



Draft Gypsy and Traveller Local Plan

Integrated Impact Assessment Sustainability Appraisal (Regulation 19)

Non-technical summary

- This is the Non-Technical Summary of the Integrated Impact Assessment (IIA) of Islington's Gypsy and Traveller Local Plan review
- The London Borough of Islington (LBI) is preparing a Local Plan to address Gypsy and Traveller needs. The Local Plan review is a strategic policy issue and will include an overarching policy for Gypsy and Traveller accommodation as well as a site allocation policy - a policy which identifies a particular use for a site. A key issue for the review is the identification of sites.
- 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 Gypsy and Traveller Local Plan review. At this stage a draft Sustainability Appraisal has been undertaken, a Equalities Impact Assessment has also been produced as well as a Health Impact assessment and a Habitats regulation screening.
- 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 is published as a separate document as part of this Regulation 18 consultation. This stage also proposes the draft framework objectives against which all policies are considered.
- The framework objectives have been derived from an analysis of the sustainability, health and equalities issues facing the Gypsy and Traveller community in the borough. These locally-specific objectives describe the outcomes that the Gypsy and Traveller Local Plan review 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.
- The second stage in the Sustainability Appraisal process is developing and refining alternatives to policies and sites. The purpose of this stage is to evaluate the likely significant effects of the draft Local Plan policies and to test reasonable alternatives to policies against the objectives set out in the framework. Only realistic alternatives need to be considered and not every plan issue needs an alternative policy solution. Sometimes there may be only one approach to an issue.
- No alternatives were assessed for the policies. A number of alternatives were considered for the sites. In summary these were either greenspace enhancement or development of conventional housing.
- The policies and sites have been assessed against the framework which identifies the effects considered; either significant or minor effect, negative or positive or neutral. The assessment also includes consideration of short/medium/long term effects, cumulative effects, secondary effects and permanent / temporary effects. Where negative effects are

identified, mitigation should be considered to reduce the negative effects. The assessment should also consider ways that policies can be improved.

- The Sustainability Appraisal process is iterative and on-going process, which will run alongside the Gypsy and Traveller Local Plan review.

Key Findings by Local Plan Gypsy and Traveller review section

- **Policies:** the Sustainability Appraisal identifies that the policies in this section are positive in that they help to meet the identified housing needs of the Gypsy and Travellers who live in the borough during the plan period. The appraisal of these policies provides the opportunity to give high level consideration to this issue without having to consider the detail of site-specifics.
- **Sites:** the Sustainability Appraisal at Regulation 18 consultation stage considered nine sites and at the current Regulation 19 consultation stage nine sites are considered and two sites are removed; GT1 Stephens Ink and GT7 Pleasant Place Gardens. The assessment considered the finely balanced benefits and disbenefits of allocating the remaining sites. Whilst there are minor negative effects for a number of objectives including health, liveable neighbourhoods, biodiversity and climate change with impacts principally caused by the impact of loss of estate amenity space there is a possibility of mitigation for some of the site allocations which could reduce these negative effects. This has to be balanced against the significant positive effect of meeting the housing needs of the Gypsy and Travellers who live in the borough.
- The removal of site GT1 Stephens Ink results from further consideration of the assessment and impact on existing residents as well as the further evidence base work undertaken. The Stephens Ink estate has one piece of amenity grass space for estate residents which would be lost in its entirety. Whilst this space is currently closed to residents and is underutilised there are landscaping improvements planned which would make better use of the amenity space. The assessment considered the loss of estate amenity space a minor negative as it would reduce access to open space and reduce the opportunity for physical activity for residents of the estate having an impact on health and wellbeing. Mitigation was noted with the local alternative available in the adjacent Gillespie Park. In addition the potential for health and wellbeing impacts for existing estate residents with protected characteristics, such as elderly residents, children and people with disabilities, is a further negative effect that the Regulation 18 assessment did not recognise and given the total loss of amenity space is potentially a significant issue that cannot be easily mitigated. With regards to biodiversity impact the arboricultural survey of Stephens Ink which was produced after the Regulation 18 assessment shows a negative effect on biodiversity resulting from the removal of trees. This is a more significant negative impact than on other proposed sites with a mix of up to ten moderate and low quality trees requiring removal. When taken together these additional negative effects weigh against the identification of this site and on balance are not considered to be outweighed by the positive effect of meeting the housing needs for Gypsies and

Travellers in the borough therefore resulting in the removal of this site from the Local Plan.

- For GT7 Pleasant Place Gardens the results of the consultation and the further evidence base have been considered. The site is a designated public open space and whilst considered to be a small and underutilised public open space the impact in the Regulation 18 assessment on access to public open space is considered to be a significant negative effect as the whole space would be lost. The consultation response demonstrated the intensity that this space is being used by local residents despite appearing underutilised. The assessment recognised the mitigation for the public open space loss with the adjacent public open space albeit consultation responses suggested this space would not meet the same needs. With regards to biodiversity impact the arboricultural survey of Pleasant Place which was produced after the Regulation 18 assessment would result in a negative effect on biodiversity resulting from the removal of trees. This is a more moderate impact than on other proposed sites with removal of a small number of low quality trees only, potential pruning of high quality off-site tree was noted. In terms of heritage a study was produced after the Regulation 18 assessment which considered that overall the site could accommodate a Gypsy and Traveller pitch without causing harm to the historic environment. This conclusion was made dependent on attention to the treatment of boundaries and walls with the adjacent Halton Road Grade II listed terrace noted in particular. In addition careful consideration of the surrounding conservation area was also recommended. Overall the effect on heritage and conserving or enhancing their significance as part of the assessment is considered to be uncertain rather than neutral. On balance the significant negative impact resulting from the loss of public open space and the uncertainty of the heritage effect could not be overcome by the positive effect of meeting the housing needs for Gypsies and Travellers in the borough therefore resulting in the removal of this site from the Local Plan.
- Overall it is important to note that sufficient sites continue to be identified to meet the identified need for 11 pitches over the plan period.
- The **Equalities Impact Assessment** concluded that there were no negative impacts on groups with protected characteristics and highlighted the positive effects that the policies and sites identified in the Gypsy and Traveller Local Plan will have for Gypsies and Travellers who have protected characteristics. The assessment acknowledged that the loss of some areas of estate amenity space on two of the council estates where sites are proposed may have potential impacts on older residents, children and disabled residents, however other areas of amenity space on these estates remain accessible and in the case of Aubert Court planned landscaping works will improve the quality of and accessibility to the amenity space. In addition the assessment noted that in relation to proposals that would result in the loss of car parking or garage spaces may potentially have implications for groups sharing protected characteristics and the council will seek to engage further with residents who are potentially impacted by the proposals and will explore options for alternative provision, where required.

- The **Health Impact Assessment** concluded that the policies in the draft plan support health improvement and reduce inequalities for Gypsy and Traveller communities living in Islington. The draft plan aligns with Islington Council's Local Plan aims, to make Islington fairer, and provide the same opportunities for everyone to enjoy a good quality of life. The Health Impact Assessment makes a number of recommendations for where the plan could better capitalise on opportunities to address existing health inequalities within Gypsy and Traveller communities, and embed collaboration with relevant organisations to improve outcomes. The assessment also suggests some additional considerations that could be utilised in future planning, that could further improve outcomes for Gypsy and Traveller communities. These will be considered as part of the Regulation 19 consultation.
- The **Habitats Regulation Assessment** (HRA) at this stage of plan review is a screening assessment and this concluded that the effects of Islington's Draft Gypsy and Traveller Local Plan policies and allocations on the identified European sites are not considered to be significant. Therefore, it is 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'.
- A flood risk assessment has been produced which demonstrates that the level of flood risk for each of the proposed site allocations is deemed to be acceptable following the application of a sequential test.

Next steps

- The IIA Report is available for comment alongside the Gypsy and Traveller Local Plan Regulation 19 draft consultation. The consultation runs from 7 July 2026 until 18 August 2026. Following the consultation the responses will be carefully considered and a further iteration of the IIA will be updated if necessary and reported to full council before submission to Government for examination by an independent Planning Inspector in 2027.

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1. Introduction

- 1.1 The London Borough of Islington (LBI) is in the process of undertaking a Gypsy and Traveller Local Plan Review. This document reports the second stage of the Integrated Impact Assessment (IIA) process and is a draft assessment the Gypsy and Traveller Local Plan Sites and Policies. The IIA process is carried out alongside the plan production process and will make recommendations to enhance potential positive outcomes and minimise negative impacts of a policy.
- 1.2 The structure of this report sets out the background to the review, the consultation stages undertaken and the approach to assessment.
- 1.3 Because the IIA has a broader scope than environmental issues, as well as consulting with the statutory bodies the draft Scoping Report will be published to invite wider feedback from the general public and other interested stakeholders to inform the IIA process.

Islington Local Plan Consultations

- 1.4 The following consultation has been undertaken on the Local Plan to date:
 - Scope of the Review consultation ran from March to April 2024,
 - the site search methodology and 'call for sites' consultation ran from January 2025 to March 2025.
 - The Regulation consultation on the first draft of the Local Plan including policies and sites ran from December 2025 to February 2026
- 1.5 A summary of the representations along with detailed responses is contained in the Consultation Statement. All comments received have been considered carefully and where relevant have resulted in changes to the documents.

2. What is an Integrated Impact Assessment (IIA)?

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

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

- 2.3. Under section 19(5) of the Planning and Compulsory Purchase Act 2004, Sustainability Appraisal (SA) is mandatory for new or revised Development Plan Documents (DPDs). The appraisal should include an assessment of the likely significant impacts - economic, social and environmental - of the plan. When conducting an SA of DPDs an environmental assessment must also be conducted in accordance with the requirements of European Directive 2001/42/EC (The Strategic Environmental Assessment Directive), transposed into the UK legislation by the Environmental Assessment of Plans and Programmes Regulations 2004, Section 12.
- 2.4. Sustainability Appraisals should be carried out in accordance with Government Guidance *A Practical Guide to the SEA Directive* (ODPM, 2005) and the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). Sustainability Appraisal, as defined under the Planning and Compulsory Purchase Act, fully incorporates the requirements of the SEA directive. The term SA is therefore used to refer to the combined assessment.
- 2.5. The methodology used for the IIA process for the Islington Local Plan review is based on the SA process. The key stages and tasks for the SA process, and their relationship with the Local Plan process, are set out in Figures 2.1 below.

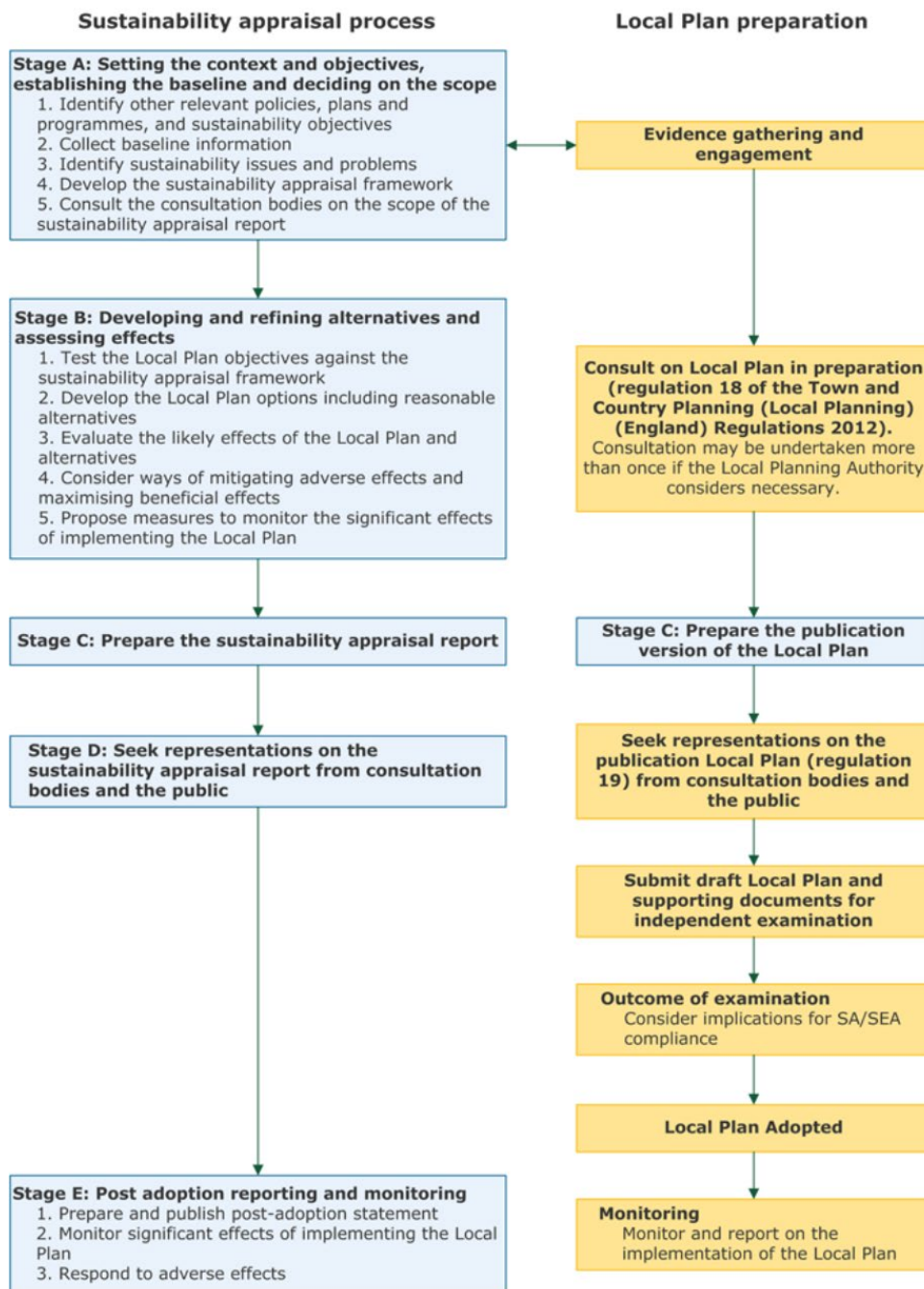


Figure 2.1: The Sustainability Appraisal Process Planning Practice Guidance: Paragraph: 013 Reference ID: 11-013-20140306

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

- 2.6. The Scoping Report is the initial stage in the IIA process. The scoping stage of the process identified relevant plans, policies and programmes that informs the IIA and Local Plan; identified baseline information; identified key sustainability issues and problems; and proposed an IIA framework consisting of sustainability objectives and indicators, against which the Local Plan is assessed as it evolves. It is important to note that IIA is an iterative and on-going process, which has been in train from the start of the Local Plan review. Stages and tasks in the IIA process may be revisited and updated or revised, to take account of updated or new evidence as well as consultation responses.
- 2.7. The draft Scoping Report for IIA was published in October 2016 and subject to public consultation. The consultation ran alongside the scope of the Local Plan Review - October 2016 to January 2017.
- 2.8. Under the Environmental Assessment of Plans and Programmes Regulations (2004), three statutory consultation bodies (Environment Agency, Historic England and Natural England) have been consulted. The three bodies responded with no comments on the scope and level of detail of the information included in the draft Scoping Report.
- 2.9. The IIA has a broader scope than environmental issues so alongside the draft IIA assessment the draft Scoping Report will also be published during the Regulation 18 stage of consultation to invite wider feedback from the general public and other interested stakeholders.
- 2.10. This document reports on stage D: 'seek representations on the sustainability appraisal report from consultation bodies and the public' stage of the IIA. As set out in Planning Practice Guidance (PPG), the purpose of the developing and refining stage is to evaluate the likely significant effects of the draft Local Plan, to test the draft Local Plan objectives, policies and sites against the IIA framework objectives and to test reasonable alternatives before the draft Local Plan is submitted for examination.
- 2.11. A key part of Stage B of the SA process is the consideration of reasonable alternatives to policy options, the significant effects of which should be evaluated. Only the consideration of reasonable alternatives is necessary, the different realistic options for policy and the need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. It is unnecessary to consider an unrealistic alternative. Also not every plan issue needs an alternative. Sometimes there may be only one approach to an issue with no possibility of having no policy as an option.
- 2.12. The SA has taken this into account and identified various alternatives. Some alternatives were considered but then discounted and not assessed; the basis for these discounted alternatives is discussed in section 3 and section 4. The review of policies and whether reasonable alternatives are considered is set out in table 2.1 below.

POLICY	REASONABLE ALTERNATIVE REVIEW
GTSP1: Meeting Gypsy and Traveller Accommodation Needs	No reasonable alternatives identified.
Strategic Policy GTSP2: Delivering high quality Gypsy and Traveller sites	No reasonable alternatives identified.
Site Allocation GT1: Stephen's Ink Estate	One reasonable alternative has been considered for the site, the enhancement of the space to provide improved estate amenity space. This site has been removed from the plan and the reasonable alternative will likely proceed.
Site Allocation GT2: Aubert Court Estate	Two reasonable alternative uses have been considered for the site, the redevelopment of the site for residential development and enhancement of the space to provide improved estate amenity space.
GT3: Aberdeen Lane	One reasonable alternative has been identified and appraised for this site, residential development.
Site Allocation GT4: Ronald's Road	One reasonable alternative has been considered and appraised for this site for public open space. Conventional residential use has been discounted for this site.
Site Allocation GT5: Athenaeum Court	One reasonable alternative has been identified and appraised for this site, residential development. It is noted that the Council has confirmed that the residential New Build project previously considered for this Site Allocation is not proceeding so there is uncertainty over the effects of this alternative being achieved.
Site Allocation GT6: Mayville Estate	No reasonable alternative has been identified for this site. The alternative is remaining in use as garages.
Site Allocation GT7: Pleasant Place Garden	No reasonable alternatives have been identified and appraised for this site. The alternative is remaining in use as public open space.

POLICY	REASONABLE ALTERNATIVE REVIEW
	This site has been removed from the plan and the site will remain in use as public open space..
Site Allocation GT8: Mora Street	Two reasonable alternatives have been considered and appraised for the site, that is the redevelopment of the site to provide commercial floorspace or to provide a mixed-use development consisting of residential and commercial floorspace.
Site Allocation GT9: Upper Hilldrop Estate	No reasonable alternative has been identified and appraised for this site. The site will remain in use as estate amenity space.

- 2.13. Alternatives were assessed in comparison to the preferred policy approach against the effect on the framework rather than scored in silo. This enables a more straightforward determination of the effect of the alternative and whether it is preferable to the preferred policy approach. The following table sets out in summary the conclusions of the assessments. The full assessments are set out in section 3 and 4.
- 2.14. For the policies the appraisal identifies and evaluates the likely significant effects on the baseline, drawing on the issues identified in the Scoping Report. Effects are predicted on the framework objectives. The Framework objectives have been derived from an analysis of the sustainability, health and equalities issues facing the borough. These locally-specific objectives describe the outcomes that the Local Plan should seek to achieve, and will be used to check and refine the policies as the Local Plan develops.
- 2.15. The Sustainability Framework is set out in table 2.1 below and the full framework with related 'prompt' questions is set out in appendix 1. 'Prompt' questions are used to frame the appraisal of policies against each objective. Further detail on how the framework was derived was published in the Scoping Report and the Framework incorporates recommended changes including those made by statutory consultees, through consultation.

Table 2.1: Islington Local Plan sustainability framework

TOPIC	IIA OBJECTIVE
HIGH QUALITY ENVIRONMENT	1. Promote a high quality, inclusive, safe and sustainable built environment
EFFICIENT USE OF LAND	2. Ensure efficient use of land, buildings and infrastructure
HERITAGE	3. Conserve or enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.
LIVEABLE NEIGHBOURHOODS	4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles
MEETING NEEDS	5. Ensure that Gypsy and Traveller residents have access to good quality, well-located, affordable accommodation
SOCIAL INCLUSION	6. Promote social inclusion, equality, diversity and community cohesion

TOPIC	IIA OBJECTIVE
HEALTH AND WELLBEING	7. Improve the health and wellbeing of the population and reduce health inequalities
ECONOMIC GROWTH	8. Foster sustainable economic growth and increase employment opportunities
NEED TO TRAVEL	9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking
OPEN SPACE / ACCESSIBLE	10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional
BIODIVERSITY	11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.
CLIMATE CHANGE MITIGATION	12. Reduce contribution to climate change
CLIMATE CHANGE ADAPTATION	13. Promote climate change adaptation
RESOURCE EFFICIENCY	14. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste
NATURAL RESOURCES	15. Maximise protection and enhancement of natural resources including water, land and air

2.16. The two strategic policies have been assessed followed by each of the proposed site allocations. The matrix identifies the effects considered; either significant or minor effect and whether they are negative or positive.

2.17. Where, if any, negative effects are identified any potential measures to mitigate against those negative impacts have been proposed. Where improvements are identified to strengthen the positive effects of plan policies, these have been identified and incorporated into the plan draft where appropriate. Table 2.2 sets out the scoring system used to record potential effects.

Table 2.2: Framework scoring system

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

- 2.18. It is important to note that IIA is an iterative and on-going process, and therefore stages and tasks in the IIA process may be revisited and updated or revised as a plan develops, to take account of updated or new evidence as well as consultation responses. A further iteration of the IIA will be updated if necessary and reported to full council before submission for examination.
- 2.19. The Framework includes consideration of short/medium/long term effects, cumulative effects, synergistic effects, secondary effects and permanent / temporary effects. The approach taken in presenting some of the cumulative effects is set out in the conclusion in section 5 of this report.
- 2.20. The Site Allocations will be subject to a separate bespoke sequential assessment, using the outputs of Islington's Strategic Flood Risk Assessment (SFRA). While Islington is located in Flood Risk Zone 1, which means there is low risk of fluvial flooding, the SFRA demonstrates that there are areas of surface water flood risk across the borough and these must be taken into account when deciding on the appropriateness of a site location. The full sequential test Heath Impact Assessment (HIA)
- 2.21. Health Impact Assessment (HIA) is a systematic approach to predicting the magnitude and significance of the potential health and wellbeing impacts, both positive and negative, of new plans and projects. The approach ensures decision making at all

levels considers the potential impacts of decisions on health and health inequalities. HIA is particularly concerned with the distribution of effects within a population (as different groups are likely to be affected in different ways) and therefore looks at how health and social inequalities might be reduced or widened by a proposed plan or project.

- 2.22. While HIA is not a statutory requirement of the Local Plan preparation process, the physical environment is shaped by planning decisions which can facilitate or deter a healthy lifestyle, affect the quality and safety of the environment, encourage or discourage employment and training opportunities, enhance or impair social networks, and nurture or neglect opportunities for a rich community life. The HIA is attached at appendix x.

Equalities Impact Assessment (EqIA)

- 2.23. The Equality Act 2010 includes a public sector equality duty which requires public organisations and those delivering public functions to show due regard to the need to:

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

- 2.24. An Equalities Impact Assessment (EqIA) is a way of measuring the potential impacts (both positive and negative) that a policy, function or service may have on the key protected characteristics covered by the Equality Duty and on Human Rights. The EqIA process supports decent decision making by enabling a good understanding of the need and differential impacts that policies may have on different groups. The initial Equalities Impact assessment is included at appendix 2.

Habitats Regulations Assessment

- 2.25. Under Article 6 (3) and (4) of the Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive) land-use plans, including Local Plans, are also subject to Habitats Regulations Assessment (HRA). The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of a European Site and to ascertain whether it would adversely affect the integrity of that site. HRA for the Local Plan review is attached at appendix x.

