeting the needs of vulnerable older people	Part F contains a proposed change which is identified as a main modification however the change does not amend the application of the policy approach and is an improvement on policy drafting.	The screening has therefore identified that this policy change does not need assessment.
SDM-MO37 to SDM-MO38		Minor changes	No assessment necessary
SDM-MO39 and SDM-MO41	Policy H12: Gypsy and Traveller Accommodation	Part A is a modification that reflects the changes to the Publication London Plan policy H14 in response to Directions from the Secretary of State which removed the draft London Plan definition of Gypsies and Travellers for the purposes of assessing needs. The change removes the reference to 10 pitches identified through the London Plan definition in the policy. However, the modification maintains in policy that identified need will be met and retains reference in the supporting text to the need identified by the draft London Plan	The screening has identified that this policy change does not need assessment as it will not change the minor effects already identified. The EQIA has also considered this change.

Modification reference(s)	Policy	Description	Screening Assessment
		definition and the Planning Policy for Traveller Sites.	
SDM-MO40	Policy H12: Gypsy and Traveller Accommodation	Minor changes	No assessment necessary
SDM-MO42	Policy H12: Gypsy and Traveller Accommodation. Para 3.150	Proposed change is identified as a main modification however the change does not amend the application of the policy approach and is an improvement on policy drafting.	No assessment necessary
SDM-MO43 and SDM-MO44	Policy SC1: Social and Community Infrastructure	Proposed change to clarify the Council's approach following the 2020 amendments to the Use Classes Order and the introduction of Class E to clarify that where a propose social infrastructure use/facility is necessary to mitigate the impacts of a development this use will be secured at planning stage.	The screening has identified this policy change and related supporting text needs assessment.

**Table 2.4 Screening of Inclusive Economy, business floorspace policies main modifications**

Modification reference(s)	Policy	Description	Screening Assessment
SDM-MO45 to SDM-MO49)	<b>Policy B1: Delivering business floorspace</b>	Parts D and E, contains a proposed change to clarify the Council's approach following the 2020 amendments to the Use Classes Order and the introduction of Class E. The change clarifies industrial uses sought in LSISs in the context of Class E s. The changes in the supporting text makes clear the risk from increased flexibility on existing floorspace being converted to other non-business uses eroding the overall supply of business floorspace in the borough.	The screening has identified this policy change and related supporting text requires an assessment. There are related changes to business floorspace and Class E proposed elsewhere in the Local Plan (Policy SC1, Policy B1, Policy B2, Policy SP3, Policies R1 to R10 and BC1 and BC2)
SDM-MO50 To SDM-MO55	<b>Policy B2: New Business Floorspace</b>	Part A, contains a proposed change to clarify the Council's approach following the 2020 amendments to the Use Classes Order and the introduction of	The screening has identified this policy change and related supporting text requires an assessment. There are related changes

		Class E. The change identifies that conditions will be used on future proposals to ensure that specific uses such as new office, research and development and light industrial floorspace are secured in these locations. The supporting text contains new paragraph explaining spatial importance of different locations across the borough.	to business floorspace and Class E proposed elsewhere in the Local Plan (Policy SP2, SC1, Policy B1, Policy B2, Policy SP3 and Policies R1 to R10 and BC1 and BC2).
SDM-MO50 and SDM-MO53	<b>Policy B2: New Business Floorspace</b>	Part D contains a proposed change (SDM-MO50 and SDM-MO53) which clarifies the councils approach to air quality and sustainable transport with a modification to Part D that adds cross reference to policies S7, T2 and T5. The change identifies that proposals for industrial uses which would lead to a significant increase in vehicle movements may potentially have particular impacts on air quality, and will be required to put in place robust, specific mitigation measures to minimise the impacts. There are related changes in policy T5 which have strengthened the approach. Part E contains a proposed modification which clarifies the specific business uses that are suitable within town centres within the context of Class E, with cross references to relevant retail policies added.	The screening has identified these policy changes and related supporting text require an assessment.
SDM-MO56	<b>Policy B3: Existing business floorspace</b>	Proposed changes (SDM-MO55 and SDM-MO56) to clarify the Council's approach following the 2020 amendments to the Use Classes Order and the introduction of Class E. The changes include clarification of the approach to marketing of existing business uses within the context of class E and how proposals that have been secured for a particular class E use should be marketed.	The screening has identified this policy change and related supporting text requires an assessment. There are related changes to business floorspace and Class E proposed elsewhere in the Local Plan (Policy B1 and Policy).
SDM-MO57	<b>Policy B3: Existing business floorspace</b>	Proposed change to reflect updates to Policy E4 in line with the Publication London Plan December 2020 version.	The screening has identified this change to the supporting text does not change the effects already identified and does not require an assessment.

<p>SDM-MO58 to SDM-MO60</p> <p>SDM-MO63 and SDM-MO64</p> <p>SDM-MO66 to SDM-MO71</p>	<p><b>Policy B4: Affordable Workspace</b></p>	<p>Proposed change to clarify the Council’s approach following the 2020 amendments to the Use Classes Order and the introduction of Class E.</p>	<p>The screening considered these changes minor.</p>
<p>SDM-MO61 and SDM-MO62 and SDM-MO65</p>	<p><b>Policy B4: Affordable Workspace</b></p>	<p>The supporting text contains a proposed changes (SDM-MO60, SDM-MO61 and SDM-MO64) to clarify flexibility around application of the affordable workspace policy requirements in response to various locations / types of proposal across the borough. There are three changes proposed: Proposals which involve a small uplift of office floorspace relative to existing office use floorspace will be able to consider site specific viability evidence on a case by case basis. Mixed use proposals which deliver on-site affordable housing, where in exceptional circumstances, the provision of affordable workspace will undermine the ability to the scheme to secure affordable housing, the provision of affordable housing will take priority. Proposals in PELs and Town Centre Locations outside of the CAZ where wholly commercial schemes are proposed, site specific viability evidence for affordable workspace provision will be considered on a case by case basis.</p> <p>The changes require discussion as they introduce additional flexibility but in relatively specific circumstances. The impact of the changes are likely</p>	<p>The screening has identified that this policy change does not justify an assessment.</p>

		to be minimal and relate to policy application and do not change the general policy approach to affordable workspace and are not considered to have an effect. They are clarifying changes which introduce additional flexibility to the application of the policy approach in respect to viability and viability evidence.	
SDM-MO66 to SDM- MO71		Minor changes	No assessment necessary

**Table 2.5 Screening of Inclusive Economy, retail floorspace policies main modifications**

<b>Modification reference(s)</b>	<b>Policy</b>	<b>Description</b>	<b>Screening Assessment</b>
SDM-MO72-SDM-MO73	<b>Policy R1: Retail, Leisure and Services</b>	Proposed change to clarify the Council’s approach following the 2020 amendments to the Use Classes Order and the introduction of Class E. The approach identifies that the Council is seeking a proportionate tiered approach to development involving Class E proposals, alongside recognising the flexibility provided by Class E, impacts are appropriately considered using assessments in relation to the scale of a proposal and the location of a proposal. Reference is also introduced into policy in relation to concentration of Class E uses. There are also changes in the supporting text explaining in particular the use of impact assessments as a tool to assess the harm that might arise from the range of uses within Class E. There are related changes to retail floorspace and Class E proposed elsewhere in the Local Plan (Policies R1 to R10).	The screening has identified this policy change and related supporting text requires an assessment.

SDM-MO74 and SDM-MO75	<b>Policy R1: Retail, Leisure and Services</b>	Minor	No assessment necessary
SDM-MO76 and SMD-MO77	<b>Policy R2, Primary Shopping Areas</b>	Proposed changes to clarify the Council's approach following the 2020 amendments to the Use Classes Order and the introduction of Class E. This includes clarifications to the role of the percentage targets for retail, the contribution of new development to the ground floor retail function and that it will be appropriately conditioned to maintain this with impacts assessed where it does not, and changes in relation to change of use/marketing periods and provision of an impact assessment. There are related changes to retail floorspace and Class E proposed elsewhere in the Local Plan (Policies R1 to R10).	The screening has identified this policy change and related supporting text requires an assessment.
SDM-MO78	<b>Policy R3: Islington's Town Centres</b>	Proposed change to clarify the Council's approach following the 2020 amendments to the Use Classes Order and the introduction of Class E. The change introduces a threshold for requiring an impact assessment of 350sqm. Reference to the CAZ and its primary business function is introduced. Changes in supporting text clarify the importance of active frontages. There are related changes to retail floorspace and Class E proposed elsewhere in the Local Plan (Policies R1 to R10).	The screening has identified this policy change and related supporting text requires an assessment.
SDM-MO79 to SDM-MO81	<b>Policy R3: Islington's Town Centres</b>	Minor	No assessment necessary
SDM-MO82 and SDM-MO83	<b>Policy R4: Local Shopping Areas</b>	Proposed change to clarify the Council's approach following the 2020 amendments to the Use Classes Order and the introduction of Class E. The changes introduce a threshold for requiring an impact assessment of 200sqm. A distance threshold of	The screening has identified this policy change and related supporting text requires an assessment.

		300m for access to essential goods and services is also identified. Changes in supporting text clarify use of marketing for change of use to other non-Class E main town centre uses. There are related changes to retail floorspace and Class E proposed elsewhere in the Local Plan (Policies R1 to R10).	
SDM-MO84	<b>Policy R5: Dispersed retail and leisure uses</b>	Proposed change to clarify the Council's approach following the 2020 amendments to the Use Classes Order and the introduction of Class E. The changes introduce a requirement that where there is a particular need the Council will condition a unit to provide a retail use to allow the potential for the selling of essential daily goods. There are related changes to retail floorspace and Class E proposed elsewhere in the Local Plan (Policies R1 to R10).	The screening has identified this policy change and related supporting text requires an assessment.
SDM-MO85	<b>Policy R5: Dispersed retail and leisure uses</b>	Minor	No assessment necessary
SDM-MO86	<b>Policy R6: Maintaining and enhancing Islington's unique retail character</b>	Minor	No assessment necessary
SDM-MO87	<b>Policy R6: Maintaining and enhancing Islington's unique retail character</b>	Proposed change to clarify the Council's approach following the 2020 amendments to the Use Classes Order and the introduction of Class E. Introduces reference to active frontages and amends approach to encourage in para 4.114.	The screening has identified this policy change and related supporting text requires an assessment.
SDM-MO88	<b>Policy R7: Markets and Specialist Shopping Areas</b>	Proposed change (SDM-MO86 to SDM-MO92) to clarify the Council's approach following the 2020 amendments to the Use Classes Order and the introduction of Class E. The changes relate to clarifying the role of the percentage targets within the revised Use Classes Order and marketing for change of use. There are related changes to retail floorspace and Class E proposed elsewhere in the Local Plan (Policies R1 to R10).	The screening has identified this policy change and related supporting text requires an assessment.

SDM-MO89 to SDM-MO92	<b>Policy R7: Markets and Specialist Shopping Areas</b>	Minor	No assessment necessary
SDM-MO93 to SDM-MO97	<b>Policy R8: Location and concentration of uses</b>	Proposed change to clarify the Council’s approach following the 2020 amendments to the Use Classes Order and the introduction of Class E. The proposed change introduces reference to overconcentration of Class E uses but is not considered to have sufficient effects to require an assessment. In addition, it is noted that the concept of overconcentration of Class E uses is introduced in Policy R1 and forms part of the assessment.	The screening has identified this policy change and related supporting text requires an assessment.
SDM98 to SDM108	<b>Policy R9: Meanwhile and temporary uses</b>	Minor	No assessment necessary

**Table 2.6 Screening of Green Infrastructure policies main modifications**

<b>Modification reference(s)</b>	<b>Policy</b>	<b>Description</b>	<b>Screening Assessment</b>
SDM-MO109	<b>Policy G2: Green Infrastructure</b>	Proposed change (SDM-MO109) in response to the representation from the Canal and River Trust who are seeking further flexibility in relation to residential moorings and moorings for leisure use on Regent's Canal and facilities to support moorings. The modification proposed spans three policies in the Local Plan (SP2, BC4 and G2) and provide clarification on how proposals for moorings and facilities to support moorings should be approached in the context of the canal as public open space.	The screening considers this policy change and related supporting text requires assessment alongside the related proposed changes elsewhere in the Local Plan (Policies BC3 and G2).
SDM-MO110	<b>Policy G2: Green Infrastructure</b>	Minor	No assessment necessary

SDM-MO111	<b>Figure 5.2: Sites of Importance to Nature Conservation (SINC) designation</b>	There is an update (SDM-MO111) to the SINC map to reflect amended boundary to the SINC at 351 Caledonian Road. This is a revision to correct an error and to improve accuracy of mapping. See Policies Map Changes for full explanation.	The screening identifies that the change is factual and does not require an assessment.
SDM-MO112	<b>Policy G5: Green Infrastructure</b>	Proposed change (SDM-MO112) to clarify that intensive and semi-intensive green roofs may be acceptable instead of extensive green roofs if they can demonstrate they can enhance biodiversity, sustainable drainage and cooling functions, this reflects policy G5, part E. Clarification is also provided in relation to accessible roofs for amenity purposes.	The screening does not consider the change has effects to require an assessment, the policy and supporting text continue to prioritise biodiversity-based extensive green roofs.

**Table 2.7 Screening of Sustainable Design policies main modifications**

<b>Modification reference(s)</b>	<b>Policy</b>	<b>Description</b>	<b>Screening Assessment</b>
SDM-MO113	<b>Policy S1: Delivering Sustainable Design</b>	Minor	No assessment necessary
SDM-MO114	<b>Policy S1: Delivering Sustainable Design, supporting text, Paragraph 6.9, 6.10, 6.11</b>	Proposed change (SDM-MO114) to clarify that the use of low-emission CHP systems will only be acceptable to support the expansion of area-wide heat networks as part of the planned transition to the use of secondary sources to power heat networks.	The screening has identified this policy change requires assessment alongside the related proposed changes elsewhere in the Local Plan (Policy S5).
SDM-MO115 to SDM-MO117  SDM-MO120  SDM-MO122	<b>Policy S5: Energy Infrastructure</b>	(SDM-MO15) Part A, contains a proposed change to recognise a different dataset for the calculations of carbon emissions which is considered to provide a better reflection of a development's future carbon emissions.	The screening has identified that this change is factual and does not require an assessment.

SDM-MO124		<p>(SDM-MO116) A change is proposed to part C to clarify the approach to larger minor new developments, selecting heat sources in line with the heating hierarchy, with a new part D to clarify minor new-build developments should prioritise low carbon heating systems.</p> <p>A modification (SDM-MO120) is proposed which clarifies that feasibility assessments for connection to heat networks should use a whole life-cycle assessment methodology this will enable a fair comparison between carbon emissions with heat network connection and other heat source options.</p> <p>A modification (SDM-MO124) is proposed to provide a new paragraph which provides a link to the production of a Zero Carbon SPD to assist with the implementation of the council's sustainable design policies as part of the council's wider zero carbon strategy, including taking into account changes to this policy area over time.</p>	<p>The screening has identified this policy change which reduces the opportunity for minor development to use gas fuelled boilers requires assessment alongside the related proposed changes elsewhere in the Local Plan (Policy S1).</p> <p>The screening identified that this clarification does not require an assessment and will not change the effects already identified.</p> <p>The screening identified that the link to future guidance does not require an assessment.</p>
SDM-MO118 and SDM-MO119  SDM-MO121  SDM-MO123  SDM-MO125	<b>Policy S5: Energy Infrastructure</b>	Minor	No assessment necessary
SDM-MO127 to SDM-MO129	<b>Policy S9: Integrated Water Management and Sustainable Drainage</b>	Minor	No assessment necessary

SDM-MO130	<b>Policy S10: Circular Economy and Adaptive Design</b>	Minor	No assessment necessary
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**Table 2.8 Screening of Public Realm and Transport policies main modifications**

<b>Modification reference(s)</b>	<b>Policy</b>	<b>Description</b>	<b>Screening Assessment</b>
SDM-MO131	<b>Policy T1: Enhancing the public realm and sustainable transport</b>	Proposed changes have been introduced to reference the adoption of the Councils Transport Strategy in November 2020.	The screening has identified that this change is factual and does not require an assessment.
SDM-MO132 and SDM-MO133	<b>Policy T2: Sustainable Transport Choices</b>	Minor	No assessment necessary
SDM-MO134 to SDM-MO137	<b>Policy T5: Delivery, Servicing and construction</b>	Proposed changes (SDM-MO134, 135, 136, 137) that seeks to promote more sustainable freight movements including the use of non-motorised modes of transport for safe, clean and efficient deliveries and servicing, including for uses which generate deliveries to end customers as part of their operation. The clarification and update to linked to the recently adopted Islington Transport Strategy. The change introduces the need for development to demonstrate how it is maximising use of more sustainable modes of transport.	The screening has identified this change needs assessment.

**Table 2.9 Screening of Design and Heritage policies main modifications**

Modification reference(s)	Policy	Description	Screening Assessment
SDM-MO138 to SDM-MO139	<b>Policy DH2: Heritage assets</b>	Minor	No assessment necessary
SDM-MO140	<b>Policy DH2: Heritage assets</b>	There is a change to supporting text which deletes reference to St John's Gate which has been de-scheduled (as a historic monument). It remains a grade I listed building.	The screening has identified that this change is factual and does not require an assessment.
SDM-MO141-SDM-MO142		Minor changes	No assessment necessary
SDM-MO143	<b>Policy DH3: Tall Buildings</b>	Part F is a change that revises the policy text to provide clarification.	The screening has identified this change needs assessment.

**Table 2.10 Screening of Strategic Infrastructure policies main modifications**

Modification reference(s)	Policy	Description	Screening Assessment
SDM-MO144	<b>Paragraph 9.4</b>	The modification to paragraph 9.4 is made in response to representations from the Department for Education and clarified that where it has been necessary to forward fund infrastructure projects developer contributions may be secured retrospectively.	The screening has identified that this clarification does not require an assessment and will not change the effects already identified.
SDM-MO146	<b>Paragraph 9.11</b>	Modification to paragraph 9.11 provides a clarification that the boroughs only safeguarded waste site will be identified on the policies map. This update is for consistency with the London Plan and North London Waste Plan.	The screening has identified that this clarification does not require an assessment and will not change the effects already identified.
SDM-MO145	<b>Paragraph 9.6</b>  <b>Policy ST3: Telecommunications,</b>	Minor	Minor

SDM-MO147 and SDM- MO148	<b>communications and utilities equipment</b>		
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**Table 2.11 Screening of Monitoring policies main modifications**

<b>Modification reference(s)</b>	<b>Policy</b>	<b>Description</b>	<b>Screening Assessment</b>
SDM-MO149	<b>Monitoring</b>	A modification is proposed to the monitoring section which sets some key indicators that will be used to help monitor the plan, providing further clarification on the approach to monitoring.	The screening has identified that this clarification does not require an assessment.

**Table 2.12 Screening of Appendices main modifications**

<b>Modification reference(s)</b>	<b>Policy</b>	<b>Description</b>	<b>Screening Assessment</b>
SDM-MO150	Appendix 1: Marketing and Vacancy Criteria	Provides a clarification of the approach to marketing and vacancy evidence in the context of changes to the Use Classes Order and the introduction of class E and is considered by other class E assessments for in particular for Policy B3.	The screening has identified this change requires an assessment. There are related changes to business floorspace and Class E proposed elsewhere in the Local Plan (Policy SC1, Policy B1, Policy B2, Policy SP3, Policies R1 to R10 and BC1 and BC2)
SDM-MO151	Appendix 2: Noise and vibration	Appendix 2 sets out how noise impacts should be considered has been updated to reflect changes to the Use Classes Order. A clarification has been added in relation to the examples where assessments of internal sound transfer should be considered (for example gyms and nurseries where there is residential above. There is also a clarification about how impact generating uses are considered where there are likely to be noise issues which could impact upon residential properties	The screening has identified that this clarification does not change the effects already identified and does not require an assessment.

		(below or above). This helps to provide further clarification in relation to policy DH5.	
SDM-MO152 and SDM-MO153	Appendix 3: Transport Assessments and Travel Plans	Proposed changes to clarify the Council's approach following the 2020 amendments to the Use Classes Order and the introduction of Class E. The requirement for a transport assessment is introduced for a premises larger than 750sqm where Class E use is unspecified to ensure transport impacts of the most intensive use are considered. The Cycle Parking Standards introduces a standard for general Class E use to ensure sufficient cycle parking is provided for unspecified Class E use.	The screening has identified that these changes require assessment.
SDM-MO154 and SDM-MO155	Appendix 3: Transport Assessments and Travel Plans	Minor	Minor
SDM-MO156 and SDM-MO157	Appendix 4: Cycle parking standards	Proposed changes to clarify the Council's approach following the 2020 amendments to the Use Classes Order and the introduction of Class E. The requirement for a transport assessment is introduced for a premises larger than 750sqm where Class E use is unspecified to ensure transport impacts of the most intensive use are considered. The Cycle Parking Standards introduces a standard for general Class E use to ensure sufficient cycle parking is provided for unspecified Class E use.	The screening has identified that these changes require assessment.
SDM-MO158 and SDM-MO159	Appendix 4: Cycle parking standards	Minor	No assessment necessary
SDM-MO160	Appendix 5: Social Value self-assessment	In response to Fossil Free Islington reference has been added to the Social Value requirements to include reference to promoting low carbon behaviour	No assessment necessary

**Table 2.13 Screening of Glossary main modifications**

Modification reference(s)	Policy	Description	Screening Assessment
SDM-MO175	<b>Appendix 9 Glossary: Low traffic neighbourhoods</b>	The Glossary for transport adds a definition of Low Traffic Neighbourhoods which is referenced in T1: 'Low Traffic Neighbourhoods: Low Traffic Neighbourhoods restrict through traffic to create more space for pedestrians and cyclists on local streets. Through traffic is traffic that is simply taking a short cut through a local area but has no origin or destination within that area. However, Low Traffic Neighbourhoods maintain access for local residents, their visitors, the emergency services, and local shops and businesses. A reduction in through traffic will improve air quality and allow more space for local people to travel safely around their local streets on foot and by bicycle'.	The screening has identified that the changes are clarification and do not change the effects already identified and does not require an assessment. The modifications to the glossary summarised above will assist with the implementation of policy that has been assessed for its effects.
SDM-MO178	<b>Appendix 9 Glossary: Non-motorised forms of transport</b>	The Glossary includes a new definition for non-motorised transport modes, which clarifies the new provision for policy T5. It is stated that it refers to active travel and human powered transportation, including walking and cycling, and variants such as small-wheeled transport (cycle rickshaws, cargo cycles, skateboards, push scooters and hand carts) and wheelchair travel. The Council consider electric cycles and mobility scooters also form part of that category.	The screening has identified that the changes are clarification and do not change the effects already identified and does not require an assessment. The modifications to the glossary summarised above will assist with the implementation of policy that has been assessed for its effects.
SDM-MO162 SDM-MO165 SDM-MO170 SDM-MO172 SDM-MO177	<b>Appendix 9 Glossary: business uses; retail use; shop; industrial floorspace; leisure</b>	The Glossary includes an update definition of business use (SDM-MO162), retail use (SDM-MO170), industrial floorspace (SDM-MO165), as well as a new definition of leisure use (SDM-MO172) to take into account the changes to the	The screening has identified that the changes are clarification and do not change the effects already identified and does not require an assessment. The modifications to the glossary summarised above will assist

		Use Classes Order. A new definition of shop (SDM-MO177) has also been added.	with the implementation of policy that has been assessed for its effects.
SDM-MO161, 163, 164,166, 167, 168, 169, 171, 173, 174, 176	<b>Appendix 9: Glossary</b>	Minor	Minor

**Table 2.14 Screening of Bunhill and Clerkenwell AAP main modifications**

<b>Modification reference(s)</b>	<b>Policy</b>	<b>Description</b>	<b>Screening Assessment</b>
BC-MO2 and BC-MO3	Policy BC1: Prioritising office use	Parts D, contains a proposed change (BC-MO2 and BC-MO3) to clarify the Council's approach following the 2020 amendments to the Use Classes Order and the introduction of Class E. The screening has identified this policy change and related supporting text requires an assessment. There are related changes to business floorspace and Class E proposed elsewhere in the Local Plan (Policy SC1, Policy B1, Policy B2, Policy SP3 and Policies R1 to R10 and BC2).	The screening has identified that these changes require assessment.
BC-MO5 and BC-MO6	Policy BC2: Culture, retail and leisure uses	parts A and B, contain a proposed changes to clarify the Council's approach following the 2020 amendments to the Use Classes Order and the introduction of Class E. There are related changes to business floorspace and Class E proposed elsewhere in the Local Plan (Policy SC1,	The screening has identified that these changes do not require assessment as they make a point of clarity and amend references to uses in relation to the new use class order.

		<p>Policy B1, Policy B2, Policy SP3 and Policies R1 to R10 and BC2).</p> <p>There are also changes made in B which clarify the application of the approach to location of cultural uses.</p>	
BC-MO8	Policy BC3: City Fringe Opportunity Area	The supporting text to BC3 contains a clarification to paragraph 3.11 which clarifies that the Moorfields site represents a unique opportunity for office space – this reflects the changes to the Use Classes Order.	The screening has identified that this change does not require assessment and does not change the effects identified for policy BC3.
BC-MO9	Policy BC4: City Road	Proposed change in response to the representation from the Canal and River Trust who are seeking further flexibility in relation to residential moorings and moorings for leisure use on Regent's Canal and facilities to support moorings, including in relation to policy G2 on open space. The modifications proposed span three policies in the Local Plan (SP2, BC4 and G2) and provide clarification on how proposals for moorings and facilities to support moorings should be approached in the context of the canal as public open space.	The screening has identified this policy change and related supporting text needs assessment alongside the related proposed changes elsewhere in the Local Plan (Policies SP2 and G2).
BC-MO12	Policy AAP1 and supporting text	A modification is propose to AAP1 and supporting text (BC-M12) which updates the policy within the context of Use Classes Order changes, and clarify how specific uses identified in allocations should be provided. This is to ensure that development contributes to meeting identified development needs. There are related changes to business floorspace and Class E proposed elsewhere in the	The screening identified that this change does not require an additional assessment.

		Local Plan (Policy SC1, Policy B1, Policy B2, Policy SP3 and Policies R1 to R10 and BC2) where the effects have been assessed.	
BC-M20	Site Allocation BC13: Car park at 11 Shire House, Whitbread Centre, Lamb's Passage, Allocation and Justification	A modification is proposed which will amend the allocation from a wholly office led redevelopment to a mixed use development which includes a significant amount of office floorspace and where additional residential use may be acceptable.	The screening has identified that these changes require assessment.
BC-M52	Site Allocations monitoring	A modification is proposed to the monitoring section of the AAP (BC-M80) this is to clarify indicators that will be used to help monitor the Bunhill and Clerkenwell Area Action Plan.	The screening has identified that this clarification does not require an assessment.
BC-M53	Appendix 1: scheduled monuments	<b>Appendix 1</b> includes an update to the scheduled monuments identified to clarify that one monument was de-scheduled and update the name of another in responding to representations from Historic England. This is a factual update to correct and error and is not considered to require an additional assessment.	This is a factual update to correct and error and is not considered to require an additional assessment.
BC-MO54, 55, 58, 60	Glossary	The glossary includes several updated definitions including those to business use (BC-M54), entertainment use (BC-M55), industrial floorspace (BC-M58) and retail use (BC-M60) to take into account changes to the Use Classes Order. These modifications to the glossary will assist with the implementation of policy that has been assessed for its effects. The screening has identified that the changes	The screening has identified that the changes are clarification and do not change the effects already identified and does not require an assessment

		are clarification and do not change the effects already identified and does not require an assessment	
BC-M1,4, 7, 10, 14, 15, 16, 17, 18, 19, 21, 22, 23, 24, 25, 26, 27, 28, 29, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 56, 57, 59, 61	Supporting text Site allocations Glossary	minor	minor

**Table 2.15 Screening of Site Allocations main modifications**

The table below sets out the screening assessment for the modifications to the Site Allocations.

Modification reference(s)	Description	Screening Assessment
SA-MO1 to SA-MO9	<p>New Site Allocations proposed for additional housing:</p> <ul style="list-style-type: none"> <li>• KC8, Bemerton Estate South</li> <li>• OIS27: York Way Estate</li> <li>• OIS28: Barnsbury Estate</li> <li>• OIS29: Highbury Quadrant Congregational Church</li> <li>• OIS30: Cluse Court</li> <li>• OIS31: Hillside Estate</li> <li>• OIS32: New Orleans</li> </ul>	Each new site allocation is subject to an assessment set out below in this section. The assessment includes consideration of reasonable alternatives.

Modification reference(s)	Description	Screening Assessment
	<ul style="list-style-type: none"> <li>OIS33: Drakeley Court and Aubert Court</li> <li>OIS34: Kerridge Court</li> </ul>	
SA-MO10 to SA-MO11	<p>Site Allocations proposed to be removed:</p> <ul style="list-style-type: none"> <li>FP10: Former George Robey Public House, 240 Seven Sisters Road</li> <li>OIS9: Ladbroke House, 62-66 Highbury Grove</li> </ul>	Both of these allocations are proposed to be deleted because both of the sites have been subject to developments that have now been completed.
SA-MO12 to SA-MO15	Minor changes	No assessment necessary
SA-MO16 SA-MO17 SA-MO18 SA-MO19	Site Allocations modifications, policy SA1 and supporting text.	The proposed modification to policy SA1 seeks to clarify the council's approach to determining development proposals for allocations site in light of the changes to the Use Classes Order, including the potential impact of the boroughs ability to meet evidenced priority development needs. There are related changes to business floorspace and Class E proposed elsewhere in the Local Plan (Policy SC1, Policy B1, Policy B2, Policy SP3 and Policies R1 to R10 and BC2) where the effects have been assessed. The screening identified that this change does not require an additional assessment.
SA-MO20	Minor changes	No assessment necessary
SA-MO21	Table 1.2 amended to reflect changes made to capacity assumptions following the grant of 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 is considered as part of cumulative effects section on overall capacity.
SA-MO22 to SA-MO33	Minor changes	No assessment necessary

Modification reference(s)	Description	Screening Assessment
SA-MO34 to SA-MO35	VR1: Fayers Site, 202-228 York Way. The site allocation has been amended to acknowledge a planning permission whilst reflecting the need for future application to retain and intensify industrial floorspace	Reflects recent planning decision and doesn't change existing assessment. No assessment necessary
SA-MO36 to SA-MO46	Minor changes	No assessment necessary
SA-MO47 to SA-MO48	AUS2: Pride Court, 80-82 White Lion Street. The site allocation has been amended to acknowledge a planning permission whilst reflecting the need for future application to retain and intensify industrial floorspace	Reflects recent planning decision and doesn't change existing assessment. No assessment necessary
SA-MO49 to SA-MO50	Minor changes	No assessment necessary
SA-MO51	Site Allocations modifications, AUS8: 161-169 Essex Road, Allocation and justification	<p>The proposed modification changes part of the allocation to incorporate residential use on the car park to the rear of the site, rather than priorities business floorspace.</p> <p>An updated assessment of this site allocation which incorporates this change has been carried out.</p>
SA-MO52 to SA-MO56	Minor changes	No assessment necessary
SA-MO57	Site Allocations modifications NH1: Morrison's supermarket and adjacent car park, 10 Hertslet Road, and 8-32 Seven Sisters Road, Allocation and justification	<p>The proposed modification changes to the focus of the allocation to recognise the increased potential for residential use, alongside the retention of and improvements to existing retail floorspace.</p> <p>An updated assessment of this site allocation which incorporates this change has been carried out.</p>
SA-MO58 to SA-MO73	Minor changes	No assessment necessary

Modification reference(s)	Description	Screening Assessment
SA-MO74	Site Allocations modifications FP5: 1 Prah Road, Allocation and justification	An updated assessment of this site allocation which incorporates this change has been carried out.
SA-MO75 to SA-MO77	Minor changes	No assessment necessary
SA-MO78	ARCH1: Vorley Road/Archway Bus Station. The proposed modification introduces social and community uses.	An updated assessment of this site allocation which incorporates this change has been carried out.
SA-MO79 to SA-MO83	Minor changes	No assessment necessary
SA-MO84 to 85	ARCH5: Archway Campus, Highgate Hill. The proposed modification introduces an element of student accommodation on the proviso that the development can achieve the quantum and the tenure of affordable housing which is fully policy compliant.	An updated assessment of this site allocation which incorporates this change has been carried out.
SA-MO86 to SA-MO98	Minor changes	No assessment necessary
SA-MO99	Site Allocations modifications OIS4: 1 Kingsland Passage and the BT Telephone Exchange, Kingsland Green	The proposed modification amends the site boundary to remove part of the site that was subject to a recent planning permission that has made comprehensive redevelopment of the wider site unlikely during the plan period. However the telephone exchange building which makes up the vast majority of the site continues to have development potential. Whilst the decrease in site size could be argued to reduce the quantum of development that will contribute towards the SA objectives, the modification does not impact on the uses proposed and is not considered to contribute to a change in the scoring of the assessment.
SA-MO100 to SA-MO102	Site Allocations modifications OIS5: Bush Industrial Estate. The modifications provide additional information in relation to the site's	The modification adds additional site designations and constraints which add clarity and could have potential positive effects in relation to mitigating any effects of future proposals,

Modification reference(s)	Description	Screening Assessment
	development context and how this should be considered by future proposals, in particular the northeastern section of the site.	however these effects are uncertain and would be expected to be addressed in line with other policies in the plan.
SA-MO104	OIS6: Site of Harvist Under Fives, 100 Hornsey Road. Updated in response to advice from the Early Years' Service and the recent grant of planning permission for the site.	Removes the reference to nursery provision but assessment not necessary in light of recent planning consent.
SA-MO105 to SA-MO106	OIS10: Hornsey Road and Grenville Works, Updated in response to the recent grant of planning permission for the site on appeal.	Replaces allocation of business use only with mixed use office and residential in light of recent appeal decision. An updated assessment of this site allocation which incorporates this change has been carried out.
SA-MO103 and SA-MO107 SA-MO112	Minor changes	No assessment necessary
SA-MO113 SA-MO114	Site Allocations modifications OIS24: Pentonville Prison, Caledonian Road	The site boundary has been amended to reflect the full boundary of the prison estate. An assessment of the allocation has been undertaken in part 1. Whilst the increase in site size could be argued to help to contribute to some of the development objectives for the suite, the modification does not impact on the uses proposed and overall is not considered to contribute to a change in the scoring of the assessment.
SA-MO115, 118,119, and 122,123, 125, 126	Minor changes	No assessment necessary
SA-MO116	Main change to provide additional information on how the delivery of allocated sites will be monitored	The screening has identified that this clarification of the approach to monitoring does not require an assessment.
SA-MO117 SA-MO119 SA-MO120 SA-MO121 SA-MO124	Main changes which update references in the glossary to various use class E for business, industrial and leisure uses	These modifications to the glossary will assist with the implementation of policy that has been assessed for its effects. The screening has identified that the changes are clarification and do not change the effects already identified and does not require an assessment

## Pre hearing modifications assessment

Proposed changes to SP2, BC4 and G2 re canal boat moorings are in response to the representation from the Canal and River Trust who are seeking further flexibility in relation to residential moorings and moorings for leisure use on Regent's Canal and facilities to support moorings, including in relation to policy G2 on open space. The modifications proposed span three policies in the Local Plan (SP2, BC4 and G2) provide clarification on how proposals for moorings and facilities to support moorings should be approached in the context of the canal as public open space.

**Table 2.16 Policy SP2: King’s Cross and Pentonville Road, Policy BC4 and Policy G2: Green Infrastructure pre hearing modifications assessment**

IIA Objective	Proposed change to SP2, BC4 and G2 re canal boat moorings and facilities	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	0	This modification will have no negative effects on the built environment as the policy states that boater facilities will only be permitted where there is no detrimental impact on the character and amenity of the waterway corridor and its function as an open space, and any development must also meet the Local Plan policies for design, including PLAN1.

IIA Objective	Proposed change to SP2, BC4 and G2 re canal boat moorings and facilities	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
2. Ensure efficient use of land, buildings and infrastructure	+	This modification will have minor positive effects on the efficient use of space by allowing improved boater facilities and infrastructure to be built along the canal corridor, improving the function and amenity of those living on and using the canal.
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	The modifications are likely to have no effects on conservation of the historic environment as the policy states that boater facilities will only be permitted where there is no detrimental impact on the character and amenity of the waterway corridor, and any development must also meet the Local Plan policies to protect heritage assets (DH1 and DH2).
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	0	The modifications, through clarifying the approach to the provision of boater facilities on the canal, have the potential to minor positive effects on promoting liveable neighbourhoods as boater facilities could include waste and recycling infrastructure which would improve amenity, and electricity infrastructure that will reduce reliance on diesel generators and improve air quality. On balance the policy does not require improvements therefore the effect would depend on implementation and is considered neutral.
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	The modifications, through clarifying the approach to the provision of boater facilities on the canal, have the potential to have a minor positive effects by improving the standard of accommodation for boaters. The modifications clarify the role of policies in relation to the open space policy but are not considered to have any additional effects in relation to the provision of moorings. On balance the policy does not require improvements therefore the effect would depend on implementation and is considered neutral.

IIA Objective	Proposed change to SP2, BC4 and G2 re canal boat moorings and facilities	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
6. Promote social inclusion, equality, diversity and community cohesion	0	No effects have been identified.
7. Improve the health and wellbeing of the population and reduce health inequalities	0	The modifications, through clarifying the approach to the provision of boater facilities on the canal, have the potential to have positive effects on health and wellbeing by improving the air quality. This could be achieved by installation of power supply to more moorings reducing reliance on diesel generators. On balance the policy does not require improvements therefore the effect would depend on implementation and is considered neutral.
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	0	No effects have been identified.
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	0	No effects have been identified.

IIA Objective	Proposed change to SP2, BC4 and G2 re canal boat moorings and facilities	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	The modifications provide clarification in relation to the consideration of moorings and boater facilities on the canal which is an open space. No effects have been identified as the policy states that development can only take place where it there is no detrimental impact on nature conservation and biodiversity value, and the character and amenity of the waterway corridor and its function as public open space.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	The modifications provide clarification in relation to the consideration of moorings and boater facilities on the canal which is an open space. No significant effects on the biodiversity have been identified as the policy states that development can only take place where it there is no detrimental impact on nature conservation and biodiversity value, and the character and amenity of the waterway corridor and its function as public open space.
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	The modifications, through clarifying the approach to the provision of boater facilities on the canal, have the potential to have a have minor positive effect on reducing climate change by potentially introducing more electricity supply points shifting energy use of boats away from fossil fuels (diesel generators). On balance the policy does not require improvements therefore the effect would depend on implementation and is considered neutral.

IIA Objective	Proposed change to SP2, BC4 and G2 re canal boat moorings and facilities	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	The modifications, through clarifying the approach to the provision of boater facilities on the canal, have the potential to have a have minor positive effect on reducing waste by providing reuse and recycling facilities for boaters which will increase the proportion of household waste that is recycled and reduce the amount of waste going to landfill. On balance the policy does not require improvements therefore the effect would depend on implementation and is considered neutral.
14. Maximise protection and enhancement of natural resources including water, land and air	0	The modifications, through clarifying the approach to the provision of boater facilities on the canal, have the potential to have a a positive effect on protecting natural resources by improving air quality through supply of electricity to boats and shifting away from diesel generator use, and also on water by providing water and sewerage infrastructure is available to service boats. On balance the policy does not require improvements therefore the effect would depend on implementation and is considered neutral.

## Summary

The assessment has identified the modifications to the policies do not result in negative effects on open space, the environment or biodiversity as the modifications do not change the criteria which ensures impacts are mitigated. Whilst the policy is clear in respect to detrimental impacts there is some uncertainty identified around potential improvements resulting from development of boater facilities.

## Assessment of alternatives to modifications to Policy SC1

The inclusion of former D1 uses such as health centres, nurseries and day centres within the new class E, means that they can change to another use within class E without planning permission and cannot be specifically protected for social and community infrastructure use. Social and community infrastructure uses not falling within Class E will now be classified as either F.1 (learning and non-residential institutions) or F.2 (local community) uses. The preferred approach and alternative are as follows:

**Table 2.17 Description of preferred and alternative approach to Policy SC1**

Reference	Description
Preferred approach	To seek to secure specific proposed social and community infrastructure uses that fall within class E (such as a GP surgery or nursery) through the planning process where this is necessary to mitigate the impacts of a development and/or meet the needs of the community. The approach also clarifies that applications involving social and community infrastructure uses within the F.1 and F.2 use classes will be fully assessed against the requirements of policy SC1 and other relevant Local Plan policies
Alternative	Considering the possible effects of allowing Class E without any policy intervention i.e. no policy change in relation to class E meaning there would be no policy to secure specific social and community infrastructure uses where they fall within class E.

**Table 2.18 Pre hearing assessment of preferred and alternative approach to Policy SC1**

IIA Objective	Policy SC1	Alternative 1 to Policy SC1	<b>Commentary on assessment of likely significant effects of policies</b> <b>(including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)</b>
1. Promote a high quality, inclusive, safe and sustainable built environment	+	--	<p>The preferred approach: Seeking to secure specific social and community infrastructure uses through policy SC1, rather than supporting unrestricted Class E use is likely to have a minor positive effect in terms of promoting a high quality, inclusive, safe and sustainable built environment. The policy will apply where social and community infrastructure uses falling within Class E, such as a health clinic, are deemed necessary to meet needs arising from new development and therefore places people at the heart of the process. The effect will be limited as the policy will not be able to prevent the loss of existing valued facilities falling within Class E where they are changing to another Class E use. Therefore in the short term the policy is considered positive but in the medium and long term there is uncertainty around the wider retention of social and community infrastructure.</p> <p>Alternative 1: Policy SC1 seeks to protect Islington’s existing social and community infrastructure and ensure that new social and community facilities are inclusive, accessible, flexible and sustainable. The introduction of the new Use Class E through the 2020 amendments to the Use Classes Order has curtailed the ability of the policy to safeguard existing social and community infrastructure facilities that fall within Class E, such as nurseries, day centres, medical and health services and indoor sports facilities. These facilities can play an important role for local communities, and are often location sensitive as people are unable to travel far to access healthcare or the kind of support services offered by day centres. Promoting a policy approach that does not seek to secure specific forms of social and community infrastructure from new development where this is necessary is likely to have a significant negative effect in terms of securing an inclusive, safe and sustainable built environment that places people at the heart of the design process and creates robust and adaptable buildings that respond to people’s changing needs.</p>

2. Ensure efficient use of land, buildings and infrastructure	+	-	<p>The preferred approach offers more of an opportunity to balance competing demands for land, as it would secure social and community infrastructure from new development where it was considered necessary to meet development need. This would help to focus social and community infrastructure in appropriate locations, where it is accessible for future users. The approach would have a minor positive effect, given the likely loss of existing social and community facilities through the operation of Class E. Therefore in the short term the policy is considered positive but in the medium and long term there is uncertainty around the wider retention of social and community infrastructure.</p> <p>Alternative 1: Class E provides flexibility and may help development to adapt to and accommodate evolving social and economic needs. However, it will limit the ability to focus development in the most appropriate locations and to balance competing demands between land uses to provide for the full range of development needs of the area. This is particularly the case as some social and community infrastructure uses, such as day centres or nurseries, serve an important social purpose but would not be able to compete for land with higher value uses such as offices or housing. It is considered this approach would have a minor negative effect. A similar uncertainty is considered to apply in the medium and longer term around the wider retention of social and community infrastructure.</p>
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	0	Alternative 1 and the preferred approach would have a neutral effect in terms of the conservation and enhancement of heritage assets.

4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	+	0	<p>The preferred approach seeks to manage the provision of social and community infrastructure so that facilities are located in areas that are convenient for the communities they serve, and within buildings that are inclusive and accessible. Social and community infrastructure uses would be secured through condition so that they can serve the needs and wellbeing of the population in accordance with objective 4. The policy would have a positive effect in terms of supporting liveable neighbourhoods. However in the medium and long term there is uncertainty around the wider retention of social and community infrastructure.</p> <p>Alternative 1 could result in improved access to essential services for residents, as there is potential for facilities such as health clinics and nurseries to open in former shops or offices under Class E. However, there is also potential for such services to be pushed out by other, more financially viable, uses such as offices. The approach limits the Council's ability to manage the diversity of uses in town and local centres and could lead to social and community infrastructure being located in sub-optimal locations that does not promote accessible services and liveable neighbourhoods. Overall, it is considered the approach would be neutral because of the uncertainty of the effects.</p>
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	0	Alternative 1 and the preferred approach would have a neutral effect in terms of the provision of affordable housing.
6. Promote social inclusion, equality, diversity and community cohesion	+	-	<p>The preferred approach offers some protection to new social and community infrastructure uses but retains flexibility – if it can be demonstrated at some point in the future that a facility is no longer fit for purpose, or is no longer needed for social infrastructure uses, then a change of use can be approved. This approach is considered to have a minor positive effect in promoting social inclusion and community cohesion.</p> <p>Alternative 1 allows a broad range of uses under class E that could lead to the creation of a wider range of employment opportunities, potentially helping to remove some barriers to employment. There is nevertheless a concern that this could come at the expense of worsening social exclusion for others – for example if a day centre supporting older residents and helping them remain connected to their community changes use to a shop and is not replaced. Similarly, objective 6 refers to the importance of early years' services in helping vulnerable children to have the best start in life. If there is nothing in policy securing the ongoing use of new early years' facilities, the benefits they can bring could be lost through Class E. It is considered overall that alternative 1 would have a minor negative impact.</p>

7. Improve the health and wellbeing of the population and reduce health inequalities	+	0	<p>The preferred approach aims to improve health and wellbeing by securing facilities necessary to meet the needs of the community in appropriate and accessible locations. The approach would have a minor positive effect, given the likely loss of existing social and community facilities through the operation of Class E.</p> <p>Alternative 1 could help to reduce health inequalities by increasing opportunities for healthcare facilities, as well as leisure and indoor recreation uses such as gyms, to secure premises. However, there is also the potential for these uses to be lost to other Class E uses with negative consequences for health and wellbeing. Given this uncertainty it is considered that overall alternative 1 would have a neutral effect with regards to health and wellbeing.</p>
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	+	+	<p>Both alternative 1 and the preferred approach could have minor positive effects in terms of fostering economic growth. Alternative 1 supports the flexible use of premises and could lead to a range of employment types and job opportunities that would contribute to the borough's economy. However, the preferred approach seeks to protect social and community infrastructure that supports residents to access the jobs market. For example, the policy would aim to safeguard new childcare facilities from changes of use that would create a barrier to employment for some parents and protect healthcare facilities that help support people back into work.</p>
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	+	-	<p>The preferred approach aims to secure social and community uses in appropriate locations, which are accessible for the people who need them, so that the need to travel is minimised. A minor positive effect has therefore been identified.</p> <p>By supporting flexible uses across the borough, with the potential for retail and office uses to replace social and community infrastructure uses, alternative 1 could encourage increasing amounts of servicing and freight rather than minimising the need to travel. Not being able to secure some social and community infrastructure uses which are accessible to people who need them would also increase the need to travel. A minor negative effect has therefore been identified.</p>
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	<p>Alternative 1 and the preferred approach would have a neutral effect in terms of the protection and enhancement of open space.</p>

11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	Alternative 1 and the preferred approach would have a neutral effect in terms of the protection and enhancement of biodiversity.
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	+	-	<p>The preferred approach aims to secure social and community uses in appropriate locations, which are accessible for the people who need them, so that the need to travel, and resultant emissions, are minimised. A minor positive effect has therefore been identified.</p> <p>Alternative 1 has the potential to encourage increasing amounts of servicing and freight to service the flexible uses permitted under Class E, which will result in additional carbon emissions. People may also have to travel further to access social and community infrastructure facilities if existing premises change use under Class E, which may also affect emission levels. It is considered alternative 1 could have a minor negative effect with regards to efforts to reduce contributions to climate change.</p>
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	Alternative 1 and the preferred approach would have a neutral effect in terms of promoting resource efficiency.
14. Maximise protection and enhancement of natural resources including water, land and air	+	0	<p>The preferred approach aims to secure social and community uses in appropriate locations, which are accessible for the people who need them, so that the need to travel and impacts on air quality are minimised. A minor positive effect has therefore been identified.</p> <p>Alternative 1 has the potential to encourage increasing amounts of servicing and freight to service the flexible uses permitted under Class E, which could have a negative impact on air quality. People may also have to travel further to access social and community infrastructure facilities if existing premises change use under Class E, which may also affect emission levels and air quality. However, it is considered that the effect of Class E is uncertain with regards to efforts to protect natural resources including air quality and is considered neutral.</p>

## **Summary**

The assessments makes clear the uncertainty of the alternative on social and community facilities, which could both help to reduce health inequalities by increasing opportunities for healthcare facilities, as well as leisure and indoor recreation uses such as gyms but could also increase health inequalities by not protecting these facilities against change of use to higher value uses. This uncertainty around the wider retention of social and community infrastructure is considered to increase with time over the medium to long term. The wider positives are noted in particular the creation of a wider range of employment opportunities which could potentially help remove some barriers to employment. But the assessment, despite the uncertainty ultimately identifies the preferred approach as preferable as it seeks to secure social and community uses in appropriate locations, which are accessible for the people who need them.

## Inclusive Economy: Assessment of Class E Policy and policy alternative for Policies B1 to B5 and SP3

The new UCO changes introduced on 1 September 2020 identify office uses as part of class E. This means that an office can now be changed to other uses considered within class E without planning permission. This puts existing office floorspace in the borough at risk of being converted to other non-business uses. The introduction of class E poses some new challenges for the future of business floorspace, particularly for lower grade and smaller office stock, which is generally more affordable and located outside the CAZ. The additional flexibility introduced by class E could have significant impacts on the way that Islington's business floorspace is distributed, affecting the borough's well-established employment clusters.

### Table 2.19 Description of preferred and alternative approach to Policy B1, B2 and B4

The following two alternatives described below; the preferred approach for Policy B1 and Policy B2 and Policy B4 and the alternative.

Reference	Description
Preferred approach	Taking a targeted approach to class E, recognising flexibility whilst restricting class E in some instances through conditions. The assessment is principally considering the effect of a Class E proposal that comes through the planning system rather than take advantage of the flexibility presented by Class E.
Alternative	Considering the possible effects of allowing Class E without any policy intervention. This assessment considers the full range of uses that Class E could introduce, aside from business floorspace (e.g. office) and the effects that this alternative will have against the sustainability framework objectives, with a particular focus on the potential range of effects of Class E on existing business clusters.

### Table 2.20 Description of preferred and alternative approach to Policy B3, marketing and vacancy

Marketing assessments are a standard approach for considering whether there is continued demand for an existing use and are judged against a set of criteria. The criteria used are set out in appendix 1 of the draft Local Plan. The possible effects of reducing the marketing requirement on applications to change the use of business floorspace to other uses are considered by the assessment of the following choices.

Reference	Description
Preferred approach	Restricting class E through conditions and proposed policy approach (including 24 months of marketing evidence for offices whilst the unit is vacant).
Alternative	Reducing the marketing/vacancy evidence for offices to 12 months and allowing 12 months marketing vacancy of class E.

The criteria would apply to both uses which could take advantage of Class E (offices and light industrial) and uses which couldn't such as warehousing and industrial or sui generis uses. The assessment is principally considering the effect of an alternative Class E proposal that comes through the planning system rather than take advantage of the flexibility presented by Class E.

**Table 2.21 Description of preferred and alternative approach to Policy SP3 Vale Royal Brewery Road LSIS**

Class E removes the ability to differentiate between light industrial office and research and development, and a broader range of uses such as restaurant/cafés, shops, gyms and medical facilities. The options for Policy SP3 (and parts of B1 and B2) are as follows:

Reference	Description
Preferred approach	Industrial consolidation and intensification as part of a plan-led or masterplanning process in the Vale Royal and Brewery Road LSIS, taking a targeted approach to class E, recognising flexibility whilst restricting class E in some instances through conditions. The assessment is principally considering the effect of an alternative Class E proposal to come through the planning system rather than take advantage of the flexibility presented by Class E.
Alternative 1	Class E co-location in the LSIS: the co-location of industrial and class E office uses as part of a plan-led or masterplanning process in the Vale Royal and Brewery Road LSIS

The alternative to SP3 reflects allowing the co-location of full class E with industrial uses, and it is in part interrelated with alternative set out in Part 1: Updated policy assessments, that considers office as co-locating alongside industrial intensification. Offices have traditionally attracted higher values and are highly sought in the borough due to its position within the CAZ. However, Islington's economic success relies on the diversity of its business clusters and the Vale Royal/Brewery Road LSIS is an example of a successful agglomeration of industrial businesses which benefit from their close proximity to the CAZ. The introduction of class E will inevitably lead to some loss of light industrial floorspace to other class E uses in the LSIS. Considering the recent pressures from office development proposals, it is likely that this activity will be the

preferred one from class E accompanied by some restaurant/cafés and retail depending on future market trends. Therefore, the assessment of the alternative considers the broad range of class E uses but with the potential for more office Class E use.

**Table 2.22 Pre hearing assessment of the preferred and alternative approach to Policy B1 and Policy B2 and Policy B4**

IIA Objective	Preferred approach policy response for B1/B2 and B4	Alternative SP3 and parts of B1 and B2	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	0	0	<p>No effect for alternative or proposed policy response.</p> <p>In the longer term there may be a detrimental effect on the existing economic function of an area if significant quantum of floorspace changes via flexible uses which over time could have an effect on the character of an area with incremental applications to change building facades and fascias which could erode positive aspects of an areas architecture coherence. However, overall the effect is considered to be neutral.</p>
2. Ensure efficient use of land, buildings and infrastructure	+	-	<p>The Preferred approach policy response for B1/B2 and B4 will seek a Class E use conditioned for office or light industrial Class E for either the Priority Employment Locations, town centres or LSIS to prioritise the delivery of employment floorspace needs. This will have a positive effect by encouraging development which primarily supports the existing economic function of an area which will reinforce the economic sustainability of an area, and may see design which compliments existing character of an area. For example, Grade A offices in the Central Activities Zone; co-working space in Priority Employment Locations. The policies require incorporation of inclusive design features and ensure safety and inclusivity as part of the design process. The conditioning of specific business uses will assist in making the most efficient use of land by encouraging maximisation of business floorspace space in locations which have already well-established employment hubs and suitable business clusters.</p> <p>The alternative approach of Class E 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 which would require planning permission. This may be beneficial to owners but won't maximise potential uplift in floorspace and won't ensure an efficient use of land. Class E could lead to a dispersed pattern of growth of business uses away from more sustainable locations such as town centres and the CAZ which offer excellent public transport connections established through the historic pattern of growth. Overall, the alternative is considered likely to have a significant negative effect on the efficient use of land over the medium to long term.</p>

IIA Objective	Preferred approach policy response for B1/B2 and B4	Alternative SP3 and parts of B1 and B2	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	0	No effect for alternative or preferred approach policy response.
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	+	+	<p>The preferred approach policy response for B1/B2 and B4 would seek in the CAZ, Priority Employment Locations and Town Centre locations, a range of units in terms of size and type expected which will help support diversity in town centres and should benefit existing services in these locations. This is likely to have a minor positive effect.</p> <p>The alternative allows a range of uses that could support the creation of liveable neighbourhoods. However, the lack of strategic control over the supply and location of this broad range of uses (including offices and light industrial space), could cause significant harm on prominent office floorspace locations such as the CAZ or more likely on more affordable peripheral locations. This would affect the mix and balance of uses. Alternative 1 could also lead to the overconcentration of uses that could have a negative impact on the vitality of town centre locations and amenity of residents. Whilst individually it may be positive and provide or maintain a wide range of services, facilities and amenities for residents close to home, at a cumulative level, Class E could have significant effects on the function of town centres, PELs and the CAZ. On balance, due to the potential harm identified on town centre locations and amenity, the benefits are considered minor positive effects.</p>

IIA Objective	Preferred approach policy response for B1/B2 and B4	Alternative SP3 and parts of B1 and B2	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	0	There are no effects for both approaches. There is potential for a minor negative effect as both alternatives could stifle the supply of housing in certain locations across the borough, through prioritising commercial floorspace. However, on balance, because other policies will help to ensure housing targets are met both approaches are considered to have a neutral impact.
6. Promote social inclusion, equality, diversity and community cohesion	+	0	<p>Preferred approach policy response for B1/B2 and B4 in seeking to reduce the potential consequences of Class E through securing new business floorspace in adequate employment locations will strengthen the local economy and provide new jobs by encouraging development of office space which will meet demand and unlock potential economic growth. This approach will also have a positive effect on Policy B4 with regards to the provision of affordable workspace, creating more certainty around its implementation which could remove barriers to employment by increasing opportunities for residents.</p> <p>Alternative would lead to potentially different types of employment and commercial activity in various locations across the borough which will potentially broaden the access to different employment opportunities. However Class E may also result in a reduction in office floorspace for example in the CAZ at ground floor level which could result in lower levels of employment and constrain employment supply in this prominent business floorspace location. This could lead to a reduction of employment opportunities for residents and have negative effects on the borough and Central London economy. Therefore on balance the effect is considered neutral. In addition class E does not enable jobs and training and opportunities to be sought reducing the opportunity for social inclusion, equality, diversity and community cohesion as well as removing the opportunity to secure affordable workspace. The effect from the alternative on Policy B4 would be uncertain in terms of the Council's ability to secure affordable workspace. An increase of class E development and implementation of other commercial uses over office-led proposals could lead to a reduction in the supply of affordable workspace. This could have an impact on removing barriers to employment for people.</p>

IIA Objective	Preferred approach policy response for B1/B2 and B4	Alternative SP3 and parts of B1 and B2	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
7. Improve the health and wellbeing of the population and reduce health inequalities	0	0	No effect for alternative or proposed policy response

<p>8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes</p>	<p>+</p>	<p>-</p>	<p>The Preferred approach policy response for B1/B2 and B4 will seek to reduce the consequences of Class E through conditions to secure office and other business floorspace and will have a positive effect. The development and maximisation of new office floorspace sustains and improves Islington's economy and helps to meet defined needs. It will be required to provide a range of units, in terms of size and type, which can support a range of businesses. Space will be directed to certain areas including the Central Activities Zone and existing business clusters, this will allow agglomeration benefits to be felt and will allow businesses to grow and thrive. New office floorspace in the borough will contribute towards sustaining London's economic activity and the wider economy. However class E introduces significant uncertainty, with landlords likely to hold back land for intensification which will constrain supply and economic growth in the short term and maybe longer. Protecting the industrial function of LSIS in particular has wider benefits serving other economic functions in both the local and wider London economy. Protecting the industrial function also helps to reduce the need for goods and services to travel, reducing congestion and air pollution. These areas also offer a range of jobs providing greater employment opportunity. The preferred approach will also have a positive effect on Policy B4 and the provision of affordable workspace creating more certainty around its implementation which could increase employment opportunities.</p> <p>The alternative allows a broad range of uses under class E. The borough has an important role in supporting Central London's economy due to its strategic location within the CAZ. Considering the marked losses of office to residential in past years and the constrained supply, it is important that office floorspace is protected and maximised to ensure that there is a balanced supply to meet demand. Class E is a market-led approach and may only address short term need. This option could support economic growth to provide a range of diverse employment opportunities although there maybe a quality issue with some of those employment opportunities and they may not meet defined floorspace need. Over time the effect on supply will remain or worsen. The lack of control over the creation and the protection of business floorspace (former B1 use class), from which the Council also secures affordable workspace and jobs and training opportunities, would limit the viability of SMEs, and impact creative industries. In addition, economic growth would not be equal, with some groups not accommodated. The effect from the alternative on Policy B4 would be uncertain in terms of the Council's ability to secure affordable workspace which has only been tested in viability terms against office or research and development uses (or former B1 use class) and not other Class E uses. This could have an impact on employment opportunities more generally and the contribution to Islington's economic growth. In addition, the agglomeration benefits of existing business uses could undermine the long-term sustainability of existing business clusters, which support office employment types.</p>
<p>9. Minimise the need to travel and create accessible,</p>	<p>++</p>	<p>-</p>	<p>Preferred approach policy response for B1/B2 and B4 would seek to support growth and direct business development to the most appropriate and accessible locations in the borough, encouraging the provision of appropriate and accessible infrastructure, therefore promoting economic centres such as the CAZ. This</p>

IIA Objective	Preferred approach policy response for B1/B2 and B4	Alternative SP3 and parts of B1 and B2	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
safe and sustainable connections and networks by road, public transport, cycling and walking			<p>will help reducing the complexity of journey patterns from uneven growth encourage more sustainable transport choices.</p> <p>The alternative would allow a broad range of commercial uses but it would not ensure that these are strategically distributed to support efficient use of road connections, existing public transport and promote sustainable transport growth. Class E could result in dispersed growth depending on landowners which could over time increase the need to travel if office and light industrial uses disperse from existing specific locations and town centres. This could reduce the competitiveness of London's traditional economic centres like the CAZ which supports existing transport infrastructure and. In addition, the over concentration of activities of certain types outside designated areas could have impacts on air quality linked to traffic congestion and safety of pedestrians.</p>
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	There are no effects for alternatives
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	There are no effects for policies B1 to B5

IIA Objective	Preferred approach policy response for B1/B2 and B4	Alternative SP3 and parts of B1 and B2	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	+	-	<p>Preferred approach policy response for B1/B2 and B4 would direct business development to the most appropriate and accessible locations in the borough, therefore reducing the need to travel by car and encouraging more sustainable transport choices thereby reducing effect on climate change.</p> <p>Alternative 1 would allow a broad range of commercial uses but would not ensure that these are strategically distributed and could increase the need to travel depending on landowners which as identified in objective 9. In addition the locations, being less accessible could increase the need to travel by car increasing emissions. The over concentration of activities of certain types such as retail, which is a high trip generating use, outside designated areas could have impacts on air quality.</p>
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	There are no effects for alternatives.