3. Assessment of the Gypsy and Traveller Local Plan: Strategic policies

Strategic Policy GTSP1: Meeting Gypsy and Traveller Accommodation Needs

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. MEETING NEEDS	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE / ACCESSIBLE	11. BIODIVERSITY	12. CLIMATE CHANGE MITIGATION	13. CLIMATE CHANGE ADAPTATION	14. RESOURCE EFFICIENCY	15. NATURAL RESOURCES
GTSP1: Meeting Gypsy and Traveller Accommodation Needs (Reg 18 assessment)	+	+	0	0	++	++	+	0	0	0	0	0	0	0	0
GTSP1: Meeting Gypsy and Traveller Accommodation Needs (Reg 19 assessment)	+	+	0	0	++	++	+	0	0	0	0	0	0	0	0

Commentary on assessment of likely significant effects of Policy GTSP1 (Reg 18 assessment)	Commentary on assessment of likely significant effects of Policy GTSP1 (Reg 19 assessment)
In terms of Objective 1 the policy is expected to have a minor positive impact, as it seeks to meet the need for Gypsy and Traveller accommodation through the allocation of sites that have been assessed against a set of criteria and are considered to be suitable, ensuring that this type of development would be location sensitive. The provision of Gypsy and Traveller sites would balance competing demands between land uses to provide for the full range of development needs of the area and the accommodation needs identified for the Gypsy and Traveller community, which is considered to have a minor positive effect in terms of Objective 2. The policy sets a target for meeting the identified Gypsy and Traveller accommodation need, proposes site allocations to meet the need within the first ten years of the plan, and proposes that need arising in the last five years of the plan would be met through windfall sites. Therefore it is considered that the policy makes a significantly positive contribution to Objective 5, as it seeks to increase the supply of affordable and culturally suitable Gypsy and Traveller accommodation to meet identified need for 11 pitches over the plan period. It is considered that the provision of culturally suitable, affordable and high quality accommodation for Gypsy and Traveller communities would contribute to reducing social exclusion and discrimination and promoting equity and fairness, which would have a significantly positive effect on Objective 6 and would reduce health inequalities experienced by the community, which would have a positive impact in terms of Objective 7. The policy has positive effects and is expected to contribute significantly to meeting diverse housing needs and increasing social inclusion by meeting the identified need for 11 pitches over the plan period so is positive. There are no negative impacts identified.	In terms of Objective 1 the policy is expected to have a minor positive impact, as it seeks to meet the need for Gypsy and Traveller accommodation through the allocation of sites that have been assessed against a set of criteria and are considered to be suitable, ensuring that this type of development would be location sensitive. The provision of Gypsy and Traveller sites would balance competing demands between land uses to provide for the full range of development needs of the area and the accommodation needs identified for the Gypsy and Traveller community, which is considered to have a minor positive effect in terms of Objective 2. The policy sets a target for meeting the identified Gypsy and Traveller accommodation need, proposes site allocations to meet the need within the first ten years of the plan, and proposes that need arising in the last five years of the plan would be met through windfall sites. Therefore it is considered that the policy makes a significantly positive contribution to Objective 5, as it seeks to increase the supply of affordable and culturally suitable Gypsy and Traveller accommodation to meet identified need for 10 pitches within the first ten years of the plan period. It is considered that the provision of culturally suitable, affordable and high quality accommodation for Gypsy and Traveller communities would contribute to reducing social exclusion and discrimination and promoting equity and fairness, which would have a significantly positive effect on Objective 6 and would reduce health inequalities experienced by the community, which would have a positive impact in terms of Objective 7. The policy has positive effects and is expected to contribute significantly to meeting diverse housing needs and increasing social inclusion by meeting the

Commentary on assessment of likely significant effects of Policy GTSP1 (Reg 18 assessment)	Commentary on assessment of likely significant effects of Policy GTSP1 (Reg 19 assessment)
	identified need for 10 pitches within the first ten years of the plan period so is positive. There are no negative impacts identified.

Strategic Policy GTSP2: Delivering high quality Gypsy and Traveller sites

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. MEETING NEEDS	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE / ACCESSIBLE	11. BIODIVERSITY	12. CLIMATE CHANGE MITIGATION	13. CLIMATE CHANGE ADAPTATION	14. RESOURCE EFFICIENCY	15. NATURAL RESOURCES
GTSP2: Delivering high quality Gypsy and Traveller sites (Reg 18 assessment)	+	+	0	0	++	++	+	0	0	0	+	+	+	0	0
GTSP2: Delivering high quality Gypsy and Traveller sites (Reg 19 assessment)	+	+	0	0	++	++	+	0	0	0	+	+	+	0	0

Commentary on assessment of likely significant effects of Policy GTSP2 (Reg 18 assessment)	Commentary on assessment of likely significant effects of Policy GTSP2 (Reg 19 assessment)
In terms of Objective 1 the policy is expected to have a minor positive impact, as requires Gypsy and Traveller sites to be designed and built to a high quality standard, and demonstrate they meet the four key design principles: contextual, connected, inclusive and sustainable. The provision of Gypsy and Traveller sites would balance competing demands between land uses to provide for the full range of development needs of the area and the accommodation needs identified for the Gypsy and Traveller community. The policy also requires that proposed development should seek to optimise the site capacity in line with the proposed site allocations. Therefore it is considered that the policy has a minor positive effect in terms of Objective 2. The policy seeks to ensure that Gypsy and Traveller accommodation need is met through high quality sites that provide a good level of residential amenity, which is considered to make a significantly positive contribution to Objective 5. It is considered that the provision of culturally suitable and high quality accommodation which is expected to meet inclusive design principles, would contribute to reducing social exclusion and discrimination and promoting equity and fairness for Gypsy and Traveller communities, which would have a significantly positive effect on Objective 6 and would reduce health inequalities experienced by the community, which would have a positive impact in terms of Objective 7. The policy also indicates that Gypsy and Traveller sites would be expected to include elements of green infrastructure and sustainable design, which have a minor positive impact in terms of Objectives 11,12 and 13. The policy has positive effects and is expected to contribute significantly to meeting diverse housing needs and increasing social inclusion.	In terms of Objective 1 the policy is expected to have a minor positive impact, as requires Gypsy and Traveller sites to be designed and built to a high quality standard, and demonstrate they meet the four key design principles: contextual, connected, inclusive and sustainable. The provision of Gypsy and Traveller sites would balance competing demands between land uses to provide for the full range of development needs of the area and the accommodation needs identified for the Gypsy and Traveller community. The policy also requires that proposed development should seek to optimise the site capacity in line with the proposed site allocations. Therefore it is considered that the policy has a minor positive effect in terms of Objective 2. The policy seeks to ensure that Gypsy and Traveller accommodation need is met through high quality sites that provide a good level of residential amenity, which is considered to make a significantly positive contribution to Objective 5. It is considered that the provision of culturally suitable and high quality accommodation which is expected to meet inclusive design principles, would contribute to reducing social exclusion and discrimination and promoting equity and fairness for Gypsy and Traveller communities, which would have a significantly positive effect on Objective 6 and would reduce health inequalities experienced by the community, which would have a positive impact in terms of Objective 7. The policy also indicates that Gypsy and Traveller sites would be expected to include elements of green infrastructure and sustainable design, which have a minor positive impact in terms of Objectives 11,12 and 13. The policy has positive effects and is expected to contribute significantly to meeting diverse housing needs and increasing social inclusion.

4. Assessment of Gypsy and Traveller Local Plan: Site Allocations and alternatives

Site Allocation GT1: Stephen's Ink Estate

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. MEETING NEEDS	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE / ACCESSIBLE	11. BIODIVERSITY	12. CLIMATE CHANGE MITIGATION	13. CLIMATE CHANGE ADAPTATION	14. RESOURCE EFFICIENCY	15. NATURAL RESOURCES
GT1: Stephen's Ink Estate (Reg 18 assessment)	+	+	0	-	++	++	0	0	-	-	-	-	-	0	0
GT1: Stephen's Ink Estate (Reg 19 assessment)	+	+	0	-	++	++	0	0	-	-	--	-	-	0	0

Commentary on assessment of likely significant effects of site allocations (Reg 18 assessment)	Commentary on assessment of likely significant effects of site allocations (Reg 19 assessment)
The proposed site allocation is for the provision of up to 2 permanent pitches to meet identified Gypsy and Traveller need. It is noted that a less intensive option is also available.	This proposed site has been removed from the draft Gypsy and Traveller Local Plan. Four pieces of evidence have been produced for this site which look at heritage, trees, ecology and site access survey.

Commentary on assessment of likely significant effects of site allocations (Reg 18 assessment)	Commentary on assessment of likely significant effects of site allocations (Reg 19 assessment)
It is considered that the Site Allocation would have a <u>minor positive effect</u> on Objective 1, as the proposed development would be required to provide a good level of residential amenity and high-quality housing for future occupiers of the site. Mitigation through screening and/or landscaping to secure a good level of residential amenity for surrounding residential properties is required and contributes towards a high-quality environment. Allocating the site for Gypsy and Traveller use seeks to balance competing demands between land uses to provide for the borough's full range of development needs. The allocation <u>significantly positively</u> contributes towards the provision of housing to meet the identified needs of Gypsies and Travellers in the borough in line with Objective 5 and optimising the use of land in a residential area in line with Objective 2 resulting in a <u>minor positive impact</u>. By providing accommodation for people who may possess a protected characteristic the allocation is considered to have a <u>significant positive effect</u>, in relation to Objective 6 for social inclusion, as does the site allocation requirement to engage with the Local Community and Gypsy and Traveller Community. The loss of the existing area of estate amenity space is considered to have a <u>minor negative impact</u> with regards to Objectives 4, 7, 10 which seek to maintain and enhance access to open space and promote physical activity for residents of the estate. It is, however, relevant here to highlight that the	It is considered that the Site Allocation would have a <u>minor positive effect</u> on Objective 1, as the proposed development would be required to provide a good level of residential amenity and high-quality housing for future occupiers of the site. Mitigation through screening and/or landscaping to secure a good level of residential amenity for surrounding residential properties is required and contributes towards a high-quality environment. The arboricultural report indicates that the removal of a mix of up to ten moderate and low quality trees will have a negative effect. Given the spread of trees on-site this impact is fairly certain. Allocating the site for Gypsy and Traveller use seeks to balance competing demands between land uses to provide for the borough's full range of development needs. The allocation <u>significantly positively</u> contributes towards the provision of housing to meet the identified needs of Gypsies and Travellers in the borough in line with Objective 5 and optimising the use of land in a residential area in line with Objective 2 resulting in a <u>minor positive impact</u>. By providing accommodation for people who may possess a protected characteristic the allocation is considered to have a <u>significant positive effect</u>, in relation to Objective 6 for social

Commentary on assessment of likely significant effects of site allocations (Reg 18 assessment)	Commentary on assessment of likely significant effects of site allocations (Reg 19 assessment)
existing amenity space is currently closed to the public and estate residents. In addition, it is noted that it is located directly adjacent to Gillespie Park which ensures that residents would continue to have access to open space which reduces the negative impact. With this in mind however, the provision of culturally suitable accommodation for Gypsy and Traveller residents is considered to contribute towards a <u>minor positive impact</u> with regards Objective 7 in terms of reducing health inequalities for this community through providing a good quality housing that is culturally appropriate and that improves mental health and overall wellbeing. Given that the site allocation supports the use of private vehicles, it is considered to have a <u>minor negative effect</u> with regard to Objective 9 although it is noted that there needs to be provision for vehicles to tow caravans to support Gypsy and Travellers way of life. The site is adjacent to the Gillespie Park Local Nature Reserve which is designated as Metropolitan Grade Site of Importance of Nature Conservation (SINC), the site also falls within a Critical Drainage Area and within a Local Flood Risk Zone (LFRZ3006). There are also several existing trees located on site, depending on site design it may be possible to retain trees and a significant proportion of the existing shrubland. Despite this, the loss of existing green space will have negative impacts with regards to biodiversity and green space connectivity and could have further negative	inclusion, as does the site allocation requirement to engage with the Local Community and Gypsy and Traveller Community. The loss of the existing area of estate amenity space is considered to have a <u>minor negative impact</u> with regards to Objectives 4, 7, 10 which seek to maintain and enhance access to open space and promote physical activity for residents of the estate. This may have potential impacts on groups sharing protected characteristics, such as elderly residents, children and people with disabilities which given the total loss of the space is considered to elevate the significance of this impact. Whilst the existing amenity space is currently closed to the public and estate residents removing this space cannot easily be mitigated if it were to be re-opened. It is noted that it is located directly adjacent to Gillespie Park which ensures that residents would continue to have access to open space which reduces the negative impact. With this in mind however, the provision of culturally suitable accommodation for Gypsy and Traveller residents is considered to contribute towards a <u>minor positive impact</u> with regards Objective 7 in terms of reducing health inequalities for this community through providing a good quality housing that is culturally appropriate and that improves mental health and overall wellbeing and overall neutral effect.

Commentary on assessment of likely significant effects of site allocations (Reg 18 assessment)	Commentary on assessment of likely significant effects of site allocations (Reg 19 assessment)
impacts with regards to water-run off and microclimate. As such, the proposed site allocation is considered to have a <u>minor negative</u> in relation to Objectives 10, 11, 12 and 13. Further ecology and arboricultural surveys would be required to fully assess the extent of the impact and the possible mitigation.	Given that the site allocation supports the use of private vehicles, it is considered to have a <u>minor negative effect</u> with regard to Objective 9 although it is noted that there needs to be provision for vehicles to tow caravans to support Gypsy and Travellers way of life. The site is adjacent to the Gillespie Park Local Nature Reserve which is designated as Metropolitan Grade Site of Importance of Nature Conservation (SINC), the site also falls within a Critical Drainage Area and within a Local Flood Risk Zone (LFRZ3006). The loss of existing green space and trees will have negative impacts with regards to biodiversity and green space connectivity and could have further negative impacts with regards to water-run off and microclimate. As such, the proposed site allocation is considered to have a <u>minor negative</u> in relation to Objectives 10, 11, 12 and 13. As noted above the arboricultural surveys indicates the negative impact on moderate and low quality trees.

I/A Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. MEETING NEEDS	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE / ACCESSIBLE	11. BIODIVERSITY	12. CLIMATE CHANGE MITIGATION	13. CLIMATE CHANGE ADAPTATION	14. RESOURCE EFFICIENCY	15. NATURAL RESOURCES
Reasonable Alternative: Enhanced estate amenity space (Reg 18 assessment)	+	+	0	+	0	+	++	0	0	++	+	+	+	0	0
Reasonable Alternative: Enhanced estate amenity space (Reg 19 assessment)															

Commentary on assessment of likely significant effects of Alternative (Reg 18 Assessment)	Commentary on assessment of likely significant effects of Alternative (Reg 19 Assessment)
The alternative use of the site to provide enhanced estate amenity space has been considered given that the existing area of amenity space has not been open to the public or residents of the estate for some time. The improvement of the existing amenity space would improve the quality of the built environment to the <u>benefit of</u> Objective 1. Re-opening the site to the public would contribute towards increasing resident's access to open space	This proposed site has been removed from the draft Gypsy and Traveller Local Plan.

Commentary on assessment of likely significant effects of Alternative (Reg 18 Assessment)	Commentary on assessment of likely significant effects of Alternative (Reg 19 Assessment)
contributing towards better health and wellbeing outcomes, providing an improved space where the community can come together resulting in a <u>minor positive impact</u> with regards to Objectives 4 and 6, and a <u>significant positive impact</u> with regards to Objectives 7 and 10. The retention of the existing open space and existing trees would ensure that the site continues to make a positive contribution towards reducing flood risk, urban cooling and would sustain the sites biodiversity value. It is likely that any enhancement of the space would conform with the Local Plan Policy G1 and the requirement to connect to existing green infrastructure through exploring the possibility of increasing green connectivity between the site and the neighbouring Gillespie Park. It is also likely that any improvements to the open space would result in upgrades to the space which would <u>make a minor positive contribution</u> towards Objectives 11,12 and 13, providing improvements to biodiversity, climate adaptation and mitigation. Further ecology and arboriculture surveys would be required to fully assess the extent of any potential benefits associated with the enhancement of the space.	

Conclusion for Site Allocation GT1: Stephen's Ink Estate (Reg 18 assessment)	Conclusion for Site Allocation GT1: Stephen's Ink Estate (Reg 19 assessment)
One reasonable alternative use has been considered for the site, the enhancement of the space to provide improved estate amenity space.	This proposed site has been removed from the draft Gypsy and Traveller Local Plan.

Conclusion for Site Allocation GT1: Stephen's Ink Estate (Reg 18 assessment)	Conclusion for Site Allocation GT1: Stephen's Ink Estate (Reg 19 assessment)
Both options are considered to positively contribute towards Objective 1. Any allocation of the site to deliver Gypsy and Traveller accommodation would include a requirement for high quality design, similarly, any residential development of the site would be required to conform with relevant Local Plan Policies which require high-quality design. Any potential improvement to the site in maintaining it as estate amenity space would help to conserve and enhance the local character of the area. With regards to Objective 2, the allocation of the site to provide Gypsy and Traveller accommodation is considered to have a <u>minor positive</u> effect. The enhancement of the space as estate amenity space is also considered to have a positive impact with regards to Objective 2 as it would bring the area of amenity space back into meaningful use, with the site currently closed to estate residents and the public. Similarly, the reasonable alternative is considered to have a <u>minor positive</u> impact in relation to Objectives 4 and 10. The Gypsy and Traveller site option is considered to have a <u>significant positive</u> impact in terms of Objectives 5 and 6, as it would contribute to providing affordable and culturally suitable accommodation for Gypsy and Traveller residents, which is recognised as a factor that can reduce social exclusion and discrimination experienced by Gypsy and Traveller communities. High quality Gypsy and Traveller accommodation has the	

Conclusion for Site Allocation GT1: Stephen's Ink Estate (Reg 18 assessment)	Conclusion for Site Allocation GT1: Stephen's Ink Estate (Reg 19 assessment)
potential to promote fairness and equity for Gypsy and Traveller residents and contribute to social cohesion. Also, the provision of Gypsy and Traveller accommodation is considered to have a <u>minor positive</u> with regards to Objective 7 through providing good quality housing. Similarly, the reasonable alternative and the potential re-opening of the open space to the public and estate residents is considered to have a <u>minor positive</u> impact with regards to objectives 6 and a significant positive with regards to objective 7. With regards to Objectives 10, 11,12 and 13 the alternative and associated upgrades to the existing open space is considered to have positive effects with regards to biodiversity, climate mitigation and adaption. On the other hand, the provision of a gypsy and traveller site is considered to have negative effects with regards to objectives 11,12 and 13 due to the associated impacts on the existing vegetation/trees on site. Overall, it is recognised that the effects are finely balanced between an allocation for Gypsy and Traveller accommodation and the reasonable alternatives of enhanced estate amenity space. There are positive effects for delivering Gypsy and Traveller accommodation although these also create negative effects on open space, biodiversity and climate change. Whilst delivering enhancements to the estate amenity space would deliver positive effects and have no negative effects this option would however not	

Conclusion for Site Allocation GT1: Stephen's Ink Estate (Reg 18 assessment)	Conclusion for Site Allocation GT1: Stephen's Ink Estate (Reg 19 assessment)
contribute to meeting any housing needs. In addition, there are significant positive effects as the accommodation helps to meet Gypsy and Traveller needs and contributes to reducing social exclusion.	

Site Allocation GT2: Aubert Court Estate

I/A Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. MEETING NEEDS	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE / ACCESSIBLE	11. BIODIVERSITY	12. CLIMATE CHANGE MITIGATION	13. CLIMATE CHANGE ADAPTATION	14. RESOURCE EFFICIENCY	15. NATURAL RESOURCES
GT2: Aubert Court (Reg 18 assessment)	+	+	0	0	++	++	0	0	-	-	-	-	-	0	0
GT2: Aubert Court (Reg 19 assessment)	+	+	0	0	++	++	0	0	-	-	-	-	-	0	0

Commentary on assessment of likely significant effects of site allocations (Reg 18 assessment)	Commentary on assessment of likely significant effects of site allocations (Reg 19 assessment)
The proposed Site Allocation is for the provision of up to 2 permanent pitches to meet identified Gypsy and Traveller need. It is noted that a less intensive option is also available. It is considered that the Site Allocation would have a <u>minor positive</u> effect on Objective 1, as the proposed development would be required to provide a good level of residential amenity and high-quality housing for future occupiers of the site. Mitigation through screening and/or landscaping to secure a good level of residential amenity for surrounding	The proposed Site Allocation is for the provision of 2-3 permanent pitches to meet identified Gypsy and Traveller need. It is noted that a less intensive option has also been explored. Five pieces of evidence have been produced for this site which look at heritage, trees, ecology, site access and street parking survey. It is considered that the Site Allocation would have a <u>minor positive</u> effect on Objective 1, as the proposed development

Commentary on assessment of likely significant effects of site allocations (Reg 18 assessment)	Commentary on assessment of likely significant effects of site allocations (Reg 19 assessment)
residential properties is required and contributes towards a high-quality environment. Allocating the site for Gypsy and Traveller use seeks to balance competing demands between land uses to provide for the borough's full range of development needs. The allocation contributes towards the provision of housing to meet the identified needs of Gypsies and Travellers in the borough, which is considered a <u>significant positive</u> effect on Objective 5, and to optimising the use of land within an existing housing estate, which would have a <u>minor positive</u> effect on Objective 2. By providing accommodation for people who may possess a protected characteristic and requiring consultation with the local Gypsy and Traveller community and wider local community, the allocation is considered to have a <u>significant positive</u> effect in relation to Objective 6 for social inclusion. The provision of high quality, culturally suitable accommodation for Gypsy and Traveller residents is considered to contribute positively in terms of reducing health inequalities for this community. In relation to health and wellbeing impacts for existing estate residents, while an area of estate amenity space would be removed to accommodate this use, estate residents would continue to have access to green open space on the estate, albeit reduced and the impact would be minor negative therefore it is considered that the proposal would have an overall <u>neutral impact</u> on Objective 7.	would be required to provide a good level of residential amenity and high-quality housing for future occupiers of the site. Mitigation through screening and/or landscaping to secure a good level of residential amenity for surrounding residential properties is required and contributes towards a high-quality environment. The arboricultural report indicates that strategic removal of smaller and lower quality trees may allow access without removing more valued trees. Retaining the more valued trees such as those on the site boundaries would contribute to maintaining visual amenity and provide screening and contributing to landscape value. There is a degree of uncertainty regarding the extent of impacts to trees and the wider landscape benefit, depending on further site layout and design work. The heritage statement includes a series of recommended mitigation measures to be explored at the detailed design stage, that would contribute to responding positively to the surrounding character, for example in relation to lighting strategies, planting and green buffers, boundary treatments, materials and architectural character. Allocating the site for Gypsy and Traveller use seeks to balance competing demands between land uses to provide for the borough's full range of development needs. The allocation contributes towards the provision of housing to meet the identified needs of Gypsies and Travellers in the borough, which is considered a <u>significant positive</u> effect on Objective 5, and to