IIA Objective	Preferred approach policy response for B1/B2 and B4	Alternative SP3 and parts of B1 and B2	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	There are no effects for alternatives.

### Summary

The assessment recognises the detrimental longer term effect on the existing economic function of parts of the borough if a significant quantum of floorspace changes via Class E to flexible uses over time. The detrimental effect is recognised in particular on the role of the CAZ in supporting Central London's economy. But harm through take up of Class E is also recognised as likely in more affordable peripheral locations. Uncertainty is recognised across both locations and it is too early to determine the take up of floorspace changes via Class E. The benefits of not attempting to manage the effect of Class E are recognised with Class E potentially supporting the opportunity for a range of economic growth opportunities across the borough. However despite this positive effect and the uncertainty surrounding take up of Class E, there are several negative effects as well. Therefore, the preferred approach is considered overall beneficial.

**Table 2.23: Pre hearing assessment of preferred and alternative approach to Policy B3**

IIA Objective	Preferred approach class E /proposed policy	Alternative : allowing class E marketing vacancy after 12 months	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	0	0	No effect for the preferred approach and the alternative.

IIA Objective	Preferred approach class E /proposed policy	Alternative : allowing class E marketing vacancy after 12 months	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
2. Ensure efficient use of land, buildings and infrastructure	-	-	<p>The Preferred approach will have a minor negative effect in the short term. It protects new business floorspace secured as offices (or former B1 range of uses) through conditions from future changes through the flexibility of Class E, which will help maintain a balance of employment land across the borough meeting a range of business needs. However for the vast majority of existing floorspace the longer marketing period may discourage landowners from seeking alternative uses through the planning system in the short term and instead they may likely consider changing use within Class E and not intensifying the existing office use of a building which would represent a lost opportunity. Once a landowner has invested in a building they will expect to see a return on their investment before further investment is made in that building. However given that most commercial property is leased on a medium to long term basis may mean that this negative effect on the efficient use of land is not realised as much as it could be. In addition depending on the location and concentration of alternative Class E uses would affect landowners choices. Eg the quantum of potential class E space in locations such as the CAZ and a town centre is a very different opportunity compared to an isolated office in the north of the borough.</p> <p>The Alternative would encourage landowners to consider an approach through the planning system by reducing the length of time that offices need to be vacant to demonstrate that the building has no demand for continued office use. This may encourage more efficient use of sites where they seek alternative uses through the planning system and result in intensification of use. However, this could also lead to the long term effects mentioned in the assessment of alternative for policy B1, B2 and B4 with more loss of office space. In the CAZ this will be particularly damaging to the borough's future economic growth. But in terms of this objective which is seeking to optimise the use of previously developed land the approach could be beneficial outside employment designations, where there is less specific demand of business floorspace. On balance because of the long term implications it is considered this approach would have a negative effect through the impact on the overall supply of office space.</p> <p>Overall both approaches are considered to have minor negative effects for different reasons.</p>

IIA Objective	Preferred approach class E /proposed policy	Alternative : allowing class E marketing vacancy after 12 months	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	0	There are no effects for alternative or preferred policy approach.
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	-	+	<p>The Preferred Approach will have a minor negative effect through seeking to protect new business floorspace with longer marketing requirements. A positive aspect of this approach is that it may help maintain diversity outside the CAZ and town centres and counter predominantly residential neighbourhoods, promoting economic activity in these locations. However, as identified in response to objective 2 this would depend on landowners and it could discourage them from seeking alternative uses through the planning system in the short term, and instead they may likely consider changing use within Class E. Therefore, on balance, this approach is considered to be neutral against the objective.</p> <p>The alternative would encourage landowners to engage with the planning system by reducing the length of time that offices need to be vacant and could encourage redevelopment by introducing a degree of flexibility that would diversify the range of services available in an area which may improve access to services, facilities and amenities near residents homes. The impacts of this will vary depending on location and on the quantum of existing floorspace that is considered class E. In the longer-term the effect of the changes maybe more uncertain and have a negative impact on vibrant and thriving town centres. The extent of flexibility and access is more limited in many parts of the borough given it already has a mixed-use nature and high levels of accessibility. However, on balance, it is considered that the alternative approach has minor positive effects on this objective as it could lead to increased access to services.</p>

IIA Objective	Preferred approach class E /proposed policy	Alternative : allowing class E marketing vacancy after 12 months	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	0	There are no effects for alternative or preferred policy approach.
6. Promote social inclusion, equality, diversity and community cohesion	-	0	<p>The preferred approach is considered to have a minor negative effect as set out against objective 2.</p> <p>The alternative would encourage landowners to consider an approach through the planning system by reducing the length of time that offices need to be vacant and could encourage redevelopment by introducing a degree of flexibility that would diversify the economy and remove barriers to employment. Conversely this may also affect existing office jobs by reducing the protection of business floorspace lead to the displacement of businesses that are essential to the borough's economic growth and affect wider employment opportunities for residents. Overall these effects are considered to cancel each other out.</p>
7. Improve the health and wellbeing of the population and reduce health inequalities	0	0	There are no effects for alternative or preferred policy approach.

IIA Objective	Preferred approach class E /proposed policy	Alternative : allowing class E marketing vacancy after 12 months	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	0	-	<p>The Preferred approach will have a minor negative effect in the short term. It protects new business floorspace secured as offices (or former B1 range of uses) through conditions from future changes through the flexibility of Class E, which will help maintain a balance of employment land across the borough meeting a range of business needs. However for the vast majority of existing floorspace the longer marketing period may discourage landowners from seeking alternative uses through the planning system in the short term and instead they may likely consider changing use within Class E and not intensifying the existing office use of a building which would represent a lost opportunity. However given that most commercial property is leased on a medium to long term basis may mean that this negative effect on economic growth is not realised as much as it could be. In addition depending on the location and concentration of alternative Class E uses would affect landowners choices. Eg the quantum of potential class E space in locations such as the CAZ and a town centre is a very different opportunity compared to an isolated office in the north of the borough. Therefore, considering both of the above negative and positive effects, it is considered that on balance the effects of this approach is neutral on this objective.</p> <p>The Alternative would encourage landowners to consider an approach through the planning system by reducing the length of time that offices need to be vacant to demonstrate that the building has no demand for continued office use. This may encourage more efficient use of sites where they seek alternative uses through the planning system and result in intensification of use. However, this could also lead to the long term effects mentioned in the assessment of alternative for policy B1, B2 and B4 with more loss of office space. In the CAZ this will be particularly damaging to the borough's future economic growth which is fundamental to this objective. Class E is a market-led approach and may only address short term need. This option could support economic growth to provide a range of diverse employment opportunities although there maybe a quality issue with some of those employment opportunities and they may not meet defined floorspace need. On balance because of the long term implications it is considered this approach would have a negative effect through the impact on the overall supply of office space.</p>

IIA Objective	Preferred approach class E /proposed policy	Alternative : allowing class E marketing vacancy after 12 months	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	-	+	<p>The preferred approach could have similar long term impacts identified against objective 2 which could encourage more Class E development because of the longer marketing period which results in less control over where new uses are located which could lead to traffic congestion. Although any predictions of where uses will be located are uncertain, this approach could have a minor negative impact in road networks and sustainable transport modes when there is an accumulation of uses that have loading and parking requirements or high numbers of journeys such as offices in industrial areas which do not have the public transport access.</p> <p>The alternative would have a similar effect to objective 2 and could encourage more flexible use of sites in the longer term rather than landowners seeking to use full class E flexibility which could lead to changes of use which don't best reflect the intensity of their transport impact. This may lead to development decisions which better reflect existing patterns of development and which relate to existing public transport infrastructure.</p>
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	There are no effects for alternative or preferred policy approach.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	There are no effects for alternative or preferred policy approach.

IIA Objective	Preferred approach class E /proposed policy	Alternative : allowing class E marketing vacancy after 12 months	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	0	There are no effects for alternative or preferred policy approach.
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	There are no effects for alternative or preferred policy approach.
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	There are no effects for alternative or preferred policy approach.

## Summary

Overall the assessment has to make assumptions about what land owners might do and teasing out the potential overall impact of the options is difficult and uncertain in respect to Class E. The Preferred approach has some minor negative effects, in particular in the short term as a longer marketing period may discourage landowners from seeking alternative uses through the planning system and instead they may likely consider changing use within Class E and not intensifying their sites and that would represent a lost opportunity. Conversely the alternative reduced marketing could encourage more efficient use of sites where they seek alternative uses through the planning system and result in intensification of use. But there is uncertainty recognised depending on the location and concentration of alternative Class E uses which could affect landowners choices. Eg it is recognised that the quantum of potential class E space in locations such as the CAZ and a town centre is a very different opportunity compared to an isolated office in the north of the borough. Overall though the preferred approach is considered positive, and it's noted it applies to changes of use without Class E affecting a wider range of land uses.

**Table 2.24 Pre hearing assessment of preferred and alternative approach to Policy SP3 (and parts of B1 and B2) - protecting and promoting industrial uses in the LSIS**

IIA Objective	Policy SP3 (and parts of B1 and B2): protecting and promoting industrial uses in the LSIS	Alternative to Policy SP3 (and parts of B1 and B2): class E co-location in the LSIS	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	+	--	<p>Policy SP3 would have a minor positive effect because the proposed policy aims to protect the primary economic function of the industrial cluster. The strategic policy protection assigned to this area will nurture the future sustainability of the industrial cluster and will ensure that new development supports the economic activity of the area. There is a minor positive effect for policy SP3. The policy provides specific guidance on building heights within the area, informed by evidence. Height restrictions will ensure that future development will enhance the local character and distinctiveness of the industrial area.</p> <p>The alternative would have significant negative effects on the economic function of the Vale royal and Brewery Road LSIS. The introduction of full class E, which involves a mix of light industrial, offices, restaurants, retail, medical and leisure uses, will attract a large volume of visitors. The area has very narrow street profiles and its roads are essential for industrial businesses to continue their operations and distributions activities. The additional volume of pedestrians and traffic that class E could generate would compromise both safety of the visitors and industrial operations of the LSIS.</p>
2. Ensure efficient use of land, buildings and infrastructure	+	--	<p>There is a minor positive effect for Policy SP3 as it focuses development in the most appropriate areas by making specific reference to retaining and strengthening industrial floorspace to protect the economic activity in the Vale Royal and Brewery Road LSIS. Policy SP3 will have a minor positive effect in the LSIS as it supports the economic activity in this area. The proposed policy protects existing industrial activity and promotes the intensification of industrial activity in the area akin to B8, B2 and light industrial uses. It is noted that the rise of e-commerce and distribution activities has been significant in recent years. This has been more notable during the pandemic. Recent anecdotal evidence observed in Town Centres showed that a great portion of businesses have switched to online trading. Some retail businesses have recently expressed the need for larger facilities that can accommodate large storage and distribution operations.</p> <p>A recent analysis of premises and use classes carried on February 2020, in the Vale Royal and Brewery Road LSIS, showed that there are almost 10,000sqm of light industrial floorspace (former B1c), most of which is located along Brewery Road, Brandon Road and Blundell Street. There is a smaller cluster of light industrial</p>

IIA Objective	Policy SP3 (and parts of B1 and B2): protecting and promoting industrial uses in the LSIS	Alternative to Policy SP3 (and parts of B1 and B2): class E co-location in the LSIS	<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>premises located between Tileyard Road and Vale Royal. In addition, there are approximately 7,300sqm of storage (B8) floorspace that includes light industrial floorspace, located between Brandon Road and Tileyard Road. However, it is difficult to determine the proportion of light industrial floorspace combined with storage.</p> <p>The introduction of the new class E means that over 10,000sqm of light industrial floorspace in the LSIS is potentially at risk of being lost to other non-industrial use classes that attract higher values. The northern fringe along Brewery Road is the main transport route in the LSIS and many of the industrial businesses in the borough depend on this route to carry out their essential delivery and distribution activities. Most of the light industrial floorspace is concentrated along this road.</p> <p>Offices are also included within class E along the other uses permitted. In February 2020 we estimated that there are almost 11,000sqm of office floorspace in the LSIS, and a further 6,000sqm of general B1 floorspace which can include offices, research and development and light industrial activities. Based on this analysis, it is estimated that the Vale Royal and Brewery Road LSIS has a total of 107,409 sqm of business floorspace uses in the area (including industrial B2, B8, Sui Generis akin to industrial, offices and light industrial). If both existing office and light industrial floorspace are considered as part of this, the total floorspace that could potentially be lost to the other uses within class E is 27,000sqm or a 25% which is a significant amount considering the constrained supply of industrial land to meet demand in the borough and in Central London. Any expansion of class E could exacerbate this loss.</p> <p>The rise of e-commerce and distribution activities has been significant in recent years. This has been more notable during the pandemic. Recent anecdotal evidence observed in Town Centres showed that a great portion of businesses have switched to online trading. Some retail businesses have recently expressed the need for larger facilities that can accommodate large storage and distribution operations.</p>
3. Conserve and enhance the significance of	0	0	New effects have been identified for Policy SP3 following review of the IIA as part of the examination and changed the effects from minor positive to neutral. Whilst the policy sets out height restrictions, part of the rationale for which is due to specific heritage considerations in the area the updated assessment considers that

IIA Objective	Policy SP3 (and parts of B1 and B2): protecting and promoting industrial uses in the LSIS	Alternative to Policy SP3 (and parts of B1 and B2): class E co-location in the LSIS	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
heritage assets and their settings, and the wider historic and cultural environment.			<p>some of the maximisation of employment space and intensification supported by policy B1 and B2 might have a minor negative impact on the significance of heritage assets and their settings. This would depend on the wider historic environment and on implementation. This could happen if development has negative impacts in terms of massing, scale, visual impacts. However this is counterbalanced by other local plan policies such as PLAN1 and DH1, DH2 and DH3 and to an extent SP3 which favours refurbishment projects. The impact is therefore considered to be neutral.</p> <p>The alternative is assumed to have a similar effect to the assessment for policy SP3. Depending on the extent to which intensification of full class E uses with industrial floorspace happens, it might have negative effects on the significant heritage assets and their settings, in terms of massing, scale and design as the mix of uses considered within class E. In addition, the range of uses considered within class E serve very different purposes and could introduce different design patterns which could divert significantly from the industrial function of the LSIS. However, the impact is considered to be neutral because it can be counterbalanced with general policies such as PLAN1 and design heritage DH1, DH2 and DH3.</p>
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	+	+	<p>New effects have been identified for Policy SP3 following review of the IIA as part of the examination and changed the effects from neutral to minor positive. The Policy seeks to improve pedestrian connections throughout the LSIS. This could improve connections for residents with the primary school which is located in the LSIS.</p> <p>The alternative would have a minor positive impact and lead to the creation of a more liveable neighbourhood, with the increase in accessible services for the community that class E could bring. However, the area is currently a functional industrial location. Therefore, an increase in pedestrians and vehicle congestion brought by the intensification of new class E activities could disrupt the economic activity of the industrial cluster and bring in conflicts between pedestrians and vehicles, which could compromise safety. The alternative is also assumed to have a similar effect to the assessment for policy SP3.</p>

IIA Objective	Policy SP3 (and parts of B1 and B2): protecting and promoting industrial uses in the LSIS	Alternative to Policy SP3 (and parts of B1 and B2): class E co-location in the LSIS	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	0	No effective identified for the alternative or the preferred approach. It could be considered that there could be a minor negative impact on the supply of affordable housing. However, the LSIS is a functional industrial cluster, which includes some more traditional industrial uses that cannot coexist with housing. In addition other policies in the plan will help to meet housing needs in other more suitable locations.
6. Promote social inclusion, equality, diversity and community cohesion	0	0	No effect for alternatives to policies SP3, B1 and B2.identified for alternative and preferred approach
7. Improve the health and wellbeing of the population and reduce health inequalities	+	0	<p>The preferred approach would protect the principal function of the LSIS. The strategic location of the LSIS enables shorter journeys and supply chains, which has a more positive effect on air quality, while providing industrial, storage, distribution and other uses that are increasingly essential to the functioning of London's economy and meeting the needs of its growing population and the aspect of its role in servicing the Central London Economy. Without the policy protection, industrial businesses are likely to be displaced to Outer London locations and this will have significant impacts on transport routes into London, leading to increased traffic congestion and emissions from traffic which will impact on the health of residents. In addition, the proposed policy for the area integrates requirements to improve pedestrian and vehicle connections in the area, where possible, having regard to routes identified to improve connections in the area. Overall the preferred approach is considered to have a minor positive effect.</p> <p>No effect is identified for the alternative. There is no evidence to suggest that allowing more office uses instead of industrial uses, would have a pronounced effect on health and wellbeing.</p>

IIA Objective	Policy SP3 (and parts of B1 and B2): protecting and promoting industrial uses in the LSIS	Alternative to Policy SP3 (and parts of B1 and B2): class E co-location in the LSIS	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	+	-	<p>The preferred approach would continue to protect existing businesses in the LSIS and would promote the intensification and renovation of old industrial sites. This would attract a wider range of different sized occupiers in need of industrial premises. The Vale Royal/Brewery Road LSIS accommodates many of the type of uses suggested in the Mayor's evidence for the London Plan, including 'clean' activities that provide for the expanding Central London business market. As identified in Islington's Employment Land Study (2016), this area comprises a mix of traditional industrial activities and storage facilities that coexist with emerging industrial uses, including a significant concentration of creative production businesses which are based primarily in industrial units and support Islington's wider creative sector. Proposed policy reflects the Council's commitment to support creative production industries where it is more needed in the borough.</p> <p>The alternative would have a minor to significant negative effect on the economic function of the LSIS. Whilst this approach introduces flexibility to the commercial market, it undermines the ability to protect light industrial floorspace from other non-industrial class E uses. This means that there will be further encroachment of class E uses in the LSIS. The advancement of class E in the LSIS could undermine the cluster's ability to grow and to continue delivering its primary industrial function. This makes a stronger argument to protect remaining general industrial, storage and distribution uses, as well as introducing conditions on new light industrial floorspace that is secured to limit class E. Any policy that could diminish this function could undermine economic growth. While office uses and other class E use could themselves have some economic benefit, further significant expansion of offices in the LSIS would be likely to undermine the overarching function and on balance would cause a negative effect.</p>
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road,	+	-	<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</p>

IIA Objective	Policy SP3 (and parts of B1 and B2): protecting and promoting industrial uses in the LSIS	Alternative to Policy SP3 (and parts of B1 and B2): class E co-location in the LSIS	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
public transport, cycling and walking			<p>residents. In addition, the proposed policy for the area integrates requirements to improve pedestrian and vehicle connections in the area, where possible, having regard to routes identified to improve connections in the area.</p> <p>The alternative could lead to industrial uses being forced to locate outside of Islington, while still needing to travel to central London to access their markets. This could increase vehicle mileage through Islington, which risks increased congestion and emissions, which would have climate change and air quality impacts. The alternative would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expanded in this location.</p> <p>Office uses are likely to create more journeys to work than many industrial uses, and for this reason are usually supported in locations which are more accessible than the LSIS ( which has low PTAL ratings along the western edge along York Way), such as town centres and CAZ where transport infrastructure better supports the intensity of journeys created. Various other uses considered within class E could have a negative impact in the operation of industrial businesses, which could lead to traffic congestion and safety concerns due to the lack of loading and parking facilities for industrial uses.</p>
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	No effect for alternative or preferred approach
11. Create, protect and enhance suitable wildlife habitats wherever	0	0	No effect for alternative or preferred approach

IIA Objective	Policy SP3 (and parts of B1 and B2): protecting and promoting industrial uses in the LSIS	Alternative to Policy SP3 (and parts of B1 and B2): class E co-location in the LSIS	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
possible and protect species and diversity.			
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	+	-	<p>As noted in objective 9 the preferred approach will support the strategic location of the LSIS which enables shorter journeys and supply chains, while providing industrial, storage, distribution and other uses that are increasingly essential to the functioning of London's economy, and meeting the needs of its growing population and the aspect of its role in servicing the Central London Economy. Without the policy protection, industrial businesses are likely to be displaced to Outer London locations and this will have significant impacts on transport routes into London, leading to increased traffic congestion and emissions from traffic which will impact on the health of residents. In addition, the proposed policy for the area integrates requirements to improve pedestrian and vehicle connections in the area, where possible, having regard to routes identified to improve connections in the area. On balance the preferred approach is considered to have a minor positive impact.</p> <p>As noted in objective 9, the alternative could lead to the displacement of industrial activities of the LSIS. This could increase vehicle mileage through Islington, which risks increased congestion and emissions, which would have climate change and air quality impacts. The alternative would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expanded in this location.</p>
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that	0	0	No effect for alternative or preferred approach

IIA Objective	Policy SP3 (and parts of B1 and B2): protecting and promoting industrial uses in the LSIS	Alternative to Policy SP3 (and parts of B1 and B2): class E co-location in the LSIS	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
optimises resource use and minimises waste			
14. Maximise protection and enhancement of natural resources including water, land and air	+	-	<p>As noted in objective 12 the preferred approach will support the strategic location of the LSIS which enables shorter journeys and supply chains, while providing industrial, storage, distribution and other uses that are increasingly essential to the functioning of London's economy, and meeting the needs of its growing population and the aspect of its role in servicing the Central London Economy. Without the policy protection, industrial businesses are likely to be displaced to Outer London locations and this will have significant impacts on transport routes into London, leading to increased traffic congestion and emissions from traffic which will impact on the health of residents. In addition, the proposed policy for the area integrates requirements to improve pedestrian and vehicle connections in the area, where possible, having regard to routes identified to improve connections in the area. On balance the preferred approach is considered to have a minor positive impact.</p> <p>As noted in objective 12, the alternative could lead to the displacement of industrial activities of the LSIS. This could increase vehicle mileage through Islington, which risks increased congestion and emissions, which would have climate change and air quality impacts. The alternative would therefore have a minor to significant negative effect, dependent on the level of industrial activities lost, displaced and /or prevented from expanded in this location.</p>

## Summary

The assessment identifies the key risk from class E in the LSIS; undermining the industrial cluster's ability to grow and to continue delivering its primary industrial function. An estimate is made which quantifies the floorspace at risk from Class E. The impacts from a wider mix of offices, restaurants, retail, medical and leisure uses attracting more visitors to the area are made clear as well as the potential negative environmental impacts. The only positive identified of the alternative is the potential economic benefit that office uses and other class E use could have.

Overall the preferred approach which seeks to manage Class E development in Vale Royal where this is possible is seen as overwhelmingly positive.

## **Inclusive Economy: Assessment of preferred approach and policy alternative for Policies R1 to R9**

Evidence demonstrates that there is strong demand for retail in the borough. This is evidenced through low vacancy rates compared to the national average as well as identified need for additional retail space over the plan period. The Regulation 19 draft Local Plan responds to the competing pressures for retail floorspace from some commercial and residential land uses resulting in a specific approach that seeks to protect retail space in the Primary Shopping Area and offer a more relaxed approach across the rest of town centre. This was intended to ensure a diverse range of uses across the borough. Outside town centres in LSAs a more relaxed approach was set out in the Regulation 19 draft Local Plan compared to the adopted Local Plan. Class E is likely to affect this, with retail premises moving to non-retail class E uses without planning permission. This is going to have impacts on the borough's Town Centres and Local Shopping Areas, potentially most significantly in the Primary Shopping Area.

Whilst the flexibility in some parts of a town centre may be desirable, in other parts that are particularly suitable for comparison retail floorspace this flexibility to change to other leisure or business uses has the potential to be damaging, not only in terms of its local impacts but to the wider coherence of the town centre. Angel town centre for instance may for see a hollowing out effect which impacts comparison good floorspace predominantly responding to wider sectoral factors – Angel town centre has the highest amount of comparison expenditure of all the borough's town centres. Any dilution of retail floorspace could have a knock-on effect on provision of other goods and services. Different town centres have differing retail floor space capacity forecasts over the plan period. Scenario testing explored adjusting the levels of protection and attempts to secure retail in different town centres, however, given the ability for Class E flexibility to significantly change the quanta of retail floorspace, there is uncertainty as to the full impact of Class E on retail floorspace. The policies set a framework that seeks to continue to provide for retail needs and function in an appropriately cautionary approach where impacts of policies on individual town centres will be monitored.

### **Preferred approach Policies R1 to R9**

#### **Policy R1: Retail, leisure and services, culture and visitor accommodation**

Policy R1 sets a tiered approach to securing retail floorspace which utilises the existing retail hierarchy. In order to support Town Centres, the Council is seeking a proportionate tiered approach to development involving Class E proposals where alongside recognising the flexibility provided by Class E, impacts are appropriately considered using assessments in relation to the scale and location of a proposal. Current development within the E use class seeking to change to another E use is beyond the scope of planning control and could result in a distortion of the retail hierarchy, at least in the short term. The tiered approach evolves the existing policies in the spirit of Class E and seeks to secure retail uses in some specific existing retail concentrations to retain their retail functions. Policies R2, R3 and R4 would see an impact

assessment required for Class E based on the locations ability to absorb the impacts of development and the scale of the proposal. The sequential test, although now diminished because of the changes that can occur within class E can still be applied to non-E use main town centre use development.

## **Policy R2: Primary Shopping Areas**

In particular Policy R2: for the Primary Shopping Area – retail use at ground floor will be conditioned where possible to remain in retail use. Maintaining the maximum possible protection is desirable because of the PSA agglomeration benefits for retail in order to continue to meet residents and other's needs. Percentage thresholds for the retail mix in each town centre have remained the same from the Reg19 submission, however, these have changed to be strategic targets as opposed to original development management criteria. Where retail uses are conditioned to maintain a Class E retail use and seek to change to another E use, a period of marketing will be required with 6 months identified.

Where specifically an E use proposed to change to a non-E main town centre use(s), the premises must be marketed for 12 months and vacant for at least 12 months. This helps to maintain and promote the retail core of town centres and recognising the flexibility that Class E brings through the introduction of other appropriate town centre uses such as professional/financial services and cafes/restaurants. Furthermore, the retention of an E use makes the ability for a premises to return to a retail use easy and efficient which is key to the PSAs role and function. A period of 12 months is considered to be appropriate to reflect the importance of publicly accessible E uses that contribute most significantly to town centres vibrancy, vitality and viability, whilst not making the change of use to other main town centre uses that can also contribute positively to town centres unduly onerous. This is demonstrated through a reduction in the marketing period from the Reg19 submission of 24 months to 12 months.

An impact assessment is especially necessary given the wide range of uses within the E use class and therefore the wide range of impacts. An impact assessment will be required for any development seeking flexible E use, to explore the different impacts of the individual E uses and the cumulative impacts these could have on the retail function of the PSA and, depending on the scale of change, on the wider town centre. Regarding other main town centre use development, the Council may request an impact assessment depending on whether the scale and use is considered to have potential for significant adverse impacts.

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

Rest of Town Centres (outside PSA) - in line with Reg 19 submission plan policy R3 introduces a more flexible approach outside the PSA. Applications for E uses would have to demonstrate a full Class E use impact assessment for development above 350sqm gross. A threshold of 350sqm reflect development that is around double the size of the average town centre unit across Islington's four town centres. 350sqm is therefore considered the threshold at which a town centre location could reasonably be expected to absorb the impacts of Class E development effectively.

## **Policy R4: Local Shopping Areas**

Within LSAs, the flexibility of Class E uses is recognised with development creating over 200sqm required to provide an impact assessment. The 200sqm threshold has been determined through analysis of the average size of a small supermarket above which it is considered there could be an impact on retail viability of the LSA itself and neighbouring town centres. An impact assessment is also necessary given the wide range of uses within the E use class and therefore the wide range of impacts, an impact assessment will be required for any development seeking flexible E use over 200sqm to explore the different impacts of the individual E uses and the cumulative impacts these could have on neighbouring LSA/town centres viability and amenity. In regard to other commercial development the Council may request an impact assessment depending on whether the scale and use is considered to have potential significant adverse impacts.

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

The preferred approach for dispersed locations is to allow flexible class E development in line with the tiered approach and retail hierarchy. However, where a new retail development comes forward in some circumstances where there is a particular local need, the council will seek to condition the unit in retail use to provide essential daily goods. Dispersed retail units can assist with work to mitigate the prevalence of food deserts in the borough, in line with the overarching plan objective on healthy environments. Food deserts are where local access to affordable and healthy food is lacking, which can contribute to ill health including cancer, heart disease, diabetes and mental health problems. Accessible provision of essential goods has multiple benefits including a balanced diet, active travel, reduced transport congestion, and increased social contact.

## **Policy R7: Markets and Specialist Shopping Areas**

The preferred approach for SSAs seeks to retain the specialist shopping function of Camden Passage and Fonthill Road. Like Policy R2, the retail percentage mix threshold assumes a strategic aim as opposed to a development management criterion in light of the reduction in control of uses due to Class E. It was considered whether Policy R7 should be omitted but due to Islington's town centres still retaining retail viability and SSAs still contributing to the unique selling proposition of Angel and Finsbury Park, the efficacy of retaining the policy was considered to be beneficial.

## **Consideration of alternatives to Class E**

The IIA involves considering a preferred approach and an approach which does not react to the context of Class E; essentially the alternative would stay silent, removing redundant policy references, remove policy targets for shopping frontages where appropriate, remove references to sequential tests and not consider impacts. In summary the following alternative are considered:

**Table 2.25 Description of the preferred and alternative approach to Class E**

Reference	Description
Preferred approach	Where possible restricting class E through conditions, impact assessment and variable marketing assessments with the aim to maintain the town centre. Relevant policies: R1, R2, R3, R4, R5 and R7
Alternative	Removing redundant policy references to former use class and related redundant content. Relevant policies: R1, R2, R3, R4, R5 and R7

The preferred approach could have various permutations of the following policy issues:

- % retail mix threshold
- floorspace threshold for impact assessment
- Marketing period for change of use
- Impact assessment

Permutations of floorspace thresholds to trigger an impact assessment were explored. The floorspace thresholds need to allow flexible change of E uses whilst acknowledging the reasonable capacity different designations have to host a range of E uses. This provides a basis for impacts to be assessed and conditions applied to limit harmful uses. This approach however does see a slight change in the tiered approach in that the PSA and dispersed locations require an impact assessment because of the potential for certain uses in these locations to either diminish the retail core (PSA) or provide unsuitable uses to non-commercial settings or where a distinct need for retail access is identified.

The other alternatives considered but discounted looked at considering the effects of various different percentage levels of retail use protected in the PSA across each of the town centres which were different to the retail percentage thresholds set out in the Regulation 19 version of Policy R2; differences in marketing periods; and different applications of the requirement for impact assessments. Applying such varying permutations across the different town centres was considered to have too many variants to be able to define the effects and also to be a potentially inconsistent approach with little justification in evidence for the variations.

The potential alternatives to Policy R6; would be variations in the period for which the temporary use is considered. Variations were not considered possible to assess as the assessment would not be able to provide a meaningful comparison of the various effects and the

significance that different periods of time that a vacant unit could be used for flexible uses. There could be an alternative to the range of uses. It was not considered realistic to expand the range of uses further as the approach adopted was already permissive. A more limited range of uses was a possible alternative however this was considered unreasonable given the flexibility the policy is seeking to promote.

**Table 2.26 Pre hearing assessment of preferred and alternative approaches to Policies R1, R2 and R7**

IIA Objective	R1: Retail, preferred approach	R1: alternative	R2: PSA, preferred approach	R2: PSA, alternative	R7: Markets and SSAs, preferred approach	R7: Markets and SSAs, alternative	Commentary on assessment of likely significant effects of policies
1. Promote a high quality, inclusive, safe and sustainable built environment	-	-	-	--	-	--	<p>The Policy alternative to Policy R1 could see the potential for adverse impacts on the public realm felt from changes in footfall if large amounts of floorspace were to change use creating minor negative effects. It is considered that these adverse impacts on public realm would be felt the most where existing high footfall areas, such as the PSA and SSA, creating a significant negative effect from Policy alternatives for Policy R2 and Policy R7. This could be experienced through a change to office, creating demands on the public realm from commuters, or from retail increasing demands on the public realm from increased numbers of shoppers beyond areas which currently experience this demand. This could affect the local character and distinctiveness would be eroded. Additionally, negative effects could be experienced from COU to café/restaurants which although would increase natural surveillance could increase anti-social behaviour if there is a new concentration of such uses in areas not always close to public transport, particularly some LSAs. High trip generating uses locating away high public transport access locations also does not make best use of existing public transport. There could be a demand for expansion of pavement seating. A minor positive effect could be in terms of adaptable buildings due to Class E, encouraging buildings to be configured to support the wide range of commercial uses found in Class E but this would be outweighed by the inability of the alternative to provide specific uses in certain locations in order to protect and enhance the character.</p>

IIA Objective	R1: Retail, preferred approach	R1: alternative	R2: PSA, preferred approach	R2: PSA, alternative	R7: Markets and SSAs, preferred approach	R7: Markets and SSAs, alternative	Commentary on assessment of likely significant effects of policies
							<p>Policy R1 would introduce the principle of the requirement for impact assessments for Policies R2-R5 which will include consideration of the impact on the public realm and the relationship with the retail designation based on scale of development.</p> <p>Both Policy R1 and the alternative will not be able to ensure that appropriate retail development is directed to the core of the town centres so both would result in a minor negative effect although the alternative is considered to have a stronger, yet not significant negative effect given the possibility that impacts cannot be addressed.</p> <p>Policy R2 alternative would result in Class E impeding the approach to protecting retail in highly concentrated, accessible cores of town centres. Although significant negative effects may be seen in the short term, it is unknown whether the market would adjust to provide for retailing needs in the longer term.</p> <p>The preferred approach for Policy R2 seeks to secure retail development at ground floor through conditions, promoting location sensitive design, justified on the basis of impact that would lessen the effect to a minor negative effect. The preferred approach for Policy R7 seeks to protect and preserve the role of SSA as far as possible which could also reduce the significance of the negative effect.</p>
2. Ensure efficient use of land, buildings and infrastructure	-	--	-	--	-	--	The alternative approach would have an overall significant negative impact on the efficient use of land and infrastructure. The alternative approach to policies R1, R2 and R7 will have a significant negative effect on optimising the use of developed land

IIA Objective	R1: Retail, preferred approach	R1: alternative	R2: PSA, preferred approach	R2: PSA, alternative	R7: Markets and SSAs, preferred approach	R7: Markets and SSAs, alternative	Commentary on assessment of likely significant effects of policies
							<p>which focuses commercial, cultural and civic activity in town centres. Over time there is likely to be a dilution of retail development in the most appropriate locations in primary shopping areas. This would erode the function of the town centre and accelerate the shift to more leisure and experience based activities, which would be ineffective in balancing competing demands between land uses and affect the ability of the Local Plan to meet the development needs of the area through ensuring comparison and convenience retailing needs are provided for example. Town Centres have the necessary transport infrastructure and public realm to accommodate high footfall and accessibility from different parts of the borough and from elsewhere too. In addition, there will be a significant negative impact on the specialist shopping areas in the town centres of Angel and Finsbury Park in any case given Class E flexibility, although this would be amplified under the alternative approach because no new retail development would be secured and the SSAs would be more likely to diminish at a faster rate.</p> <p>The preferred approach for Policies R1 and R2 will have a minor positive effect in terms of directing appropriate new build E use retail development and other Sui Generis and F.2 main town centre uses to the core of the town centres - the primary shopping areas. However, COU of existing retail uses away from retail diminishes the efficacy of this strategic approach with the ability to secure retail floorspace through conditions not likely to be seen until cumulatively significant quanta of new development has come through the planning system. The sequential test can be applied where relevant to Class E and to non-class E development, however Class E means that the focusing of specific uses in appropriate locations will be made harder to ensure. The increased use of impact assessments where possible</p>

IIA Objective	R1: Retail, preferred approach	R1: alternative	R2: PSA, preferred approach	R2: PSA, alternative	R7: Markets and SSAs, preferred approach	R7: Markets and SSAs, alternative	Commentary on assessment of likely significant effects of policies
							<p>(from new build development or increases in E use floorspace) will however highlight the inappropriateness of some E uses in certain areas, allowing mitigation. The approach for R1 and R2 will go some way to encouraging development to focus in the most appropriate locations in town centres and their primary shopping areas, although it will not be able to fully mitigate the negative impact of Class E so will still have a minor negative effect. Similarly the preferred approach for Policy R7 which seeks to protect and preserve the role of SSA as far as possible may also go some way to encouraging development which supports the SSA which could help mitigate the significance of the negative effect.</p>
<p>3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.</p>	-	-	-	-	-	-	<p>There could be a minor negative impact from policies R1, R2 and R7 and alternatives on the setting of the historic and cultural environment. The negative effects are likely to be stronger for the alternative approach where impacts are not considered through an impact assessment. The preferred approach in Policy R3 also requires development in town centres to provide a frontage which engages positively with local character and the street scene, as well as protecting historical shopfronts. This helps to mitigate the erosion of character in town centres albeit unlikely significantly enough to counter the potential changes to character brought about through Class E. The establishment of E uses that are not publicly accessible such as previously B1a, B1b, B1c uses at ground floor would cumulatively erode the character of Town Centres and LSAs and make these designations less appealing to visit by tourists. In particular, harmful impacts could occur in Camden Passage, covered by the Angel conservation area, Chapel market part of the Chapel market/Penton Street conservation area within Angel town centre and St John's Grove</p>

IIA Objective	R1: Retail, preferred approach	R1: alternative	R2: PSA, preferred approach	R2: PSA, alternative	R7: Markets and SSAs, preferred approach	R7: Markets and SSAs, alternative	Commentary on assessment of likely significant effects of policies
							conservation area in Archway town centre. Impacts may also be felt in conservation areas outside these locations.
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	+	-	+	-	-	-	<p>The policy alternative for policies R1, R2 and R7 could have a negative impact on access for residents to essential services. The ability for retail premises to change to other E uses without planning permission combined with an approach that did not seek to secure retail development could see a cumulative change of use away from retail that could over the longer term severely impede access to a wide range of goods in town centres. This could see a negative impact especially on comparison retailing in PSAs and convenience retailing in other town centres.</p> <p>The preferred approach for policies R1, R2 and R7 are likely to have positive effects on enabling town centres PSAs to continue to serve the needs and wellbeing of the local residents across different retail catchment areas by seeking to maintain a balance of retail, leisure and business uses. Albeit this approach is unavoidably diminished by the introduction of Class E.</p> <p>However, Policy R7 will likely see negative effects in the specialist shopping areas through the preferred and alternative approach, although the preferred approach would seek to mitigate this decline.</p> <p>The potential for E uses which do not form active frontages, such as offices at ground floor would cumulatively and in specific locations individually, have a significant negative impact on the diversity, vibrancy and economic prosperity of town centres, PSAs and to a lesser extent LSAs. With potential reduction in ground floor retail uses and an increase in previously B1a, B1b, B1c uses, centres may become less attractive for multi-use visitation, resulting in diminished vibrancy. Change within Use Class E may have positive impacts on upper floors in town centres, and</p>

IIA Objective	R1: Retail, preferred approach	R1: alternative	R2: PSA, preferred approach	R2: PSA, alternative	R7: Markets and SSAs, preferred approach	R7: Markets and SSAs, alternative	Commentary on assessment of likely significant effects of policies
							especially in less well performing LSAs that would benefit from an influx of workers on the upper floors.
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	0	0	0	0	0	No effect for the policy alternatives for R1, R2 and R7 or the preferred approach. There is potential for a minor negative effect as the policies affect the supply of housing in certain locations across the borough and either approach would maintain the restriction on residential at ground floors within town centres and LSAs. The assessment considers this to have no effect overall as other policies within the plan provide for housing outside the locations identified to meet targets. Further detail is set out in the Reg 19 IIA assessment tables.
6. Promote social inclusion, equality, diversity and community cohesion	0	0	0	0	0	0	No effect for policy alternatives to R1, R2 and R7 and preferred approach.  There may be minor effects which may see increased employment opportunities from a wider range of uses in some parts of the borough however this can be balanced against decreased employment opportunities for other areas depending on the viability of the various Class E uses.
7. Improve the health and wellbeing of the population and reduce health inequalities	-	-	0	0	0	0	No effect for policy alternatives to R1, R2 and R7 and preferred approach.  The preferred approach would go some way to maintaining retail and café uses. Access to shops in particular is vital in bettering health and wellbeing. This is especially important for people with reduced mobility. Overall whilst potentially negative it is not clear that this would bear out as an effect.

IIA Objective	R1: Retail, preferred approach	R1: alternative	R2: PSA, preferred approach	R2: PSA, alternative	R7: Markets and SSAs, preferred approach	R7: Markets and SSAs, alternative	Commentary on assessment of likely significant effects of policies
							<p>Class E represents potential for increased noise, odour, ingress/egress, anti-social behaviour and moped delivery impacts on residents in particular from cafes using former retail units and opening later than previous units would have which can affect nearby residents' amenity. Impacts from extended opening times will not be managed through the planning system but through the licensing system where there is less scope and flexibility to mitigate such effects. This negative effect would apply to both preferred approach and to the alternative approach and is considered to apply at a strategic level to Policy R1. Conversely the impact would be less in PSA and SSA where there is generally less residential accommodation so in that respect the alternative would have less negative amenity impact if more cafes were to establish in the PSA therefore is considered neutral.</p> <p>For Class E, health facilities are unlikely to be able to compete from a viability point of view with other retail/leisure/office use in a town centre, so this is unlikely to create a positive effect on people's ability to access health facilities. Theoretically, Class E has the potential to provide a greater opportunity for some health facilities, especially in secondary space on upper floors but could also lead to their loss and therefore impacts within town centres are uncertain. Please see Social Infrastructure IIA assessment for Class E effects.</p>
8. Foster sustainable economic growth and increase employment opportunities across a range of	+	-	+	-	+	-	<p>The effect of the alternative to R1, R2 and R7 could see a proliferation of non-publicly accessible uses – in particular offices in town centres at ground floor that cumulatively could have a negative effect by diluting the other commercial, cultural and civic activity in town centres. It could reduce the commercial offer for residents and tourists; with stretches of frontages that do not engage well or provide use to visitors, creating inactive frontages that creates the perception of decreasing quality of town centres</p>

IIA Objective	R1: Retail, preferred approach	R1: alternative	R2: PSA, preferred approach	R2: PSA, alternative	R7: Markets and SSAs, preferred approach	R7: Markets and SSAs, alternative	Commentary on assessment of likely significant effects of policies
sectors and business sizes							<p>resulting in less visitors and thus reduced viability of shops. This could lead to a reduction in economic growth within the retail sector and other related service and leisure sectors that are all interdependent on multi-purpose visitation to maintain a healthy town centre. Town centre locations for retail should achieve the highest commercial value however with a distortion of retail and office uses caused by Class E this harmony could change in the short term and accelerate any longer-term changes in commercial floorspace market. There will be a significant negative impact on economic growth and the town centres of Angel and Finsbury park if the specialist shopping areas change via Class E under the alternative approach with their function attracting people from further afield. Once a critical mass of antique shops for instance in Camden Passage SSA change away from retail use, the appeal of the designation to provide comparison needs is lost. However, there could also be positive effects from the alternative policy R2 which could enable a range of uses that were previously prevented to locate in the PSA and are able to take advantage of the PSA location which could help to maintain and support the town centre depending on the centre.</p> <p>The preferred approach set out in R2 seeks to encourage retail uses at ground floor and where possible seeks to retain the core retail function of town centres which will help maintain and support a range of local businesses, maintaining opportunities for residents to access employment through retail. There are theoretical economic benefits brought about by Class E flexibility, especially in areas where retail is struggling. However, such unfettered flexibility would actually be harmful to Islington's Town Centres that benefit from established agglomerations of retail and enjoy low vacancy rates. This more flexible approach, is supported by R1 which sets out the tiered approach and</p>

IIA Objective	R1: Retail, preferred approach	R1: alternative	R2: PSA, preferred approach	R2: PSA, alternative	R7: Markets and SSAs, preferred approach	R7: Markets and SSAs, alternative	Commentary on assessment of likely significant effects of policies
							consideration of impact which will be assessed depending on the scale of the proposal and will enable more flexible Class E uses on other floors which will help manage this whilst also providing wider opportunity in line with the flexibility introduced by Class E. There is uncertainty over how landowners will utilise Class E which affects how positive the effects from the preferred approach might be. The preferred approach for R7 seeks to protect as far as possible the retail use of the specialist shopping areas which will support the wider economic function of the town centre and economic growth more generally.
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	+	-	0	-	0	-	The effect of the alternative to R1, R2 and R7 could see a negative impact on efficient, sustainable travel with potential distortion of the retail hierarchy across all policies which could increase the need to travel. High trip generating E uses located outside of town centres could see these uses not located in the most well served locations for public transport infrastructure specifically bus, tube and rail connections. The preferred approach set out in policy R1, R2 and R7 may help mitigate some of the unintended consequences of Class E in town centres by seeking to maintain the retail function, active frontages and consider impacts which could support maintaining uses in accessible locations. Policy R1 that sets out the strategic framework would therefore have the most likely overall positive effect.
10. Protect and enhance open spaces that are high quality, networked,	0	0	0	0	0	0	No effect for alternative to R1, R2 and R7 or the preferred approach.

IIA Objective	R1: Retail, preferred approach	R1: alternative	R2: PSA, preferred approach	R2: PSA, alternative	R7: Markets and SSAs, preferred approach	R7: Markets and SSAs, alternative	Commentary on assessment of likely significant effects of policies
accessible and multi-functional							
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	0	0	0	0	No effect for alternative to R1, R2 and R7 or the preferred approach.
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	-	0	-	0	0	The effect of the alternative to R1, R2 and R7 could see a negative impact on efficient, sustainable travel with potential distortion of the retail hierarchy across all policies which could increase the need to travel and therefore carbon emissions associated with transport. High trip generating E uses located outside of town centres could see these uses not located in the most well served locations for public transport infrastructure specifically bus, tube and rail connections. The preferred approach set out in policy R1, R2 and R7 may help mitigate some of the unintended consequences of Class E in town centres by seeking to maintain the retail function, active frontages and consider impacts which could support maintaining uses in accessible locations. The effects of the alternative policies are less pronounced from policy R1 and R2 to policy R7 because of the smaller area R7 covers and is considered neutral.
13. Promote resource efficiency by decoupling waste generation from economic	0	0	0	0	0	0	No effect for alternative to R1, R2 and R7 or the preferred approach.

IIA Objective	R1: Retail, preferred approach	R1: alternative	R2: PSA, preferred approach	R2: PSA, alternative	R7: Markets and SSAs, preferred approach	R7: Markets and SSAs, alternative	Commentary on assessment of likely significant effects of policies
growth and enabling a circular economy that optimises resource use and minimises waste							
14. Maximise protection and enhancement of natural resources including water, land and air	0	-	0	-	0	0	The effect of the alternative to R1, R2 and R7 could see a minor negative impact on efficient, sustainable travel with potential distortion of the retail hierarchy across all policies which could increase the need to travel and therefore carbon emissions associated with transport. This in turn contributes to the high levels of air pollution in London. High trip generating E uses located outside of town centres could see these uses not located in the most well served locations for public transport infrastructure specifically bus, tube and rail connections. The preferred approach set out in policy R1, R2 and R7 may help mitigate some of the unintended consequences of Class E in town centres by seeking to maintain the retail function, active frontages and consider impacts which could support maintaining uses in accessible locations. The effects of the alternative policies are less pronounced from policy R1 and R2 to policy R7 because of the smaller area R7 covers and is considered neutral

## Summary

Overall the assessment has to make assumptions about what land owners might do, although there is more certainty given the wider weakness in the retail sector so considering the impact in respect to Class E is more robust for retail compared to office floorspace. The assessment

suggest impacts including a potential distortion of the retail hierarchy which could have a range of effects including ability to meet retail needs, wider provision of services, increasing the need to travel and associated carbon emissions. In particular the potential dilution of retail development in the most appropriate locations is considered to be ineffective in balancing competing demands between land uses and ultimately an inefficient use of land. The impacts on economic growth, in particular for town centres are considered to be overall negative with no overall positive effects identified for the alternative 'do nothing'. However there could be positive effects from the alternative which could enable a range of uses that were previously prevented to locate in the PSA/town centres and are able to take advantage in particular of the PSA location which could help to maintain and support the town centre depending on the centre. However this is not enough to outweigh the overall negative impacts and despite the uncertainty over how landowners will utilise Class E the preferred approach is considered positive.

**Table 2.27 Pre hearing assessment of preferred approach and policy alternatives for policies R3, R4 and R5**

IIA Objective	R3: Islington's Town Centres	R3: alternative Islington's Town Centres	R4: Local Shopping Areas	R4: alternative Local Shopping Areas	R5: Dispersed retail and leisure uses	R5: alternative Dispersed retail and leisure uses	Commentary on assessment of likely significant effects of policies
1. Promote a high quality, inclusive, safe and sustainable built environment	+	-	+	--	+	-	<p>The alternative approach to Policy R3, R4 and R5 could see the potential for adverse effects on the public realm depending on the location of the place in the retail hierarchy and the scale of the Class E use proposal. This may lead to a change in footfall if large amounts of floorspace were to change use. This could be experienced through a change to office, creating demands on the public realm from commuters, or from retail increasing demands on the public realm from increased numbers of shoppers. This would affect the design response and local character and distinctiveness would be eroded. Additionally negative impacts could be experienced from COU to café/restaurants which although would increase natural surveillance could increase anti-social behaviour if there is a new concentration of such uses in areas not always close to public transport, particularly some LSAs. This impact could be more keenly felt in LSAs and dispersed retail areas which don't have the scale of existing use to consider impacts. The sequential test - that seeks to promote 'main town centre uses' in the four town centres that are commercial hubs, benefiting from high PTAL ratings, agglomeration of retail and leisure uses, and commercial characters that can absorb negative impacts on amenity more so than other locations, would not be applied through alternative to policy R3. A minor positive could be in terms of adaptable buildings, due to Class E encouraging buildings to be configured to support the wide range of commercial uses found in Class E. However, the inability of the alternative to provide specific uses in certain locations in order to protect and enhance the character would have detrimental effects on sense of place.</p> <p>The Preferred approach to Policy R3 and R4 would set out a requirement for impact assessments will include consideration of the impact on the public realm. Impact assessments will help illuminate impacts of noise, odour, ingress/egress, anti-social behaviour and moped delivery as well as scale, operating hours and impact on the function of the designation. This approach</p>

IIA Objective	R3: Islington's Town Centres	R3: alternative Islington's Town Centres	R4: Local Shopping Areas	R4: alternative Local Shopping Areas	R5: Dispersed retail and leisure uses	R5: alternative Dispersed retail and leisure uses	Commentary on assessment of likely significant effects of policies
							<p>seeks to put people at the heart of the process by ensuring amenity and economic growth needs are met although the loss of control with class E may not see this materialise as intended at least in the short term due to trends of perceived viable E uses.</p> <p>The preferred approach to Policy R3, R4 and R5 will also have a positive effect focusing appropriately scaled development in line with the retail hierarchy but also ensuring high quality development of uses that benefit a wide demographic of people that includes residents and workers, ensuring accessibility, amenity and sustainability are considered.</p>
2. Ensure efficient use of land, buildings and infrastructure	+	-	+	-	+	-	<p>The preferred approach for Policies R3, R4 and R5 will have a minor positive effect in terms of directing appropriate new build E use retail development and other Sui Generis and F.2 main town centre uses to town centres and LSAs. However, COU of existing retail uses away from retail diminishes the efficacy of this strategic approach with the ability to secure retail floorspace through conditions not likely to be seen until cumulatively significant quanta of new development has come through the planning system. The sequential test can be applied where relevant to Class E and to non-class E development however Class E means that the focusing of specific uses in appropriate locations will be made harder to ensure. The heightened use of impact assessments where possible (from new build development or increases in E use floorspace) will however help to highlight the inappropriateness of some E uses in certain areas as well as specific mitigation measures. The approach for R3, R4, R5 and R6 will go some way to encouraging development to focus in the most appropriate locations in town centres with greater flexibility outside PSAs, which allows town centres to accommodate evolving social and economic needs as shopping behaviours and functions of town centres shift to more leisure and experience based activities. The requirement for impact assessments will help to focus appropriately scaled development in line with the retail hierarchy with Policy R3 having a higher threshold of 350sqm to reflect development that is around double the size of the average town centre unit and in Policy R4 LSA having a slightly lower threshold of 200sqm which will help to guide development to the most appropriate locations. The tiered approach aims to encourage development to maintain the existing retail</p>

IIA Objective	R3: Islington's Town Centres	R3: alternative Islington's Town Centres	R4: Local Shopping Areas	R4: alternative Local Shopping Areas	R5: Dispersed retail and leisure uses	R5: alternative Dispersed retail and leisure uses	Commentary on assessment of likely significant effects of policies
							<p>hierarchy as far as possible in order to help meet retail needs in the most sustainable locations.</p> <p>The alternative approach would have an overall minor negative effect on the efficient use of land and infrastructure. This is in light of acknowledgement that Class E has theoretical benefits in terms of efficient use of buildings in the short term as a flexible approach to Class E could help ensure land is brought back into use. However, the alternative approach to Policies R3, R4 and R5 will have a negative effect on optimising the use of developed land which focuses commercial, cultural and civic activity in town centres. Over time development would not be focused in the most appropriate locations in town centres, rest of town centre locations and LSAs, and the concentration of retail uses would become weakened. This would erode the function of the town centre and accelerate the shift to more leisure and experience based activities, which would be ineffective in balancing competing demands between land uses and affect the ability of the Local Plan to meet the development needs of the area through ensuring comparison and convenience retailing needs are provided for example.</p> <p>Evidence demonstrates that there is strong demand for retail in the borough. This is evidenced through low vacancy rates compared to the national average as well as identified need for additional retail space over the plan period. Cumulatively increases in ground floor E uses (previously B1a, B1b, B1c uses) would reduce the retail and leisure uses that contribute to the spaces in which 'community' can prosper. There will inevitably be some dilution of retail floorspace due to the change of use allowed within developed Class E uses under the preferred and alternative approach. However, the preferred approach seeks to mitigate this negative effect of cumulative dilution of retail floor space so that sustainable use of buildings is realised. Any dilution of retail floorspace could have a knock on effect on the provision of other goods and services due to multi-trip visitation.</p> <p>Policy R4 could see a minor positive effect in LSAs by allowing a more flexible approach to Class E that may be beneficial in certain circumstances in LSAs</p>

IIA Objective	R3: Islington's Town Centres	R3: alternative Islington's Town Centres	R4: Local Shopping Areas	R4: alternative Local Shopping Areas	R5: Dispersed retail and leisure uses	R5: alternative Dispersed retail and leisure uses	Commentary on assessment of likely significant effects of policies
							<p>that will experience further decline as shopping destinations more so than town centres. However, across the majority of LSAs it is important to manage impacts of Class E proposals so that LSAs core functions as centres for essential daily goods and services is not damagingly eroded in favour of higher land value uses. LSAs often provide for localised needs of residents. With no attempt to assess impacts of Class E development above 200sqm this could distort the retail hierarchy and see retail development in LSAs shift footfall away from neighbouring town centres, further diminishing the character and functions of town centres. There may be a minor positive effect of E class development in that less well performing LSAs could evolve to offer a wider range of uses.</p> <p>Policy R5 alternative would see a minor negative impact in relation to dispersed shops especially those that provide essential daily goods for people with mobility issues. The COU from dispersed shops to 'office, research/development, light industrial' uses would see these spaces no longer serving a local community but rather workers from further afield. Although dispersed shops are still vulnerable to change of use within Class E in the preferred approach, there are opportunities to monitor these changes and in certain locations where it is appropriate to condition development to retail use to help meet local essential needs, the policy can help achieve this.</p>
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	-	0	-	0	-	<p>There could be a minor negative impact on Policies R3, R4, R5 and R6 on the setting of the historic and cultural environment. The negative effects are likely to be stronger for the alternative approach where impacts are not considered. The establishment of E uses that are not publicly accessible such as previously B1a, B1b, B1c uses at ground floor would cumulatively erode the character of Town Centres and LSAs and make these designations less appealing to visit by tourists. The preferred approach would enable assessment of the individual and cumulative impacts of development in relation to scale, waste and refuse, delivery and servicing, operating hours and access which all influence the setting of the historical and cultural environment, albeit this is considered to have a minimal effect on the historic and cultural environment in light of the</p>