Commentary on assessment of likely significant effects of site allocations (Reg 18 assessment)	Commentary on assessment of likely significant effects of site allocations (Reg 19 assessment)
Given that the site allocation supports the use of private vehicles, it is considered to have a <u>minor negative</u> effect with regard to Objective 9, although it is noted that there needs to be provision for vehicles to tow caravans to support Gypsy and Travellers way of life. The proposed Site Allocation would occupy an area of existing estate amenity space, and whilst it would not preclude wider landscaping improvements from being carried out for the remaining part of the estate, the loss of existing green space will have negative impacts with regards to biodiversity and green space connectivity and could have further negative impacts with regards to water-run off and microclimate, which is considered to have a <u>minor negative impact</u> in relation to Objective 10. There are existing trees on the site which will need to be taken into careful consideration and the allocation highlights that development should minimise impacts on trees. Further ecology and arboriculture surveys would be required to assess the extent of the impact and the possible mitigation Given the proposed use would be single storey and it would not require laying foundations, it can be considered that impacts in terms of biodiversity – Objective 11 would be a <u>minor negative</u>. The impact in terms of Objective 12 and 13, climate mitigation and climate adaptation is considered to be a <u>minor negative</u>, with potential effects of the development in relation to water run-off and microclimate.	optimising the use of land within an existing housing estate, which would have a <u>minor positive</u> effect on Objective 2. The heritage assessment indicates that the proposal could be accommodated at the site without resulting in harm to the historic environment, and recommends a series of mitigation measures that respond positively to the adjacent conservation area and local townscape character. By providing accommodation for people who may possess a protected characteristic and requiring consultation with the local Gypsy and Traveller community and wider local community, the allocation is considered to have a <u>significant positive</u> effect in relation to Objective 6 for social inclusion. In relation to health and wellbeing impacts for existing estate residents, an area of estate amenity space would be removed to accommodate this use, which may have potential impacts on groups sharing protected characteristics, such as elderly residents, children and people with disabilities. However, this would amount to a small proportion of the overall open space. With the planned landscaping works proposed on Drakeley Court and Aubert Court estates, the quality and accessibility of the open space and residents' access to it will be improved. Estate residents would continue to have access to green open space on the estate, albeit reduced, and the impact would be

Commentary on assessment of likely significant effects of site allocations (Reg 18 assessment)	Commentary on assessment of likely significant effects of site allocations (Reg 19 assessment)
	minor negative. The provision of high quality, culturally suitable accommodation for Gypsy and Traveller residents is considered to contribute positively in terms of reducing health inequalities for this community. Therefore it is considered that on balance, the proposal would have an overall <u>neutral impact</u> on Objective 7. Given that the site allocation supports the use of private vehicles, it is considered to have a <u>minor negative</u> effect with regard to Objective 9, although it is noted that there needs to be provision for vehicles to tow caravans to support Gypsy and Travellers way of life. It may be necessary to remove some on-street parking spaces to create access into the site. Any removal of resident or pay-by-phone bays will be kept to a minimum. The council has undertaken a parking pressure survey to measure the usage of spaces, which indicates there is sufficient capacity to accommodate the expected occupancy. The site access study demonstrates that all the vehicles expected to use the site can access it safely. The proposed Site Allocation would occupy an area of existing estate amenity space, and whilst it would not preclude wider landscaping improvements from being carried out for the remaining part of the estate, the loss of existing green space will have negative impacts with regards to biodiversity and green

Commentary on assessment of likely significant effects of site allocations (Reg 18 assessment)	Commentary on assessment of likely significant effects of site allocations (Reg 19 assessment)
	space connectivity and could have further negative impacts with regards to water-run off and microclimate, which is considered to have a <u>minor negative impact</u> in relation to Objective 10. There are existing trees on the site which will need to be taken into careful consideration and the allocation highlights that development should minimise impacts on trees. The tree survey shows that there will be impacts on trees with a number of trees of moderate quality requiring removal. The 3-pitch option would require the removal or more of the trees on the southern boundary of the site, compared to the 2-pitch option. However in both cases it is possible to retain the two high category trees on the edges of the site. The study also provides helpful evidence to demonstrate that it would be possible to protect remaining trees and their roots with use of suitable surfacing. The sloping topography may require levelling works which may have impacts in relation to tree roots and ecology and this adds an element of uncertainty to this assessment. The ecology study indicates that the site has a low to moderate intrinsic ecological value and there are no prohibitive ecological constraints. Given the proposed use would be single storey and it would not require laying foundations, it can be considered that impacts in terms of biodiversity – Objective 11 would be a <u>minor negative</u>.

Commentary on assessment of likely significant effects of site allocations (Reg 18 assessment)	Commentary on assessment of likely significant effects of site allocations (Reg 19 assessment)
	The impact in terms of Objective 12 and 13, climate mitigation and climate adaptation is considered to be a <u>minor negative</u> , with potential effects of the development in relation to water run-off and microclimate.

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. MEETING NEEDS	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE / ACCESSIBLE	11. BIODIVERSITY	12. CLIMATE CHANGE MITIGATION	13. CLIMATE CHANGE ADAPTATION	14. RESOURCE EFFICIENCY	15. NATURAL RESOURCES
Reasonable Alternative 1: Residential (Reg 18 assessment)	+	+	0	+	++	+	0	0	0	+	0	0	0	0	0
Reasonable Alternative 1: Residential (Reg 19 assessment)	+	+	0	+	++	+	0	0	0	+	0	0	0	0	0

Commentary on assessment of likely significant effects of Alternative 1 (Reg 18 assessment)	Commentary on assessment of likely significant effects of Alternative 1 (Reg 19 assessment)
The alternative use for conventional residential development has been considered, in line with the adopted Local Plan Site Allocation OIS31. However it should be noted that the adopted Site Allocation OIS31 comprises a much larger area including the two housing estates, estate amenity space and car parking areas. It should be noted that Local Plan Site Allocation OIS31 was linked to a Council New Build scheme, however since the adoption of the Local Plan, following a review of the viability and value for money of several New Build projects, it has been confirmed that the scheme to deliver housing on this site is no longer proceeding so there is uncertainty about the effects of this alternative. As required by Local Plan Policy PLAN1, any development of the site for residential purposes would be required to be of high-quality and would need to make a positive contribution to the local character of the area, this would result in a <u>minor positive</u> impact with regard to Objective 1. While the potential quantum of housing that could be accommodated on site is not known, overall the alternative is considered to optimise the use of land in a residential area through infill residential development, which is a <u>minor positive</u> for Objective 2. The alternative use requires public realm improvements, creating a safer and more inclusive environment and promoting more liveable neighbourhoods which is a <u>minor positive</u> effect for Objective 4.	The alternative use for conventional residential development has been considered, in line with the adopted Local Plan Site Allocation OIS31. However it should be noted that the adopted Site Allocation OIS31 comprises a much larger area including the two housing estates, estate amenity space and car parking areas. It should be noted that Local Plan Site Allocation OIS31 was linked to a Council New Build scheme, however since the adoption of the Local Plan, following a review of the viability and value for money of several New Build projects, it has been confirmed that the scheme to deliver housing on this site is no longer proceeding so there is uncertainty about the effects of this alternative. As required by Local Plan Policy PLAN1, any development of the site for residential purposes would be required to be of high-quality and would need to make a positive contribution to the local character of the area, this would result in a <u>minor positive</u> impact with regard to Objective 1. While the potential quantum of housing that could be accommodated on site is not known, overall the alternative is considered to optimise the use of land in a residential area through infill residential development, which is a <u>minor positive</u> for Objective 2. The alternative use requires public realm improvements, creating a safer and more inclusive environment and promoting

Commentary on assessment of likely significant effects of Alternative 1 (Reg 18 assessment)	Commentary on assessment of likely significant effects of Alternative 1 (Reg 19 assessment)
Affordable housing would be provided as part of the development of the site, making a <u>minor positive</u> contribution to Objective 5 for meeting diverse housing needs, and Objective 6 for social inclusion. The improved landscaping would contribute towards increasing accessibility and increasing the quality of open space on the housing estate, which is considered to have a minor <u>positive</u> effect on Objective 10. In the absence of proposals showing where the residential infill development would be located within the boundary of Site Allocation OIS31, there is uncertainty about the impacts on Objective 11 in terms of biodiversity and Objectives 12 and 13 – climate mitigation and climate adaptation, therefore these impacts are considered to be <u>neutral</u>.	more liveable neighbourhoods which is a <u>minor positive</u> effect for Objective 4. Affordable housing would be provided as part of the development of the site, making a <u>minor positive</u> contribution to Objective 5 for meeting diverse housing needs, and Objective 6 for social inclusion. The improved landscaping would contribute towards increasing accessibility and increasing the quality of open space on the housing estate, which is considered to have a minor <u>positive</u> effect on Objective 10. In the absence of proposals showing where the residential infill development would be located within the boundary of Site Allocation OIS31, there is uncertainty about the impacts on Objective 11 in terms of biodiversity and Objectives 12 and 13 – climate mitigation and climate adaptation, therefore these impacts are considered to be <u>neutral</u>.

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. MEETING NEEDS	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE / ACCESSIBLE	11. BIODIVERSITY	12. CLIMATE CHANGE MITIGATION	13. CLIMATE CHANGE ADAPTATION	14. RESOURCE EFFICIENCY	15. NATURAL RESOURCES
Reasonable Alternative 2: Enhanced estate amenity space (Reg 18 assessment)	+	0	0	+	0	0	+	0	0	+	+	+	+	0	0
Reasonable Alternative 2: Enhanced estate amenity space (Reg 19 assessment)	+	0	0	+	0	0	+	0	0	+	+	+	+	0	0

Commentary on assessment of likely significant effects of Alternative 2 (Reg 18 assessment)	Commentary on assessment of likely significant effects of Alternative 2 (Reg 19 assessment)
The alternative use of the site for enhanced estate amenity space has been considered, based on estate landscaping improvement proposals that have been put forward by the council in May 2025.	The alternative use of the site for enhanced estate amenity space has been considered, based on estate landscaping improvement proposals that have been put forward by the council in May 2025.

Commentary on assessment of likely significant effects of Alternative 2 (Reg 18 assessment)	Commentary on assessment of likely significant effects of Alternative 2 (Reg 19 assessment)
The alternative use would provide public realm improvements that will benefit the quality of the built environment, having a <u>minor positive</u> effect on Objective 1, and would improve the existing provision for residents of open space and play areas which is a <u>minor positive</u> impact for Objective 4. The alternative is considered to have a <u>neutral</u> effect in terms of Objective 2, for effective use of land, as it would not optimise the use of land within a residential estate where residential development has previously been considered; however improved landscaping would have the potential to implement green infrastructure in unused areas. Improvements to estate amenity space would contribute positively to the health and wellbeing of existing residents, being considered a <u>minor positive</u> impact in terms of Objective 7. The proposal would contribute towards increasing the quality and improving access to existing estate amenity open space, having a <u>minor positive</u> effect on Objective 10. This alternative is considered to contribute <u>positively</u> to Objectives 11, 12 and 13 as improved landscaping would be expected to protect and enhance biodiversity, and have benefits in terms of the microclimate and reducing flooding risk.	The alternative use would provide public realm improvements that will benefit the quality of the built environment, having a <u>minor positive</u> effect on Objective 1, and would improve the existing provision for residents of open space and play areas which is a <u>minor positive</u> impact for Objective 4. The alternative is considered to have a <u>neutral</u> effect in terms of Objective 2, for effective use of land, as it would not optimise the use of land within a residential estate where residential development has previously been considered; however improved landscaping would have the potential to implement green infrastructure in unused areas. Improvements to estate amenity space would contribute positively to the health and wellbeing of existing residents, being considered a <u>minor positive</u> impact in terms of Objective 7. The proposal would contribute towards increasing the quality and improving access to existing estate amenity open space, having a <u>minor positive</u> effect on Objective 10. This alternative is considered to contribute <u>positively</u> to Objectives 11, 12 and 13 as improved landscaping would be expected to protect and enhance biodiversity, and have benefits in terms of the microclimate and reducing flooding risk.

Conclusion for Site Allocation GT2 Aubert Court (Reg 18 assessment)	Conclusion for Site Allocation GT2 Aubert Court (Reg 19 assessment)
The site is part on an adopted Local Plan Site Allocation for residential infill development and amenity space improvements on existing council estates. The proposed Gypsy and Traveller accommodation would occupy a small area of existing amenity space. Two reasonable alternatives have been considered for this site, for residential use and for enhanced estate amenity space. It is noted that the Council has confirmed that the residential New Build project previously considered for this Site Allocation is not proceeding so there is uncertainty over any of the positive or negative effects of this alternative being achieved. All three options are considered to contribute positively to achieving a high-quality built environment in line with Objective 1, as development considerations for the Gypsy and Traveller site would include requirements for high quality design, while residential development would be expected to meet relevant Local Plan design and housing quality requirements. Landscaping improvement plans are considered to conserve and enhance local character. In terms of Objective 2, both the Gypsy and Traveller site and residential use are considered to have a minor positive effect. While residential infill development would be assumed to provide a higher number of homes due to higher densities being possible, it is recognised as part of this objective that there is a need to balance competing demands between land uses in order to meet the full	The site is part on an adopted Local Plan Site Allocation for residential infill development and amenity space improvements on existing council estates. The proposed Gypsy and Traveller accommodation would occupy a small area of existing amenity space. Two reasonable alternatives have been considered for this site, for residential use and for enhanced estate amenity space. It is noted that the Council has confirmed that the residential New Build project previously considered for this Site Allocation is not proceeding so there is uncertainty over any of the positive or negative effects of this alternative being achieved. All three options are considered to contribute positively to achieving a high-quality built environment in line with Objective 1, as development considerations for the Gypsy and Traveller site would include requirements for high quality design, while residential development would be expected to meet relevant Local Plan design and housing quality requirements. Landscaping improvement plans are considered to conserve and enhance local character. In terms of Objective 2, both the Gypsy and Traveller site and residential use are considered to have a minor positive effect. While residential infill development would be assumed to provide a higher number of homes due to higher densities being possible, it is recognised as part of this objective that there is a need to balance competing demands between land uses in order to meet the full

Conclusion for Site Allocation GT2 Aubert Court (Reg 18 assessment)	Conclusion for Site Allocation GT2 Aubert Court (Reg 19 assessment)
range of development needs of an area, including the unmet need for Gypsy and Traveller accommodation. However it is noted that the Council has confirmed that the residential New Build project previously considered for this Site Allocation is not proceeding so there is uncertainty over any of the positive or negative effects of this alternative being achieved. Moreover, the proposed Gypsy and Traveller site would occupy a small area of existing amenity space which would not preclude either residential infill or landscaping improvements from being delivered as part of the wider Local Plan Site Allocation. The enhanced amenity space would have a neutral effect in terms of optimising the use of land. The Gypsy and Traveller site option is considered to have a significant positive impact in terms of Objectives 5 and 6, as it would contribute to providing affordable and culturally suitable accommodation for Gypsy and Traveller residents, which is recognised as a factor that can reduce social exclusion and discrimination experienced by Gypsy and Traveller communities. High quality Gypsy and Traveller accommodation has the potential to promote fairness and equity for Gypsy and Traveller residents and contribute to social cohesion. The residential development alternative is considered to have a minor positive impact for these objectives, as it would provide housing that meets the diverse and changing needs of the population, as well as affordable housing which would help reduce inequality and relative poverty.	range of development needs of an area, including the unmet need for Gypsy and Traveller accommodation. However it is noted that the Council has confirmed that the residential New Build project previously considered for this Site Allocation is not proceeding so there is uncertainty over any of the positive or negative effects of this alternative being achieved. Moreover, the proposed Gypsy and Traveller site would occupy a small area of existing amenity space which would not preclude either residential infill or landscaping improvements from being delivered as part of the wider Local Plan Site Allocation. The enhanced amenity space would have a neutral effect in terms of optimising the use of land. The Gypsy and Traveller site option is considered to have a significant positive impact in terms of Objectives 5 and 6, as it would contribute to providing affordable and culturally suitable accommodation for Gypsy and Traveller residents, which is recognised as a factor that can reduce social exclusion and discrimination experienced by Gypsy and Traveller communities. High quality Gypsy and Traveller accommodation has the potential to promote fairness and equity for Gypsy and Traveller residents and contribute to social cohesion. The residential development alternative is considered to have a minor positive impact for these objectives, as it would provide housing that meets the diverse and changing needs of the population, as well as affordable housing which would help reduce inequality and relative poverty.

Conclusion for Site Allocation GT2 Aubert Court (Reg 18 assessment)	Conclusion for Site Allocation GT2 Aubert Court (Reg 19 assessment)
In terms of Objective 10 related to open space, the Gypsy and Traveller site is considered to have minor negative impacts; whilst it would not preclude wider landscaping improvements from being carried out for the remaining part of the estate, the loss of existing green space will have negative impacts with regards to biodiversity and green space connectivity and could have further negative impacts with regards to water-run off and microclimate. The residential alternative is considered to have a neutral impact, as the Local Plan Site Allocation mentions improvements to open space which could offset potential negative impacts of residential infill. The enhanced estate amenity option is considered to have a positive impact for this objective as it would provide improvements to existing open space. For Objectives 11,12 and 13, the Gypsy and Traveller site is considered to have a minor negative impact. While initial assessments indicate that the existing trees could be retained, further ecology and arboriculture surveys would be required to establish the scale of impacts and possible mitigation. The residential alternative is considered to have a neutral impact, as the scale of development is not known, however the existing Site Allocations includes improvements to landscaping. The enhanced estate amenity space would contribute positively to the objectives related to biodiversity, climate mitigation and adaptation.	While the loss of an area of amenity space may have potential impacts on groups sharing protected characteristics, such as elderly residents, children and people with disabilities, this would only amount to a small proportion of the overall amenity space. With the planned landscaping works proposed on Drakeley Court and Aubert Court estates, the quality and accessibility of the open space and residents' access to it will be improved which contributes to mitigating some of the potential adverse impacts in relation to health inequalities. The proposal for a Gypsy and Traveller site is considered to contribute positively to addressing health inequalities experienced by the community. On balance, the proposed Site Allocation use for Gypsy and Traveller accommodation and the alternative for residential use are considered to have a neutral overall impact in relation to Objective 7 on health inequalities. The alternative for landscaping improvements would have a minor positive impact in terms of this objective. In terms of Objective 10 related to open space, the Gypsy and Traveller site is considered to have minor negative impacts; whilst it would not preclude wider landscaping improvements from being carried out for the remaining part of the estate, the loss of existing green space will have negative impacts with regards to biodiversity and green space connectivity and could have further negative impacts with regards to water-run off and microclimate. The residential alternative is considered to have a neutral impact, as the Local Plan Site Allocation mentions improvements to open space which could offset potential negative impacts of residential infill. The

Conclusion for Site Allocation GT2 Aubert Court (Reg 18 assessment)	Conclusion for Site Allocation GT2 Aubert Court (Reg 19 assessment)
Overall it is recognised that the effects are finely balanced between an allocation for Gypsy and Traveller accommodation and the alternatives of residential infill development and enhanced estate amenity space.	enhanced estate amenity option is considered to have a positive impact for this objective as it would provide improvements to existing open space. For Objectives 11,12 and 13, the Gypsy and Traveller site is considered to have a minor negative impact. The tree survey indicates that a number of trees of moderate quality require removal, but provides helpful evidence to demonstrate that it would be possible to protect remaining trees and their roots with use of suitable surfacing. The sloping topography may require levelling works which may have impacts in relation to tree roots and ecology. There is a degree of uncertainty regarding the impacts on trees pending further detailed site design work. The site has a low to moderate ecological value and there are no prohibitive ecological constraints. The residential alternative is considered to have a neutral impact, as the scale of development is not known, however the existing Site Allocations includes improvements to landscaping. The enhanced estate amenity space would contribute positively to the objectives related to biodiversity, climate mitigation and adaptation. Overall it is recognised that the effects are finely balanced between an allocation for Gypsy and Traveller accommodation and the alternatives of residential infill development and enhanced estate amenity space.

Site Allocation GT3: Aberdeen Lane

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. MEETING NEEDS	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE / ACCESSIBLE	11. BIODIVERSITY	12. CLIMATE CHANGE MITIGATION	13. CLIMATE CHANGE ADAPTATION	14. RESOURCE EFFICIENCY	15. NATURAL RESOURCES
GT3: Aberdeen Lane (Reg 18 assessment)	+	+	0	0	++	++	+	0	0	0	0	0	0	0	0
GT3: Aberdeen Lane (Reg 19 assessment)	+	+	0	0	++	++	+	0	0	0	0	0	0	0	0

Commentary on assessment of likely significant effects of site allocations (Reg 18 assessment)	Commentary on assessment of likely significant effects of site allocations (Reg 19 assessment)
The proposed site allocation is for the provision of 1 permanent pitch to meet identified Gypsy and Traveller need. It is considered that the Site Allocation would have a <u>minor positive</u> effect on Objective 1, as the proposed development would be required to provide a good level of residential amenity and high-quality housing for future occupiers of the site. Mitigation through screening and/or landscaping to secure a good level of residential amenity for surrounding residential	The proposed Site Allocation remains unchanged from the Reg 18 assessment and is for the provision of 1 permanent pitch to meet identified Gypsy and Traveller need. Three pieces of evidence have been produced for this site which relate to heritage, site access and street parking survey.

Commentary on assessment of likely significant effects of site allocations (Reg 18 assessment)	Commentary on assessment of likely significant effects of site allocations (Reg 19 assessment)
properties is required and contributes towards a high-quality environment. The site is located within the Aberdeen Park Conservation Area. The site allocation requires any development of the site to consider the significance of the conservation area and conserve or enhance this significance. The effects of the proposal are considered uncertain and the site allocation is considered to have a <u>neutral impact</u> with regards to Objective 3. Allocating the site for Gypsy and Traveller use seeks to balance competing demands between land uses to provide for the borough's full range of development needs. The allocation <u>positively contributes</u> towards the provision of housing to meet the identified needs of Gypsies and Travellers in the borough in line with Objective 5 and optimising the use of land in a residential area in line with Objective 2, resulting in a <u>minor positive impact</u>. By providing accommodation for people who may possess a protected characteristic the allocation is considered to have a <u>significant positive effect</u> in relation to Objective 6 for social inclusion, as does the site allocation requirement to engage with the Local Community and Gypsy and Traveller Community. The provision of culturally suitable accommodation for Gypsy and Traveller residents is considered to <u>contribute positively</u> to Objective 7 in terms of reducing health inequalities	The proposed site allocation is for the provision of 1 permanent pitch to meet identified Gypsy and Traveller need. It is considered that the Site Allocation would have a <u>minor positive</u> effect on Objective 1, as the proposed development would be required to provide a good level of residential amenity and high-quality housing for future occupiers of the site. Mitigation through screening and/or landscaping to secure a good level of residential amenity for surrounding residential properties is required and contributes towards a high-quality environment. The site is located within the Aberdeen Park Conservation Area. The site allocation requires any development of the site to consider the significance of the conservation area and conserve or enhance this significance. The heritage assessment undertaken for the site indicates that the proposal could be accommodated without resulting in harm to the historic environment, including Aberdeen Park Conservation Area. The assessment recommends a series of mitigation measures that respond positively to the relevant Conservation Areas and local townscape character. As such, the site allocation is considered to have <u>neutral impact</u> with regards to Objective 3. Allocating the site for Gypsy and Traveller use seeks to balance competing demands between land uses to provide for the borough's full range of development needs. The allocation

Commentary on assessment of likely significant effects of site allocations (Reg 18 assessment)	Commentary on assessment of likely significant effects of site allocations (Reg 19 assessment)
for this community through providing a good quality housing and improving mental health and overall wellbeing. The redevelopment of existing car parks is strongly encouraged by Local Plan Policies (T3) as part of the wider commitment to driving model shift towards more sustainable transport methods resulting in a positive impact in relation to Objectives 2 and 9. However, given that the site allocation supports the use of private vehicles, although it is noted that there needs to be provision for vehicles to tow caravans to support Gypsy and Travellers way of life, the impact of the site allocation with regards to Objective 9 is considered to be <u>neutral</u>. The current use of the site for car-parking makes little to no biodiversity value and does not contribute with regards to mitigating the effects of climate change or aiding adaption to climate change. However, there are existing trees located on the site boundary and in close proximity to the site's boundary. Any development of the site will need to carefully consider these existing trees. Further ecology and arboriculture surveys would be required to fully assess the extent of any potential benefits associated with the enhancement of the space. Consequently, the site allocation is considered to have a <u>neutral impact</u> in relation to Objectives 11,12 and 13 at this stage.	<u>positively contributes</u> towards the provision of housing to meet the identified needs of Gypsies and Travellers in the borough in line with Objective 5 and optimising the use of land in a residential area in line with Objective 2, resulting in a <u>minor positive impact</u>. By providing accommodation for people who may possess a protected characteristic the allocation is considered to have a <u>significant positive effect</u> in relation to Objective 6 for social inclusion, as does the site allocation requirement to engage with the Local Community and Gypsy and Traveller Community. The provision of culturally suitable accommodation for Gypsy and Traveller residents is considered to <u>contribute positively</u> to Objective 7 in terms of reducing health inequalities for this community through providing a good quality housing and improving mental health and overall wellbeing. The proposal would result in the loss of some car parking spaces for estate residents, which may have potential implications with regards to Objective 4 and people's ability to be able to access essential services. While the proposal would result in the loss of some car parking spaces for estate residents, which may have the potential to impact on some groups sharing protected characteristics, the parking pressure survey undertaken by the Council indicates that there is capacity to accommodate the

Commentary on assessment of likely significant effects of site allocations (Reg 18 assessment)	Commentary on assessment of likely significant effects of site allocations (Reg 19 assessment)
	displaced car parking capacity on Aberdeen Park, subject to residents applying to the management company for a parking permit. This includes any provision required for any Blue Badge holders without creating a significant greater walking distance. The provision of high-quality, well-connected accommodation for Gypsy and Traveller residents would contribute positively towards Objective 4. Therefore, it is considered that the proposal would not result in adverse impacts in relation to Objective 4. The redevelopment of existing car parks is strongly encouraged by Local Plan Policies (T3) as part of the wider commitment to driving model shift towards more sustainable transport methods resulting in a positive impact in relation to Objectives 2 and 9. The site access study demonstrates that all the vehicles expected to use the site, including refuse collection vehicles, emergency service appliances, towed touring caravans and the delivery of static caravans will be able to access the site safely. Notwithstanding this, as the site allocation supports the use of private vehicles, the effect with regard to Objective 9 is considered to be <u>neutral</u>. The current use of the site for car-parking makes little to no biodiversity value and does not contribute with regards to mitigating the effects of climate change or aiding adaption to climate change. However, there are existing trees located on the site boundary and in close proximity to the site's boundary. Any

Commentary on assessment of likely significant effects of site allocations (Reg 18 assessment)	Commentary on assessment of likely significant effects of site allocations (Reg 19 assessment)
	development of the site will need to carefully consider these existing trees. Whilst it is not anticipated that there will be any impact on the existing trees located on the site, further ecology and tree surveys would be required at planning application stage to fully assess the extent of any potential benefits associated with the enhancement of the space. Given the site currently provides the necessary hardstanding and the development would not require digging foundations, it is considered that the proposal would not affect the root protection areas of boundary trees. Consequently, the site allocation is considered to have a <u>neutral impact</u> in relation to Objectives 11,12 and 13 at this stage.

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. MEETING NEEDS	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE / ACCESSIBLE	11. BIODIVERSITY	12. CLIMATE CHANGE MITIGATION	13. CLIMATE CHANGE ADAPTATION	14. RESOURCE EFFICIENCY	15. NATURAL RESOURCES
Reasonable Alternative 1: Residential (Reg 18 assessment)	+	+	+	0	++	+	+	0	+	0	+	+	+	0	0

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. MEETING NEEDS	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE / ACCESSIBLE	11. BIODIVERSITY	12. CLIMATE CHANGE MITIGATION	13. CLIMATE CHANGE ADAPTATION	14. RESOURCE EFFICIENCY	15. NATURAL RESOURCES
Reasonable Alternative 1: Residential (Reg 19 assessment)	+	+	+	0	++	+	+	0	+	0	+	+	+	0	0

Commentary on assessment of likely significant effects of Alternative 1 (Reg 18 assessment)	Commentary on assessment of likely significant effects of Alternative 1 (Reg 19 assessment)
The alternative use of the site for conventional residential development has been considered. As required by Local Plan Policy Plan1, any development of the site for residential purposes would be required to be of high-quality and would need to make a positive contribution to the local character of the area, this would result in a <u>minor positive impact</u> with regard to Objective 1. Moreover, any redevelopment of the site would be required to conform with Local Plan Policy DH2 which requires proposals to conserve the significance of heritage assets, as such, and with the current use of the site as a car park in mind, residential redevelopment of the site is considered to have a neutral impact with regards to Objective 3.	The alternative use of the site for conventional residential development has been considered. As required by Local Plan Policy Plan1, any development of the site for residential purposes would be required to be of high-quality and would need to make a positive contribution to the local character of the area, this would result in a <u>minor positive impact</u> with regard to Objective 1. Moreover, any redevelopment of the site would be required to conform with Local Plan Policy DH2 which requires proposals to conserve the significance of heritage assets, as such, and with the current use of the site as a car park in mind, residential redevelopment of the site is considered to have a neutral impact with regards to Objective 3.

Commentary on assessment of likely significant effects of Alternative 1 (Reg 18 assessment)	Commentary on assessment of likely significant effects of Alternative 1 (Reg 19 assessment)
The delivery of some housing would lead to a <u>positive effect</u> with regards to Objectives 2 & 5, helping to meet Islington’s housing need, additionally, affordable housing would be required as part of any development of the site making a positive contribution with regards to Objective 6. The provision of good quality housing, that is energy efficient is considered to have a positive impact on health and wellbeing and Objective 7. The redevelopment of existing car parks is strongly encouraged by Local Plan Policies (T3) as part of the wider commitment to driving model shift towards more sustainable transport methods resulting in a positive impact in relation to Objective 2.. Any redevelopment of the site will be required to provide cycle-parking, therefore, in addition to the loss of the existing private car-parking it is considered that the proposed redevelopment of the site to provide a mixed-use development would have a <u>minor benefit</u> with regard to Objectives 9 through supporting model shift. Given the current use of the site for car-parking, the site has little biodiversity value and does not contribute with regards to mitigating the effects of climate change or aiding adaption to climate change. There are several existing trees on the site boundary; whilst any residential development of the site would be required to conform with Local Plan Policy G4 requires development to minimise impacts on the existing trees and other vegetation, it is likely that any residential development of the site would require the removal of trees. The delivery of a policy compliant	The delivery of some housing would lead to a <u>positive effect</u> with regards to Objectives 2 & 5, helping to meet Islington’s housing need, additionally, affordable housing would be required as part of any development of the site making a positive contribution with regards to Objective 6. The provision of good quality housing, that is energy efficient is considered to have a positive impact on health and wellbeing and Objective 7. The redevelopment of existing car parks is strongly encouraged by Local Plan Policies (T3) as part of the wider commitment to driving model shift towards more sustainable transport methods resulting in a positive impact in relation to Objective 2. Any redevelopment of the site will be required to provide cycle-parking, therefore, in addition to the loss of the existing private car-parking it is considered that the proposed redevelopment of the site to provide a mixed-use development would have a <u>minor benefit</u> with regard to Objectives 9 through supporting model shift. While the proposal would result in the loss of some car parking spaces for estate residents, which may have the potential to impact on some groups sharing protected characteristics, the parking pressure survey undertaken by the Council indicates that there is capacity to accommodate the displaced car parking capacity on Aberdeen Park, subject to residents applying to the

Commentary on assessment of likely significant effects of Alternative 1 (Reg 18 assessment)	Commentary on assessment of likely significant effects of Alternative 1 (Reg 19 assessment)
development for conventional residential accommodation would require improvements to be achieved on site with regards to biodiversity, mitigation of flood risk, the delivery of sustainable buildings and the requirement to incorporate a green roof. As such, the development of the site to provide conventional residential accommodation is considered to have a <u>minor positive benefit</u> in relation to Objectives 11, 12 and 13.	management company for a parking permit. This includes any provision required for any Blue Badge holders without creating a significant greater walking distance. Therefore, overall, it is considered that the proposal would not result in adverse impacts in relation to Objective 4. Given the current use of the site for car-parking, the site has little biodiversity value and does not contribute with regards to mitigating the effects of climate change or aiding adaption to climate change. There are several existing trees on the site boundary; whilst any residential development of the site would be required to conform with Local Plan Policy G4 requires development to minimise impacts on the existing trees and other vegetation, it is likely that any residential development of the site would require the removal of trees. The delivery of a policy compliant development for conventional residential accommodation would require improvements to be achieved on site with regards to biodiversity, mitigation of flood risk, the delivery of sustainable buildings and the requirement to incorporate a green roof. As such, the development of the site to provide conventional residential accommodation is considered to have a <u>minor positive benefit</u> in relation to Objectives 11, 12 and 13.

Conclusion for Site Allocation GT3 Aberdeen Lane (Reg 18 assessment)	Conclusion for Site Allocation GT3 Aberdeen Lane (Reg 19 assessment)
One reasonable alternative has been considered for this site, the redevelopment of the site to provide conventional residential development. Both uses are considered to make a <u>minor positive</u> contribution towards Objective 1, any allocation of the site to delivery Gypsy and Traveller accommodation would include a requirement for high quality design, similarly, any residential development of the site would be required to conform with relevant Local Plan Policies which require high-quality design. In terms of Objective 2, both the Gypsy and Traveller site and residential use are considered to have a <u>minor positive</u> effect. While conventional residential development would be assumed to provide a higher number of homes due to higher densities being possible, it is recognised as part of this objective that there is a need to balance competing demands between land uses in order to meet the full range of development needs of an area, including the unmet need for Gypsy and Traveller accommodation. The Gypsy and Traveller site option is considered to have a <u>significant positive</u> impact in terms of Objectives 5 and 6, as it would contribute to providing affordable and culturally suitable accommodation for Gypsy and Traveller residents, which is recognised as a factor that can reduce social exclusion and discrimination experienced by Gypsy and Traveller communities. High quality Gypsy and Traveller accommodation has the potential to promote fairness and equity for Gypsy and Traveller residents and contribute to social cohesion. The residential development alternative	One reasonable alternative has been considered for this site, the redevelopment of the site to provide conventional residential development. Both uses are considered to make a <u>minor positive</u> contribution towards Objective 1, any allocation of the site to deliver Gypsy and Traveller accommodation would include a requirement for high quality design, similarly, any residential development of the site would be required to conform with relevant Local Plan Policies which require high-quality design. More specifically, with regards to Objective 3, the heritage assessment undertaken for the site indicates that the proposed site allocation for Gypsy and Traveller accommodation could be accommodated without resulting in harm to the historic environment, including the Moorfields Conservation Area in which the site is located and the nearby St Luke's Conservation Area. In terms of Objective 2, both the Gypsy and Traveller site and residential use are considered to have a <u>minor positive</u> effect. While conventional residential development would be assumed to provide a higher number of homes due to higher densities being possible, it is recognised as part of this objective that there is a need to balance competing demands between land uses in order to meet the full range of development needs of an area, including the unmet need for Gypsy and Traveller accommodation. The Gypsy and Traveller site option is considered to have a <u>significant positive</u> impact in terms of Objectives 5 and 6, as it

Conclusion for Site Allocation GT3 Aberdeen Lane (Reg 18 assessment)	Conclusion for Site Allocation GT3 Aberdeen Lane (Reg 19 assessment)
is considered to have a <u>minor positive</u> impact for these objectives, as it would provide housing that meets the diverse and changing needs of the population, as well as affordable housing which would help reduce inequality and relative poverty. Moreover, given that both involve the creation of good quality housing, both options are considered to have a <u>minor positive</u> with regards to Objective 7. In considering Objective 9, the delivery of a conventional residential development is considered to have a minor positive impact with regards to supporting model shift; the provision of Gypsy and Traveller accommodation is considered to have a <u>neutral impact</u> given that the site allocation supports the continued use of private vehicles. Given the current use of the site as a car park, the redevelopment of the site to provide conventional residential accommodation is considered to have a <u>minor positive</u> impact on Objectives 11,12 and 13 with any such development required to conform with relevant Local Plan Policies requiring improvements with regards to biodiversity and climate change adaptation and mitigation. With regards to the use of the site to provide Gypsy and Traveller accommodation, notwithstanding the need for additional surveys, it is considered that it may be possible to retain the existing trees on site resulting in a <u>neutral impact</u> with regards to objectives 11,12 and 13. It is also relevant here to consider the difficulty of providing a green roof or solar panels as part of a Gypsy and Traveller Pitch in comparison to a conventional residential development.	would contribute to providing affordable and culturally suitable accommodation for Gypsy and Traveller residents, which is recognised as a factor that can reduce social exclusion and discrimination experienced by Gypsy and Traveller communities. High quality Gypsy and Traveller accommodation has the potential to promote fairness and equity for Gypsy and Traveller residents and contribute to social cohesion. The residential development alternative is considered to have a <u>minor positive</u> impact for these objectives, as it would provide housing that meets the diverse and changing needs of the population, as well as affordable housing which would help reduce inequality and relative poverty. Moreover, given that both involve the creation of good quality housing, both options are considered to have a <u>minor positive</u> with regards to Objective 7. The Parking Pressure survey demonstrates that any displaced parking capacity can be accommodated within the wider estate, including any Blue Badge Holders, indicating a neutral impact with regards to Objective 9 and to Objective 4 with regards to affecting people's ability to be able to access essential services. More specifically, with regards to the proposed allocation of the site to provide Gypsy and Traveller accommodation, the Site Access Study demonstrates that all of the vehicles expected to use the site can access it safely. Notwithstanding this, in considering Objective 9, whilst the delivery of a conventional residential

Conclusion for Site Allocation GT3 Aberdeen Lane (Reg 18 assessment)	Conclusion for Site Allocation GT3 Aberdeen Lane (Reg 19 assessment)
Overall, it is recognised that the impacts associated with an allocation for Gypsy and Traveller accommodation and the identified reasonable alternative are finely balanced. There are positive effects associated with the delivery of conventional residential development, this includes helping to meet Islington's housing need and minor positive impacts with regards to biodiversity, climate change adaptation and climate change mitigation. Whilst there are no positive impacts with regards to biodiversity or climate change associated with the provision of Gypsy and Traveller accommodation, there are significant positive effects with regards to helping to meet the acute need for Gypsy and Traveller accommodation in Islington and reducing social exclusion.	development is considered to have a minor positive impact with regards to supporting modal shift; the provision of Gypsy and Traveller accommodation is considered to have a <u>neutral impact</u> given that the site allocation supports the continued use of private vehicles. Given the current use of the site as a car park, the redevelopment of the site to provide conventional residential accommodation is considered to have a <u>minor positive</u> impact on Objectives 11,12 and 13 with any such development required to conform with relevant Local Plan Policies requiring improvements with regards to biodiversity and climate change adaptation and mitigation. With regards to the use of the site to provide Gypsy and Traveller accommodation, whilst it is not anticipated that there will be any impact on the existing trees located on the site, further ecology and tree surveys would be required at planning application stage to fully assess the extent of any potential benefits associated with the enhancement of the space. Given the site currently provides the necessary hardstanding and the development would not require digging foundations, it is considered that the proposal would not affect the root protection areas of boundary trees. . With this in mind, the propose site allocation is considered to have a <u>neutral impact</u> with regards to objectives 11,12 and 13. It is also relevant here to consider the difficulty of providing a green

Conclusion for Site Allocation GT3 Aberdeen Lane (Reg 18 assessment)	Conclusion for Site Allocation GT3 Aberdeen Lane (Reg 19 assessment)
	roof or solar panels as part of a Gypsy and Traveller Pitch in comparison to a conventional residential development. Overall, it is recognised that the impacts associated with an allocation for Gypsy and Traveller accommodation and the identified reasonable alternative are finely balanced. There are positive effects associated with the delivery of conventional residential development, this includes helping to meet Islington's housing need and minor positive impacts with regards to biodiversity, climate change adaptation and climate change mitigation. Whilst there are no positive impacts with regards to biodiversity or climate change associated with the provision of Gypsy and Traveller accommodation, there are significant positive effects with regards to helping to meet the acute need for Gypsy and Traveller accommodation in Islington and reducing social exclusion.

Site Allocation GT4: Ronald's Road

I/A Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. MEETING NEEDS	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE / ACCESSIBLE	11. BIODIVERSITY	12. CLIMATE CHANGE MITIGATION	13. CLIMATE CHANGE ADAPTATION	14. RESOURCE EFFICIENCY	15. NATURAL RESOURCES
GT4: Ronald's Road (Reg 18 assessment)	+	+	0	0	++	++	+	0	-	0	-	-	-	0	0
GT4: Ronald's Road (Reg 19 assessment)	+	+	0	0	++	++	+	0	-	0	-	-	-	0	0

Commentary on assessment of likely significant effects of site allocations (Reg 18 assessment)	Commentary on assessment of likely significant effects of site allocations (Reg 19 assessment)
The proposed Site Allocation is for the provision of up to 2 permanent pitches to meet identified Gypsy and Traveller need. In terms of promoting a high-quality environment for Objective 1 the development considerations are assessed to have a <u>minor positive</u> effect as they are location sensitive with reference to the railway tunnel beneath the site. They consider the potential impacts of noise and vibration from the	The proposed Site Allocation is for the provision of 2-3 permanent pitches to meet identified Gypsy and Traveller need. Three pieces of evidence have been produced for this site which look at trees, ecology and site access. In terms of promoting a high-quality environment for Objective 1 the development considerations are assessed to have a

Commentary on assessment of likely significant effects of site allocations (Reg 18 assessment)	Commentary on assessment of likely significant effects of site allocations (Reg 19 assessment)
railway on residents of the site and require mitigation of such impacts. In addition mitigation of the site through screening and/or landscaping to secure a good level of residential amenity for surrounding residential properties is required and contributes towards a high-quality environment. Allocating the site for Gypsy and Traveller use seeks to balance competing demands between land uses to provide for the borough's full range of development needs. The allocation contributes towards the provision of housing to meet the identified needs of Gypsies and Travellers in the borough, which is considered a <u>significant positive</u> effect on Objective 5, and optimising the use of previously developed land, which would have a <u>minor positive</u> effect on Objective 2. By providing accommodation for people who may possess a protected characteristic and requiring consultation with the local Gypsy and Traveller community and wider local community, the allocation is considered to have a <u>significant positive</u> effect in relation to Objective 6 for social inclusion. The provision of high quality, culturally suitable accommodation for Gypsy and Traveller residents is considered to contribute positively to Objective 7 in terms of reducing health inequalities for this community. Given that the site allocation supports the use of private vehicles, it is considered to have a <u>minor negative</u> effect with regard to Objective 9 although it is noted that there needs to be provision for vehicles to tow caravans to support Gypsy and Travellers way of life.	<u>minor positive</u> effect as they are location sensitive with reference to the railway tunnel beneath the site. They consider the potential impacts of noise and vibration from the railway on residents of the site and require mitigation of such impacts. In addition mitigation of the site through screening and/or landscaping to secure a good level of residential amenity for surrounding residential properties is required and contributes towards a high-quality environment. The arboricultural report identifies that for the 2-pitch option, the retention of larger and mature trees on the south and north boundaries would be possible and the removal of lower quality trees within the site will likely be of low significance from a visual amenity aspect. The 3-pitch option would also require the removal of the moderate category trees on the southern boundary of the site. Allocating the site for Gypsy and Traveller use seeks to balance competing demands between land uses to provide for the borough's full range of development needs. The allocation contributes towards the provision of housing to meet the identified needs of Gypsies and Travellers in the borough, which is considered a <u>significant positive</u> effect on Objective 5, and optimising the use of previously developed land, which would have a <u>minor positive</u> effect on Objective 2.

Commentary on assessment of likely significant effects of site allocations (Reg 18 assessment)	Commentary on assessment of likely significant effects of site allocations (Reg 19 assessment)
There are existing trees on the site which will need to be taken into careful consideration and the allocation highlights that development should minimise impacts on trees. Further ecology and arboriculture surveys would be required to assess the extent of the impact and the possible mitigation. Given the proposed use would be single storey and it would not require laying foundations, it can be considered that impacts in terms of biodiversity – Objective 11 - and climate mitigation and adaptation -Objectives 12 and 13- would be a <u>minor negative</u>.	Respondents to the Regulation 18 consultation included concerns about potential impacts on the operation of the Highbury Roundhouse Community Centre and food bank, which support a range of groups sharing protected characteristics such as elderly people, children and young people and low-income residents. The Highbury Roundhouse Community Centre is an important community resource and safe and inclusive access to the site is important. The draft policy for the site is clear that proposals should accommodate suitable pedestrian and vehicular access to the new community centre to the north of the site, including turning space for emergency services vehicles. The delivery of the access route for the community centre can continue and does not need to be held up by the proposal. The allocation should not impede the operation of the community centre. A short-term agreement is in place between the Council and Islington Foodbank and the Council and Highbury Roundhouse Community Association regarding the use of the hardstanding area of the site for the storage of containers. The agreement is for an initial short-term period and after this period the agreement continues and can be terminated by either party subject to the necessary notice. Alternative locations for a food bank will be explored. Whilst there is some uncertainty considering mitigation, it is considered that

Commentary on assessment of likely significant effects of site allocations (Reg 18 assessment)	Commentary on assessment of likely significant effects of site allocations (Reg 19 assessment)
	there could potentially not be adverse impacts in relation to Objective 6 and Objective 7. By providing accommodation for people who may possess a protected characteristic and requiring consultation with the local Gypsy and Traveller community and wider local community, the allocation is considered to have a <u>significant positive</u> effect in relation to Objective 6 for social inclusion. The provision of high quality, culturally suitable accommodation for Gypsy and Traveller residents is considered to contribute positively to Objective 7 in terms of reducing health inequalities for this community. Given that the site allocation supports the use of private vehicles, it is considered to have a <u>minor negative</u> effect with regard to Objective 9 although it is noted that there needs to be provision for vehicles to tow caravans to support Gypsy and Travellers way of life. There are existing trees on the site which will need to be taken into careful consideration and the allocation highlights that development should minimise impacts on trees. The arboricultural report identifies that for the 2-pitch option, the retention of larger and mature trees on the south and north boundaries would be possible and the removal of lower quality trees within the site will likely be of low significance

Commentary on assessment of likely significant effects of site allocations (Reg 18 assessment)	Commentary on assessment of likely significant effects of site allocations (Reg 19 assessment)
	from a visual amenity aspect. The 3-pitch option would also require the removal of the moderate category trees on the southern boundary of the site. The study also provides helpful evidence to demonstrate that it would be possible to protect remaining trees and their roots with use of suitable surfacing. The sloping topography may require levelling works which may have impacts in relation to tree roots and ecology. The ecology study indicates that the site has a low to moderate intrinsic ecological value and there are no prohibitive ecological constraints. Given the proposed use would be single storey and it would not require laying foundations, it can be considered that impacts in terms of biodiversity – Objective 11 - and climate mitigation and adaptation -Objectives 12 and 13- would be a <u>minor negative</u>.