IIA Objective	R3: Islington's Town Centres	R3: alternative Islington's Town Centres	R4: Local Shopping Areas	R4: alternative Local Shopping Areas	R5: Dispersed retail and leisure uses	R5: alternative Dispersed retail and leisure uses	Commentary on assessment of likely significant effects of policies
							COU allowed of existing buildings and is therefore identified as neutral for the purposes of this assessment.
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	+	-	+	-	+	-	<p>Policies R3, R4 and R5 will have positive effects on enabling town centres and LSAs to continue to serve the needs and wellbeing of the local residents across different retail catchment areas by seeking to maintain balance of retail, leisure and business uses. Albeit this approach is unavoidably diminished by the introduction of Class E.</p> <p>The potential for E uses which do not form active or publicly accessible frontages, such as offices at ground floor could cumulatively and in specific locations individually, have a negative impact on the diversity, vibrancy and economic prosperity of town centres and LSAs. With potential reduction in ground floor retail uses and an increase in B1a, B1b, B1c uses, centres may become less attractive for multi-use visitation, resulting in diminished vibrancy. The alternative to Policies R3, R4, R5 and R6 would strengthen this negative effect.</p> <p>However, the increased ability for COU within the E use class may have positive impacts on upper floors in town centres, and especially in less well performing LSAs that would benefit from an influx of workers.</p> <p>Policy R4 will have a positive effect, through seeking to enable LSAs to continue to serve the needs of local residents across local retail catchment areas. The approach allows a flexibility in LSAs that responds to the decline of traditional retail whilst seeking to manage these changes whereby there is not a deficiency of access to essential goods because of short term market preference and/or a proliferation of E uses that could harm the primary function of LSAs as places to serve local retail and service needs.</p> <p>Policy R5 will have a positive effect through seeking to ensure that essential dispersed convenience and café services are protected. These facilities are</p>

IIA Objective	R3: Islington's Town Centres	R3: alternative Islington's Town Centres	R4: Local Shopping Areas	R4: alternative Local Shopping Areas	R5: Dispersed retail and leisure uses	R5: alternative Dispersed retail and leisure uses	Commentary on assessment of likely significant effects of policies
							<p>often the closest facilities to where people live so enabling their protection as a local neighbourhood service is particularly beneficial.</p> <p>The policy alternative for Policies R3, R4 and R5 would have a negative impact on access for residents to essential services. Although Class E allows for the potential increase in access to some services from change of use to these services, the ability for retail premises to change to other E uses without planning permission and an approach that did not seek to secure retail development could over the longer term severely impede access to a wide range of goods in town centres. This could see a negative impact on convenience retailing in LSAs and dispersed shops. Ground floor retail and leisure uses across town centres, LSAs and dispersed locations encourage social environments and can often act as informal spaces for civic engagement, supporting cultural provision. The diminishment and complete lack of control over such uses could have a negative impact on the informal social and cultural provision.</p>
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	0	0	0	0	0	No effect for Policies R3, R4, R5 and R6 or the alternatives. There is potential for a minor negative effect as the policies affect the supply of housing in certain locations across the borough and either approach would maintain the restriction against conversion to residential. However, the assessment considers this to have no effect overall as other policies within the plan provide for housing to be delivered to meet housing targets. The policies set out circumstances where residential would be suitable in town centres and LSAs.
6. Promote social inclusion, equality, diversity and community cohesion	0	0	0	0	0	0	No effect for Policies R3, R4 and R5 or the alternatives. There may be minor effects which may see increased employment opportunities from a wider range of uses in some parts of the borough however this can be balanced against decreased employment opportunities for other areas depending on the viability

IIA Objective	R3: Islington's Town Centres	R3: alternative Islington's Town Centres	R4: Local Shopping Areas	R4: alternative Local Shopping Areas	R5: Dispersed retail and leisure uses	R5: alternative Dispersed retail and leisure uses	Commentary on assessment of likely significant effects of policies
							of the various Class E uses. Please see Social Infrastructure IIA assessment for Class E effects.
7. Improve the health and wellbeing of the population and reduce health inequalities	0	-	0	-	0	-	<p>No effect for policies R3 and R4. The preferred approach would go some way to maintaining retail. Access to shops in particular is vital in bettering health and wellbeing. This is especially important for people with reduced mobility. Smaller LSAs would likely experience more pronounced effects of a reduction in retail which takes fewer changes of use to impact on overall viability or retail, resulting in the cessation of these LSAs to provide for localised need. Overall whilst there could potentially be negative effects due to the loss of retail to other class E uses, it is not clear that this would bear out as an effect.</p> <p>Policy R5 seeks to maintain local shops and cafes. These facilities are often the closest facilities to where people live so enabling their protection against change to non E class use and seeking to condition new retail as retail to maintain a local neighbourhood service will especially benefits access to goods and services by people with mobility issues and is considered to have a positive effect however it is uncertain how effective this approach will be therefore is considered neutral.</p> <p>A negative effect is created by the alternatives if access to shops is reduced through a lack of impact assessment or conditions are not used where possible to maintain shops which would affect health and wellbeing.</p> <p>Class E also represents potential for increased amenity impacts such as noise, odour, ingress/egress, anti-social behaviour and moped delivery impacts on residents in particular from cafes using former retail units and opening later than previous units would have, which can affect nearby residents amenity. These impacts will not be managed through the planning system but through the licensing system where there is less scope and flexibility to mitigate such effects. This negative effect would apply to both preferred approach and to the alternative approach. However, the preferred approach seeks to mitigate the negative impacts of Class E on town centres and LSAs where development of</p>

IIA Objective	R3: Islington's Town Centres	R3: alternative Islington's Town Centres	R4: Local Shopping Areas	R4: alternative Local Shopping Areas	R5: Dispersed retail and leisure uses	R5: alternative Dispersed retail and leisure uses	Commentary on assessment of likely significant effects of policies
							a significant scale could impact on the function and viability of these designations to provide for goods and services, which in turn benefits health through comprehensive access to these uses across the borough.
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	++	-	+	-	+	0	<p>The preferred approach Policy R3 will have a significant positive effect as the approach aims to strike a balance between retail, leisure and businesses uses to enable response to changing retail patterns. Town centre uses are key drivers in the local and London economy and also provide important local services. Town centres, LSAs and edge of centre locations are all promoted for varying degrees of flexibility of use based on their function and appropriateness for certain types of development with the sequential test which can be applied where relevant to Class E and to non-class E development. However, Class E means that the focusing of specific types of development in appropriate locations will be made harder to ensure. The heightened use of impact assessments where possible (from new build development or increases in E use floorspace) will however highlight the inappropriateness of some E uses in certain areas and identify mitigation measures. The approach for R3, R4 and R5 will go some way to encouraging development to focus in the most appropriate locations in town centres with flexibility introduced outside PSAs which allows town centres to accommodate evolving social and economic needs as shopping behaviours and functions of town centres shift to more leisure and experience based activities. The requirement for impact assessments will help to focus appropriately scaled development in line with the retail hierarchy with Policy R3 having a higher threshold of 350sqm and in Policy R4 LSA having a slightly lower threshold of 200sqm which will help to guide development to the most appropriate locations. The tiered approach aims to encourage development to maintain the existing retail hierarchy as far as possible in order to help meet retail needs in the most sustainable locations. Town Centres provide the employment opportunities outside the CAZ and help provide job opportunities for local residents.</p> <p>In addition, the effect of the alternative to R3 and wider town centres in particular could see a proliferation of non-publicly accessible uses – in particular offices, in town centres at ground floor that cumulatively could have a</p>

IIA Objective	R3: Islington's Town Centres	R3: alternative Islington's Town Centres	R4: Local Shopping Areas	R4: alternative Local Shopping Areas	R5: Dispersed retail and leisure uses	R5: alternative Dispersed retail and leisure uses	Commentary on assessment of likely significant effects of policies
							<p>negative effect by diluting the commercial, cultural and civic activity in town centres. This could reduce the commercial offer for residents and tourists; with stretches of frontages that do not engage well or provide use to visitors, creating inactive frontages that creates the perception of decreasing quality of town centres resulting in less visitors and thus reduced viability of shops. This will lead to a reduction in economic growth within the retail sector and other related service and leisure sectors that are all interdependent on multi-purpose visitation to maintain a healthy town centre. Town centre locations for retail should achieve highest commercial value, however, with a distortion of retail and office uses caused by Class E this harmony could change in the short term and accelerate any longer-term changes in the commercial floorspace market. Negative economic effects on the retail sector are likely to be experienced by both the alternative and preferred policy approach in the short term at least from a number of impacts: market forces pushing a decline in some retail uses from economic downturn caused by Covid-19 and Brexit; change of use away from retail within Class E, reducing viable retail floorspace; and change of uses from retail to other non-publicly accessible E uses such as business uses could cumulatively diminish the vibrancy of town centres, impacting upon their appeal as leisure and retail destinations.</p> <p>Policy R4 and policy R5 will both have a minor positive impact as they are both aiming to strike the right balance between retail, leisure and business uses to enable response to changing retail patterns. Local centres are drivers in the local economy and ensuring space is protected will help meet the needs of small businesses.</p> <p>The alternative to Policy R4 would see a negative impact due to LSAs core functions as centres for essential daily goods and services eroded in favour of higher land value uses. LSAs often provide local employment for residents. With no attempt to assess impacts of Class E development above 200sqm this could distort the retail hierarchy and see retail development in LSAs shift footfall away from neighbouring town centres, further diminishing the character and functions of town centres. There may be a minor positive effect of E class</p>

IIA Objective	R3: Islington's Town Centres	R3: alternative Islington's Town Centres	R4: Local Shopping Areas	R4: alternative Local Shopping Areas	R5: Dispersed retail and leisure uses	R5: alternative Dispersed retail and leisure uses	Commentary on assessment of likely significant effects of policies
							<p>development in certain locations, in that less well performing LSAs could evolve to offer a wider range of viable uses. This could aid the economic growth and viability of these centres, albeit in a move away from the core function of providing essential goods and services to surrounding residents. However, this positive effect is likely to only be of notable benefit in particular LSAs where retail has already diminished, whereas borough wide LSAs are considered to be viable, reflecting the review of LSAs in this Local Plan review.</p> <p>Policy R5 could theoretically see land be used for more viable uses, more efficiently through Class E. The change from dispersed retail uses to other E uses of business activity may be a larger employer thus increasing overall economic growth, however, the alternative to Policy R5 will more likely see a negative impact in relation to dispersed shops especially those that provide essential daily goods for people with mobility issues. The COU from dispersed shops to 'office, research/development, light industrial' uses would see these spaces no longer serving a local community but rather workers from further afield, impacting on residents and workers easy access to goods made all the more pertinent through home working, who in themselves are contributors to the economy.</p> <p>The alternative to R4 could have a minor positive effect in the long term which may occur from the flexible E uses sustaining LSAs vitality. Over the plan period GLA projections show in 'other locations' which include LSA, -614sqm of convenience retail will be needed and -2160sqm of comparison retail will be demanded over the plan period. Flexibility in the LSA could enable a reduced amount of retail to remain viable from multiple other supporting uses able to establish quickly. However, contrasting with this scenario is a reduction of key retail units through loss via Class E uses that could see a premature deficiency in retail floorspace. There may be a negative impact on LSAs in the short term that may see the reduction in retail due to Class E changes stifle short term viability and local employment. This negative impact on retail viability could also be exacerbated when combined with the cumulative damaging impacts of the proliferation of uses such as cafes/restaurants.</p>

IIA Objective	R3: Islington's Town Centres	R3: alternative Islington's Town Centres	R4: Local Shopping Areas	R4: alternative Local Shopping Areas	R5: Dispersed retail and leisure uses	R5: alternative Dispersed retail and leisure uses	Commentary on assessment of likely significant effects of policies
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	+	-	+	-	+	-	The effect of the alternative to R3, R4 and R5 could see a negative impact on efficient, sustainable travel with potential distortion of the retail hierarchy across all policies which could increase the need to travel. High trip generating E uses located outside of town centres could see these uses not located in the most well served locations for public transport infrastructure specifically bus, tube and rail connections. The preferred approach set out in policy R3 may help mitigate some of the unintended consequences of Class E in town centres by seeking to maintain the retail function and thus the draw to town centres, active frontages and consider impacts which could support maintaining uses in accessible locations. Policies R4 and R5 concentrate on managing impacts so that uses that previously would unlikely be located in LSAs and dispersed locations of a significant scale are not putting unnecessary pressure on transport systems.
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	0	0	0	0	No effect for the alternative to R3, R4 and R5 or the preferred Policies R3, R4 and R5
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	0	0	0	0	No effect for the alternative to R3, R4 and R5 or the preferred Policies R3, R4 and R5

IIA Objective	R3: Islington's Town Centres	R3: alternative Islington's Town Centres	R4: Local Shopping Areas	R4: alternative Local Shopping Areas	R5: Dispersed retail and leisure uses	R5: alternative Dispersed retail and leisure uses	Commentary on assessment of likely significant effects of policies
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	0	-	0	-	0	0	The effect of the alternative to R3, R4 and R5 could see a negative impact on efficient, sustainable travel with potential distortion of the retail hierarchy across all policies which could increase the need to travel and therefore emissions associated with transport. High trip generating E uses located outside of town centres could see these uses not located in the most well served locations for public transport infrastructure specifically bus, tube and rail connections. The preferred approach set out in policy R3 and R4 may help mitigate some of the unintended consequences of Class E in town centres and LSAs by seeking to maintain the retail function, active frontages and consider impacts which could support maintaining uses in accessible locations. This is less certain in dispersed locations due to their accessibility varying greatly, however to a hyper localised catchment this reduces the need for travel. This is considered to have a neutral effect overall.
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	0	0	0	0	No effect for the alternative to R3, R4 and R5 or the preferred Policies R3, R4 and R5
14. Maximise protection and enhancement of natural resources including water, land and air	0	0	0	0	0	0	No effect for the alternative to R3, R4 and R5 or the preferred Policies R3, R4 and R5 The preferred approach to Policy R3 and R4 would contribute to better air quality than the alternative approach, from a reduced need to travel to access goods and services by retaining established functions of areas dispersed

IIA Objective	R3: Islington's Town Centres	R3: alternative Islington's Town Centres	R4: Local Shopping Areas	R4: alternative Local Shopping Areas	R5: Dispersed retail and leisure uses	R5: alternative Dispersed retail and leisure uses	Commentary on assessment of likely significant effects of policies
							across the borough. However, this is considered to be of minimal impact to bettering air quality and has been classed as a neutral effect.

## Summary

Overall, the assessment has to make assumptions about what landowners might do and given the wider weakness in the retail sector some of the changes envisaged in the assessment maybe more certain than others such as office floorspace. As with the assessment of policies R1, R2 and R7 the assessment of the alternative 'do nothing' approach suggests similar negative effects including other non-main town centre uses diluting the core function of town centres as locations for culture, civic and commercial activity alongside negative effects on local centres role in provision of essential daily goods and services. The negative effect of offices on retail frontages is noted and the creation of inactive frontages which creates a perception of decreasing town centre quality. This could have a wide range of effects including ability to meet retail needs, wider provision of services, increasing the need to travel and associated carbon emissions. Associated amenity impacts from different uses in unsuitable locations are also clearly identified in terms of noise and odours and anti-social behaviour. The impacts on economic growth, in particular for town centres are considered to be clearly negative with no positive effects identified for the alternative 'do nothing' alternative. The exception to this is Policy R4 Local Centres where a minor positive effect of E class development in certain locations could help less well performing LSAs evolve to offer a wider range of viable uses. This could aid the economic growth and viability of these centres. The positive impact of the alternative on provision of local services is noted. However, this is not enough to outweigh the overall negative impacts and considering the uncertainty over how landowners will utilise Class E the preferred approach is considered positive.

## Assessment of Bunhill and Clerkenwell AAP: Alternative to Policies BC1 and BC2

The new UCO changes introduced on 1 September 2020 identify office uses as part of class E. This means that an office can now be changed to other uses considered within class E without planning permission. This puts existing office floorspace in the borough at risk of being converted to other non-business uses. The introduction of class E poses some new challenges for the future of business floorspace. The additional flexibility introduced by class E could have significant impacts on the way that Islington's business floorspace is distributed, affecting the borough's well-established employment clusters such as the CAZ. In addition the possibility is raised around

### Policies BC1 and BC2

The following alternatives described below; the preferred approach for Policies BC1 and BC2 the alternative.

**Table 2.28 Description of preferred and alternative approaches to Policies BC1 and BC2**

Reference	Description
Preferred approach BC1	Taking a targeted approach to class E, recognising flexibility whilst restricting class E through conditions. The assessment is principally considering the effect of an alternative Class E proposal to come through the planning system rather than take advantage of the flexibility presented by Class E.
Alternative BC1	Considering the possible effects of allowing Class E without any policy intervention. This assessment considers the full range of uses that Class E could introduce, aside from business floorspace (e.g. office) and the effects that this alternative will have against the sustainability framework objectives, with a particular focus on the potential range of effects of Class E on existing business clusters.
Preferred approach BC2	Taking a targeted approach to class E, recognising flexibility whilst restricting class E through conditions. The assessment is principally considering the effect of an alternative Class E proposal to come through the planning system rather than take advantage of the flexibility presented by Class E.
Alternative BC2	Considering the possible effects of allowing Class E without any policy intervention. This assessment considers the full range of uses that Class E could introduce, aside from business floorspace (e.g. office) and the effects that this alternative will have against the sustainability framework objectives, with a particular focus on the potential range of effects of Class E on existing business clusters.

**Table 2.29 Pre hearing assessment of preferred and alternative approaches to Policy BC1 and BC2**

IIA Objective	Preferred approach to Policy BC1: Prioritising office use	Alternative to Policy BC1: Prioritising office use (full Class E)	Policy BC2: Culture, retail and leisure uses	Alternative to Policy BC2: Culture, retail and leisure uses (full Class E)	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	+	-	0	0	<p>The preferred approach to Policy BC1 will likely have a minor positive effect on promoting a high quality, inclusive, safe, and sustainable built environment. The area has a mixed-use character with specific concentrations of employment uses, particularly large floorplate and SME offices. The policy will promote business-led development consistent with this character.</p> <p>BC1 alternative: The alternative will likely have a minor negative effect on promoting a high quality, inclusive, safe, and sustainable built environment. The alternative will remove the ability for the Council to control the type and distribution of commercial, business and service uses on many sites in the Bunhill and Clerkenwell area, potentially harming the mix and balance of uses with impacts on their function and offer and also potentially creating conflict between commercial and residential uses, with impacts on amenity.</p> <p>BC2: No effect for the preferred approach or the alternative.</p>
2. Ensure efficient use of land, buildings and infrastructure	++	--	+	-	<p>The preferred approach to Policy BC1 will likely have a significant positive effect on the efficient use of land. The policy will focus development of employment uses (which generate a large number of trips) in an area highly accessible by sustainable means of transport. Development will be located in areas with excellent public transport accessibility including to the underground and the Elizabeth Line as well as walking and cycling. The Islington Employment Study states that the Central Activities Zone is the location with the most demand for Grade A office space and this will be the priority. Maximisation of business floorspace will be required in the CAZ, given this is the area which will see the most demand for business floorspace. Local evidence currently indicates that there is a significant</p>

IIA Objective	Preferred approach to Policy BC1:Prioritising office use	Alternative to Policy BC1:Prioritising office use (full Class E)	Policy BC2: Culture, retail and leisure uses	Alternative to Policy BC2: Culture, retail and leisure uses (full Class E)	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
					<p>shortfall in supply of employment land. This policy will maximise development of floorspace in this most appropriate location ensuring the efficient use of the land.</p> <p>BC1 alternative: The alternative to BC1 will have significant negative impacts on efficient use of land buildings and infrastructure, by allowing office uses to change to other commercial, business, and service uses within Class E without permission. It can be expected that alternative uses including shops, professional services, restaurants and cafes, and gyms will be developed taking the place of office floorspace. While these other uses are valued and play a role in the CAZ they would be developed at the cost of office floorspace. Consideration of what the most efficient use of land is for area should include agreed planning objectives and priorities, rather than deferring to the market alone which cannot meet all needs for all individuals. Office floorspace is the priority land use across the Bunhill and Clerkenwell AAP area. Local Plan evidence sets out that the Council has significant evidenced need to provide office floorspace to cater for projected jobs increases and secure inclusive economic growth, and the BCAAP area is the best location for these uses, with good access and agglomeration benefits with the other central London office markets and supporting service uses.</p> <p>The preferred approach to Policy BC2 will have a minor positive effect on the efficient use of land, buildings, and infrastructure by ensuring that cultural, retail, and leisure uses are developed in the most appropriate locations, improving positive agglomeration effects and the cultural, retail, and leisure offer of the area, while reducing harmful impacts between uses in particular the effects of noise, litter, and anti-social behaviour on residential uses.</p>

IIA Objective	Preferred approach to Policy BC1: Prioritising office use	Alternative to Policy BC1: Prioritising office use (full Class E)	Policy BC2: Culture, retail and leisure uses	Alternative to Policy BC2: Culture, retail and leisure uses (full Class E)	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
					BC2 alternative: without any policy intervention Class E would have a negative effect on the efficient use of land, buildings, and infrastructure by preventing the Council from ensuring that cultural, retail, and leisure uses are developed in the most appropriate locations, improving positive agglomeration effects and the cultural, retail, and leisure offer of the area, while reducing harmful impacts between uses in particular the effects of noise, litter, and anti-social behaviour on residential uses.
3. Conserve and enhance the significance of <b>heritage assets</b> and their settings, and the wider historic and cultural environment.	0	0	0	0	BC1: No effect for the preferred approach or the alternative.  BC2: No effect for the preferred approach or the alternative.
4. Promote <b>liveable neighbourhoods</b> which support good quality accessible services and sustainable lifestyles	0	-	+	-	The preferred approach to Policy BC1 will have a neutral effect. While this policy requires that the majority proportion of new development is office, it does allow smaller proportions of other uses on site. In addition, there are a number of sites allocated for other (non-office) uses. These factors combined with the existing mixed use character of the area means the mix of uses which support liveable neighbourhoods will not be affected.  BC1 alternative: The alternative will have a likely minor negative effect on liveable neighbourhoods as the lack of planning control for many uses, including food and drink uses like cafes and restaurants, may result in some of these uses being developed in inappropriate locations due to their effect

IIA Objective	Preferred approach to Policy BC1:Prioritising office use	Alternative to Policy BC1:Prioritising office use (full Class E)	Policy BC2: Culture, retail and leisure uses	Alternative to Policy BC2: Culture, retail and leisure uses (full Class E)	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
					<p>on residential amenity such as noise, odours, and servicing impacts. It will also may have an impact on the vitality and viability of the Local Shopping Areas as the Council will have less control to direct and retain high street uses in these locations, potentially reducing the offer of these centres.</p> <p>The preferred approach to Policy BC2 will have a minor positive effect on liveable neighbourhoods. It ensures that retail, cultural, entertainment and food and drink uses are located in predominately commercial areas and that they do not harm the amenity of the area. The policy also sets out that development cannot create harmful concentrations of night time economy uses, which would include impacts from noise, litter, and anti-social behaviour. The policy also directs cultural uses to the Clerkenwell / Farringdon Cultural Quarter helping expand the cultural role of this area and of London as a whole.</p> <p>BC2 alternative: As with BC1, the alternative will have a likely minor negative effect on liveable neighbourhoods as the lack of planning control for many uses, including food and drink uses like cafes and restaurants, may result in some of these uses being developed in inappropriate locations due to their effect on residential amenity such as noise, odours, and servicing impacts.</p>
5. Ensure that all residents have access to good quality, well-located, <b>affordable housing</b>	0	0	0	0	The preferred approach to BC1 and the BC1 alternative will not effect the provision of affordable housing.

IIA Objective	Preferred approach to Policy BC1: Prioritising office use	Alternative to Policy BC1: Prioritising office use (full Class E)	Policy BC2: Culture, retail and leisure uses	Alternative to Policy BC2: Culture, retail and leisure uses (full Class E)	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
6. Promote <b>social inclusion, equality, diversity and community cohesion</b>	+	-	0	0	<p>The preferred approach to Policy BC1 will have minor positive effects, in terms of social inclusion, equality, diversity, and community cohesion. The policy will strengthen the local economy and provide new jobs by encouraging development of employment floorspace which will meet demand and unlock potential economic growth. These policies will work alongside other policies in the plan whereby new office developments must provide a proportion of affordable workspace. These policies will result in more office development and therefore more affordable workspace. The increase in businesses and employment in the area will also lead to a greater number of training and apprenticeships opportunities for local residents.</p> <p>BC1 alternative: The alternative will lead to minor negative effects in terms of social inclusion, equality, diversity, and community cohesion in comparison to policy BC1 by reducing the amount of employment uses and associated employment and training opportunities. The alternative does not maximise the development of employment uses where it is in most demand and most suitable as set out in the Islington Employment Study.</p> <p>BC2: No effect for the preferred approach or the alternative.</p>
7. Improve the <b>health and wellbeing</b> of the population and reduce health inequalities	0	0	+	-	<p>For Policy BC1 both the preferred approach and the policy alternative will not have significant effects on the health and wellbeing of the population.</p> <p>The preferred approach to Policy BC2 will have a minor positive effect on the health and wellbeing of the population by directing uses with potential for negative effects on amenity to the most appropriate locations to minimise harmful effects. In particular, the policy ensures that retail, cultural, entertainment, and food and drink uses are located in predominately commercial areas and that they do not harm the amenity of the area. The policy also sets out that development cannot create harmful</p>

IIA Objective	Preferred approach to Policy BC1: Prioritising office use	Alternative to Policy BC1: Prioritising office use (full Class E)	Policy BC2: Culture, retail and leisure uses	Alternative to Policy BC2: Culture, retail and leisure uses (full Class E)	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
					<p>concentrations of night time economy uses, which would include impacts from noise, litter, and anti-social behaviour.</p> <p>BC2 alternative: This will have a minor negative effect as it will reduce the Council's ability to stop developments locating in areas where they may harm residential amenity which can impact on health outcomes.</p>
8. Foster sustainable <b>economic growth</b> and increase employment opportunities across a range of sectors and business sizes	++	--	+	-	<p>The preferred approach to Policy BC1 will have significant positive effects on economic growth and providing employment opportunities. The Council recognises that there is uncertainty around growth projections for the London office market due to Covid 19 and Brexit. The home working necessitated during the pandemic will have lasting effects on the office market, however evidence indicates that these effects should not be overstated, with the need for fewer desks often balanced against a need for higher quality spaces, and with population growth driving demand in the long term.</p> <p>The policy will provide much needed floorspace for employment uses, in particular office uses. There is high demand in Islington for office floorspace, which is projected to exceed supply, restricting economic growth and employment in the borough. The biggest threat to the supply of employment land is likely to be from restricted supply caused by a lack of sites as they are outbid by residential developments. In addition, the loss of office stock within the CAZ to residential development has the potential to undermine the strategic functions of the CAZ and East London Tech City. As part of office development, other Local Plan policies will ensure that these developments also provide affordable workspace and space suitable for small and medium enterprises, helping to diversify the employment opportunities in the borough.</p> <p>BC1 alternative: This alternative will have significant negative effects as office accommodation may change under Class E to other uses, reducing the supply of office floorspace needed for businesses and economic growth</p>

IIA Objective	Preferred approach to Policy BC1: Prioritising office use	Alternative to Policy BC1: Prioritising office use (full Class E)	Policy BC2: Culture, retail and leisure uses	Alternative to Policy BC2: Culture, retail and leisure uses (full Class E)	<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>in the borough. The existing permitted development rights will further reduce the supply of employment floorspace meaning that control of new build office floorspace over the longer term is important. The Council recognises Class E will allow the operators of commercial, business, and service uses a greater range of potential sites for use. The Council does not consider that this flexibility delivers on Local Plan objectives when compared to the proposed policy approach where uses are planned in a proactive way. In Islington's circumstances, there is high demand for office floorspace to take advantage of the central London office markets, but also high values for other uses which may outcompete office uses while not providing the same number and type of employment opportunities. These offices would provide the space for establishment and expansion of businesses in the tech and creative sectors and their supporting services, spaces for SMEs, affordable workspace for enterprises with social value, and training opportunities.</p> <p>The preferred approach to Policy BC2 will have a minor positive effect. It will prevent some development of cultural, retail, and entertainment uses in locations that are deemed inappropriate. However, the policy will have overall positive effects on economic growth by directing growth of cultural, retail, and leisure uses to the most appropriate locations, improving the offer of these locations and supporting the important economic role these uses play in Bunhill and Clerkenwell, and London as a whole. We recognise that Class E rights will lead to less defined Local Shopping Areas however the policy will reduce this effect.</p> <p>BC2 alternative: Full Class E is likely to have a minor negative effect on the economy. While some businesses including shops, cafes and restaurants will gain the advantage of being able to locate in a larger range of sites throughout the BCAAP area without planning permission, potentially leading to some economic activity, this will be outweighed by the disadvantages in</p>

IIA Objective	Preferred approach to Policy BC1: Prioritising office use	Alternative to Policy BC1: Prioritising office use (full Class E)	Policy BC2: Culture, retail and leisure uses	Alternative to Policy BC2: Culture, retail and leisure uses (full Class E)	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
					not being able to maintain areas as clusters of uses to maintain an attractive and walkable offer, with a distinct character, which will sustain local businesses and support the wider economy.
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	+	-	+	-	<p>The preferred approach to policy BC1 will have a minor positive effect as it will promote development in areas with excellent public transport accessibility, including to the underground and the Elizabeth Line.</p> <p>BC1 alternative: Allowing change to Class E uses will have a minor negative effect as may replace offices which are a high trip generating use to other uses which are less trip generating, leading to a more dispersed and less sustainable trip generation pattern, and not maximising the relative accessibility of the AAP area compared to other parts of the borough.</p> <p>The preferred approach to policy BC2 will have minor positive effects as it will promote clustering of uses in the Local Shopping Areas to combine trips in accessible areas.</p> <p>BC2 alternative: This may have minor negative effects as it will likely result in a less coherent distribution of retail and high street uses in the BCAAP area, increasing trip generation.</p>
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	0	0	<p>BC1: No effect for the preferred approach or the alternative.</p> <p>BC2: No effect for the preferred approach or the alternative.</p>

IIA Objective	Preferred approach to Policy BC1: Prioritising office use	Alternative to Policy BC1: Prioritising office use (full Class E)	Policy BC2: Culture, retail and leisure uses	Alternative to Policy BC2: Culture, retail and leisure uses (full Class E)	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
11. Create, protect and enhance suitable <b>wildlife habitats</b> wherever possible and protect species and diversity.	0	0	0	0	<p>BC1 alternative: No effect for alternative. Both residential and commercial uses will be required to integrate green infrastructure where possible.</p> <p>BC2: No effect for the preferred approach or the alternative.</p>
12. Reduce contribution to <b>climate change</b> and enhance community resilience to climate change impacts.	+	-	+	-	<p>BC1: The preferred approach to policy BC1 will have a minor positive effect as it will promote development with high trip generation (offices) in areas with excellent public transport accessibility, including to the underground and the Elizabeth Line, maximising use of low carbon transport.</p> <p>BC1 alternative: Allowing change to Class E uses will have a minor negative effect as may replace offices which are a high trip generating use to other uses which are less trip generating, leading to a more dispersed and less sustainable trip generation pattern, and not maximising the relative accessibility of the AAP area compared to other parts of the borough.</p> <p>The preferred approach to policy BC2 will have minor positive effects on reducing climate change as it will promote clustering of uses in the Local Shopping Areas to combine trips in accessible areas.</p> <p>BC2 alternative: This may have minor negative effects on climate change as it will likely result in a less coherent distribution of retail and high street uses in the BCAAP area, increasing trip generation for more carbon intensive forms of transport.</p>

IIA Objective	Preferred approach to Policy BC1:Prioritising office use	Alternative to Policy BC1:Prioritising office use (full Class E)	Policy BC2: Culture, retail and leisure uses	Alternative to Policy BC2: Culture, retail and leisure uses (full Class E)	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a <b>circular economy</b> that optimises resource use and minimises waste	0	0	0	0	BC1: No effect for the preferred approach or the alternative.  BC2: No effect for the preferred approach or the alternative.
14. Maximise protection and enhancement of <b>natural resources</b> including water, land and air	0	0	0	0	BC1: No effect for the preferred approach or the alternative.  BC2: No effect for the preferred approach or the alternative.

## Summary

The assessment recognises the potential harmful effect on the mix and balance of uses and efficient use of land in the CAZ which is considered to impact the wider economic function of the area. The potential for conflict between commercial and residential uses, with impacts on amenity is also recognised. Allowing office uses to change to other commercial, business, and service uses within Class E such as shops, professional services, restaurants and cafes, and gyms is recognised by the assessment as having a value and a role to play in the CAZ but the assessment makes clear that this will be at the cost of office floorspace. Therefore overall the assessment recognises the significant harm in economic terms of not securing floorspace by conditions where new office floorspace requires planning consent but there is also uncertainty

over how effective the overall approach to BC1 will be in terms of maximising office floorspace where changes to office floorspace can occur without requiring planning consent.

Whilst the preferred approach to BC2 will prevent some development of cultural, retail, and entertainment uses in locations that are deemed inappropriate it is considered to have an overall positive effect on economic growth by directing growth of cultural, retail, and leisure uses to the most appropriate locations, improving the offer of these locations and supporting the important economic role these uses play in Bunhill and Clerkenwell, and London as a whole. The alternative more flexible approach is considered to lead to a more dispersed pattern of leisure and culture uses which given the CAZ location in principle is not unwelcome however this may be to the economic disadvantage of maintaining areas as clusters of uses, with a distinct character, which as an approach is considered will sustain more local businesses and support the wider economy so is the preferred choice.

**Low Carbon heating / ASHP change: Policy S1: Delivering Sustainable Design, supporting text, Paragraph 6.9, 6.10, 6.11**  
**Policy S5: Energy Infrastructure:**

**Policy S1: Delivering Sustainable Design, supporting text, Paragraph 6.9, 6.10, 6.11**, contains a proposed change to clarify that the use of low-emission CHP systems will only be acceptable to support the expansion of area-wide heat networks as part of the planned transition to the use of secondary sources to power heat networks.

**Policy S5: Energy Infrastructure, Part D (formerly Part C)**, contains a proposed change (SDM-MO116 ) to clarify that minor new-build developments with an individual heating system are required to prioritise low carbon heating systems over gas boilers, with the new **Part C** clarifying the larger minor new-build developments should select the heat source in accordance with the heating hierarchy in part A of the policy.

**Policy S5: Energy Infrastructure, supporting text, new Paragraph 6.67** contains a proposed change to clarify that ultra-low NOx gas boilers as the heat source for the communal heating system of major and larger minor developments will only be acceptable as part of a hybrid system involving heat pumps, and where it can be demonstrated that heat network connection and zero-emission or local secondary heat sources are not feasible.

**Policy S5: Energy Infrastructure, supporting text, new Paragraphs 6.69 and 6.70** contain proposed changes to clarify that the most appropriate low carbon heating systems for use in minor new-build developments with an individual heating system will be Air Source Heat Pumps (ASHPs), in preference to ultra-low NOx gas boilers, due to the decarbonisation of the electricity grid. These paragraphs also contain proposed changes to clarify that minor development using ASHPs or direct electric heating as the heat source for an individual heating system will only be acceptable where the development will achieve minimal heat demands through building design with a very high standard of fabric energy efficiency (Passivhaus standards or similar).

**Table 2.30 Pre hearing assessment of proposed change to Policies S1 and S5**

IIA Objective	Proposed change to S1 and S5 low carbon heat ASHP	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	+	The proposed changes to policies S1 and S5 will have a minor positive effect. These changes will help to minimise carbon emissions from heating systems and promote sustainable energy infrastructure, which will contribute towards a more sustainable built environment.
2. Ensure efficient use of land, buildings and infrastructure	0	No effect has been identified.
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	The proposed changes to policy S5 have the potential to impact upon heritage assets by prioritising the use of ASHPs over gas boilers for minor development with individual heating systems and requiring high standards of fabric energy efficiency. The effect of these requirements on building design will be considered and balanced alongside other policies in the plan, so the effect on the conservation and enhancement of heritage assets is considered to be neutral overall.

IIA Objective	Proposed change to S1 and S5 low carbon heat ASHP	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	0	<p>The proposed change to Policy S1 will ensure that gas CHP will only be allowed in exceptional cases where CHP is essential for the creation of a strategic heat network. The proposed change to Policy S5 will limit the use of gas boilers in minor developments 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.</p> <p>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. A result, these policy changes will have a neutral effect on the promotion of liveable neighbourhoods.</p>
5. Ensure that all residents have access to good quality, well-located, affordable housing	+	<p>The proposed change to Policy S5 requires minor developments using an ASHP or direct electric heating as the heat source for their individual heating system to achieve high standards of fabric energy efficiency in order to ensure they will achieve minimal heat demands to keep energy bills down.</p>
6. Promote social inclusion, equality, diversity and community cohesion	+	<p>The proposed change to Policy S5 in relation to requiring high standards of fabric energy efficiency will contribute to reducing fuel poverty in the borough, which has economic and health benefits for Islington residents.</p>

IIA Objective	Proposed change to S1 and S5 low carbon heat ASHP	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
7. Improve the health and wellbeing of the population and reduce health inequalities	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 neutral effect on improving health and wellbeing.</p> <p>The proposed change to Policy S5 in relation to requiring high standards of fabric energy efficiency will ensure that individual ASHP or direct electric heating systems will not lead to high energy bills and as a result will prevent these heating systems from contributing to fuel poverty in the borough. This policy change will therefore have a neutral impact on improving health and wellbeing.</p>
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	+	The proposed change to policy S5 to prioritise ASHPs in minor developments with individual heating systems will help to support the development of green industries and a low-carbon economy.
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	0	No effect.

IIA Objective	Proposed change to S1 and S5 low carbon heat ASHP	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	No effect.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	No effect.

IIA Objective	Proposed change to S1 and S5 low carbon heat ASHP	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	++	<p>The proposed change to policy S1 will have a significant positive effect on reducing the borough's contribution to climate change because it will reduce carbon emissions by ensuring that that gas CHP will only be allowed in exceptional cases where CHP is essential for the creation of a strategic heat network as part of the transition to the use of secondary sources to power heat networks.</p> <p>The proposed change to policy S5 will have a significant positive effect on reducing the borough's contribution to climate change because it will reduce carbon emissions by prioritising low carbon heating systems, in particular ASHPs, over gas boilers as the power source for minor developments with an individual heating system. The policy change to require a high standard of fabric energy efficiency for such developments will also contribute to reducing carbon emissions by reducing energy demand.</p> <p>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.</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>The changes to policies S1 and S5 will help to minimise the use of non-renewable energy sources by limiting the use of gas CHP and gas boilers. The change to policy S5 will also promote the use of ASHPs which are a renewable sustainable energy source.</p>

IIA Objective	Proposed change to S1 and S5 low carbon heat ASHP	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
14. Maximise protection and enhancement of natural resources including water, land and air	0	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. A result, these policy changes will have a neutral effect on the protection and enhancement of air quality.

## Summary

These changes respond to technological evolution and will help to minimise carbon emissions from heating systems and promote sustainable energy infrastructure, which will contribute towards a more sustainable built environment improving air quality through reduced NOx and a reduction in carbon emissions. In addition to the health and environmental benefits these changes also have economic benefits and help in particular with residents in fuel poverty.

## Transport and Public Realm: Assessment of Policy alternative to Policy T1 & T2

The preferred approach proposes changes to Appendix 3, which relate to Policy T1 which sets out the requirements for cycle parking and Transport Assessments or Travel Plans. The changes proposed for Appendix 3 reflect the nominal changes made to use class orders; replacing the previous use class with the updated use class. To ensure that thresholds for Transport Assessments and Full Travel Plans reflect the size, transport needs and impacts of General Class E developments, a spatial threshold of 750sqm is proposed. This is the lowest threshold for a Class E development; Use Class E(b) Sui Generis Hot Food Takeaway. The purpose of this is to ensure that developers assess transport impacts and explore mitigation for all activities included in Class E. The preferred approach to T2 aligns the cycle parking standards to take into account the changes to the use class order, including the different uses that now fall within class E to ensure that appropriate cycle parking, is provided as well as the importance of designing flexibility to cater for different activities within the same use class. In addition a requirement is introduced for class E where a particular use is unspecified to ensure that a suitable minimum level of cycle parking is provided which can adapt to short stay/long stay requirements of different uses. In summary the option for assessment is:

**Table 2.31 Description of preferred and alternative approach to Policies T1 & T2**

Reference	Description
Preferred approach T1 and T2	To set a minimum threshold for Transport Assessments and Full Travel Plans to ensure the size, transport needs and impacts of General Class E developments, are considered and to set a suitable minimum general level of cycle parking provision for an unspecified Class E use
Alternative BC1	Considering the possible effects of allowing Class E without any policy intervention on transport impact and cycle parking

It is noted that the policy assessment is of a specific aspect of policies T1 and T2 and therefore the policies are assessed together in the same assessment table.

**Table 2.32 Pre hearing assessment of preferred and alternative approach to Policies T1 and T2**

IIA Objective	Preferred approach to policies T1 and T2	Alternative to policies T1 and T2 – no change to specifically address class E and changes to the use class order.	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	++	-	<p>The assessment of the preferred approach identifies positive effects in terms of transport assessments because it will help to address safety and sustainability concerns over quantity of traffic for a proposal and with regards cycle parking because it proposes to provide sufficient cycle parking for visitors or residents/staff as part of development with a general Class E requirement.</p> <p>The alternative by not specifying Class E activity could result in minor loss of cycle parking, harming the promotion of sustainable built environment and potentially cause negative transport impacts if adequate transport assessment was not undertaken.</p>
2. Ensure efficient use of land, buildings and infrastructure	0	-	<p>Preferred approach to Policies T1 and T2 will have a minor positive effect as they encourage more sustainable modes of transport and will tailor the requirement to the use unless its general Class E. This will help to support a more optimal land use in relation to transport and the movement of people and goods. It could also lead to an inefficient use of land with additional cycle parking provided it was not required taking away land from other development needs so is considered overall neutral.</p> <p>The alternative, not specifying Class E activity in Appendix 4 could result in excess or lack of land attributed to cycle parking, an inefficient use of land. A minor negative impact has therefore been identified.</p>

IIA Objective	Preferred approach to policies T1 and T2	Alternative to policies T1 and T2 – no change to specifically address class E and changes to the use class order.	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	0	No effect for alternative or Policy T2.
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	++	-	<p>The preferred approach will have a significant positive effect through helping to ensure that transport impacts can be appropriately assessed and mitigated which will help to reduce the impacts of pollution on the public realm, it will also help to ensure appropriate provision of cycle parking is provided on proposals and that this is sufficiently flexible to adapt - this will help to promote connections and ensure services are accessible via sustainable transport options.</p> <p>The alternative, not specifying cycle parking minimum requirements by activities in Appendix 4 could lead to inappropriate cycle parking provision. The flexibility of Class E means that the needs for long stay and short stay can change depending on the activity. Not having standards which take this into account could lead to inappropriate and insufficient provision which could negatively impact on sustainable transport and accessing services via sustainable means. In addition, not being able to appropriately assess transport impacts could lead to increased transport impacts which can in turn result in additional pollution on the public realm. A minor negative has therefore been identified.</p>

IIA Objective	Preferred approach to policies T1 and T2	Alternative to policies T1 and T2 – no change to specifically address class E and changes to the use class order.	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	0	No effect for alternative or Policy T2.
6. Promote social inclusion, equality, diversity and community cohesion	0	0	No effect for alternative or Policy T2.
7. Improve the health and wellbeing of the population and reduce health inequalities	++	-	<p>The preferred approach will have a significant positive effect through helping to ensure that transport impacts can be appropriately assessed and mitigated which can help to reduce the impacts of pollution on the public realm which can help to tackle pollution and air quality which can impact on health. Ensuring adequate cycle parking is provided will also help to promote active travel which can improve physical health and wellbeing.</p> <p>For the alternative a minor negative effect has been identified. Unrestricted class E in Appendix 3 and 4 could lead to adverse transport impacts and inadequate cycle parking provision, which would affect communities by increasing congestion, air pollution, road danger, as well as creating barriers to cycling.</p>

IIA Objective	Preferred approach to policies T1 and T2	Alternative to policies T1 and T2 – no change to specifically address class E and changes to the use class order.	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	0	-	<p>For the preferred approach no effect has been identified.</p> <p>For the alternative a minor negative effect has been identified. Not addressing the different impacts of class E could lead to adverse transport impacts and inadequate cycle parking provision, which could affect access to employment spaces by increasing congestion or lack of cycle parking.</p>
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	+	-	<p>The preferred approach will have a minor positive effect through helping to ensure that transport impacts can be appropriately assessed and mitigated which can help to promote safe and sustainable connections by public transport, walking and cycling. Ensuring adequate cycle parking which takes into account the different potential impacts of Class E and provides flexibility for cycle parking to adapt will also help to achieve this objective.</p> <p>For the alternative a minor negative effect has been identified. Not addressing the different impacts of class E could lead to adverse transport impacts and inadequate cycle parking provision.</p>

IIA Objective	Preferred approach to policies T1 and T2	Alternative to policies T1 and T2 – no change to specifically address class E and changes to the use class order.	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	0	No effect for alternative or Policy T2.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	0	No effect for alternative or Policy T2.

IIA Objective	Preferred approach to policies T1 and T2	Alternative to policies T1 and T2 – no change to specifically address class E and changes to the use class order.	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	+	-	<p>The preferred approach will have a minor positive effect through helping to ensure that transport impacts can be appropriately assessed and mitigated which can help to reduce the impacts of pollution and emissions. Ensuring adequate cycle parking is provided will also help to promote sustainable travel which can be beneficial in reducing vehicle trips and associated emissions.</p> <p>For the alternative a minor negative effect has been identified. Transport amounts for around 50% of emissions in Islington which contribute to air pollution. Not addressing the different impacts of class E could lead to adverse transport impacts and inadequate cycle parking provision, which would increase emissions and hinder the Council's ambition to be carbon neutral by 2030.</p>
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	0	0	No effect for alternative or Policy T2.

IIA Objective	Preferred approach to policies T1 and T2	Alternative to policies T1 and T2 – no change to specifically address class E and changes to the use class order.	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
14. Maximise protection and enhancement of natural resources including water, land and air	+	-	<p>The preferred approach will have a minor positive effect through helping to ensure that transport impacts can be appropriately assessed and mitigated which can help with tackling air quality. Ensuring adequate cycle parking is provided will also help to promote sustainable travel which can be beneficial in reducing vehicle trips and associated emissions.</p> <p>For the alternative a minor negative effect has been identified Transport amounts for around 50% of emissions in Islington which contribute to air pollution. Not addressing the different impacts of class E could lead to adverse transport impacts and inadequate cycle parking provision. These negative impacts could lead to increased use of motor vehicles, which can in turn impact air quality.</p>

### Summary

The assessment identifies that the flexibility of Class E means that the needs for cycle parking could potentially not be met which could negatively impact on sustainable transport and accessing services via sustainable means. In addition, not being able to appropriately assess transport impacts could lead to increased transport impacts which can in turn result in additional pollution on the public realm, having an effect on health. The preferred approach ensures that transport impacts can be appropriately assessed and mitigated which helps tackling air quality and promoting sustainable travel which can be beneficial in reducing vehicle trips although it could also lead to an inefficient use of land with additional cycle parking provided if developers sought a flexible Class E use which could take away land from other development needs. No positive benefits of the alternative were identified.

## Policy T5: Delivery, Servicing and construction

The policy contains proposed changes (SDM-MO134, 135, 136, 137) that seeks to promote more sustainable freight movements including the use of non-motorised modes of transport for safe, clean and efficient deliveries and servicing, including for uses which generate deliveries to end customers as part of their operation.. The changes to Policy B2: New Business Floorspace, part D contains a proposed change (SDM-MO50) which clarifies the councils approach to air quality and sustainable transport that adds cross reference to policies S7, T2 and T5. The change identifies that proposals for industrial uses which would lead to a significant increase in vehicle movements may potentially have particular impacts on air quality, and will be required to put in place robust, specific mitigation measures to minimise the impacts. The changes to T5 clarify the need for development to demonstrate how it is maximising use of more sustainable modes of transport. The clarification and update is also linked to the recently adopted Islington Transport Strategy.

**Table 2.33 Pre hearing assessment of proposed change to Policy T5**

IIA Objective	Proposed change to T5 delivery, servicing and construction	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
1. Promote a high quality, inclusive, safe and sustainable built environment	+	The modifications require developments to explore more efficient and sustainable freight, delivery and servicing movements, by using sustainable and 'clean' modes for servicing and delivery, including uses generating delivery trips to end customers such as restaurants or shops. This has the potential to reduce the safety and sustainability impacts that deliveries have on the built environment, in particular the public realm. A minor positive effect has therefore been identified.

IIA Objective	Proposed change to T5 delivery, servicing and construction	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
2. Ensure efficient use of land, buildings and infrastructure	+	A minor positive effect has been identified as developments must investigate more efficient, sustainable and non-motorised freight, serving and delivery movements, which could reduce the amount of space required on-site and off-site to accommodate these vehicular movements. The new provision relating to delivery to end customers (for instance for restaurants and shops) also contributes towards that positive effect. Optimised and efficient vehicular movements for freight, delivery, servicing can together lead to positive impacts in terms of improvement congestion on the road network.
3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	0	No effect has been identified.
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	+	A minor positive effect as developments must investigate more efficient, sustainable and non-motorised freight, serving and delivery movements, which supports a reduction in vehicular movements, promotes non-motorised modes, which can support better access to services and sustainable lifestyles.
5. Ensure that all residents have access to good quality, well-located, affordable housing	0	No effect has been identified.

IIA Objective	Proposed change to T5 delivery, servicing and construction	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
6. Promote social inclusion, equality, diversity and community cohesion	0	No effect has been identified.
7. Improve the health and wellbeing of the population and reduce health inequalities	+	A minor positive effect has been identified as relevant developments must investigate more efficient, sustainable and non-motorised freight, serving and delivery movements, which supports a reduction in vehicular movements, promotes non-motorised modes, which can support better access to services and sustainable lifestyles, and by extension reduce health inequalities. The policy can have a positive impact in improving air quality, reduce congestion and other negative consequences relating to traffic, improving health and wellbeing.
8. Foster sustainable economic growth and increase employment opportunities across a range of sectors and business sizes	0	No effect has been identified.
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	+	A minor positive effect has been identified. The requirement to demonstrate how safe, clean and efficient delivery and servicing, which can lead to consolidating and reducing the number of operational vehicle trips. The promotion of non-motorised transport modes can also reduce the volume of motorised trips.

IIA Objective	Proposed change to T5 delivery, servicing and construction	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	0	No effect
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	0	No effect
12. Reduce contribution to climate change and enhance community resilience to climate change impacts.	+	A minor positive effect has been identified. The modifications require delivery and Servicing Plans to demonstrate how clean and efficient deliveries and servicing has been facilitated which will assess the ongoing freight impact of the development and minimise and mitigate the impacts of this. Requiring that industrial developments should facilitate sustainable freight movement , and investigate the use of non-motorised transport and 'clean' vehicles which minimise motorised vehicle trips, which could have a positive effect on reducing carbon emissions.

IIA Objective	Proposed change to T5 delivery, servicing and construction	Commentary on assessment of likely significant effects of policies (including consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects)
13. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	+	A minor positive effect has been identified. The modifications can help promote resource efficiency through reducing motor vehicle use and promote sustainable transport options, minimising the use of non-renewable resources such as petroleum-based fuels.
14. Maximise protection and enhancement of natural resources including water, land and air	+	A minor positive effect has been identified. The modifications requirement for Delivery and Servicing Plans to demonstrate how clean and efficient deliveries and servicing has been facilitated which will assess the ongoing freight impact of the development and minimise and mitigate the impacts of this on the transport system. In addition, the use of low-emission vehicles and efficient and sustainable delivery systems which minimise motorised vehicle trips is encouraged, could have a positive effect on air quality.

### Summary

The assessment identifies the positive benefits of making the changes which will have a help to improve air quality, reduce congestion and other negative consequences relating to traffic, thereby improving health and wellbeing for those living, working or visiting Islington.

# Part 2: New and amended Site Assessments

## **Introduction**

This section sets out the assessment of the new site allocations and amended existing site allocations proposed for pre-hearings consultation.

**Table 2.34 Pre hearing assessment of site KC8 Bemerton Estate**

I/A Objective / Site	1. HIGH QUALITY ENVIRONM	2. EFFICIENT USE OF	3. HERITAGE	4. LIVEABLE NEIGHBOU	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEIN	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVER SITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENC	14. NATURAL RESOURCE
<b>KC8: Bemerton Estate</b>	+	+	0	+	++	+	0	0	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>KC8 is allocated for infill residential development including the provision of additional genuinely affordable housing. Re-provision of community space and provision of new retail/commercial spaces along Caledonian Road is required, alongside improved landscaping, lighting, seating, play spaces and security measures across the estate.</p> <p>The allocation aims to optimise the use of land in a residential area, offering the opportunity to deliver quality housing in an appropriate location. Affordable housing would be provided as part of the development of the site, contributing towards meeting Islington's housing need as well as addressing objectives relating to social inclusion. The allocation requires public realm improvements which will benefit the quality of the built environment, creating a safer and more inclusive environment as well as the re-provision of community and commercial space that will promote more liveable neighbourhoods.</p>													
<b>Reasonable alternative summary</b>	<p>In terms of possible reasonable alternatives to residential use of the site, the site is a housing estate owned by the London Borough of Islington (LBI) identified as having potential to accommodate additional housing development. The Council will not make the site available for non-residential development as this would not align with the Council's objectives for the estate.</p>													

**Table 2.35 Pre hearing assessment of site OIS27: York Way Estate**

I/A Objective / Site	1. HIGH QUALITY ENVIRONM	2. EFFICIENT USE OF	3. HERITAGE	4. LIVEABLE NEIGHBOU	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEIN	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVER SITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENC	14. NATURAL RESOURCE
<b>OIS27: York Way Estate</b>	+	+	0	+	++	+	0	0	0	0	0	0	0	0
<b>Commentary on assessment of likely significant</b>	<p>The allocation suggests that additional genuinely affordable housing can be accommodated on new blocks within the estate, alongside improved play space provision, improvements to communal facilities and enhanced landscaping.</p> <p>The allocation aims to optimise the use of land in a residential area, offering the opportunity to deliver quality housing in an appropriate location. Affordable housing would be provided as part of the development of the site, contributing towards meeting</p>													

<b>effects of site allocations</b>	Islington's housing need as well as addressing objectives relating to social inclusion. 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 promoting a more liveable neighbourhood.
<b>Reasonable alternative summary</b>	In terms of assessing potential reasonable alternatives to residential use of the site, it is appropriate to note that the site is a non-LBI owned housing estate. The draft allocation reflects the landowners' plans for the site and it is considered unlikely that the site would be made available for non-residential development.

**Table 2.36 Pre hearing assessment of site OIS28: Barnsbury Estate**

<b>IIA Objective / Site</b>	<b>1. HIGH QUALITY ENVIRONM</b>	<b>2. EFFICIENT USE OF</b>	<b>3. HERITAGE</b>	<b>4. LIVEABLE NEIGHBOU</b>	<b>5. HOUSING QUALITY</b>	<b>6. SOCIAL INCLUSION</b>	<b>7. HEALTH AND WELLBEIN</b>	<b>8. ECONOMIC GROWTH</b>	<b>9. NEED TO TRAVEL</b>	<b>10. OPEN SPACE</b>	<b>11. BIODIVER SITY</b>	<b>12. CLIMATE CHANGE</b>	<b>13. RESOURCE EFFICIENC</b>	<b>14. NATURAL RESOURCE</b>
<b>OIS28: Barnsbury Estate</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 allocated for refurbishment of Old Barnsbury estate and redevelopment of New Barnsbury estate for residential use, including the provision of additional new homes and genuinely affordable housing. Improvements to existing estate open spaces including the creation of a park on Pultney Street, and the provision of a new park on Carnegie Street with a community centre, play and exercise equipment and ball court. Improvements to landscaping, planting, lighting and security measures, play spaces, seating and bin and cycle storage across the estate.</p> <p>The allocation aims to optimise the use of land in a residential area, offering the opportunity to deliver quality housing in an appropriate location. Affordable housing would be provided as part of the development of the site, contributing towards meeting Islington's housing need as well as addressing objectives relating to social inclusion. The allocation requires extensive improvements to communal facilities, including play spaces, a new community centre and improved routes through estate, which will benefit the quality of the built environment, create a safer and more inclusive environment and promote a more liveable neighbourhood. New publicly accessible open spaces should be provided, contributing towards the increasing need for open space in the borough.</p>													
<b>Reasonable alternative summary</b>	In terms of assessing potential alternatives to residential use of the site, it is appropriate to note that the site is a non-LBI owned housing estate. The draft allocation reflects the landowners' plans for the site and it is considered unlikely that the site would be made available for non-residential development.													

**Table 2.37 Pre hearing assessment of site OIS29 Highbury Quadrant Congregational Church**

The draft Highbury Quadrant Congregational Church allocation reflects the landowner’s plans for the site, which involve the co-location of housing with a new church and community space. The reasonable alternative to the allocation assessed below is retention of the existing quantum of social and community floorspace.

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
OIS29 Highbury Quadrant Congregational Church	+	++	0	++	+	+	+	0	0	0	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	<p>The site is allocated for re-provision of the Church and community space alongside residential development, including affordable housing. Landscaping and public realm improvements should be provided. Improvements to pedestrian access to the site are also important given its ‘island’ location.</p> <p>The co-location of social and community infrastructure uses with housing at the site is considered to be an efficient use of the site. The existing buildings on site are currently in a state of disrepair and development should have a positive effect on the built environment. This option would support the delivery of much needed affordable housing on the site, and bring underused social and community infrastructure back into more productive use. This would have significant positive effects for local residents by encouraging social interaction and providing community and faith facilities, alongside the benefits brought by new good quality housing. This supports the liveable neighbourhoods, social inclusion and health objectives.</p>													
IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. 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: Retention of social and community infrastructure</b>	-	-	0	+	0	+	+	0	0	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of Alternative 1</b>	In terms of potential alternative uses of the site, whilst the retention of social and community infrastructure is strongly supported by policy, in this case allocating the site solely for social and community infrastructure uses could have a negative impact on the built environment and the efficient use of land. The site has suffered fire damage and there are challenges associated with bringing parts of the site back into community use. This alternative could see the site fall into further disrepair, without some form of development to help with improvements to the worship and community meeting spaces. Nevertheless if sole use of the site for social and community infrastructure could be achieved, it would likely have a positive effect on liveable neighbourhoods, social inclusion and health and wellbeing.														
<b>Conclusion</b>	The proposed allocation allows for re-provision of the Church and community space alongside residential development. The alternative considered the retention of social and community infrastructure but that was considered negative against objectives for built environment and the efficient use of land and would not help meet the boroughs development needs given the potential for residential-led development. On balance re-provision of the Church and community space alongside residential development is considered to be the most appropriate use for the site.														