I/A Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. MEETING NEEDS	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE / ACCESSIBLE	11. BIODIVERSITY	12. CLIMATE CHANGE MITIGATION	13. CLIMATE CHANGE ADAPTATION	14. RESOURCE EFFICIENCY	15. NATURAL RESOURCES
Reasonable Alternative 1: Public open space (Reg 18 assessment)	+	0	0	+	0	0	+	0	0	0	++	+	+	0	0
Reasonable Alternative 1: Public open space (Reg 19 assessment)	+	0	0	+	0	0	+	0	0	0	++	+	+	0	0

Commentary on assessment of likely significant effects of Alternative 1 (Reg 18 assessment)	Commentary on assessment of likely significant effects of Alternative 1 (Reg 19 assessment)
The use of the site as a public open space has been considered as an alternative use. The provision of public open space on a site that is currently partly vacant is considered to contribute to enhancing the quality of the existing environment and provides a <u>minor positive</u> contribution to Objective 1 and Objective 4.	The use of the site as a public open space has been considered as an alternative use. The provision of public open space on a site that is currently partly vacant is considered to contribute to enhancing the quality of the existing environment and provides a <u>minor positive</u> contribution to Objective 1 and Objective 4.

Commentary on assessment of likely significant effects of Alternative 1 (Reg 18 assessment)	Commentary on assessment of likely significant effects of Alternative 1 (Reg 19 assessment)
In terms of the efficient use of land the use as public open space is not considered to contribute to the need to balance competing demands between land uses, and hinders the ability to optimise the use of previously developed land to provide for the full range of needs of the area, including the accommodation needs of Gypsy and Traveller communities. This is due to the fact that the site is in close proximity to other provision of designated open space, including Olden Gardens, Arvon Road Community Garden, and Highbury Fields. Therefore it is considered that the impact in terms of Objective 2, effective use of land would be <u>neutral</u>. While the alternative use would increase the provision of publicly accessible open space, it is considered that within the context of the site and due to its proximity to a range of other public open space provision, the contribution to Objective 10 is <u>neutral</u>, as it does not address a deficiency or specific local need. However, the use of the site as public open space is considered to have a significant positive contribution to Objective 11 in terms of protecting biodiversity and existing trees; in turn, this would result in a minor positive effect on Objectives 12 and 13 in relation to climate mitigation and adaptation.	In terms of the efficient use of land the use as public open space is not considered to contribute to the need to balance competing demands between land uses, and hinders the ability to optimise the use of previously developed land to provide for the full range of needs of the area, including the accommodation needs of Gypsy and Traveller communities. This is due to the fact that the site is in close proximity to other provision of designated open space, including Olden Gardens, Arvon Road Community Garden, and Highbury Fields. Therefore it is considered that the impact in terms of Objective 2, effective use of land would be <u>neutral</u>. While the alternative use would increase the provision of publicly accessible open space, it is considered that within the context of the site and due to its proximity to a range of other public open space provision, the contribution to Objective 10 is <u>neutral</u>, as it does not address a deficiency or specific local need. However, the use of the site as public open space is considered to have a significant positive contribution to Objective 11 in terms of protecting biodiversity and existing trees; in turn, this would result in a minor positive effect on Objectives 12 and 13 in relation to climate mitigation and adaptation.

Conclusion on Site Allocation GT4: Ronald's Road (Reg 18 assessment)	Conclusion on Site Allocation GT4: Ronald's Road (Reg 19 assessment)
One reasonable alternative has been considered for this site, for public open space. Both options are considered to contribute positively to achieving a high-quality built environment in line with Objective 1, as development considerations for the Gypsy and Traveller site would include requirements for high quality design, while public open space would be considered to conserve and enhance local character. In terms of Objective 2, the Gypsy and Traveller site use is considered to have a minor positive effect. It is recognised as part of this objective that there is a need to balance competing demands between land uses in order to meet the full range of development needs of an area, including the unmet need for Gypsy and Traveller accommodation. The Gypsy and Traveller site option is considered to have a significant positive impact in terms of Objectives 5 and 6, as it would contribute to providing affordable and culturally suitable accommodation for Gypsy and Traveller residents, which is recognised as a factor that can reduce social exclusion and discrimination experienced by Gypsy and Traveller communities. High quality Gypsy and Traveller accommodation has the potential to promote fairness and equity for Gypsy and Traveller residents and contribute to social cohesion. The public open space alternative is considered to have a neutral impact for these objectives.	One reasonable alternative has been considered for this site, for public open space. Both options are considered to contribute positively to achieving a high-quality built environment in line with Objective 1, as development considerations for the Gypsy and Traveller site would include requirements for high quality design, while public open space would be considered to conserve and enhance local character. In terms of Objective 2, the Gypsy and Traveller site use is considered to have a minor positive effect. It is recognised as part of this objective that there is a need to balance competing demands between land uses in order to meet the full range of development needs of an area, including the unmet need for Gypsy and Traveller accommodation. The Gypsy and Traveller site option is considered to have a significant positive impact in terms of Objectives 5 and 6, as it would contribute to providing affordable and culturally suitable accommodation for Gypsy and Traveller residents, which is recognised as a factor that can reduce social exclusion and discrimination experienced by Gypsy and Traveller communities. High quality Gypsy and Traveller accommodation has the potential to promote fairness and equity for Gypsy and Traveller residents and contribute to social cohesion. Potential impacts on

Conclusion on Site Allocation GT4: Ronald's Road (Reg 18 assessment)	Conclusion on Site Allocation GT4: Ronald's Road (Reg 19 assessment)
For Objectives 11,12 and 13, the Gypsy and Traveller site use is considered to have a minor negative impacts. Further ecology and arboriculture surveys would be required to establish the scale of impacts and possible mitigation. The public open space option would contribute positively to the objectives related to biodiversity, climate mitigation and adaptation. Creating a new public open space would deliver positive effects and have no negative effects, however this option would not contribute to meeting any housing needs. There are negative effects of delivering Gypsy and Traveller accommodation on biodiversity and climate adaptation from delivering a Gypsy and Traveller pitch however there are also significant positive effects as the accommodation helps to meet Gypsy and Traveller needs and contributes to reducing social exclusion therefore this option is considered to deliver more positive effects overall.	the operation of the Highbury Roundhouse Community Centre and food bank which support groups sharing protected characteristics have been raised as part of the Regulation 18 consultation. However the proposals would ensure existing access would be maintained and there is no expected impact on the operation of the community centre. Alternative locations for the food bank will be explored. Whilst there is some uncertainty considering mitigation, it is considered that there could potentially not be adverse impacts in relation to Objective 6 and Objective 7. The public open space alternative is considered to have a neutral impact for these objectives. For Objectives 11,12 and 13, the Gypsy and Traveller site use is considered to have a minor negative impact. The tree survey shows that there will be impacts on trees with a number of trees of low quality and one tree of moderate quality requiring removal. The study also provides helpful evidence to demonstrate that it would be possible to protect remaining trees and their roots with use of suitable surfacing. The ecology study indicates that the site has a low to moderate intrinsic ecological value and there are no prohibitive ecological constraints. The public open space option would contribute positively to the objectives related to biodiversity, climate mitigation and adaptation. Creating a new public open space would deliver positive effects and have no negative effects, however this

Conclusion on Site Allocation GT4: Ronald's Road (Reg 18 assessment)	Conclusion on Site Allocation GT4: Ronald's Road (Reg 19 assessment)
	option would not contribute to meeting any housing needs. There are negative effects of delivering Gypsy and Traveller accommodation on biodiversity and climate adaptation from delivering a Gypsy and Traveller pitch however there are also significant positive effects as the accommodation helps to meet Gypsy and Traveller needs and contributes to reducing social exclusion therefore this option is considered to deliver more positive effects overall.

Site Allocation GT5: Athenaeum Court Site B

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. MEETING NEEDS	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE / ACCESSIBLE	11. BIODIVERSITY	12. CLIMATE CHANGE MITIGATION	13. CLIMATE CHANGE ADAPTATION	14. RESOURCE EFFICIENCY	15. NATURAL RESOURCES
GT4: Athenaeum Court (Reg 18 assessment)	+	+	0	0	++	++	+	0	0	0	0	0	0	0	0
GT4: Athenaeum Court (Reg 19 assessment)	+	+	0	0	++	++	+	0	0	0	0	0	0	0	0

Commentary on assessment of likely significant effects of site allocations (Reg 18 assessment)	Commentary on assessment of likely significant effects of site allocations (Reg 19 assessment)
The proposed site allocation is for provision of 1 permanent pitch to meet identified Gypsy and Traveller need. It is considered that the Site Allocation would have a <u>minor positive</u> effect on Objective 1, as the proposed development would be required to provide a good level of residential amenity and high-	The proposed Site Allocation remains unchanged from Reg 18 assessment and is for the provision of 1 permanent pitch to meet identified Gypsy and Traveller need. Two pieces of evidence have been produced for this site which look at site access and street parking survey.

Commentary on assessment of likely significant effects of site allocations (Reg 18 assessment)	Commentary on assessment of likely significant effects of site allocations (Reg 19 assessment)
quality housing for future occupiers of the site. Mitigation through screening and/or landscaping to secure a good level of residential amenity for surrounding residential properties is required and contributes towards a high-quality environment. Allocating the site for Gypsy and Traveller use seeks to balance competing demands between land uses to provide for the borough's full range of development needs. The allocation contributes towards the provision of housing to meet the identified needs of Gypsies and Travellers in the borough, which is considered a <u>significant positive</u> effect on Objective 5, and optimising the use of land within an existing housing estate, which would have a <u>minor positive</u> effect on Objective 2. By providing accommodation for people who may possess a protected characteristic and requiring consultation with the local Gypsy and Traveller community and wider local community, the allocation is considered to have a <u>significant positive</u> effect in relation to Objective 6 for social inclusion. The provision of high quality, culturally suitable accommodation for Gypsy and Traveller residents is considered to contribute positively in terms of reducing health inequalities for this community in line with Objective 7. The redevelopment of existing car parks is strongly encouraged by Local Plan Policies (T3) as part of the wider commitment to driving model shift towards more sustainable transport methods resulting in	It is considered that the Site Allocation would have a <u>minor positive</u> effect on Objective 1, as the proposed development would be required to provide a good level of residential amenity and high-quality housing for future occupiers of the site. Mitigation through screening and/or landscaping to secure a good level of residential amenity for surrounding residential properties is required and contributes towards a high-quality environment. Allocating the site for Gypsy and Traveller use seeks to balance competing demands between land uses to provide for the borough's full range of development needs. The allocation contributes towards the provision of housing to meet the identified needs of Gypsies and Travellers in the borough, which is considered a <u>significant positive</u> effect on Objective 5, and optimising the use of land within an existing housing estate, which would have a <u>minor positive</u> effect on Objective 2. While the proposal would result in the loss of some car parking spaces for estate residents, which may have the potential to impact on some groups sharing protected characteristics, there is other car parking available on the estate which would meet the needs of residents, including Blue Badge holders for whom accessible parking is considered essential, without creating a greater walking distance. The provision of high quality, well connected accommodation for Gypsy and Traveller residents would contribute positively towards Objective 4. Therefore on balance it is

Commentary on assessment of likely significant effects of site allocations (Reg 18 assessment)	Commentary on assessment of likely significant effects of site allocations (Reg 19 assessment)
a positive impact in relation to Objectives 2 and 9. Despite this, as the site allocation supports the use of private vehicles, the effect with regard to Objective 9 is considered to be <u>neutral</u>. The proposed provision of 1 permanent pitch could be accommodated on site alongside an area of planting, and retaining trees adjacent to the site. Further ecology evidence would be required to fully assess the extent of any potential benefits associated with the enhancement of the space. Consequently, the site allocation is considered to have a neutral impact in relation to Objectives 11, 12 and 13.	considered that the proposal would not result in adverse impacts in relation to Objective 4 and overall have a neutral impact. By providing accommodation for people who may possess a protected characteristic and requiring consultation with the local Gypsy and Traveller community and wider local community, the allocation is considered to have a <u>significant positive</u> effect in relation to Objective 6 for social inclusion. The provision of high quality, culturally suitable accommodation for Gypsy and Traveller residents is considered to contribute positively in terms of reducing health inequalities for this community in line with Objective 7. The redevelopment of existing car parks is strongly encouraged by Local Plan Policies (T3) as part of the wider commitment to driving model shift towards more sustainable transport methods resulting in a positive impact in relation to Objectives 2 and 9. The council has undertaken a parking pressure survey to measure the usage of spaces, which indicates there is sufficient capacity to accommodate the expected occupancy either within the estate or the surrounding streets. This would include any accessible parking that may require to be replaced. The site access study demonstrates that all the vehicles expected to use the site can access it safely. Despite this, as the site allocation supports the use of private vehicles, the effect with regard to Objective 9 is considered to be <u>neutral</u>.

Commentary on assessment of likely significant effects of site allocations (Reg 18 assessment)	Commentary on assessment of likely significant effects of site allocations (Reg 19 assessment)
	The proposed provision of 1 permanent pitch could be accommodated on site alongside an area of planting, and retaining trees adjacent to the site. Whilst it is not anticipated that there will be any impact on the existing trees located in the vicinity of the site, further ecology evidence would be required at planning application stage to fully assess the extent of any potential benefits associated with the enhancement of the space. Given the site currently provides the necessary hardstanding and the development would not require digging substantial foundations, it is considered that the proposal would not affect the root protection areas of boundary trees. Consequently, the site allocation is considered to have a neutral impact in relation to Objectives 11, 12 and 13.

I/A Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. MEETING NEEDS	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE / ACCESSIBLE	11. BIODIVERSITY	12. CLIMATE CHANGE MITIGATION	13. CLIMATE CHANGE ADAPTATION	14. RESOURCE EFFICIENCY	15. NATURAL RESOURCES
Reasonable Alternative 1: Residential (Reg 18 assessment)	+	+	0	0	++	+	+	0	0	0	0	0	0	0	0
Reasonable Alternative 1: Residential (Reg 19 assessment)	+	+	0	0	++	+	+	0	0	0	0	0	0	0	0

Commentary on assessment of likely significant effects of Alternative 1 (Reg 18 assessment)	Commentary on assessment of likely significant effects of Alternative 1 (Reg 19 assessment)
The alternative use of the site for infill residential development has been considered, in line with the adopted Local Plan Site Allocation OIS14 for Athenaeum Court. However it should be noted that the adopted Site Allocation OIS14 comprises the wider area comprising the whole estate. It should be noted that Local Plan Site Allocation OIS14 was linked to a Council New Build scheme, however the scheme to deliver housing on this site is no longer proceeding so there is uncertainty about the effects of this alternative.	The alternative use of the site for infill residential development has been considered, in line with the adopted Local Plan Site Allocation OIS14 for Athenaeum Court. However it should be noted that the adopted Site Allocation OIS14 comprises the wider area comprising the whole estate. It should be noted that Local Plan Site Allocation OIS14 was linked to a Council New Build scheme, however the scheme to deliver housing on this site is no longer

Commentary on assessment of likely significant effects of Alternative 1 (Reg 18 assessment)	Commentary on assessment of likely significant effects of Alternative 1 (Reg 19 assessment)
As required by Local Plan Policy PLAN1, any development of the site for residential purposes would be required to be high-quality and would need to make a positive contribution to the local character of the area, this would result in a <u>minor positive</u> impact with regard to Objective 1. While the potential quantum of housing that could be accommodated on site is not known, overall the alternative aims to optimise the use of land in a residential area through infill residential development, which is a <u>minor positive</u> for Objective 2. Affordable housing would be provided as part of the development of the site, making a <u>positive</u> contribution to Objective 5 for meeting diverse housing needs, and Objective 6 for social inclusion. In the absence of proposals showing where the residential infill development would be located within the boundary of Site Allocation OIS14, there is uncertainty about the impacts on Objective 11 in terms of biodiversity and Objectives 12 and 13 – climate mitigation and climate adaptation, therefore these impacts are considered to be <u>neutral</u>. An alternative option has been considered for this site, for residential development. It is noted that the Council has confirmed that the residential New Build project previously considered for this Site Allocation is not proceeding so there is uncertainty over the effects of this alternative being achieved. Both options are considered to contribute positively to achieving a high-quality built environment in line with Objective 1, as development	proceeding so there is uncertainty about the effects of this alternative. As required by Local Plan Policy PLAN1, any development of the site for residential purposes would be required to be high-quality and would need to make a positive contribution to the local character of the area, this would result in a <u>minor positive</u> impact with regard to Objective 1. While the potential quantum of housing that could be accommodated on site is not known, overall the alternative aims to optimise the use of land in a residential area through infill residential development, which is a <u>minor positive</u> for Objective 2. Affordable housing would be provided as part of the development of the site, making a <u>positive</u> contribution to Objective 5 for meeting diverse housing needs, and Objective 6 for social inclusion. In the absence of proposals showing where the residential infill development would be located within the boundary of Site Allocation OIS14, there is uncertainty about the impacts on Objective 11 in terms of biodiversity and Objectives 12 and 13 – climate mitigation and climate adaptation, therefore these impacts are considered to be <u>neutral</u>. An alternative option has been considered for this site, for residential development. It is noted that the Council has confirmed that the residential New Build project previously considered for this

Commentary on assessment of likely significant effects of Alternative 1 (Reg 18 assessment)	Commentary on assessment of likely significant effects of Alternative 1 (Reg 19 assessment)
considerations for the Gypsy and Traveller site would include requirements for high quality design, while residential development would be expected to meet relevant Local Plan design and housing quality requirements. In terms of Objective 2, both the Gypsy and Traveller site and residential use are considered to have a minor positive effect. While residential infill development would be assumed to provide a higher number of homes due to higher densities being possible, it is recognised as part of this objective that there is a need to balance competing demands between land uses in order to meet the full range of development needs of an area, including the unmet need for Gypsy and Traveller accommodation. The Gypsy and Traveller site option is considered to have a significant positive impact in terms of Objectives 5 and 6, as it would contribute to providing affordable and culturally suitable accommodation for Gypsy and Traveller residents, which is recognised as a factor that can reduce social exclusion and discrimination experienced by Gypsy and Traveller communities. High quality Gypsy and Traveller accommodation has the potential to promote fairness and equity for Gypsy and Traveller residents and contribute to social cohesion. The residential development alternative is considered to have a minor positive impact for these objectives, as it would provide housing that meets the diverse and changing needs of the population, as well as affordable housing which would help	Site Allocation is not proceeding so there is uncertainty over the effects of this alternative being achieved. Both options are considered to contribute positively to achieving a high-quality built environment in line with Objective 1, as development considerations for the Gypsy and Traveller site would include requirements for high quality design, while residential development would be expected to meet relevant Local Plan design and housing quality requirements. In terms of Objective 2, both the Gypsy and Traveller site and residential use are considered to have a minor positive effect. While residential infill development would be assumed to provide a higher number of homes due to higher densities being possible, it is recognised as part of this objective that there is a need to balance competing demands between land uses in order to meet the full range of development needs of an area, including the unmet need for Gypsy and Traveller accommodation. The Gypsy and Traveller site option is considered to have a significant positive impact in terms of Objectives 5 and 6, as it would contribute to providing affordable and culturally suitable accommodation for Gypsy and Traveller residents, which is recognised as a factor that can reduce social exclusion and discrimination experienced by Gypsy and Traveller communities. High quality Gypsy and Traveller accommodation has the potential

Commentary on assessment of likely significant effects of Alternative 1 (Reg 18 assessment)	Commentary on assessment of likely significant effects of Alternative 1 (Reg 19 assessment)
reduce inequality and relative poverty although there is uncertainty over the effects of this alternative and delivery being achieved. For Objectives 11,12 and 13, both options are considered to have a neutral impact, as they would likely provide some biodiversity and sustainable design benefits compared to the existing car park use. Further ecology and arboriculture surveys would be required to establish the scale of impacts. Overall it is recognised that the effects are finely balanced between an allocation for Gypsy and Traveller accommodation and the alternative of residential development.	to promote fairness and equity for Gypsy and Traveller residents and contribute to social cohesion. The residential development alternative is considered to have a minor positive impact for these objectives, as it would provide housing that meets the diverse and changing needs of the population, as well as affordable housing which would help reduce inequality and relative poverty although there is uncertainty over the effects of this alternative and delivery being achieved. For Objectives 11,12 and 13, both options are considered to have a neutral impact, as they would likely provide some biodiversity and sustainable design benefits compared to the existing car park use. Further ecology and arboriculture surveys would be required at planning application stage to establish the scale of impacts. Overall it is recognised that the effects are finely balanced between an allocation for Gypsy and Traveller accommodation and the alternative of residential development.

Conclusion for Site Allocation GT5 Athenaeum Court (Reg 18 assessment)	Conclusion for Site Allocation GT5 Athenaeum Court (Reg 19 assessment)
An alternative option has been considered for this site, for residential development. It is noted that the Council has confirmed that the	An alternative option has been considered for this site, for residential development. It is noted that the Council has confirmed

Conclusion for Site Allocation GT5 Athenaeum Court (Reg 18 assessment)	Conclusion for Site Allocation GT5 Athenaeum Court (Reg 19 assessment)
residential New Build project previously considered for this Site Allocation is not proceeding so there is uncertainty over the effects of this alternative being achieved. Both options are considered to contribute positively to achieving a high-quality built environment in line with Objective 1, as development considerations for the Gypsy and Traveller site would include requirements for high quality design, while residential development would be expected to meet relevant Local Plan design and housing quality requirements. In terms of Objective 2, both the Gypsy and Traveller site and residential use are considered to have a minor positive effect. While residential infill development would be assumed to provide a higher number of homes due to higher densities being possible, it is recognised as part of this objective that there is a need to balance competing demands between land uses in order to meet the full range of development needs of an area, including the unmet need for Gypsy and Traveller accommodation. The Gypsy and Traveller site option is considered to have a significant positive impact in terms of Objectives 5 and 6, as it would contribute to providing affordable and culturally suitable accommodation for Gypsy and Traveller residents, which is recognised as a factor that can reduce social exclusion and discrimination experienced by Gypsy and Traveller communities. High quality Gypsy and Traveller accommodation has the potential to	that the residential New Build project previously considered for this Site Allocation is not proceeding so there is uncertainty over the effects of this alternative being achieved. Both options are considered to contribute positively to achieving a high-quality built environment in line with Objective 1, as development considerations for the Gypsy and Traveller site would include requirements for high quality design, while residential development would be expected to meet relevant Local Plan design and housing quality requirements. In terms of Objective 2, both the Gypsy and Traveller site and residential use are considered to have a minor positive effect. While residential infill development would be assumed to provide a higher number of homes due to higher densities being possible, it is recognised as part of this objective that there is a need to balance competing demands between land uses in order to meet the full range of development needs of an area, including the unmet need for Gypsy and Traveller accommodation. The Gypsy and Traveller site option is considered to have a significant positive impact in terms of Objectives 5 and 6, as it would contribute to providing affordable and culturally suitable accommodation for Gypsy and Traveller residents, which is recognised as a factor that can reduce social exclusion and discrimination experienced by Gypsy and Traveller communities. High quality Gypsy and Traveller accommodation has the potential

Conclusion for Site Allocation GT5 Athenaeum Court (Reg 18 assessment)	Conclusion for Site Allocation GT5 Athenaeum Court (Reg 19 assessment)
promote fairness and equity for Gypsy and Traveller residents and contribute to social cohesion. The residential development alternative is considered to have a minor positive impact for these objectives, as it would provide housing that meets the diverse and changing needs of the population, as well as affordable housing which would help reduce inequality and relative poverty although there is uncertainty over the effects of this alternative and delivery being achieved. For Objectives 11,12 and 13, both options are considered to have a neutral impact, as they would likely provide some biodiversity and sustainable design benefits compared to the existing car park use. Further ecology and arboriculture surveys would be required to establish the scale of impacts. Overall it is recognised that the effects are finely balanced between an allocation for Gypsy and Traveller accommodation and the alternative of residential development.	to promote fairness and equity for Gypsy and Traveller residents and contribute to social cohesion. The residential development alternative is considered to have a minor positive impact for these objectives, as it would provide housing that meets the diverse and changing needs of the population, as well as affordable housing which would help reduce inequality and relative poverty although there is uncertainty over the effects of this alternative and delivery being achieved. For Objectives 11,12 and 13, both options are considered to have a neutral impact, as they would likely provide some biodiversity and sustainable design benefits compared to the existing car park use. Further ecology and arboriculture surveys would be required to establish the scale of impacts. Overall it is recognised that the effects are finely balanced between an allocation for Gypsy and Traveller accommodation and the alternative of residential development.