**Table 2.87 Pre hearing assessment of site OIS30: Cluse Court**

I/A Objective / Site	1. HIGH QUALITY ENVIRONM	2. EFFICIENT USE OF	3. HERITAGE	4. LIVEABLE NEIGHBOU	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEIN	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVER SITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENC	14. NATURAL RESOURCE
OIS30: Cluse Court	+	+	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 residential development, including the provision of additional genuinely affordable housing. Improvements to play space, amenity space and landscaping across the estate are required.</p> <p>The allocation aims to optimise the use of land in a residential area, offering the opportunity to deliver quality housing in an appropriate location. Affordable housing would be provided as part of the development of the site, contributing towards meeting Islington’s housing need as well as addressing objectives relating to social inclusion. The allocation requires public realm improvements that will benefit the quality of the built environment, creating a safer and more inclusive environment that will promote more liveable neighbourhoods.</p>													
<b>Reasonable alternative summary</b>	<p>In terms of possible reasonable alternatives to residential use of the site, the site is a housing estate owned by the London Borough of Islington (LBI) identified as having potential to accommodate additional housing development. The Council will not make the site available for non-residential development as this would not align with the Council’s objectives for the estate.</p>													

**Table 2.39 Pre hearing assessment of site OIS31: Hillside Estate**

I/A Objective / Site	1. HIGH QUALITY ENVIRONM	2. EFFICIENT USE OF	3. HERITAGE	4. LIVEABLE NEIGHBOU	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEIN	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVER SITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENC	14. NATURAL RESOURCE
OIS31: Hillside Estate	+	+	0	-/0	++	0/-	0	0	0	0	0	0	0	0
<b>Commentary on assessment of likely significant</b>	<p>Subject to justifying any loss of social infrastructure, residential development including the provision of additional genuinely affordable housing. Improvements to play space, amenity space and landscaping across the estate.</p>													

<b>effects of site allocations</b>	The allocation aims to optimise the use of land in a residential area, offering the opportunity to deliver quality housing in an appropriate location. Affordable housing would be provided as part of the development of the site, contributing towards meeting Islington’s housing need as well as addressing objectives relating to social inclusion. The allocation requires public realm improvements which will benefit the quality of the built environment, creating a safer and more inclusive environment. There is the potential for existing community facilities to be lost as a 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.
<b>Reasonable alternative summary</b>	In terms of possible reasonable alternatives to residential use of the site, the site is a housing estate owned by the London Borough of Islington (LBI) identified as having potential to accommodate additional housing development. The Council will not make the site available for non-residential development as this would not align with the Council’s objectives for the estate.

**Table 2.40 Pre hearing assessment of site OIS32: New Orleans Estate**

IIA Objective / Site	1. HIGH QUALITY ENVIRONM	2. EFFICIENT USE OF	3. HERITAGE	4. LIVEABLE NEIGHBOU	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEIN	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVER SITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENC	14. NATURAL RESOURCE
<b>OIS32: New Orleans Estate</b>	+	+	0	+	++	+	0	0	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>The site is allocated for residential development including the provision of additional genuinely affordable housing. Relocation and re-provision of the existing multi-use games area and community building is proposed, alongside improvements to play space, amenity space and landscaping across the estate.</p> <p>The allocation aims to optimise the use of land in a residential area, offering the opportunity to deliver quality housing in an appropriate location. Affordable housing would be provided as part of the development of the site, contributing towards meeting Islington’s housing need as well as addressing objectives relating to social inclusion. The allocation requires public realm improvements that will benefit the quality of the built environment, creating a safer and more inclusive environment that will promote more liveable neighbourhoods.</p>													
<b>Reasonable alternative summary</b>	In terms of possible alternatives to residential use of the site, the site is a housing estate owned by the London Borough of Islington (LBI) identified as having potential to accommodate additional housing development. The Council will not make the site available for non-residential development as this would not align with the Council’s objectives for the estate.													

**Table 2.41 Pre hearing assessment of site OIS33: Drakeley Court and Aubert Court**

I/A Objective / Site	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
OIS33: Drakeley Court and Aubert Court	+	+	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 residential development including the provision of additional genuinely affordable housing. Relocation of Aubert Court community centre to improve visibility and accessibility is proposed, alongside improved landscaping - including the creation of a new green square - and improved lighting, seating, play space and security measures across the estate. The allocation aims to optimise the use of land in a residential area, offering the opportunity to deliver quality housing in an appropriate location. Affordable housing would be provided as part of the development of the site, contributing towards meeting Islington’s housing need as well as addressing objectives relating to social inclusion. The allocation requires public realm improvements that will benefit the quality of the built environment, creating a safer and more inclusive environment and promoting more liveable neighbourhoods. The new green square will contribute towards the increasing need for open space in the borough.</p>													
<b>Reasonable alternative summary</b>	<p>In terms of possible alternatives to residential use of the site, the site is a housing estate owned by the London Borough of Islington (LBI) identified as having potential to accommodate additional housing development. The Council will not make the site available for non-residential development as this would not align with the Council’s objectives for the estate.</p>													

**Table 2.42 Pre hearing assessment of site OIS34: Kerridge Court**

I/A Objective / Site	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
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<b>OIS34: Kerridge Court</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 allocated for residential development including the provision of additional genuinely affordable housing. Re-provision of the existing multi-use games area within a new, centrally located public space and improvements to play space, amenity space and landscaping across the estate are expected.</p> <p>The allocation aims to optimise the use of land in a residential area, offering the opportunity to deliver quality housing in an appropriate location. Affordable housing would be provided as part of the development of the site, contributing towards meeting Islington's housing need as well as addressing objectives relating to social inclusion. The allocation requires public realm improvements that will benefit the quality of the built environment, creating a safer and more inclusive environment and promoting more liveable neighbourhoods. The new public space will contribute towards the increasing need for open space in the borough.</p>													
<b>Reasonable alternative summary</b>	<p>In terms of possible reasonable alternatives to residential use of the site, the site is a housing estate owned by the London Borough of Islington (LBI) identified as having potential to accommodate additional housing development. The Council will not make the site available for non-residential development as this would not align with the Council's objectives for the estate.</p>													

**Modified allocations:**

The following assessments reflect main modifications made to the allocations for sites AUS8: 161-169 Essex Road, N1 2SN; FP5: 1 Prah Road, N4 2RA; NH1: Morrison’s supermarket and adjacent car park, 10 Hertslet Road, and 8-32 Seven Sisters Road, N7 6AG; ARCH1: Vorley Road/Archway Bus Station, N19; OIS10: Hornsey Road and Grenville Works, 2A Grenville Road ; ARCH5: Archway Campus, Highgate Hill, N19

**Table 2.43 Pre hearing assessment of modifications made to site AUS8: 161-169 Essex Road, N1 2SN**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
AUS8: 161-169 Essex Road, N1 2SN	+	+	++	++	+	+	0	+	0	0	0	+	0	+
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>AUS8 is allocated for a mix of retail, culture and leisure uses. There is an opportunity to develop the car park to the rear of the site and it is considered residential use could be appropriate on this part of the site.</p> <p>The most significant positive effect of the allocation will be on liveable neighbourhoods. The allocation protects the existing cultural uses which will attract people to the area and help sustain a vibrant and viable town centre in Angel. The building is Grade II* listed and this is protected in the allocation; bringing the building back into appropriate use could have a significant positive heritage impact. The allocation also positively contributes to creating a high quality environment and optimising the use of land by supporting the development of the car park to meet need for additional housing in the area including affordable housing. Redevelopment of the car park also contributes to the council’s strategic objective to encourage active modes of transport and reduce dependency on cars, which should have a minor positive effect in relation to the council’s objectives to reduce contributions to climate change and improve air quality. The provision of good quality affordable housing could have positive effects in relation to social inclusion.</p>													
<b>Conclusion</b>	<p>The modification changes the focus of uses on the car park to the rear of the site, from business uses being priorities to recognising residential use could be appropriate. It is thought that an element of residential use could be incorporated onto the site through the redevelopment of the car park to the rear of the site. Whilst the change from business use to residential could have an effect in relation to economic growth, the site would still provide relevant town centre uses which would continue to provide for positive economic growth effects, whilst also providing a minor positive in the provision of housing.</p> <p>Note site AUS8 and alternatives are assessed in Part 1: Table 1.80</p>													

**Table 2.44 Pre hearing assessment of modifications made to site FP5: 1 Prah Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
FP5: 1 Prah Road	++	+	0	+	++	+	0	0	0	0	0	0	0	0
Commentary on assessment of likely significant effects of site allocations	<p>FP5 is allocated for residential development and public realm improvements.</p> <p>The allocation provides an opportunity to bring an unused site back into use, making more efficient use of the site and improving natural surveillance in an area with high crime levels. The site is within the town centre, providing future residents with good access to facilities and amenities in accordance with the liveable neighbourhoods objective. The site would provide affordable housing as part of any residential element. This could also have positive effects in relation to social inclusion.</p>													
Conclusion	<p>Although business use was previously identified on the site, the benefits of housing were recognised. As the site was not previously in business use (as a former Conservative club in Sui Generis use) and is located in a primarily residential area, albeit still within Finsbury Park Town Centre, residential use of this site would be appropriate, although it is recognised that this would not result in a positive contribution towards economic growth.</p> <p>Note site FP5 and alternatives are assessed in Part 1: Table 1.107</p>													

**Table 2.45 Pre hearing assessment of modifications made to site NH1: Morrison’s supermarket and adjacent car park, 10 Hertslet Road, and 8-32 Seven Sisters Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
NH1: Morrison’s supermarket and adjacent car park, 10 Hertslet Road,	++	++	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
and 8-32 Seven Sisters Road, N7 6AG														
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>NH1 is allocated for mixed-use development, with a large quantum of residential use, retention of and improvements to existing retail floorspace and a significant amount of new office floorspace. Existing site permeability through to Seven Sisters Road and the market should be maintained. Retention and enhancement of the covered market will be supported. The allocation also identifies that the site offers the opportunity for the development of a local landmark building up to 15 storeys.</p> <p>The allocation offers an opportunity to improve retail provision and add business and residential floorspace in a central location in the town centre. This should help meet resident's needs and improve access to town centre uses, foster economic growth through providing additional opportunity for employment as well as increase the supply of residential floorspace all of which result in positive effects. The site would provide affordable housing as part of any residential element. Delivery of quality housing which addresses the challenging environment would be an important consideration in this location. Permeability improvements at the site would promote liveable neighbourhoods by improving residents' connection to facilities and amenities. New development presents the opportunity for new high quality architecture that can enhance the town centre in particular along Hertslett Road. 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>													
<b>Conclusion</b>	<p>The allocation is proposed to be amended to rebalance the mix of uses proposed – the retention and improvement of existing retail floorspace is considered to be sufficient to meet demand for retail floorspace in this location. Therefore, rather than requiring additional retail floorspace, the allocation now supports a more fully mixed-use scheme with a significant amount of residential and office floorspace on the upper floors. This does not affect the scoring overall – the site will still contribute towards the delivery of economic and housing needs.</p> <p>Note site NH1 and alternatives are assessed in Part 1: Table 1.89</p>													

**Table 2.46 Pre hearing assessment of modifications made to site ARCH1: Vorley Road/Archway Bus Station, N19**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
ARCH1: Vorley Road/Archway Bus Station, N19	++	++	0	+	++	+	+	+/0	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>ARCH1 is allocated for residential-led development with social and community infrastructure uses. There may be potential for an element of business floorspace including affordable workspace and space suitable for SMEs. The allocation identifies that the northern part of the site presents an opportunity for the development of a local landmark building of up to 15 storeys, forming part of an Archway cluster of tall buildings.</p> <p>The allocation is an opportunity to develop residential, social and community infrastructure and business uses in a central and highly accessible location in the town centre, optimising the use of previously developed land and buildings. The development of a landmark tall building will and assist with wayfinding and permeability and help to enhance local character. The allocation will foster economic growth by providing additional opportunities for employment and increase the supply of residential floorspace, resulting in positive effects. The site would provide affordable housing as part of any residential element, which will help people to move out of poor quality and/or inappropriate housing with positive effects for social inclusion and health and wellbeing. Permeability improvements at the site would promote liveable neighbourhoods by improving residents' connection to facilities and amenities.</p>													
<b>Conclusion</b>	<p>The modification continues to be allocated for residential development. The introduction of a social and community uses will have positive effects in relation to liveable neighbourhoods and potential social inclusion however does not change the scoring already identified. The change in emphasis that there may be an element of business floorspace is less certain and this has been reflected in the scoring, however given the benefits of social and community infrastructure uses in a town centre location and the continued opportunity to provide a significant amount of housing the modification to the allocation is considered appropriate and has a number of positive effects.</p> <p>Note site ARCH1 and alternatives are assessed in Part 1: Table 1.118</p>													

**Table 2.47 Pre hearing assessment of modifications made to site OIS10: Hornsey Road and Grenville Works, 2A Grenville Road**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
OIS10:	+	+	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
Hornsey Road and Grenville Works, 2A Grenville Road														
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>The modification for OIS10 is allocated for mixed-use office and residential development.</p> <p>The allocation optimises the use of previously developed land. Given the site is within the Hornsey Road/Marlborough Road Priority Employment Location and the current employment use of the site a mixed use development could lead to the loss of existing business floorpace which could have a negative impact on economic growth, however the provision of some office development would still contribute towards employment objectives helping to mitigate the impacts of this to some extent leading to a neutral/minor negative effect in relation to economic development overall. The site would provide affordable housing as part of any residential element, contributing towards meeting Islington’s housing need as well as addressing objectives relating to social inclusion. The co-location of commercial and residential uses could have a positive effect on promoting liveable neighbourhoods by improving access for residents to essential services such as shops. There is some potential for conflict between residents and commercial occupiers, resulting from the noise, waste and vehicle movements associated with business operating hours and delivery and servicing requirements.</p>													
<b>Conclusion</b>	<p>An allocation for mixed-use office and residential development reflects the extant planning permission for the site. Whilst this could have a minor negative effect in relation to economic growth given the previous employment use on the site, the provision of some office development would still contribute towards employment objectives helping to mitigate the impacts of this to some extent. The modified allocation would also have positive effects on the provision of housing. On balance it is considered that the modified allocation will help to contribute towards the boroughs housing needs as well as retaining some employment use on the site to contribute towards the provision of jobs and the wider function of the PEL.</p> <p>Note site OIS10 and alternatives are assessed in Part 1: Table 1.145</p>													

**Table 2.48 Pre hearing assessment of modifications made to site ARCH5: Archway Campus, Highgate Hill, N19**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVERSITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENCY	14. NATURAL RESOURCES
ARCH5: Archway Campus, Highgate Hill, N19	+	++	0	+	++	+	0	+	0	0	0	0	0	0
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>ARCH5 is allocated for residential-led development with some commercial and community and social infrastructure uses on the ground floor. It also allows for an element of student housing provided this does not weigh against the provision of priority conventional housing on the site.</p> <p>The allocation of this site will substantially contribute to housing provision in the borough, including the provision of affordable housing, to help meet need. It also makes efficient use of land located in a highly accessible area which has been vacant for some time, and development should seek to improve linkages to Archway Town Centre, promoting a more liveable neighbourhood. Development of the site can help to enhance the local character of the area and promote a high quality built environment. The introduction of some commercial use can have a minor positive effect in relation to economic growth, with both commercial uses and community and social infrastructure use could also contribute to liveable neighbourhoods by providing accessible services.</p> <p>The introduction of an element of student housing, has the potential to make less efficient use of the land for priority land uses, however the allocation text is clear that student accommodation is provided where this is not considered to impact negatively on the provision of priority conventional housing on-site.</p>													
<b>Conclusion</b>	<p>The modified allocation retains a strong focus on residential-led development. The strong positive benefits already identified in the original scoring in relation to housing and other objectives has not changed. As noted above, the provision of an element of student housing is provided on the basis that this does not negatively impact on conventional housing and affordable housing and so the scoring in relation to those objectives is unaffected. The only change in relation to the scoring is that an element of commercial use could have a new positive impact in relation to economic growth. On balance the modified allocation is considered appropriate and has a number of positive effects.</p> <p>Note site ARCH5 and alternatives are assessed in Part 1: Table 1.122</p>													

**Table 2.49 Pre hearing assessment of modifications made to site BC13 Car park at 11 Shire House, Whitbread Centre, Lamb's Passage**

IIA Objective / Site	1. HIGH QUALITY ENVIRON	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. HOUSING QUALITY	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEIN	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE	11. BIODIVER SITY	12. CLIMATE CHANGE	13. RESOURCE EFFICIENC	14. NATURAL RESOURCE S
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<b>BC13 Car park at 11 Shire House, Whitbread Centre, Lamb's Passage</b>	+	++	0	0	+	+	0	+	+	0	0	+	0	+
<b>Commentary on assessment of likely significant effects of site allocations</b>	<p>The allocation is for redevelopment to provide a mixed use development which includes a significant amount of office floorspace including affordable workspace and small scale business uses with additional residential use may be acceptable.</p> <p>The allocation will have minor positive effects on housing and economic growth through the development of employment floorspace. The provision of significant office space, alongside affordable workspace and small scale business uses would have a positive effect in relation to economic growth and on social inclusion through provision of a range of job opportunities. The addition of housing will have a positive effect in relation to objective 5 which could also have positive effects on social inclusion.</p> <p>The site is currently a ground level car park and the allocation will have significant positive effects on the efficient use of land by bringing this into use and removing the car parking. The removal of car parking will have sustainability benefits and contribute to wider strategic aims to encourage more sustainable forms for transport, resulting in minor positive effects on the objectives for climate change, transport, and natural resources. 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>													
<b>Conclusion</b>	<p>The modification changes the allocation to recognise that there should be a significant amount of office floorspace, whilst recognising additional residential use may be acceptable. This is will have mostly the same effects as the original allocation albeit there is an additional positive effect in relation to the provision of housing.</p> <p>Note site BC13 and alternatives are assessed in Part 1: Table 1.173</p>													

# IIA Examination Conclusions

This section seeks to pull together part 1 and part 2 assessments using as a base the overall cumulative effects of the plan when considered against the sustainability framework objectives set out in part 1: cumulative effects. This has been presented below in table form with a column added which updates and adds any relevant effects identified in part 2. The section seeks to bring together the overall cumulative effects of the plan against the sustainability framework objectives, drawing out positive effects between policy areas but also potential tensions. It is intended to make clear that the effects identified in part 2 either add to the those identified in Part 1 or they replace effects identified in part 1 of the examination IIA.

**Table 2.51 IIA Examination Conclusions**

Objectives	Cumulative effects Part 1 submission IIA	Updated consideration of cumulative effects following modifications assessment in Part 2
<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>The assessment of modifications recognises the potential harmful effect on social and community uses but also the wider mix and balance of uses across the CAZ and town centres from Class E which the modifications can only partly mitigate. There is a change in effects from the submission IIA in response to introduction of Class E and whilst the modifications across various policy areas are considered positive these effects are now minor where previously they were considered significant positive. Effects are considered limited as there an element of uncertainty over how effective the approach will be in securing an inclusive, safe and sustainable built environment that places people at the heart of the design process and creates robust and adaptable buildings that respond to people’s changing needs over the long term.</p>

Objectives	Cumulative effects Part 1 submission IIA	Updated consideration of cumulative effects following modifications assessment in Part 2
<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 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>The assessment of modifications recognises the potential harmful effect on the mix and balance of uses and efficient use of land in the CAZ from Class E which is considered to impact the wider economic function of the area. There is a change in effects from the submission IIA in response to introduction of Class E and whilst the modifications across various policy areas are considered positive these effects are now minor where previously they were considered significant positive but uncertainty is identified over how effective the approach in policy BC1 will be in maximising office floorspace.</p> <p>The effect of Class E and the potential dilution of retail development in the most appropriate locations in town centres is a risk and an inefficient use of land which could be ineffective in balancing competing demands between land uses and will result in retail needs not being met. Whilst the preferred approach goes some way to mitigating this the advent of Class E is recognised as working against the policies assessed in the submission IIA which sought to balance the tensions between land uses and focus development in the right locations. Ultimately the introduction of Class E affects the ability of the Local Plan to meet the development needs of the area.</p>
<p><b>Objective 3 - Conserve and enhance the significance of heritage assets</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</p>	<p>None of the modifications have significantly changed the assessments outcomes against this objective.</p>

Objectives	Cumulative effects Part 1 submission IIA	Updated consideration of cumulative effects following modifications assessment in Part 2
<p><b>and their settings, and the wider historic and cultural environment</b></p>	<p>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 uncertainty around Class E is identified for social and community facilities, which could both help to reduce health inequalities by increasing opportunities for healthcare facilities, as well as leisure and indoor recreation uses such as gyms but could also increase health inequalities by not protecting these facilities against change of use to higher value uses. The effect of Class E will also likely have minor negative effect on liveable neighbourhoods as the lack of planning control for many uses, including food and drink uses like cafes and restaurants, may result in some of these uses being developed in inappropriate locations and have negative impact due to their effect on residential amenity such as noise, odours, and servicing impacts. The wider impact on town centre vibrancy from the potential for Class E uses which do not form active frontages, such as offices at ground floor could cumulatively and in specific locations individually, have a negative impact on the diversity, vibrancy and economic prosperity of town centres and LSAs. Overall there is a change</p>

Objectives	Cumulative effects Part 1 submission IIA	Updated consideration of cumulative effects following modifications assessment in Part 2
	<p>encourage permeability and movement and maintain and support access to services and facilities.</p>	<p>in effects from the submission IIA in response to introduction of Class E and whilst the modifications across various policy areas are considered positive these effects are now minor where previously they were considered significant positive.</p> <p>However, the increased ability for COU within the E use class may have positive impacts on upper floors in town centres, and especially in less well performing LSAs that would benefit from an influx of workers.</p> <p>The additional site allocations specifically to address housing supply will deliver wider improvements beyond improvements in 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</p>	<p>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.</p>

Objectives	Cumulative effects Part 1 submission IIA	Updated consideration of cumulative effects following modifications assessment in Part 2
	<p>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.</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>There is a change in effects from the submission IIA in response to introduction of Class E and whilst the modifications across various policy areas are considered positive these effects are now minor where previously they were considered significant positive.</p>
<p><b>Objective 7 - Improve the</b></p>	<p>Policies throughout the plan help address the health and wellbeing objective, in particular housing policies which determine housing quality</p>	<p>Policy R5 seeks to maintain local shops and cafes. These facilities are often the closest facilities to</p>

Objectives	Cumulative effects Part 1 submission IIA	Updated consideration of cumulative effects following modifications assessment in Part 2
<p><b>health and wellbeing of the population and reduce health inequalities</b></p>	<p>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>where people live so enabling their protection as a local neighbourhood service that especially benefits access to goods and services by people with mobility issues is particularly relevant and considered to have a positive effect against this objective.</p> <p>Policy T1 and T2 changes in response to Class E will have a significant positive effect through helping to ensure that transport impacts of Class E can be appropriately assessed and mitigated which can help to reduce the impacts of pollution on the public realm which can help to tackle pollution and air quality which can impact on health. Ensuring adequate cycle parking is provided will also help to promote active travel which can improve physical health and wellbeing. In addition the changes to Policy T5 are similarly positive in this respect.</p> <p>The new site allocations which specifically address housing supply and affordable housing delivery could potentially lead to impacts, for example in terms of the overall quantum of amenity space on estates potentially affecting access to that space. The effect of this is uncertain as it will depend on the circumstances of each site and the details of the final proposals at planning application stage. The effects of development on each site will be mitigated through other policies in the plan, for example on housing estates there is policy G2 which seeks to protect open space on estates and which sets criteria the for re-provision and</p>

Objectives	Cumulative effects Part 1 submission IIA	Updated consideration of cumulative effects following modifications assessment in Part 2
		enhancement of open space in the circumstance where development is proposed.
<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>The wider positives of Class E are noted in particular the creation of a wider range of employment opportunities which could potentially help remove some barriers to employment across the borough with the increased flexibility around where uses can locate. However the assessment recognises the detrimental longer term effect on the existing economic function of parts of the borough if a significant quantum of floorspace changes via Class E to flexible uses over time. The detrimental effect is recognised in particular on the role of the CAZ in supporting Central London’s economy but uncertainty is recognised in terms of all locations – including town centres and more peripheral locations. There will also be a detrimental effect on LSIS, in particular Vale Royal, Islington’s most significant LSIS. Protecting the industrial function of LSIS has wider benefits serving other economic functions in both the local and wider London economy, so there would be a detrimental effect in neighbouring boroughs depending on their dependency on the activities usually found in LSIS which support businesses in other boroughs.</p> <p>The tension Class E has introduced is particularly apparent with the assessment of marketing periods for the protection of existing uses with the assessment finely balanced over considering the options and the response of landowners with long term impacts considered to be overall negative.</p>

Objectives	Cumulative effects Part 1 submission IIA	Updated consideration of cumulative effects following modifications assessment in Part 2
		<p>More generally in the longer term Class E is considered to have a negative effect on the overall supply of office space.</p>
<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 transport impacts of class E are considered in Policy T1, T2 and T5 changes and will have a significant positive effect that builds on the submission policy through helping to ensure that transport impacts of Class E can be appropriately assessed and mitigated which can help encourage a shift to more sustainable forms of travel.</p> <p>The uncertainty over predictions of where uses will be located from Class E could now have a minor negative impact on road networks and sustainable transport modes when there is an accumulation of uses that have loading and parking requirements or high numbers of journeys such as offices in industrial areas for example which do not have appropriate public transport access.</p>
<p><b>Objective 10: Protect and enhance open spaces that are high quality, networked, accessible and multi-functional</b></p>	<p>The approach ensures that open spaces are preserved and seeks to increase the amount of green open space. Area Spatial Strategies will help to create a high quality built environment with public realm improvements and also identify improvements to access existing green open spaces or add additional open space. This will have wider health benefits when combined with Urban Greening policies and enhancement of green infrastructure. Combined with other policies in the Local Plan this helps to promote physical and mental health, health benefits</p>	<p>The changes to Policy G2 that provide clarification on how proposals for moorings and facilities to support moorings should be approached in the context of the canal as public open space identify no effects as the policy states that development can only take place where it there is no detrimental impact on nature conservation and biodiversity value, and the character and amenity of the</p>

Objectives	Cumulative effects Part 1 submission IIA	Updated consideration of cumulative effects following modifications assessment in Part 2
	associated with access to nature, responds to impacts of climate change (flood risk and urban heat island) as well as improving air quality.	waterway corridor and its function as public 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>None of the modifications have significantly changed the assessments outcomes against this objective.</p>
<b>Objective 12: Reduce contribution to climate change and enhance community resilience to climate change impacts</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 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</p>	<p>The policy changes add to the submission policies Sustainable Design policies by responding to technological evolution and will help to minimise carbon emissions from heating systems and promote sustainable energy infrastructure, which will contribute towards a more sustainable built environment improving air quality through reduced NOx and a reduction in carbon emissions.</p> <p>The displacement of industrial activities of the LSIS through Class E could see an increase in vehicle mileage through Islington, which risks increased</p>

Objectives	Cumulative effects Part 1 submission IIA	Updated consideration of cumulative effects following modifications assessment in Part 2
	<p>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>congestion and emissions, which would have climate change and air quality impacts.</p> <p>The transport impacts of class E are considered in the Policy T1 and T2 changes and will have a significant positive effect that builds on the submission policy through helping to ensure that transport impacts of Class E can be appropriately assessed and mitigated which can help reduce the carbon emissions associated with transport. In addition the changes to Policy T5 are similarly positive in this respect.</p>
<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</p>	<p>None of the modifications have significantly changed the assessments outcomes against this objective.</p>

Objectives	Cumulative effects Part 1 submission IIA	Updated consideration of cumulative effects following modifications assessment in Part 2
	working jointly with neighbouring boroughs on the North London Waste Plan, that will plan for waste management needs for the borough.	
<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>The potential negative impact on efficient, sustainable travel with potential distortion of the retail hierarchy across all policies through Class E could increase the need to travel and therefore carbon emissions associated with transport. Similarly, the displacement of industrial activities of the LSIS through Class E could see an increase in vehicle mileage through Islington, which risks increased congestion and emissions, which would have climate change and air quality impacts. This in turn contributes to the high levels of air pollution in London. High trip generating E uses located outside of town centres could see these uses not located in the most well served locations for public transport infrastructure specifically bus, tube and rail connections.</p> <p>Policy T1 and T2 changes in response to Class E will have a significant positive effect through helping to ensure that transport impacts of Class E can be appropriately assessed and mitigated which can help to reduce the impacts of air pollution. In addition the changes to Policy T5 are similarly positive in this respect.</p>

# IIA: Mitigation

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 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 ie 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 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.