Site Allocation GT6: Mayville Estate

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. MEETING NEEDS	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE / ACCESSIBLE	11. BIODIVERSITY	12. CLIMATE CHANGE MITIGATION	13. CLIMATE CHANGE ADAPTATION	14. RESOURCE EFFICIENCY	15. NATURAL RESOURCES
GT5: Mayville Estate (Reg 18 assessment)	+	+	0	0	++	++	+	0	0	0	0	0	0	0	0
GT5: Mayville Estate (Reg 19 assessment)	+	+	0	0	++	++	+	0	0	0	0	0	0	0	0

Commentary on assessment of likely significant effects of site allocations (Reg 18 assessment)	Commentary on assessment of likely significant effects of site allocations (Reg 19 assessment)
The proposed site allocation is for the provision of up to 2 permanent pitches to meet identified Gypsy and Traveller need. It is noted that a less intensive option is also available. It is considered that the Site Allocation would have a <u>minor positive effect</u> on Objective 1, as the proposed development would be required to provide a good level of residential amenity and high-quality housing for future occupiers of the site. Mitigation through screening and/or landscaping to secure a good level of residential amenity for surrounding residential properties is required and contributes towards a high-quality environment. The site is located adjacent to the Newington Green Conservation Area.	The proposed Site Allocation remains unchanged from the Reg 18 assessment and is for the provision of up to 2 permanent pitches to meet identified Gypsy and Traveller need. It is noted that a less intensive option is also available. Three pieces of evidence have been produced for this site which look at trees, site access and street parking survey. It is considered that the Site Allocation would have a <u>minor positive effect</u> on Objective 1, as the proposed development would be required to provide a good level of residential amenity

Commentary on assessment of likely significant effects of site allocations (Reg 18 assessment)	Commentary on assessment of likely significant effects of site allocations (Reg 19 assessment)
The site allocation requires any development of the site to consider any potential impacts on the significance of the conservation area and its setting. With the current use of the site as a car park in mind, the site allocation is considered to have <u>neutral impact</u> with regards to Objective 3. Allocating the site for Gypsy and Traveller use seeks to balance competing demands between land uses to provide for the borough's full range of development needs. The allocation <u>makes a significant positive contribution</u> towards the provision of housing to meet the identified needs of Gypsies and Travellers in the borough in line with Objective 5 and optimising the use of land in a residential area in line with Objective 2 resulting a <u>minor positive impact</u>. By providing accommodation for people who may possess a protected characteristic the allocation is considered to have a <u>significant positive effect</u> in relation to Objective 6 for social inclusion, as does the site allocation requirement to engage with the Local Community and Gypsy and Traveller Community. The provision of culturally suitable accommodation for Gypsy and Traveller residents is considered to <u>contribute positively</u> to Objective 7 in terms of reducing health inequalities for this community through providing a good quality housing and improving mental health and overall wellbeing.	and high-quality housing for future occupiers of the site. Mitigation through screening and/or landscaping to secure a good level of residential amenity for surrounding residential properties is required and contributes towards a high-quality environment. The tree survey identifies the existing trees on site as making a positive contribution to the local street scene, character and visual amenity; the trees on site are mainly located along the southern boundary of the site. The tree survey shows that the existing trees on site will remain largely unimpacted, the removal of a single moderate quality tree is the only anticipated requirement. The site is located adjacent to the Newington Green Conservation Area. The site allocation requires any development of the site to consider any potential impacts on the significance of the conservation area and its setting. With the current use of the site as a car park in mind, the site allocation is considered to have <u>neutral impact</u> with regards to Objective 3. Allocating the site for Gypsy and Traveller use seeks to balance competing demands between land uses to provide for the borough's full range of development needs. The allocation <u>makes a significant positive contribution</u> towards the provision of housing to meet the identified needs of Gypsies and Travellers in the borough in line with Objective 5. With regards to Objective 2,

Commentary on assessment of likely significant effects of site allocations (Reg 18 assessment)	Commentary on assessment of likely significant effects of site allocations (Reg 19 assessment)
The redevelopment of existing car parking is strongly encouraged by Local Plan Policies (T3) as part of the wider commitment to driving model shift towards more sustainable transport methods resulting in a <u>positive impact</u> in relation to Objectives 2 and 9. Despite this, given that the site allocation supports the use of private vehicles, the site allocation is considered to have a <u>neutral impact</u> with regards to Objective 9. The current use of the site for car-parking and garages has little to no biodiversity value and does not contribute with regards to mitigating the effects of climate change or aiding adaption to climate change. There are however several of existing trees on site alongside existing areas of grass and shrubbery. Any development of the site will need to carefully consider these existing trees (as required by the site allocation) and existing areas of greenery/shrubbery. Further surveys and studies including ecology and arboriculture surveys would be required to fully assess the extent of any potential impacts with regarding to biodiversity, water run-off or microclimate. Consequently, the site allocation is considered to have a <u>neutral impact</u> in relation to Objectives 11,12 and 13.	whilst it is recognised that the site is currently occupied by residential garages, which are well-used and in demand, the proposed redevelopment of the site to provide culturally appropriate housing for the Gypsy and Traveller community is considered to result in a <u>minor positive impact</u>, optimising the use of land in a residential area in line with Objective 2. By providing accommodation for people who may possess a protected characteristic the allocation is considered to have a <u>significant positive effect</u> in relation to Objective 6 for social inclusion, as does the site allocation requirement to engage with the Local Community and Gypsy and Traveller Community. The provision of culturally suitable accommodation for Gypsy and Traveller residents is considered to <u>contribute positively</u> to Objective 7 in terms of reducing health inequalities for this community through providing a good quality housing and improving mental health and overall wellbeing. The proposal would result in the loss of garages for estate residents, which may have the potential to impact on some groups sharing protected characteristics, including potential Blue Badge holders. The loss of this parking may have implications with regards to Objective 4 and people's ability to be able to access essential services. The Parking Survey indicates that it may not be

Commentary on assessment of likely significant effects of site allocations (Reg 18 assessment)	Commentary on assessment of likely significant effects of site allocations (Reg 19 assessment)
	possible to re-provide lost car-parking in garages on-street, as such the potential impacts associated with the potential loss of parking is uncertain at this stage, including any potential impacts on any Blue Badge Holders. The provision of high-quality, well-connected accommodation for Gypsy and Traveller residents would contribute positively towards Objective 4. Whilst there is uncertainty with regards to any potential impacts, on balance, it is considered that the proposal would not result in adverse impacts in relation to Objective 4 and overall have a neutral impact.. The redevelopment of existing car parking is strongly encouraged by Local Plan Policies (T3) as part of the wider commitment to driving model shift towards more sustainable transport methods resulting in a <u>positive impact</u> in relation to Objectives 2 and 9. With regards to Objective 9, the site access study demonstrates that all the vehicles expected to use the site, including refuse collection vehicles, emergency service appliances, towed touring caravans and the delivery of static caravans will be able to access the site safely. Despite this, given the uncertainty with regards to the potential loss of existing parking and the ability to find suitable alternative provision and given that the site allocation supports the use of private vehicles, the site allocation is considered to have a <u>neutral impact</u> with regards to Objective 9.

Commentary on assessment of likely significant effects of site allocations (Reg 18 assessment)	Commentary on assessment of likely significant effects of site allocations (Reg 19 assessment)
	The current use of the site for car-parking and garages has little to no biodiversity value and does not contribute with regards to mitigating the effects of climate change or aiding adaption to climate change. There are however several of existing trees on site alongside existing areas of grass and shrubbery. The tree survey shows that there will be a limited impact on the existing trees located on the site. The survey helps to demonstrate that that it would be possible to protect the existing trees and their roots; the site is identified as providing sufficient space for development which will ensure that the site can be designed in such a manner to avoid any significant impacts on the existing trees and rooting systems. A limited level of impact is anticipated due to the requirement to removed one moderate quality tree. Consequently, overall, the site allocation is considered to have a <u>neutral impact</u> in relation to Objectives 11,12 and 13.

Conclusion for Site Allocation GT6 Mayville Estate (Reg 18 assessment)	Conclusion for Site Allocation GT6 Mayville Estate (Reg 19 assessment)
No reasonable alternative has been considered for this site.	No reasonable alternative has been considered for this site.

Conclusion for Site Allocation GT6 Mayville Estate (Reg 18 assessment)	Conclusion for Site Allocation GT6 Mayville Estate (Reg 19 assessment)
Any allocation of the site to delivery Gypsy and Traveller accommodation would include a requirement for high quality design and make a minor positive contribution to Objective 1. In terms of Objective 2, the Gypsy and Traveller site is considered to have a <u>minor positive effect</u> and contribute to the unmet need for Gypsy and Traveller accommodation. The Gypsy and Traveller site option is considered to have a <u>significant positive</u> impact in terms of Objectives 5 and 6, as it would contribute to providing affordable and culturally suitable accommodation for Gypsy and Traveller residents, which is recognised as a factor that can reduce social exclusion and discrimination experienced by Gypsy and Traveller communities. High quality Gypsy and Traveller accommodation has the potential to promote fairness and equity for Gypsy and Traveller residents and contribute to social cohesion. Also the creation of good quality housing, is considered to have a <u>minor positive</u> with regards to Objective 7. In considering Objective 9, the provision of Gypsy and Traveller accommodation is considered to have a <u>neutral impact</u> given that the site allocation supports the continued use of private vehicles. The use of the site to provide Gypsy and Traveller accommodation, notwithstanding the need for additional surveys, it is considered that it	Any allocation of the site to delivery Gypsy and Traveller accommodation would include a requirement for high quality design and make a minor positive contribution to Objective 1. In terms of Objective 2, whilst the existing garages on site are well-used, the proposed Gypsy and Traveller site is considered to have a <u>minor positive effect</u> and contribute to the unmet need for Gypsy and Traveller accommodation. The Gypsy and Traveller site option is considered to have a <u>significant positive</u> impact in terms of Objectives 5, as it would contribute to providing affordable and culturally suitable accommodation for Gypsy and Traveller residents, which is recognised as a factor that can reduce social exclusion and discrimination experienced by Gypsy and Traveller communities. High quality Gypsy and Traveller accommodation has the potential to promote fairness and equity for Gypsy and Traveller residents and contribute to social cohesion. Also, the creation of good quality housing, is considered to have a <u>minor positive</u> with regards to Objective 7. In considering Objective 9, notwithstanding the proposed redevelopment of the existing garages/car-parking being supported by relevant Local Plan Policies, given the uncertainty with regards to the potential impacts associated with the

Conclusion for Site Allocation GT6 Mayville Estate (Reg 18 assessment)	Conclusion for Site Allocation GT6 Mayville Estate (Reg 19 assessment)
may be possible to retain the existing trees on site alongside retaining some of the existing shrubbery resulting in a <u>neutral impact</u> with regards to objectives 11,12 and 13. It is also relevant here to consider the difficulty of providing a green roof or solar panels as part of a Gypsy and Traveller Pitch in comparison to a conventional residential development. Overall whilst there are no positive impacts with regards to biodiversity or climate change associated with the provision of Gypsy and Traveller accommodation, there are significant positive effects with regards to helping to meet the acute need for Gypsy and Traveller accommodation in Islington and reducing social exclusion.	proposed loss of existing garages/car-parking, and given that the site allocation supports continued use of private vehicles potential re-provision the provision of Gypsy and Traveller accommodation is considered to have a <u>neutral impact</u>. Similarly, the proposed delivery of Gypsy and Traveller accommodation is considered to overall have a neutral impact with regards to Objective 4, whilst the provision of well-connected accommodation would help to ensure good access to essential services for Gypsy and Traveller residents, it is recognised that there may be the potential for existing residents to have their access to essential services impacted as a consequence of residents potentially no longer having access to parking, this is particularly relevant to any potential blue badge holders. The tree survey demonstrates that with appropriate design, the use of the site to provide Gypsy and Traveler accommodation will result in a limited impact on the existing trees located on the site, resulting in a <u>neutral impact</u> with regards to objectives 11,12 and 13. It is also relevant here to consider the difficulty of providing a green roof or solar panels as part of a Gypsy and Traveller Pitch in comparison to a conventional residential development. Overall whilst there are no positive impacts with regards to biodiversity or climate change associated with the provision of

Conclusion for Site Allocation GT6 Mayville Estate (Reg 18 assessment)	Conclusion for Site Allocation GT6 Mayville Estate (Reg 19 assessment)
	Gypsy and Traveller accommodation, there are positive effects with regards to helping to meet the acute need for Gypsy and Traveller accommodation in Islington and reducing social exclusion.

Site Allocation GT7: Pleasant Place Garden

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. MEETING NEEDS	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE / ACCESSIBLE	11. BIODIVERSITY	12. CLIMATE CHANGE MITIGATION	13. CLIMATE CHANGE ADAPTATION	14. RESOURCE EFFICIENCY	15. NATURAL RESOURCES
GT6: Pleasant Place Garden (Reg 18 assessment)	+	+	0	-	++	++	-	0	-	±	-	-	-	0	0
GT6: Pleasant Place Garden (Reg 19 assessment)	+	+	?	-	++	++	-	0	-	--	-	-	-	0	0

Commentary on assessment of likely significant effects of site allocations (Reg 18 assessment)	Commentary on assessment of likely significant effects of site allocations (Reg 19 assessment)
The proposed Site Allocation is for the provision of 1 permanent pitch to meet identified Gypsy and Traveller need. It is considered that the Site Allocation would have a <u>minor positive</u> effect on Objective 1, as the proposed development would be required to provide a good level of residential amenity and high-quality housing for future occupiers of the site. Mitigation through screening and/or	This proposed site has been removed from the draft Gypsy and Traveller Local Plan. Four pieces of evidence have been produced for this site which look at heritage, trees, ecology and site access. It is considered that the Site Allocation would have a <u>minor positive</u> effect on Objective 1, as the proposed development would be required to provide a good level of residential amenity

Commentary on assessment of likely significant effects of site allocations (Reg 18 assessment)	Commentary on assessment of likely significant effects of site allocations (Reg 19 assessment)
landscaping to secure a good level of residential amenity for surrounding residential properties is required and contributes towards a high-quality environment. Allocating the site for Gypsy and Traveller use seeks to balance competing demands between land uses to provide for the borough's full range of development needs. The allocation contributes towards the provision of housing to meet the identified needs of Gypsies and Travellers in the borough, which is considered a <u>significant positive</u> effect on Objective 5, and optimising the use of land on an underutilised site, which would have a <u>minor positive</u> effect on Objective 2. The site sits within the Cross Street Conservation Area and is located to the rear of a terrace of Grade II listed buildings (10-40 Halton Road) and opposite the Grade II listed Islington South Library building. The site allocation requires that potential impact on heritage assets should be considered as part of the design process in line with the requirements of SDMP Policy DH2. Therefore it is considered that the impact on Objective 3 would be <u>neutral</u>. By providing accommodation for people who may possess a protected characteristic and requiring consultation with the local Gypsy and Traveller community and wider local community, the allocation is considered to have a <u>significant positive</u> effect in relation to Objective 6 for social inclusion. The provision of high quality, culturally suitable accommodation for Gypsy and Traveller residents is considered to	and high-quality housing for future occupiers of the site. Mitigation through screening and/or landscaping to secure a good level of residential amenity for surrounding residential properties is required and contributes towards a high-quality environment. Allocating the site for Gypsy and Traveller use seeks to balance competing demands between land uses to provide for the borough's full range of development needs. The allocation contributes towards the provision of housing to meet the identified needs of Gypsies and Travellers in the borough, which is considered a <u>significant positive</u> effect on Objective 5, and optimising the use of land on an underutilised site, which would have a <u>minor positive</u> effect on Objective 2. The site sits within the Cross Street Conservation Area and is located to the rear of a terrace of Grade II listed buildings (10-40 Halton Road) and opposite the Grade II listed Islington South Library building. The site allocation requires that potential impact on heritage assets should be considered as part of the design process in line with the requirements of SDMP Policy DH2. The heritage assessment indicates that the Grade II listed terrace on Halton Road and the Cross Street Conservation Area are most susceptible to change. However, the assessment considers that this can be mitigated through design, layout, materiality, and boundary treatments of any proposed

Commentary on assessment of likely significant effects of site allocations (Reg 18 assessment)	Commentary on assessment of likely significant effects of site allocations (Reg 19 assessment)
contribute positively in terms of reducing health inequalities for this community. The site is considered to be a small and underutilised public open space nevertheless the impact on access to public open space is <u>significant negative</u> (Objective 10) as the whole space would be lost. It is noted that the site is adjacent to another designated open space which is part of the New River Walk linear park and the potential loss of public open space could be mitigated through improvements to the neighbouring open spaces. However despite the potential for mitigation the impact on Objectives 4 and 7 is considered <u>minor negative</u>. Given that the site allocation supports the use of private vehicles, it is considered to have a <u>minor negative</u> effect with regard to Objective 9 although it is noted that there needs to be provision for vehicles to tow caravans to support Gypsy and Travellers way of life. There are existing trees on the site which will need to be taken into careful consideration and the allocation highlights that development should minimise impacts on trees. Further ecology and arboriculture surveys would be required to assess the extent of the impact and the possible mitigation. Given the proposed use would be single storey and it would not require laying foundations, it can be considered that impacts in terms of biodiversity – Objective 11 would be a <u>minor negative</u>. The impact in terms of Objective 12 and 13, climate mitigation and climate adaptation	development which raises some uncertainty. Therefore it is considered that the impact on Objective 3 would be <u>uncertain</u>. By providing accommodation for people who may possess a protected characteristic and requiring consultation with the local Gypsy and Traveller community and wider local community, the allocation is considered to have a <u>significant positive</u> effect in relation to Objective 6 for social inclusion. The provision of high quality, culturally suitable accommodation for Gypsy and Traveller residents is considered to contribute positively in terms of reducing health inequalities for this community. The site is considered to be a small and underutilised public open space nevertheless the impact on access to public open space is <u>significant negative</u> (Objective 10) as the whole space would be lost. The consultation response however demonstrated the intensity that this space is being used by local residents despite appearing underutilised. The consultation responses also noted that the potential mitigation of the adjacent designated open space which is part of the New River Walk linear park would not meet the same needs therefore further highlighting the impact of the potential loss of public open space. The impact on Objectives 4 and 7 is considered <u>minor negative</u>. Given that the site allocation supports the use of private vehicles, it is considered to have a <u>minor negative</u> effect with regard to Objective 9 although it is noted that there needs to be

Commentary on assessment of likely significant effects of site allocations (Reg 18 assessment)	Commentary on assessment of likely significant effects of site allocations (Reg 19 assessment)
is considered to be a <u>minor negative</u>, with potential effects of the development in relation to water run-off and microclimate.	provision for vehicles to tow caravans to support Gypsy and Travellers way of life. There are existing trees on the site which will need to be taken into careful consideration and the allocation highlights that development should minimise impacts on trees. The arboriculture survey indicates there would be moderate impact caused by tree removal of low quality trees and that development will need to consider the impact on roots of the off-site high quality tree – potential pruning may be necessary. Given the proposed use would be single storey and it would not require laying foundations, it can be considered that impacts in terms of biodiversity – Objective 11 would be a <u>minor negative</u>. The impact in terms of Objective 12 and 13, climate mitigation and climate adaptation is considered to be a <u>minor negative</u>, with potential effects of the development in relation to water run-off and microclimate.

Conclusion for Site Allocation GT7 Pleasant Place Garden (Reg 18 assessment)	Conclusion for Site Allocation GT7 Pleasant Place Garden (Reg 19 assessment)
No reasonable alternative has been considered for this site. In terms of Objective 2, the Gypsy and Traveller site is considered to have a minor positive effect and meet the unmet need for Gypsy and Traveller accommodation. The Gypsy and Traveller site option is considered to have a significant positive impact in terms of Objectives 5 and 6, as it would contribute to providing affordable and culturally suitable accommodation for Gypsy and Traveller residents, which is recognised as a factor that can reduce social exclusion and discrimination experienced by Gypsy and Traveller communities. High quality Gypsy and Traveller accommodation has the potential to promote fairness and equity for Gypsy and Traveller residents and contribute to social cohesion. In terms of Objective 10 related to open space, the Gypsy and Traveller site is considered to have a significant negative effect, as the whole space would be lost. For Objectives 11,12 and 13, the Gypsy and Traveller site is considered to have a minor negative impact. While initial assessments indicate that the existing trees could be retained for the Gypsy and Traveller site option, and further ecology and arboriculture surveys would be required to establish the scale of impacts and possible mitigation.	This proposed site has been removed from the draft Gypsy and Traveller Local Plan.