# IIA: 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 2.50 Pre hearing assessment of proposed IIA indicators and proposed Local Plan indicators**

TOPIC	IIA Objective	Prompt Questions	Proposed IIA Indicator	Proposed Local Plan indicator
BUILT ENV	1. Promote a high quality, inclusive, safe and sustainable built environment	<p>Will the policy...</p> <ul style="list-style-type: none"> <li>Secure high quality architecture and urban design that enhances local character and distinctiveness?</li> <li>Promote location sensitive density and design?</li> <li>Ensure consideration of the spaces between buildings to provide an attractive, functional and sustainable public realm?</li> <li>Create robust and adaptable buildings that can respond to change over their life?</li> <li>Make the built environment safer and more inclusive?</li> <li>Promote an approach to design that places people at the heart of the design process?</li> <li>Encourage measures to reduce crime and fear of crime including anti-social behaviour?</li> </ul>	<ul style="list-style-type: none"> <li>Rate of crime (per 1000 residents)</li> <li>Perceptions of anti-social behaviour</li> </ul>	<ul style="list-style-type: none"> <li>Visitor accommodation change (completions) in schemes and bed spaces in identified locations and outside of identified locations</li> </ul>
USE OF LAND	2. Ensure efficient use of land, buildings and infrastructure	<p>Will the policy...</p> <ul style="list-style-type: none"> <li>Optimise use of previously developed land, buildings and existing infrastructure?</li> <li>Optimise the use of previously developed sites and new builds to implement Green Infrastructure in unused areas such as footpath sides, blank walls and roof space?</li> <li>Focus development in the most appropriate locations?</li> <li>Balance competing demands between land uses to provide for the full range of development needs of the area?</li> </ul>	<ul style="list-style-type: none"> <li>Proportion of floorspace consented in class E use vs proportion in conditioned class E use for office, shops, community infrastructure and light industrial.</li> </ul>	<ul style="list-style-type: none"> <li>Number of homes and amount of business floorspace completed in spatial strategy areas (cumulative totals)</li> <li>Business floorspace completed (and net change) in major developments within (i) CAZ and Bunhill and Clerkenwell AAP (ii) CAZ fringe Spatial Strategy areas – Angel and Upper</li> </ul>

TOPIC	IIA Objective	Prompt Questions	Proposed IIA Indicator	Proposed Local Plan indicator
		<ul style="list-style-type: none"> <li>Provide the necessary infrastructure in the right locations to support development e.g. water, sewerage, energy transport etc?</li> <li>Ensure that development is sufficiently flexible and adaptable to accommodate evolving social and economic needs</li> </ul>		Street; and King's Cross and Pentonville Road (iii) Priority Employment Locations (PELs)
HERITAGE	3. Conserve and enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	<p>Will the policy.....</p> <ul style="list-style-type: none"> <li>Protect sites, features and areas of historical, archaeological and cultural value and their setting in and around Islington?</li> <li>Enable the borough's heritage and culture to be understood, explored and appreciated as much as possible and by as wide a range of people as possible?</li> <li>Protect views of historically important landmarks and buildings and valued local views?</li> <li>Ensure Islington's historic environment contributes to social and cultural life in the borough?</li> <li>Successfully balance access and energy efficiency requirements with the conservation and enhancement of heritage assets?</li> <li>Encourage management plans to be actively prepared and implemented?</li> </ul>	<ul style="list-style-type: none"> <li>Changes in the number of Heritage assets; listed Buildings, Conservation Areas</li> <li>Change in number of heritage assets held on heritage at risk register</li> </ul>	<ul style="list-style-type: none"> <li>Additions and removals from the Historic England Buildings at Risk Register</li> <li>Tall buildings completed in identified locations and outside of identified locations</li> </ul>
LIVEABLE	4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	<p>Will the policy...</p> <ul style="list-style-type: none"> <li>Improve access for all residents to all essential services, facilities and amenities near their home? Such as health facilities, schools, early years provision, council services, advice services, libraries, community and faith facilities, leisure centres, open space and play areas, food growing space, and neighbourhood shops.</li> <li>Promote diverse, vibrant and economically thriving town and local centres that serve the needs and wellbeing of the population?</li> <li>Improve connections of neighbourhoods with facilities/amenities?</li> <li>Encourage a vibrant social environment that attracts visitors to the borough while respecting the needs of residents?</li> <li>Reduce the impacts of noise, vibration and pollution on the public realm?</li> </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> </ul>	<ul style="list-style-type: none"> <li>Health deprivation (IND)</li> <li>Life expectancy</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>• 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>	<ul style="list-style-type: none"> <li>• Rate of obesity in children</li> <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	<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> </ul>	<ul style="list-style-type: none"> <li>• Proportion of residents using sustainable modes of transport</li> <li>• Volume of transport in Islington</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
	transport, cycling and walking	<ul style="list-style-type: none"> <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>	<ul style="list-style-type: none"> <li>• Number of people killed or seriously injured on Islington roads</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> </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
		<ul style="list-style-type: none"> <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>		
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> </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>

TOPIC	IIA Objective	Prompt Questions	Proposed IIA Indicator	Proposed Local Plan indicator
NATURAL RESOURCES	14. Maximise protection and enhancement of natural resources including water, land and air	<ul style="list-style-type: none"> <li>• Provide the right type of infrastructure to deal with residual waste in the most sustainable way?</li> </ul> <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> <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>		<ul style="list-style-type: none"> <li>• Annual mean air pollution levels for nitrogen dioxide and PM10</li> </ul>

# Appendix 1: EqIA Local Plan Modifications

## Islington Local Plan modifications – Equalities Impact Assessment update

A full equalities impact assessment was undertaken as part of the Regulation 19 IIA. The following provides an update to this specifically looking at the equalities implications of proposed modifications to the plan.

**Table 1: Area Spatial Strategies, set out in Strategic and Development Management Policies, policies SP1 to SP8; and Bunhill and Clerkenwell Area Action Plan policies BC3 to BC8**

<b>Do the modifications have a positive or negative impact on groups with protected characteristics?</b>	<b>How will the modifications in this section impact and which groups with protected characteristics will it effect?</b>
Modifications likely to positively impact on groups with protected characteristics.	SP2 (SDM-MO4- SDM-MO5) and BC4 (BC-M09) provide clarification on how proposals for moorings and facilities to support moorings should be approached in the context of identified needs and the canal as an open space. The modifications have the potential to improve boat dwellers’ safety, convenience and quality of life by improving their access to water, electricity and waste collection. Boat dwellers may possess one or more protected characteristics; a 2016 survey of London boat dwellers conducted by the Canal and River Trust found 10% of respondents reported a disability and 11% were from non-white backgrounds. <sup>1</sup> Better boater facilities also contribute to creating a cleaner and better-quality environment for pedestrians and cyclists, therefore benefitting many protected groups who walk or cycle beside the canal. The policy does not require improvements however and so the extent of positive impacts will depend on implementation. This modification is cross-referenced by a modification in G2. The impacts of modifications of G2 for protected groups are considered in that section below.

In SP3 A (SDM-MO09), the approach to securing new light industrial floorspace through planning conditions, responding to the introduction of class E, will help retain a range of employment opportunities which can help to benefit local people.

Islington's 2016 Employment Study<sup>2</sup> highlights that land prices in the LSIS are much more affordable than in other parts of the borough, which provides a lower price threshold for enterprise space needed for new and emerging businesses. This can favour small to medium size businesses. The location of the LSIS in Inner London make it an accessible employment area for local people, who can also access it by public transport. This is likely to have a positive impact on those protected groups who may be on lower incomes; in particular BAME, disabled and pregnant women are less likely to have access to private motorised transport. It is worth noting that car ownership increases with household income, types of household and homes. People on lower incomes, lone parents and people who rent their properties are less likely to own a car<sup>3</sup>.

In spite of these identified positive impacts, existing light industrial floorspace can be converted into other uses within Class E, which could lead to a reduction of in the range of employment opportunities which could have negative impacts for local people, including those with protected characteristics identified above, albeit this is beyond the scope of the policy.

The proposed change to SP5 (SDM-MO18) and Site Allocation NH1 (SA-MO57) seeks to balance the retention and enhancement of retail and employment floorspace and emphasises the need to provide a significant amount of residential space on the upper floors. This will help to provide additional housing including affordable housing to support meet identified housing needs. All BAME groups (with the exception of Indian/Pakistani and White Other households) as well as young and older people and those with disabilities are more likely to be on lower incomes and to be housed in social

	<p>rented housing. Providing increased and improved housing opportunities for those on low incomes is likely to have a positive effect on these protected groups. The provision of accessible accommodation which will also have a positive effect on disabled and others with mobility needs.</p> <p>Other modifications were identified to have no specific impacts.</p>
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**Table 2: Thriving Communities, set out in Strategic and Development Management Policies, policies H1 to H12 and SC1 to SC4**

<b>Do the modifications have a positive or negative impact on groups with protected characteristics?</b>	<b>How will the modifications in this section impact and which groups with protected characteristics will it effect?</b>
<p>Modifications likely to positively impact on groups with protected characteristics.</p>	<p>H7- Meeting the needs of vulnerable older people, part F (SDM-MO36) is a clarification in relation to how the policy structured. It does not impact on the overall outcomes.</p> <p>(SDM-MO39 - SDM-MO41 )The changes to policy H12 and the supporting text responds to the deletion of the London Plan definition of Gypsies and Travellers. Islington has given consideration to how differing definitions of this protected ethnic group influence the identified accommodation need (Council’s Gypsy and Traveller Accommodation Assessment (2019)). The proposed modifications retain the commitment to meeting identified need, and the Local Plan continues to recognise the different levels of need that applying the removed draft London Plan definition and government definition result in.</p> <p>Islington’s evidence suggests the need is currently entirely from members of the Gypsy and Traveller community who live in permanent ‘bricks and mortar’ accommodation, including social housing in Islington. Depending on the preferences of Gypsies and Travellers living in ‘bricks and mortar’ this need may not translate into a need for pitches.</p>

The planning and delivery of new pitches may result in a reduction in social exclusion, and promote equality, fairness and respect for some Gypsies and Travellers. However, the positive benefits of this would be reduced the less the need is met. As the Local Plan recognises that the theoretical need identified may not translate into real need in practice, whilst the changes could be seen to reduce the pitch target the reality of the Islington context has not changed and whilst the change made at the London Plan level may have a negative effect from a strategic point of view the effect of the modifications at a local level remains positive. However, depending on the extent of need and if pitches are provided based on the government's definition, this could lead to the delivery of a lower number of pitches, thereby having the potential to reduce the overall positive impact. The Local Plan, whilst recognising the challenges in meeting identified need due to the circumstances of the borough, also highlights mitigations in place to meet identified need. Depending on the scale of accommodation that can be met through council sites(s), if there is a need for further sites to meet need, this could be met through a focused review of the Site Allocations document, and/or by working subregionally with other boroughs and the GLA.

(SMD-MO42) H12 Gypsy and Traveller Accommodation relating to windfall sites that come forward during the plan period, add additional clarification that proposed sites must provide a high quality of housing consistent with relevant aspects of policy H4 is added. The addition of this wording reiterates the requirement of high-quality housing for the protected group. Additions to paragraph 3.150 emphasise that amenity blocks must meet accessibility standards and a good level of privacy to be maintained. This detail will promote high accessibility standards for members of the Gypsy and Traveller community, especially for those who possess a disability.

SC1 new criterion C (SMD-MOD43) proposes to secure necessary social and community infrastructure at planning stage. Securing social and community infrastructure services and facilities is generally considered to have

a positive impact on all groups in terms of supporting physical and mental health and wellbeing and helping encourage community cohesion. As stated in the Regulation 19 Equality Impact Assessment for SC1, this infrastructure is likely to have a positive impact on disabled people and older people, particularly older women, who live longer but spend more later years living with a disability, as these groups rely more on health services. Positive impacts are also especially likely to be felt by certain BAME groups who are more likely to experience poor health. Community infrastructure also supports children, older people, and families and often offers support to people who possess protected characteristics relating to religion, race, gender reassignment, sex and sexual orientation. In spite of this positive impact, it is worth noting that class E has potential impacts in terms of loss of social infrastructure which the policy can no longer affect. The effect of Class E has curtailed the ability of the policy to safeguard existing social and community infrastructure facilities that fall within Class E, such as nurseries, day centres, medical and health services and indoor sports facilities. Whilst this could both help to reduce access to facilities by increasing opportunities for healthcare facilities, as well as leisure and indoor recreation uses such as gyms but could also increase access to facilities by not protecting these facilities against change of use to higher value uses. Therefore the impacts are considered uncertain at the moment.

Other modifications were identified as have no specific impacts.

**Table 3: Inclusive Economy, set out in Strategic and Development Management Policies, policies B1 to B5 and R1 to R12; and Bunhill and Clerkenwell Area Action Plan policies BC1 and BC2**

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>There are likely to be various positive impacts on groups with protected characteristics.</p>	<p>The amendment to B1, part E (SDM-MOD45), clarifies the approach to Locally Significant Industrial Sites within the context of the changes to the use class order, their continued protection and encouragement for their renewal, modernisation and intensification. All of this will help to ensure a range of employment provision for Islington residents, including for groups with protected characteristics.</p> <p>B2 Part A (SDM-MOD50) and supporting text modifications relating to the use of planning conditions to secure employment activities in the right locations could have a positive impact on lower income communities who might suffer from unemployment or job insecurity. The change to part C (SDM-MOD50) and supporting text will help with securing a range of employment provision for Islington residents, including for groups with protected characteristics as BAME groups, for example, have greater proportion of people who have no qualifications and face barriers to employment<sup>4</sup>. Child poverty is closely linked to unemployment. Providing a range of employment in the borough can help to reduce unemployment and increase opportunities for all protected groups including disabled people who traditionally face greater barriers to employment.</p> <p>It should however be recognised that beyond the new policies, Class E, whilst providing flexibility, also limits the Council's ability to protect employment space in the right locations. Existing business floorspace can be converted into other uses within Class E, which could lead to a reduction of business floorspace in the borough's employment locations which could impact on employment opportunities and on protected groups.</p> <p>B2 Part D (SDM-MOD50) and associated supporting text require developments to mitigate air quality impacts in the LSIS. As stated in</p>

the Islington Air Quality Strategy (2019)<sup>5</sup> disabled people, children, older people and those on lower incomes are more likely to suffer from air pollution, the policy, alongside other policies in the plan which address air quality can therefore help to have a positive impact on these groups.

SDM-M064 – A new paragraph is proposed that clarifies that on mixed use proposals, where there are exceptional circumstances where the provision of affordable workspace will undermine the ability to secure affordable housing, affordable housing would take a precedent. This both has the potential to have negative and positive impacts where the situations arise, as affordable workspace provides opportunities for people in lower income groups – however the acute need for affordable housing is evidenced. The paragraph ensures that in limited cases affordable workspace would not prevent schemes that deliver policy compliant affordable housing from coming forward.

The modifications to R1 (SDM-MOD72) recognises the flexibility benefits of Class E whilst maintaining a retail and access to services that help meet the needs of residents to ensure shops and services are located in accessible places, most capable of accommodates those uses. Impact assessments aim at mitigating some of the negative impacts of uses which have the potential to have some equalities implications, for example in relation to the function and amenity of areas (which could impact on access to services).

The changes to policy R2 (SDM-MOD76) aim to maintain a retail core in Town Centres, ensuring shops and services are accessible and manage the impacts of uses. This has beneficial impacts on protected groups as having accessible shops helps to cater for the needs of older people, children and young people, disabled residents, pregnant women and parents with young children. Town Centres are a focal point for socialising and support social interaction, they also support employment and training offering flexible entry level jobs for young and old people. Older people will also generally place value on retail which is convenient as they generally make fewer journeys. The proximity and

accessibility to Town Centre also incentivises walking trip generation. This increases the amount of physical exercise people take with its accompanying health and social benefits of all groups of residents.

It should however be recognised that beyond the new policies, Class E, whilst providing flexibility, also limits the Council's ability to protect retail spaces in the right locations. Existing retail floorspace can be converted into other uses within Class E, which can lead to a reduction of retail floorspace in the borough's shopping areas.

R3 Footnote 30- states that some class E uses like clinics and nurseries will not be required to adhere to the Sequential Test in certain circumstances but may be conditioned to operate in that use. The clarification of not requiring the sequential test for planning application purposes is unlikely to have an impact on the provision of social infrastructure. The consideration of social infrastructure and how this will be secured is assessed above.

(SDM-MO82) The amendments to policy R4 in relation to Local Shopping Areas and supporting text whilst providing flexibility in relation to Class E also seek to manage potential impacts of this and in some circumstances secure through planning conditions retail for everyday essential goods where there is no such provision within 300m of a site. This modification has scope to benefit people with families, children, older people and people with physical, sensory and cognitive disabilities and related limited mobility. Access to very local services incentivises walking trip generation. This increases the amount of physical exercise people take with its accompanying health and social benefits of all groups of residents.

R4 (SDM-MO83) - The addition of an impact assessment for developments over 200sqm proposing class E use will result in the identification of potential individual and cumulative impacts of uses, including amenity impacts. The

potential for a loss of future amenity is likely to affect disabled and older people with limited mobility more acutely as they may struggle to travel further to access shops. This modification aims to assess and monitor for such risks so that any negative impacts can be managed.

R5 B (SDM-MO84). This modification enables the council to secure a retail unit outside of a designated Town Centre for the provision of essential daily goods where a need is identified. As with R4D- this policy will benefit those older people and disabled people who may have limited mobility. It will also improve convenience shopping for the wider population. However, it is recognised that there will be impacts associated with the introduction of class E which could result in the loss of existing retail which provide essential daily goods to other class E uses which do not, albeit this is not something that policy can affect.

BC1 and supporting text (BC-MO2 and BC-MO3) were amended to clarify the policy in the context of use classes order changes, this includes clarifying the use of conditions for new developments in Bunhill and Clerkenwell consistent with the modifications for policies B1 and B2. Ensuring that new development can provide for business space can help to secure positive benefits for people in lower incomes, BAME communities and disabled people who face employment barriers. This in part mitigates against the other impact of Class E which removes the Council's ability to prevent existing office stock from changing to other Class E uses.

BC2 (BC-MO5) was amended to clarify the locations where retail, leisure and cultural uses might be appropriate. This will help to ensure that these uses do not harm the amenity of the area, which can have a positive impact on the wellbeing and safety of residents. The policy also sets out that development cannot create harmful concentrations of night time economy uses, which would include impacts from noise, litter, and anti-social behaviour. The policy also directs cultural uses to the Clerkenwell / Farringdon Cultural Quarter helping

	<p>expand the cultural role of this area and of London as a whole. This policy has potential positive impacts for protected groups – as people who suffer from poor health might be more exposed and suffer more from noise pollution. Deprived communities can also disproportionately be exposed and vulnerable to anti-social behaviour and crime. However it is recognised that there will be impacts associated with the introduction of class E which could result in the negative amenity impacts due to the location and concentration of specific uses, albeit this is not something that policy can affect.</p> <p>Other modifications were identified as have no specific impacts.</p>
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**Table 4: Green Infrastructure, set out in Strategic and Development Management Policies, policies G1 to G5**

<b>Do the modifications have a positive or negative impact on groups with protected characteristics?</b>	<b>How will the modifications in this section impact and which groups with protected characteristics will it effect?</b>
<p>This modification is likely to see mainly positive impact on groups with protected characteristics. Some minor negative impacts may also be felt by people with protected characteristics- mitigation of this is suggested.</p>	<p>G2- A (SDM-MOD109), alongside amendments to SP2 and BC4 provide clarification on how proposals for moorings should be approached in relation to the canal as an open space. As with SP2, this policy has potential to positively impact boat dwellers’ access to amenities and quality of life plus also improve the environment for pedestrian and cyclist users of the canals. There is potential for a minor negative impact on the amenity of open space enjoyed by pedestrians and cyclists with protected characteristics who use the canal depending on implementation. To mitigate this, any boater facilities must be designed to have no detrimental impact on the character and amenity of the waterway and its function as an open space.</p> <p>Other modifications were identified as have no specific impacts.</p>

**Table 5: Sustainable Design, set out in Strategic and Development Management Policies, policies S1 to S10**

Do the modifications have a positive or negative impact on groups with protected characteristics?	How will the modifications in this section impact and which groups with protected characteristics will it effect?
<p>No major additional impacts on protected groups have been identified as a result of the modifications</p>	<p>The modifications for policy S5 (SDM-MOD115 – 125) and supporting text aim to reduce carbon consumption through low / zero carbon heating sources which will make homes more energy efficient. These energy efficiencies can lead to cheaper energy bills, which can reduce fuel poverty and improve long term energy security, supporting those of lower incomes as well as groups more likely to live in poor housing accommodation such as children. The modifications to policy S5 and supporting text also include requirements for developments using air source heat pumps and direct electric heating to achieve a high specification of fabric energy efficiency. This will ensure that developments using these heating systems achieve minimal heat demands, and as a result, not lead to increased energy bills.</p> <p>Low and zero carbon heating sources, including low-carbon heat networks and secondary heat sources will have a positive impact on air quality. The modifications to policy S5 and supporting text seek to ensure that minor new-build developments with an individual heating system prioritise low carbon heating systems, such as air source heat pumps, and that ultra-low NOx gas boilers will only be acceptable in exceptional circumstances where other heating options are not feasible. This will ensure that the impact on air quality of heating systems used by minor developments is minimised and has benefits for all groups, and in particular for children, older and disabled people, as identified in the Islington 2020 Zero Carbon Strategy.</p> <p>Other modifications were identified as having no specific impacts.</p>

**Table 6: Public Realm and Transport, set out in Strategic and Development Management Policies, policies T1 to T5**

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>Positive impacts have been identified for people with protected characteristics.</p>	<p>Policy T1 supporting text (SDM-MO131) - modifications relating to Low Traffic Neighbourhoods, Vision Zero and People Friendly Streets relate to the new Islington 2020 Transport Strategy – and they aim at improving the environment for walking and cycling through minimising through traffic and reducing speeds, therefore reducing road danger and air pollution. These benefits will be particularly felt by children and older adults who are disproportionately likely to be involved in collisions, killed or seriously injured by motor vehicles. Reducing through traffic also improves air quality which will especially people with disabilities relating to respiratory health. Whilst the policies referred above are not directly linked to the Local Plan, policy T1-T5 are complementary of its objectives and will help deliver the Transport Strategy.</p> <p>The new Part C of T5 (SDM-MO135) includes a requirement for uses which generate deliveries to end customers such as restaurants, retail and restaurants to prioritise non-motorised sustainable modes of transport. Given the rise of e-commerce and take-away activities, this requirement has the potential to reduce motorised vehicular movements linked to deliveries.</p> <p>Further to new part C, the new part E for policy T5 (SDM-MO136) requires developments in the LSIS to explore reducing freight movement through consolidation and increase the proportion of trips made by non-motorised modes.</p> <p>Together, Part C and Part E have the potential to reduce the number of motorised trips, which can improve air quality by reducing emissions, reduce road danger and community severance, which all have positive effects on people who disproportionally suffer from the negative impacts related to traffic, namely children, older people, disabled people and those on lower incomes.</p>

	<p>Appendix 3 and 4 modifications translate the former use class order into the new use class order, and create a general Class E requirement which aims at mitigating transport impacts via Transport assessments or provide appropriate cycle parking for Class E. The mitigation of transport impacts via Transport Assessments will have positive impacts on people on low incomes, disabled people, children and older people who all suffer disproportionately from traffic externalities. The provision of cycle parking at an appropriate level for general Class E will also support those who do not have access to a private car in providing more sustainable transport choice.</p> <p>Other modifications were identified as have no specific impacts.</p>
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**Table 7: Design and Heritage, set out in Strategic and Development Management Policies, policies D1 to D8**

<b>Do the modifications have a positive or negative impact on groups with protected characteristics?</b>	<b>How will the modifications in this section impact and which groups with protected characteristics will it effect?</b>
No major additional impacts on protected groups have been identified as a result of the modifications	Modifications were identified as having no impacts.

**Table 8: Strategic infrastructure, set out in Strategic and Development Management Policies, policies ST1 to ST4**

<b>Do the modifications have a positive or negative impact on groups with protected characteristics?</b>	<b>How will the modifications in this section impact and which groups with protected characteristics will it effect?</b>
	The supporting text for paragraph 9.4 sets out that developer contributions may be secured retrospectively to forward fund infrastructure projects, which can benefit all Islington residents and particularly those with protected

<p>Modifications likely to have minor positive impacts on groups with protected characteristics.</p>	<p>characteristics who might benefit from a more inclusive and sustainable environment delivered through infrastructure.</p> <p>The supporting text for paragraph 9.6 establishes that the Council might secure infrastructure costs for additional education infrastructure via CIL. The supply of that infrastructure has benefits for children and parents and more generally for the wider community.</p>
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**Table 9: Site Allocations, including sites within the Bunhill and Clerkenwell Area Action Plan**

<p><b>Do the modifications have a positive or negative impact on groups with protected characteristics?</b></p>	<p><b>How will the modifications in this section impact and which groups with protected characteristics will it effect?</b></p>
<p>Various positive impacts are identified.</p>	<p>The modifications include additional site allocations for residential development, all of which will provide affordable housing. Low income groups are more likely to benefit from the provision of affordable housing and are likely to include groups with protected characteristics. Provision of residential schemes providing more than 10 units will benefit disabled and older people, as suitable accessible housing will be required for these schemes.</p> <p>Notwithstanding these positive impacts, it should be noted that increasing housing on a site might lead to a loss of amenity space for residents. This risk could impact all residents benefitting from playspace, outdoor or community space, particularly older residents, families and children. This risk is partly mitigated by the fact that the details of each proposal will be set out at planning stage, with site specific issues and local amenity need identified and addressed in line with other relevant policies. Allocations do not specify exactly where different uses need to be on site, and the Council would expect a design-led approach to respond to different strategic needs.</p>

The following allocations include reprovision, refurbishment and/or addition of community facilities which are considered to have a positive impact on all groups in terms of supporting physical and mental health and wellbeing and helping encourage community cohesion:

- KC8: Bemerton Estate South- includes the replacement of community space,
- OIS27: York Way Estate- enhancement of communal facilities, playspace and landscaping,
- OIS28: Barnsbury Estate provision of two new parks, a community centre, a play space and public realm improvements
- OIS29: Highbury Quadrant Congregational Church- reprovision of church and community space.
- OIS31: Hillside Estate- is added but on condition that the development does not result in loss of social infrastructure which would disproportionately affect groups who possess protected characteristics.

These facilities generally are considered to have a positive impact on all groups in terms of wellbeing and help encourage community cohesion. They have the more specific potential benefit older people and disabled people through improved access to services as well as children and young people, pregnant women/mothers of very young children as they can sometimes provide nursery or children activities.

The following allocations will see improvements in landscaping, community amenity areas, play space or games areas:

- OIS30: Cluse Court- playspace, amenity space and landscaping
- OIS32: New Orleans Estate- play space, landscaping and reprovision of multi-use games area,
- OIS33: Drakeley Court and Aubert Court-relocation of Aubert Court community centre to improve visibility and accessibility. Improved landscaping, including the creation of a new green square.

- OIS34: Kerridge Court- re-provision of the existing multi-use games area within a new, centrally located public space. Improvements to play space, amenity space and landscaping across the estate.

Other modifications were identified as have no specific impacts.

### **Conclusion**

Generally the modifications present either positive or no additional impacts. A potential minor negative impact is identified in respect of the amendment for boater facilities but this is considered mitigated by policy. The assessments notes the potential impact of Use Class E. Overall it is considered that the impacts where they can be managed through the policy modifications are managed as far as they can be and in that respect can be considered to have a positive effect on protected characteristic groups. The benefits identified deriving from the Social and Community, Retail and Employment policy modifications maybe affected by the wider effects of Class E. These wider effects cannot be mitigated by the Council because they cannot be managed by the planning system and these effects could have positive or negative effects on groups with protected characteristics.

## Appendix 2: HRA screening update

The effects of Islington's Local Plan policies and allocations on the identified European sites were assessed through a Screening Assessment, as part of the regulation 19 IIA and were not considered to be significant. The effect 'in combination' with other plans when combined with the Local Plan was also not considered to be significant. Therefore, it is concluded it was not necessary to carry out a full appropriate assessment (Stage 2 of the HRA process) as the Local Plan policies and allocations have been 'screened out'. The modifications to the Local Plan are not considered to effect the conclusions of the original screening.

An update to the Sustainability Appraisal has been carried out for the proposed modifications. As part of this, possible negative environmental impacts of the Local Plan have been assessed. In order to effectively manage any less than significant impacts attributed to the Local Plan policies and allocations, the Sustainability Appraisal of the Local Plan will continue to evaluate the impacts of any further changes to the document.

# Appendix 3: Flood Risk

Site name/address	Reference number	Site located in a SWMP Critical Drainage Area (CDA)	Site located in a SWMP Local Flood Risk Zone (LFRZ)	Site includes EA RoFSW High Risk Area - 1 in 30 year (3.3% annual probability)	Site includes EA RoFSW Medium Risk Area- 1 in 100 year (1% annual probability)	Site includes EA RoFSW Low Risk Area- 1 in 1000 year (0.1% annual probability)	Additional Notes	Opportunities for flood risk management/ mitigation where site includes EA RoFSW High Risk Areas	Is the level of flood risk acceptable?
Bemerton Estate South	KC8						Small area of the site includes EA RoFSW Medium Risk Area, with the majority of the site having no EA RoFSW flood risk. Eastern boundary adjacent to RoFSW High Risk Area and LFRZ.	N/A	Yes
York Way Estate	OIS27							N/A	Yes
Barnsbury Estate	OIS28						Some EA RoFSW High and Medium Risk Areas concentrated	Development to include open space and landscape improvements,	Yes

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?
							in western quarter of site. Majority of site has no EA RoFSW flood risk. Western part of site is located in a LFRZ.	and to maximise urban greening.	
Highbury Quadrant Congregational Church	OIS29							N/A	Yes
Cluse Court	OIS30						Small area in the eastern part of the site includes EA RoFSW High Risk Area, with the majority of the site having no EA RoFSW flood risk.	Development to include landscape improvements and maximise urban greening.	Yes
Hillside Estate	OIS31						Small areas of the site include EA RoFSW High Risk Areas, with the majority of the site having no	Development to include landscape improvements and 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?
							EA RoFSW flood risk.		
New Orleans Estate	OIS32						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
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	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?
							majority of the site having no EA RoFSW flood risk.		

The above matrix demonstrates that the level of flood risk for each of the 9 new allocated sites is deemed to be acceptable following the application of the sequential test. 6 of the allocated sites are located within a CDA, but only 1 is located in a LFRZ. The location of a development within a CDA does not necessarily mean it is at higher risk from surface water flooding, but that it is within a catchment area which contributes to a flooding in a LFRZ. The assessment demonstrates that the majority of the 9 new sites include a EA RoFSW Low Risk Area, with 1 site including Low Risk Areas only (no Medium or High Risk Areas) and 1 site including no EA RoFSW identified risk of surface water flooding at all. 2 sites include a Medium Risk Area with no High Risk Areas and 5 sites include a High Risk Area. Where the new sites include areas of EA RoFSW, there are only some areas of flood risk with the majority of each of these sites having no EA RoFSW flood risk at all. For 4 of the 5 sites that include EA RoFSW High Risk Areas, the high risk area only covers a small area of the site. Barnsbury Estate is the only new site that includes a larger EA RoFSW High Risk Area when compared to the other sites and is also located in a LFRZ. The high risk area is, however, concentrated in one part of the site with the majority of the site having no EA RoFSW flood risk.

It is concluded that following the application of the sequential test to Islington’s new site allocations, the council is satisfied that there are no alternative locations where the allocated sites can be located due to wider sustainable development objectives and constraints on development in the borough. The above matrix demonstrates that for all of the 9 new sites the flood risk to the majority of each site is low, and that where sites that do coincide with higher surface water flood risk, this risk only covers a small area and can be successfully managed using appropriate flood risk management and mitigation measures in accordance with the requirements set out in the Appendix 8 of the Draft Reg 19 IIA Interim Report, alongside the sequential approach to site layout. Further details explaining how the sequential test has been applied, and the use of appropriate flood risk management and mitigation measures, is set out in Appendix 8 of the Draft Reg 19 IIA Interim Report.

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

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