Site Allocation GT8: Mora Street

I/A Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. MEETING NEEDS	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE / ACCESSIBLE	11. BIODIVERSITY	12. CLIMATE CHANGE MITIGATION	13. CLIMATE CHANGE ADAPTATION	14. RESOURCE EFFICIENCY	15. NATURAL RESOURCES
GT7: Mora Street (Reg 18 assessment)	+	+	0	0	++	++	+	0	0	0	0	0	0	0	0
GT7: Mora Street (Reg 19 assessment)	+	+	0	0	++	++	+	0	0	0	0	0	0	0	0

Commentary on assessment of likely significant effects of site allocations (Reg 18 assessment)	Commentary on assessment of likely significant effects of site allocations (Reg 19 assessment)
The proposed site allocation is for the provision of 1 permanent pitch to meet identified Gypsy and Traveller need. It is considered that the Site Allocation would have a <u>minor positive</u> effect on Objective 1, as the proposed development would be required to provide a good level of residential amenity and high-quality housing for future occupiers of the site. Mitigation through screening and/or landscaping to secure a good level of residential amenity for surrounding residential	The proposed site allocation remains unchanged from the Reg 18 assessment and is for the provision of 1 permanent pitch to meet identified Gypsy and Traveller need. It is considered that the Site Allocation would have a <u>minor positive</u> effect on Objective 1, as the proposed development would be required to provide a good level of residential amenity and high-quality housing for future occupiers of the site. Mitigation through screening and/or landscaping to secure a good level of residential amenity for surrounding residential

Commentary on assessment of likely significant effects of site allocations (Reg 18 assessment)	Commentary on assessment of likely significant effects of site allocations (Reg 19 assessment)
properties is required and contributes towards a high-quality environment. The site is located within the Moorfields Conservation Area and in close proximity of the locally listed building BSG House, situated at 226-236 City Road. The site allocation requires any development of the site to consider any potential impacts on the setting of these heritage assets and with the current use of the site as a car park in mind, the site allocation is considered to have <u>neutral impact</u> with regards to Objective 3. Allocating the site for Gypsy and Traveller use seeks to balance competing demands between land uses to provide for the borough's full range of development needs. The allocation <u>makes a significant positive contribution</u> towards the provision of housing to meet the identified needs of Gypsies and Travellers in the borough in line with Objective 5 and optimising the use of land in a residential area in line with Objective 2 resulting in a <u>minor positive impact</u>. By providing accommodation for people who may possess a protected characteristic the allocation is considered to have a <u>significant positive effect</u> in relation to Objective 6 for social inclusion, as does the site allocation requirement to engage with the Local Community and Gypsy and Traveller Community. The provision of culturally suitable accommodation for Gypsy and Traveller residents is considered to make a <u>minor positive contribution</u> towards Objective 7 in terms of reducing health inequalities for	properties is required and contributes towards a high-quality environment. The site is located within the Moorfields Conservation Area and in close proximity of the locally listed building BSG House, situated at 226-236 City Road. The heritage assessment undertaken for the site indicates that the proposal could be accommodated without resulting in harm to the historic environment, including the Moorfields Conservation Area in which the site is located and the nearby St Luke's Conservation Area. The assessment recommends a series of mitigation measures that respond positively to the relevant Conservation Areas and local townscape character. As such, the site allocation is considered to have <u>neutral impact</u> with regards to Objective 3. Allocating the site for Gypsy and Traveller use seeks to balance competing demands between land uses to provide for the borough's full range of development needs. The allocation <u>makes a significant positive contribution</u> towards the provision of housing to meet the identified needs of Gypsies and Travellers in the borough in line with Objective 5 and optimising the use of land in a residential area in line with Objective 2 resulting in a <u>minor positive impact</u>.

Commentary on assessment of likely significant effects of site allocations (Reg 18 assessment)	Commentary on assessment of likely significant effects of site allocations (Reg 19 assessment)
this community through providing a good quality housing and improving mental health and overall wellbeing. The redevelopment of existing car parks is strongly encouraged by Local Plan Policies (T3) as part of the wider commitment to driving model shift towards more sustainable transport methods resulting in a positive impact in relation to Objectives 2 and 9. Despite this, as the site allocation supports the use of private vehicles, the effect with regard to Objective 9 is considered to be <u>neutral</u>. Given the current use of the site for car-parking, the site has no biodiversity value and does not contribute with regards to mitigating the effects of climate change or aiding adaption to climate change. The proposed provision of 1 permanent pitch could be accommodated on site alongside an area of biodiverse planting which would assist with site drainage, alongside providing biodiversity gain. Further ecology surveys would be required to fully assess the extent of any potential benefits associated with the enhancement of the space. Consequently, the site allocation is considered to have a <u>neutral impact</u> in relation to Objectives 11,12 and 13 at this stage.	By providing accommodation for people who may possess a protected characteristic the allocation is considered to have a <u>significant positive effect</u> in relation to Objective 6 for social inclusion, as does the site allocation requirement to engage with the Local Community and Gypsy and Traveller Community. The provision of culturally suitable accommodation for Gypsy and Traveller residents is considered to make a <u>minor positive contribution</u> towards Objective 7 in terms of reducing health inequalities for this community through providing a good quality housing and improving mental health and overall wellbeing. The proposal would result in the loss of some car parking spaces for estate residents, which may have potential implications with regards to Objective 4 and people's ability to be able to access essential services. While the proposal would result in the loss of some car parking spaces for estate residents, which may have the potential to impact on some groups sharing protected characteristics, the parking pressure survey undertaken by the Council indicates that there is sufficient capacity available on the estate to accommodate expected occupancy. This includes any provision required for any Blue Badge holders without creating a greater walking distance. The provision of high-quality, well-connected accommodation for Gypsy and Traveller residents would contribute positively towards Objective 4. Therefore, the

Commentary on assessment of likely significant effects of site allocations (Reg 18 assessment)	Commentary on assessment of likely significant effects of site allocations (Reg 19 assessment)
	potential impact in relation to Objective 4 is considered to be <u>neutral</u>. The redevelopment of existing car parks is strongly encouraged by Local Plan Policies (T3) as part of the wider commitment to driving model shift towards more sustainable transport methods resulting in a positive impact in relation to Objectives 2 and 9. With regards to Objective 9, the site access study demonstrates that all the vehicles expected to use the site, including refuse collection vehicles, emergency service appliances, towed touring caravans and the delivery of static caravans will be able to access the site safely. Notwithstanding this, as the site allocation supports the use of private vehicles, the effect with regard to Objective 9 is considered to be <u>neutral</u>. Given the current use of the site for car-parking, the site has no biodiversity value and does not contribute with regards to mitigating the effects of climate change or aiding adaption to climate change. The proposed provision of 1 permanent pitch could be accommodated on site alongside an area of biodiverse planting which would assist with site drainage, alongside providing biodiversity gain. Further ecology surveys would be required, at the planning application stage, to fully assess the extent of any potential benefits associated with the enhancement of the space. Consequently, the site allocation is

Commentary on assessment of likely significant effects of site allocations (Reg 18 assessment)	Commentary on assessment of likely significant effects of site allocations (Reg 19 assessment)
	considered to have a <u>neutral impact</u> in relation to Objectives 11,12 and 13 at this stage.

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. MEETING NEEDS	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE / ACCESSIBLE	11. BIODIVERSITY	12. CLIMATE CHANGE MITIGATION	13. CLIMATE CHANGE ADAPTATION	14. RESOURCE EFFICIENCY	15. NATURAL RESOURCES
Reasonable Alternative 1: Commercial Floorspace (Reg 18 assessment)	+	+	+	0	0	0	0	++	+	0	+	+	+	0	0
Reasonable Alternative 1: Commercial Floorspace (Reg 19 assessment)	+	+	+	0	0	0	0	++	+	0	+	+	+	0	0

Commentary on assessment of likely significant effects of Alternative 1 (Reg 18 assessment)	Commentary on assessment of likely significant effects of Alternative 1 (Reg 19 assessment)
The redevelopment of the site to provide commercial floorspace has been considered as a potential alternative. As required by Local Plan Policy Plan1, any development of the site would be required to be of high-quality and would make a positive contribution to the local character of the area, this would result in a <u>minor positive impact</u> with regard to Objective 1. Moreover, any redevelopment of the site would be required to conform with Local Plan Policy DH2 which requires proposals to conserve or enhance the significance of heritage assets, as such, and with the current use of the site as a car park in mind, the redevelopment of the site to provide commercial floorspace is considered to have a <u>minor positive impact</u> with regards to Objective 3. Given its location within the CAZ, where the overriding priority is the delivery of business floorspace, the redevelopment of the site to provide commercial floorspace is considered to have a <u>minor positive impact</u> with regards to the efficient use of land in line with Objective 2, helping to meet Islington's requirement for 443,000sqm of additional business floorspace and Objective 8 through supporting economic activity and job creation, resulting in a <u>significant positive impact</u>. The redevelopment of existing car parks is strongly encouraged by Local Plan Policies (T3) as part of the wider commitment to driving model shift towards more sustainable transport methods resulting in a <u>minor positive impact</u> in relation to Objective 2. The site allocation requires further	The redevelopment of the site to provide commercial floorspace has been considered as a potential alternative. As required by Local Plan Policy Plan1, any development of the site would be required to be of high-quality and would make a positive contribution to the local character of the area, this would result in a <u>minor positive impact</u> with regard to Objective 1. Moreover, any redevelopment of the site would be required to conform with Local Plan Policy DH2 which requires proposals to conserve or enhance the significance of heritage assets, as such, and with the current use of the site as a car park in mind, the redevelopment of the site to provide commercial floorspace is considered to have a <u>minor positive impact</u> with regards to Objective 3. Given its location within the CAZ, where the overriding priority is the delivery of business floorspace, the redevelopment of the site to provide commercial floorspace is considered to have a <u>minor positive impact</u> with regards to the efficient use of land in line with Objective 2, helping to meet Islington's requirement for 443,000sqm of additional business floorspace and Objective 8 through supporting economic activity and job creation, resulting in a <u>significant positive impact</u>.

Commentary on assessment of likely significant effects of Alternative 1 (Reg 18 assessment)	Commentary on assessment of likely significant effects of Alternative 1 (Reg 19 assessment)
consideration of the potential requirement to re-provide parking, ensuring that access to car-parking is maintained for those who require it such as blue badge holders. Any redevelopment of the site will be required to provide cycle-parking, therefore, in addition to the loss of the existing private car-parking it is considered that the proposed redevelopment of the site to provide commercial floorspace would have a <u>minor benefit</u> with regard to Objective 9 through supporting modal shift. Given the current use of the site for car-parking, the site makes little to no biodiversity value and does not contribute with regards to mitigating the effects of climate change or aiding adaption to climate change. The delivery of a policy compliant development to provide commercial floorspace would require improvements to be achieved on site with regards to biodiversity, mitigation of flood risk, the delivery of sustainable buildings and the requirement to incorporate a green roof. As such, the development of the site to provide commercial floorspace is considered to have a <u>minor positive impact</u> in relation to Objectives 11, 12 and 13.	Any potential redevelopment of the site would result in the loss of some car parking spaces for estate residents, which may have potential implications with regards to Objective 4 and people's ability to be able to access essential services. While the proposal would result in the loss of some car parking spaces for estate residents, which may have the potential to impact on some groups sharing protected characteristics, the parking pressure survey undertaken by the Council indicates that there is sufficient capacity available on the estate to accommodate expected occupancy. This includes any provision required for any Blue Badge holders without creating a greater walking distance. Therefore, the potential impact in relation to Objective 4 is considered to be <u>neutral</u>. The redevelopment of existing car parks is strongly encouraged by Local Plan Policies (T3) as part of the wider commitment to driving model shift towards more sustainable transport methods resulting in a <u>minor positive impact</u> in relation to Objective 2. Any redevelopment of the site will be required to provide cycle-parking, therefore, in addition to the loss of the existing private car-parking it is considered that the proposed redevelopment of the site to provide commercial floorspace would have a <u>minor benefit</u> with regard to Objective 9 through supporting modal shift.

Commentary on assessment of likely significant effects of Alternative 1 (Reg 18 assessment)	Commentary on assessment of likely significant effects of Alternative 1 (Reg 19 assessment)
	Given the current use of the site for car-parking, the site makes little to no biodiversity value and does not contribute with regards to mitigating the effects of climate change or aiding adaption to climate change. The delivery of a policy compliant development to provide commercial floorspace would require improvements to be achieved on site with regards to biodiversity, mitigation of flood risk, the delivery of sustainable buildings and the requirement to incorporate a green roof. As such, the development of the site to provide commercial floorspace is considered to have a <u>minor positive impact</u> in relation to Objectives 11, 12 and 13.

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. MEETING NEEDS	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE / ACCESSIBLE	11. BIODIVERSITY	12. CLIMATE CHANGE MITIGATION	13. CLIMATE CHANGE ADAPTATION	14. RESOURCE EFFICIENCY	15. NATURAL RESOURCES
Reasonable Alternative 2: Mixed-use Development (residential and commercial) (Reg 18 assessment)	+	+	+	0	+	+	+	+	+	0	+	+	+	0	0

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. MEETING NEEDS	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE / ACCESSIBLE	11. BIODIVERSITY	12. CLIMATE CHANGE MITIGATION	13. CLIMATE CHANGE ADAPTATION	14. RESOURCE EFFICIENCY	15. NATURAL RESOURCES
Reasonable Alternative 2: Mixed-use Development (residential and commercial) (Reg 19 assessment)	+	+	+	0	+	+	+	+	+	0	+	+	+	0	0

Commentary on assessment of likely significant effects of Alternative 2 (Reg 18 assessment)	Commentary on assessment of likely significant effects of Alternative 2 (Reg 19 assessment)
The alternative for a mixed-use (commercial and residential) development has been assessed. As required by Local Plan Policy Plan1, any development of the site would be required to be of high-quality and would need to make a positive contribution to the local character of the area, this would result in a <u>minor positive impact</u> with regard to Objective 1. Moreover, any redevelopment of the site would be required to conform with Local Plan Policy DH2 which requires proposals to conserve the significance of heritage assets, as such,	The alternative for a mixed-use (commercial and residential) development been assessed. As required by Local Plan Policy Plan1, any development of the site would be required to be of high-quality and would need to make a positive contribution to the local character of the area, this would result in a <u>minor positive impact</u> with regard to Objective 1. Moreover, any redevelopment of the site would be required to conform with Local Plan Policy DH2 which requires

Commentary on assessment of likely significant effects of Alternative 2 (Reg 18 assessment)	Commentary on assessment of likely significant effects of Alternative 2 (Reg 19 assessment)
and with the current use of the site as a car park in mind, the redevelopment of the site to provide a mixed-use development is considered to have a <u>minor positive impact</u> with regards to Objective 3. Given its location within the CAZ, where the overriding priority is the delivery of business floorspace the redevelopment of the site to provide an element of commercial floorspace is considered to have a positive impact with regards to the efficient use of land and supporting economic activity and job creation. It is however noted that there is potential with mixed-use allocations for higher-value residential uses to be chosen at the expense of delivering the employment floorspace, as such a mixed-use development is considered to have a <u>minor positive impact</u> with regards to Objectives 2, 5 and 8. The delivery of some housing would lead to a minor positive effect with regards to Objectives 2 & 5, helping to meet Islington's housing need, additionally, affordable housing would be required as part of any development of the site making a <u>minor positive contribution</u> with regards to Objective 6. The provision of good quality housing, that is energy efficient is considered to have a <u>minor positive impact</u> on health and wellbeing and Objective 7. The redevelopment of existing car parks is strongly encouraged by Local Plan Policies (T3) as part of the wider commitment to driving model shift	proposals to conserve the significance of heritage assets, as such, and with the current use of the site as a car park in mind, the redevelopment of the site to provide a mixed-use development is considered to have a <u>minor positive impact</u> with regards to Objective 3. Given its location within the CAZ, where the overriding priority is the delivery of business floorspace the redevelopment of the site to provide an element of commercial floorspace is considered to have a positive impact with regards to the efficient use of land and supporting economic activity and job creation. It is however noted that there is potential with mixed-use allocations for higher-value residential uses to be chosen at the expense of delivering the employment floorspace, as such a mixed-use development is considered to have a <u>minor positive impact</u> with regards to Objectives 2, 5 and 8. The delivery of some housing would lead to a minor positive effect with regards to Objectives 2 & 5, helping to meet Islington's housing need, additionally, affordable housing would be required as part of any development of the site making a <u>minor positive contribution</u> with regards to Objective 6. The provision of good quality housing, that is energy efficient is

Commentary on assessment of likely significant effects of Alternative 2 (Reg 18 assessment)	Commentary on assessment of likely significant effects of Alternative 2 (Reg 19 assessment)
towards more sustainable transport methods resulting in a positive impact in relation to Objective 2. The site allocation requires further consideration of the potential requirement to re-provide parking, ensuring that access to car-parking is maintained for those who require it such as blue badge holders. Any redevelopment of the site will be required to provide cycle-parking, therefore, in addition to the loss of the existing private car-parking it is considered that the proposed redevelopment of the site to provide a mixed-use development would have a <u>minor benefit</u> with regard to Objective 9 through supporting modal shift. Given the current use of the site for car-parking, the site makes little to no biodiversity value and does not contribute with regards to mitigating the effects of climate change or aiding adaption to climate change. The delivery of a policy compliant development to provide commercial and residential floorspace would require improvements to be achieved on site with regards to biodiversity, mitigation of flood risk, the delivery of energy efficient and sustainable buildings. As such, the development of the site to provide a mixed-use development is considered to have a <u>minor positive impact</u> in relation to Objectives 11, 12 and 13.	considered to have a <u>minor positive impact</u> on health and wellbeing and Objective 7. The proposal would result in the loss of some car parking spaces for estate residents, which may have potential implications with regards to Objective 4 and people's ability to be able to access essential services. While the proposal would result in the loss of some car parking spaces for estate residents, which may have the potential to impact on some groups sharing protected characteristics, the parking pressure survey undertaken by the Council indicates that there is sufficient capacity available on the estate to accommodate expected occupancy. This includes any provision required for any Blue Badge holders without creating a greater walking distance. Therefore, overall the the potential impact in relation to Objective 4 is considered to be <u>neutral</u>. The redevelopment of existing car parks is strongly encouraged by Local Plan Policies (T3) as part of the wider commitment to driving model shift towards more sustainable transport methods resulting in a positive impact in relation to Objective 2. Any redevelopment of the site will be required to provide cycle-parking, therefore, in addition to the loss of the existing private car-parking it is considered that the proposed redevelopment of

Commentary on assessment of likely significant effects of Alternative 2 (Reg 18 assessment)	Commentary on assessment of likely significant effects of Alternative 2 (Reg 19 assessment)
	the site to provide a mixed-use development would have a <u>minor benefit</u> with regard to Objective 9 through supporting modal shift. Given the current use of the site for car-parking, the site makes little to no biodiversity value and does not contribute with regards to mitigating the effects of climate change or aiding adaption to climate change. The delivery of a policy compliant development to provide commercial and residential floorspace would require improvements to be achieved on site with regards to biodiversity, mitigation of flood risk, the delivery of energy efficient and sustainable buildings. As such, the development of the site to provide a mixed-use development is considered to have a <u>minor positive impact</u> in relation to Objectives 11, 12 and 13.

Conclusion for Site Allocation GT8: Mora Street (Reg 18 assessment)	Conclusion for Site Allocation GT8: Mora Street (Reg 19 assessment)
Two reasonable alternatives have been considered for the site, that is the redevelopment of the site to provide commercial floorspace or to provide a mixed-use development consisting of residential and commercial floorspace.	Two reasonable alternatives have been considered for the site, that is the redevelopment of the site to provide commercial floorspace or to provide a mixed-use development consisting of residential and commercial floorspace.

Conclusion for Site Allocation GT8: Mora Street (Reg 18 assessment)	Conclusion for Site Allocation GT8: Mora Street (Reg 19 assessment)
All three of the options are considered to positively contribute towards Objective 1. Any allocation of the site to deliver Gypsy and Traveller accommodation would include a requirement for high quality design, similarly, any commercial/residential development of the site would be required to conform with relevant Local Plan Policies which require high-quality design. However, given the nature of Gypsy and Traveller accommodation the built form of any commercial/residential development of the site would make a more positive contribution to character. With regards to Objective 2, the allocation of the site to provide Gypsy and Traveller accommodation is considered to have a <u>minor positive</u> effect, similarly, both of the reasonable alternatives identified are also considered to have a <u>minor positive</u> impact with regards to Objective 2. Whilst it is recognised that both of the alternative uses may facilitate a more efficient use of land through the delivery of a more intensive use of the site, it remains relevant to recognise that as part of this objective there is a need to balance competing demands between land uses in order to meet the full range of development needs of an area, this includes the unmet need for Gypsy and Traveller accommodation. The proposed Gypsy and Traveller site is considered to have a <u>significant positive</u> impact in terms of Objectives 5 and 6, as it would contribute to providing affordable and culturally suitable accommodation for Gypsy and Traveller residents, which is recognised as a factor that can reduce social	All three of the options are considered to positively contribute towards Objective 1. Any allocation of the site to deliver Gypsy and Traveller accommodation would include a requirement for high quality design, similarly, any commercial/residential development of the site would be required to conform with relevant Local Plan Policies which require high-quality design. However, given the nature of Gypsy and Traveller accommodation the built form of any commercial/residential development of the site would make a more positive contribution to character. More specifically, with regards to Objective 3, the heritage assessment undertaken for the site indicates that the proposed site allocation for Gypsy and Traveller accommodation could be accommodated without resulting in harm to the historic environment, including the Moorfields Conservation Area in which the site is located and the nearby St Luke's Conservation Area. With regards to Objective 2, the allocation of the site to provide Gypsy and Traveller accommodation is considered to have a <u>minor positive</u> effect, similarly, both of the reasonable alternatives identified are also considered to have a <u>minor positive</u> impact with regards to Objective 2. Whilst it is recognised that both of the alternative uses may facilitate a more efficient use of land through the delivery of a more intensive use

Conclusion for Site Allocation GT8: Mora Street (Reg 18 assessment)	Conclusion for Site Allocation GT8: Mora Street (Reg 19 assessment)
exclusion and discrimination experienced by Gypsy and Traveller communities. High quality Gypsy and Traveller accommodation has the potential to promote fairness and equity for Gypsy and Traveller residents and contribute to social cohesion. Reasonable alternative 2, which includes the provision of an element of conventional residential development is considered to have a <u>minor positive</u> impact for these objectives as it would provide housing that meets the diverse and changing needs of the population, as well as an element of affordable housing which would help reduce inequality and relative poverty. Moreover, with this in mind, the provision of Gypsy and Traveller accommodation and reasonable alternative 2 are considered to have a <u>minor positive</u> with regards to Objective 7. With regards to reasonable alternative 1, the impact on these objectives is considered to be neutral, however, this use is considered to represent a <u>significant positive</u> impact with regards to Objective 8. In considering Objective 9, the delivery of a commercial floorspace or a mixed-use development is considered to have a <u>minor positive</u> impact with regards to supporting model shift; the provision of Gypsy and Traveller accommodation is considered to have a <u>neutral impact</u> given that the site allocation supports the continued use of private vehicles although it is noted that there needs to be provision for vehicles to tow caravans to support Gypsy and Travellers way of life.	of the site, it remains relevant to recognise that as part of this objective there is a need to balance competing demands between land uses in order to meet the full range of development needs of an area, this includes the unmet need for Gypsy and Traveller accommodation. The proposed Gypsy and Traveller site is considered to have a <u>significant positive</u> impact in terms of Objectives 5 and 6, as it would contribute to providing affordable and culturally suitable accommodation for Gypsy and Traveller residents, which is recognised as a factor that can reduce social exclusion and discrimination experienced by Gypsy and Traveller communities. High quality Gypsy and Traveller accommodation has the potential to promote fairness and equity for Gypsy and Traveller residents and contribute to social cohesion. Reasonable alternative 2, which includes the provision of an element of conventional residential development is considered to have a <u>minor positive</u> impact for these objectives as it would provide housing that meets the diverse and changing needs of the population, as well as an element of affordable housing which would help reduce inequality and relative poverty. In considering Objective 9 and objective 4 and any potential negative impacts with regards to affecting people's ability to be

Conclusion for Site Allocation GT8: Mora Street (Reg 18 assessment)	Conclusion for Site Allocation GT8: Mora Street (Reg 19 assessment)
Given the current use of the site as a Car Park, reasonable alternatives 1 and 2 are considered to represent a <u>minor positive</u> impact in relation to Objectives 11, 12 and 13 as commercial or mixed-use development will be required to conform with relevant Local Plan Policies which require improvements with regards to biodiversity and climate change mitigation and adaptation. With regard to the use of the site to provide Gypsy and Traveller accommodation, it is relevant to consider the difficulty in delivering a green roof or solar panels as part of a Gypsy and Traveller Pitch, in comparison to the identified reasonable alternatives, as such the impact on Objectives 11, 12 and 13 is considered to be <u>neutral</u>. Overall, it is recognised that the impacts associated with an allocation for Gypsy and Traveller accommodation and the identified reasonable alternatives are finely balanced. Given the existing use of the site, both of the reasonable alternative uses of the site are observed as having a positive effect on biodiversity, climate adaptation and climate mitigation, whilst the delivery of Gypsy and Traveller site is considered to have a neutral impact on these objectives. There are positive effects associated with both the potential delivery of commercial floorspace or a mixed-use development consisting of commercial and residential floorspace, in particular, the delivery of commercial floorspace is observed as having a significant positive impact in relation to Objective 8 and economic growth.	able to access essential services the Parking Pressure survey demonstrates that any displaced parking capacity can be accommodated within the wider estate, including any Blue Badge Holders. More specifically, with regards to the proposed allocation of the site to provide Gypsy and Traveller accommodation, the Site Access Study demonstrates that all of the vehicles expected to use the site can access it safely. The delivery of a commercial floorspace or a mixed-use development is considered to have a <u>minor positive</u> impact with regards to supporting model shift; the provision of Gypsy and Traveller accommodation is considered to have a <u>neutral impact</u> given that the site allocation supports the continued use of private vehicles although it is noted that there needs to be provision for vehicles to tow caravans to support Gypsy and Travellers way of life. Given the current use of the site as a Car Park, reasonable alternatives 1 and 2 are considered to represent a <u>minor positive</u> impact in relation to Objectives 11, 12 and 13 as commercial or mixed-use development will be required to conform with relevant Local Plan Policies which require improvements with regards to biodiversity and climate change mitigation and adaptation. With regard to the use of the site to provide Gypsy and Traveller accommodation, it is relevant to consider the difficulty in

Conclusion for Site Allocation GT8: Mora Street (Reg 18 assessment)	Conclusion for Site Allocation GT8: Mora Street (Reg 19 assessment)
Moreover, the delivery of a mixed-use development is observed to result in positive impacts with regards to Objectives 5, making a contribution towards meeting housing need and Objective 6 as any housing development would, include an element of social housing. Similarly, the delivery of Gypsy and Traveller accommodation would result in a significant positive effect with regards to these objectives through helping to meet the acute need for Gypsy and Traveller accommodation in Islington and reducing social exclusion.	delivering a green roof or solar panels as part of a Gypsy and Traveller Pitch, in comparison to the identified reasonable alternatives, as such the impact on Objectives 11, 12 and 13 is considered to be <u>neutral</u>. Overall, it is recognised that the impacts associated with an allocation for Gypsy and Traveller accommodation and the identified reasonable alternatives are finely balanced. Given the existing use of the site, both of the reasonable alternative uses of the site are observed as having a positive effect on biodiversity, climate adaptation and climate mitigation, whilst the delivery of Gypsy and Traveller site is considered to have a neutral impact on these objectives. There are positive effects associated with both the potential delivery of commercial floorspace or a mixed-use development consisting of commercial and residential floorspace, in particular, the delivery of commercial floorspace is observed as having a significant positive impact in relation to Objective 8 and economic growth. Moreover, the delivery of a mixed-use development is observed to result in positive impacts with regards to Objectives 5, making a contribution towards meeting housing need and Objective 6 as any housing development would, include an element of social housing. Similarly, the delivery of Gypsy and Traveller

Conclusion for Site Allocation GT8: Mora Street (Reg 18 assessment)	Conclusion for Site Allocation GT8: Mora Street (Reg 19 assessment)
	accommodation would result in a significant positive effect with regards to these objectives through helping to meet the acute need for Gypsy and Traveller accommodation in Islington and reducing social exclusion.

Site Allocation GT9: Upper Hilldrop Estate (Site B)

IIA Objective / Site	1. HIGH QUALITY ENVIRONMENT	2. EFFICIENT USE OF LAND	3. HERITAGE	4. LIVEABLE NEIGHBOURHOODS	5. MEETING NEEDS	6. SOCIAL INCLUSION	7. HEALTH AND WELLBEING	8. ECONOMIC GROWTH	9. NEED TO TRAVEL	10. OPEN SPACE / ACCESSIBLE	11. BIODIVERSITY	12. CLIMATE CHANGE MITIGATION	13. CLIMATE CHANGE ADAPTATION	14. RESOURCE EFFICIENCY	15. NATURAL RESOURCES
GT8: Upper Hilldrop Estate (Reg 18 assessment)	+	+	0	-	++	++	-	0	-	-	-	-	-	0	0
GT8: Upper Hilldrop Estate (Reg 19 assessment)	+	+	0	-	++	++	-	0	-	-	-	-	-	0	0

Commentary on assessment of likely significant effects of site allocations (Reg 18 assessment)	Commentary on assessment of likely significant effects of site allocations (Reg 19 assessment)
The proposed site allocation is for the provision of 1 permanent pitch to meet identified Gypsy and Traveller need. It is considered that the Site Allocation would have a <u>minor positive effect</u> on Objective 1, as the proposed development would be required to provide a good level of residential amenity and high-quality housing for future occupiers of the site. Mitigation through screening and/or landscaping to	The proposed Site Allocation remains unchanged from Reg 18 assessment and is for the provision of 1 permanent pitch to meet identified Gypsy and Traveller need. Three pieces of evidence have been produced for this site which look at trees, ecology and site access. It is considered that the Site Allocation would have a <u>minor positive effect</u> on Objective 1, as the proposed development

Commentary on assessment of likely significant effects of site allocations (Reg 18 assessment)	Commentary on assessment of likely significant effects of site allocations (Reg 19 assessment)
secure a good level of residential amenity for surrounding residential properties is required and contributes towards a high-quality environment. Development would result in the loss of an existing area of amenity space, given that there are additional, more prominently located areas of estate amenity space, maintaining resident's access to open space. As such, the loss of the estate amenity space is considered to have a <u>minor impact</u> with regards to Objectives 4, 7 and 10 which seek to maintain and enhance access to open space and promote physical activity. Allocating the site for Gypsy and Traveller use seeks to balance competing demands between land uses to provide for the borough's full range of development needs. The allocation makes a <u>significant positive</u> contribution towards the provision of housing to meet the identified needs of Gypsies and Travellers in the borough in line with Objective 5 and optimising the use of land in a residential area in line with Objective 2, resulting in a <u>minor positive impact</u>. By providing accommodation for people who may possess a protected characteristic the allocation is considered to have a <u>significant positive effect</u> in relation to Objective 6 for social inclusion, as does the site allocation requirement to engage with the Local Community and Gypsy and Traveller Community. The provision of culturally suitable accommodation for Gypsy and Traveller residents is considered to make a <u>minor positive contribution</u> towards Objective 7 in terms of reducing health inequalities for this	would be required to provide a good level of residential amenity and high-quality housing for future occupiers of the site. Mitigation through screening and/or landscaping to secure a good level of residential amenity for surrounding residential properties is required and contributes towards a high-quality environment. Development would result in the loss of an existing area of amenity space, which may have potential adverse impacts on groups sharing protected characteristics such as elderly residents, children and people with disabilities. However, given that there are additional, more prominently located areas of estate amenity space, residents' access to open space would not be significantly affected. Where there is a loss of estate amenity space, the council will explore options such as providing alternative amenity space on the estate or improving existing green and open spaces within the local area. As such, the loss of the estate amenity space is considered to have a <u>minor negative impact</u> with regards to Objectives 4, 7 and 10 which seek to maintain and enhance access to open space and promote physical activity. Allocating the site for Gypsy and Traveller use seeks to balance competing demands between land uses to provide for the

Commentary on assessment of likely significant effects of site allocations (Reg 18 assessment)	Commentary on assessment of likely significant effects of site allocations (Reg 19 assessment)
community through providing a good quality housing and improving mental health and overall wellbeing. Given that the site allocation supports the use of private vehicles, it is considered to have a <u>minor negative effect</u> with regard to Objective 9 although it is noted that there needs to be provision for vehicles to tow caravans to support Gypsy and Travellers way of life. There are existing trees on the site which will need to be taken into account; the allocation highlights that development should minimise impacts on trees. The potential loss of trees and the loss of the existing green space will have some impacts on biodiversity and could have further impacts with regards to water run-off and microclimate. Additionally, the site is located within a Critical Drainage Area. The site allocation is considered to have is considered to have a <u>minor negative</u> with regards to Objectives 10, 11, 12 and 13. Further ecology and arboriculture surveys would be required to fully assess the extent of the impact and possible mitigation.	borough's full range of development needs. The allocation makes a <u>significant positive</u> contribution towards the provision of housing to meet the identified needs of Gypsies and Travellers in the borough in line with Objective 5 and optimising the use of land in a residential area in line with Objective 2, resulting in a <u>minor positive impact</u>. While the proposal would result in the loss of some estate amenity space, which may have the potential to impact on some groups sharing protected characteristics, there are other areas of amenity space within the estate which can be accessed by residents. Therefore on balance it is considered that the proposal would not result in adverse impacts in relation to Objective 2. By providing accommodation for people who may possess a protected characteristic the allocation is considered to have a <u>significant positive effect</u> in relation to Objective 6 for social inclusion, as does the site allocation requirement to engage with the Local Community and Gypsy and Traveller Community. The provision of culturally suitable accommodation for Gypsy and Traveller residents is considered to make a <u>minor positive contribution</u> towards Objective 7 in terms of reducing health inequalities for this community through providing a good quality housing and improving mental health and overall wellbeing.

Commentary on assessment of likely significant effects of site allocations (Reg 18 assessment)	Commentary on assessment of likely significant effects of site allocations (Reg 19 assessment)
	Given that the site allocation supports the use of private vehicles, it is considered to have a <u>minor negative effect</u> with regard to Objective 9 although it is noted that there needs to be provision for vehicles to tow caravans to support Gypsy and Travellers way of life. There are existing trees on the site which will need to be taken into account; the allocation highlights that development should minimise impacts on trees. The tree survey shows that there will be impacts on trees, with a number of trees of low quality and potentially one moderate quality tree requiring removal. The study also provides helpful evidence to demonstrate that it would be possible to protect remaining trees and their roots with use of suitable surfacing. The ecology study indicates that the site has a low intrinsic ecological value and there are no prohibitive ecological constraints. The potential loss of trees and the loss of the existing green space will have some impacts on biodiversity and could have further impacts with regards to water run-off and microclimate. Additionally, the site is located within a Critical Drainage Area. The site allocation is considered to have a <u>minor negative</u> with regards to Objectives 10, 11, 12 and 13.

Conclusion for Site Allocation GT9 Upper Hilldrop Estate (Reg 18 assessment)	Conclusion for Site Allocation GT9 Upper Hilldrop Estate (Reg 19 assessment)
No reasonable alternatives have been considered for this site. The allocation of the site to deliver Gypsy and Traveller accommodation is considered to make a <u>minor positive</u> contribution towards Objective 1 and would include a requirement for high quality design. In terms of Objective 2 the Gypsy and Traveller site is considered to have a <u>minor positive</u> effect as it is recognised as part of this objective that there is a need to balance competing demands between land uses in order to meet the full range of development needs of an area, including the unmet need for Gypsy and Traveller accommodation. In considering the impact on Objectives 4 and 10 the Gypsy and Traveller site is considered to represent a <u>minor negative</u> impact as it would result in the loss of an existing area of estate amenity space. It is however relevant here to recognise that the existing area of amenity space is fenced off and is separated from the rest of the estate, with an existing car park bordering much of the space.	No reasonable alternatives have been considered for this site. The allocation of the site to deliver Gypsy and Traveller accommodation is considered to make a <u>minor positive</u> contribution towards Objective 1 and would include a requirement for high quality design. In terms of Objective 2 the Gypsy and Traveller site is considered to have a <u>minor positive</u> effect as it is recognised as part of this objective that there is a need to balance competing demands between land uses in order to meet the full range of development needs of an area, including the unmet need for Gypsy and Traveller accommodation. In considering the impact on Objectives 4 and 10 the Gypsy and Traveller site is considered to represent a <u>minor negative</u> impact as it would result in the loss of an existing area of estate amenity space, which may have potential adverse impacts on groups sharing protected characteristics such as elderly residents, children and people with disabilities. It is however relevant here to recognise that the existing area of amenity

Conclusion for Site Allocation GT9 Upper Hilldrop Estate (Reg 18 assessment)	Conclusion for Site Allocation GT9 Upper Hilldrop Estate (Reg 19 assessment)
A Gypsy and Traveller site is considered to have a <u>significant positive</u> impact in terms of Objectives 5 and 6, as it would contribute to providing affordable and culturally suitable accommodation for Gypsy and Traveller residents, which is recognised as a factor that can reduce social exclusion and discrimination experienced by Gypsy and Traveller communities. High quality Gypsy and Traveller accommodation has the potential to promote fairness and equity for Gypsy and Traveller residents and contribute to social cohesion. Also, it will involve the creation of good quality housing and is considered to have a <u>minor positive</u> with regards to Objective 7. With regards to Objectives 11, 12 and 13 the development of the site to provide Gypsy and Traveller accommodation, given that some of the existing trees will need to be removed as indicated by initial studies and given that the site is an existing area of open space, it is considered that the site allocation will have a <u>minor negative</u> impact in relation to these objectives despite the requirement to conform with relevant Local Plan Policies requiring improvements to biodiversity and climate change adaptation and mitigation. Overall, the provision of Gypsy and Traveller accommodation will have negative impacts with regards to biodiversity and climate change; there are however significant positive effects with regards to helping to meet the acute need for Gypsy and Traveller accommodation in Islington and reducing social exclusion and on balance it may therefore be considered positive.	space is fenced off and is separated from the rest of the estate, with an existing car park bordering much of the space. There are other, more prominent amenity areas within the estate. A Gypsy and Traveller site is considered to have a <u>significant positive</u> impact in terms of Objectives 5 and 6, as it would contribute to providing affordable and culturally suitable accommodation for Gypsy and Traveller residents, which is recognised as a factor that can reduce social exclusion and discrimination experienced by Gypsy and Traveller communities. High quality Gypsy and Traveller accommodation has the potential to promote fairness and equity for Gypsy and Traveller residents and contribute to social cohesion. Also, it will involve the creation of good quality housing and is considered to have a <u>minor positive</u> with regards to Objective 7. With regards to Objectives 11, 12 and 13 the development of the site to provide Gypsy and Traveller accommodation, given that some of the existing low and moderate quality trees will need to be removed as indicated by initial studies and given that the site is an existing area of open space, albeit of low ecological value, it is considered that the site allocation will have a <u>minor negative</u> impact in relation to these objectives

Conclusion for Site Allocation GT9 Upper Hilldrop Estate (Reg 18 assessment)	Conclusion for Site Allocation GT9 Upper Hilldrop Estate (Reg 19 assessment)
	despite the requirement to conform with relevant Local Plan Policies requiring improvements to biodiversity and climate change adaptation and mitigation. Overall, the provision of Gypsy and Traveller accommodation will have negative impacts with regards to biodiversity and climate change; there are however significant positive effects with regards to helping to meet the acute need for Gypsy and Traveller accommodation in Islington and reducing social exclusion and on balance it may therefore be considered positive.

5. Conclusions

5.1. The table below brings together the cumulative impacts of the proposed site allocations and strategic policies against the sustainability framework objectives. The cumulative effects indicate that the proposed site allocations are considered to have benefits, particularly in terms of meeting diverse housing needs and promoting social inclusion for Gypsy and Traveller residents as well as making efficient use of land, however these are finely balanced due to some of the site allocations having negative effects in relation to biodiversity and climate change objectives. The strategic policies are considered to bring positive impacts, in particular by meeting the identified accommodation need in full, and setting out design principles to ensure high quality development and a good level of amenity for residents and neighbours, as well as incorporating elements of inclusive and sustainable design.

IIA Objective	Cumulative effects for the Draft Gypsy and Traveller Local Plan – Sites and Policies (Reg 18 assessment)	Cumulative effects for the Draft Gypsy and Traveller Local Plan – Sites and Policies (Reg 19 assessment)
1. Promote a high quality, inclusive, safe and sustainable built environment	Cumulatively, site allocations can have a <u>minor positive</u> effect in promoting a high-quality built environment, as the proposed developments would be required to provide a good level of residential amenity and high-quality housing for future occupiers of the site. The strategic policies also make a <u>minor positive</u> contribution to this objective, as they bring forward Gypsy and Traveller accommodation in locations that	Cumulatively, site allocations can have a <u>minor positive</u> effect in promoting a high-quality built environment, as the proposed developments would be required to provide a good level of residential amenity and high-quality housing for future occupiers of the site. The strategic policies also make a <u>minor positive</u> contribution to this objective, as they bring forward Gypsy and Traveller accommodation in locations

IIA Objective	Cumulative effects for the Draft Gypsy and Traveller Local Plan – Sites and Policies (Reg 18 assessment)	Cumulative effects for the Draft Gypsy and Traveller Local Plan – Sites and Policies (Reg 19 assessment)
	are considered suitable, and set out requirements for high quality development in line with the Local Plan design principles.	that are considered suitable, and set out requirements for high quality development in line with the Local Plan design principles.
2. Ensure efficient use of land, buildings and infrastructure	The site allocations can have a <u>minor positive</u> effect in relation to the use of land overall. Allocating the sites for Gypsy and Traveller use seeks to balance competing demands between land uses to provide for the borough's full range of development needs, including the need for culturally suitable homes for Gypsy and Traveller residents. This is also supported by the strategic policies which require that proposed development should seek to optimise the site capacity in line with the proposed site allocations, resulting in a <u>minor positive</u> impact.	The site allocations can have a <u>minor positive</u> effect in relation to the use of land overall. Allocating the sites for Gypsy and Traveller use seeks to balance competing demands between land uses to provide for the borough's full range of development needs, including the need for culturally suitable homes for Gypsy and Traveller residents. This is also supported by the strategic policies which require that proposed development should seek to optimise the site capacity in line with the proposed site allocations, resulting in a <u>minor positive</u> impact.
3. Conserve or enhance the significance of heritage assets and their settings,	The cumulative impacts of the site allocations and strategic policies in relation to heritage assets is considered to be <u>neutral</u> .	The cumulative impacts of the site allocations and strategic policies in relation to heritage assets is considered to be <u>neutral</u> . The heritage assessments for the sites located within Conservation Areas, and within a historic green

IIA Objective	Cumulative effects for the Draft Gypsy and Traveller Local Plan – Sites and Policies (Reg 18 assessment)	Cumulative effects for the Draft Gypsy and Traveller Local Plan – Sites and Policies (Reg 19 assessment)
and the wider historic and cultural environment.		space, indicate that the proposals could be accommodated without resulting in harm to the historic environment, and recommend a series of mitigation measures that respond positively to setting of the heritage assets and local townscape character.
4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	The cumulative impact of the site allocations on promoting liveable neighbourhoods is considered to be overall <u>minor negative</u>. Three of the proposed site allocations would have a minor negative impact on this objective due to the loss of access to areas of amenity space for residents whilst the remaining six sites are considered to have a neutral impact. The strategic policies are considered to have a <u>neutral</u> effect on this objective.	The cumulative impact of the site allocations on promoting liveable neighbourhoods is considered to be on balance neutral <u>albeit with some uncertainty</u>. What has changed is that the two sites with more negative effects on this objective have been removed from the plan. The loss of estate amenity space and the loss of parking spaces and garages may have potential adverse impacts on some groups of residents sharing protected characteristics. Two of the site allocations would result in the loss of some estate amenity space, however in both cases other, more prominent areas of amenity space on the estates would remain accessible to residents. Where site allocations would result in the loss of car parking areas for estate residents, parking pressure

IIA Objective	Cumulative effects for the Draft Gypsy and Traveller Local Plan – Sites and Policies (Reg 18 assessment)	Cumulative effects for the Draft Gypsy and Traveller Local Plan – Sites and Policies (Reg 19 assessment)
		surveys have been undertaken to establish whether there would be capacity to accommodate any displaced parking spaces, including accessible parking. There is a variation in the degree of uncertainty across the four sites of the effects of the loss of parking as it will depend on demand and the ability to re-provide where required. The strategic policies are considered to have a <u>neutral</u> effect on this objective.
5. Ensure that Gypsy and Traveller residents have access to good quality, well-located, affordable accommodation	Cumulatively, the site allocations have a <u>significant positive</u> impact in relation to meeting the accommodation needs of Gypsy and Traveller residents. The proposed sites are considered to be well-located and the development considerations provide further detail on the mitigation measures required to ensure good quality accommodation. In addition the strategic policies also have a <u>significant positive</u> impact on this objective, as they seek to meet the identified accommodation needs in	Cumulatively, the site allocations have a <u>significant positive</u> impact in relation to meeting the accommodation needs of Gypsy and Traveller residents. The proposed sites are considered to be well-located and the development considerations provide further detail on the mitigation measures required to ensure good quality accommodation. In addition the strategic policies also have a <u>significant positive</u> impact on this objective, as they seek to meet the identified accommodation needs in full for the first ten years of the plan period, and

IIA Objective	Cumulative effects for the Draft Gypsy and Traveller Local Plan – Sites and Policies (Reg 18 assessment)	Cumulative effects for the Draft Gypsy and Traveller Local Plan – Sites and Policies (Reg 19 assessment)
	full, and set out requirements to ensure high quality design and a good level of residential amenity.	set out requirements to ensure high quality design and a good level of residential amenity.
6. Promote social inclusion, equality, diversity and community cohesion	The cumulative impact of the site allocations in relation to promoting social inclusion, equality, diversity and community cohesion is <u>significantly positive</u>, by providing accommodation for people who may possess a protected characteristic and requiring consultation with the local Gypsy and Traveller community and wider local community. The strategic policies are also considered to have a <u>significant positive</u> effect on this objective as they seek to ensure the provision of culturally suitable, affordable and high quality accommodation for Gypsy and Traveller communities which would contribute to reducing social exclusion and discrimination and promoting equity and fairness.	The cumulative impact of the site allocations in relation to promoting social inclusion, equality, diversity and community cohesion is <u>significantly positive</u>, by providing accommodation for people who may possess a protected characteristic and requiring consultation with the local Gypsy and Traveller community and wider local community. The strategic policies are also considered to have a <u>significant positive</u> effect on this objective as they seek to ensure the provision of culturally suitable, affordable and high quality accommodation for Gypsy and Traveller communities which would contribute to reducing social exclusion and discrimination and promoting equity and fairness.
7. Improve the health and wellbeing of the population	The cumulative impact of the site allocations in terms of health and wellbeing is finely balanced and is	The cumulative impact of the site allocations in terms of health and wellbeing is finely balanced

IIA Objective	Cumulative effects for the Draft Gypsy and Traveller Local Plan – Sites and Policies (Reg 18 assessment)	Cumulative effects for the Draft Gypsy and Traveller Local Plan – Sites and Policies (Reg 19 assessment)
and reduce health inequalities	considered <u>minor positive</u> overall. While the proposed use of the site allocations for Gypsy and Traveller accommodation is considered to contribute positively to reducing health inequalities for Gypsy and Traveller residents, the impacts of loss of open space and estate amenity space in terms of wider health and wellbeing for residents is a negative effect. The possibility of mitigation may be considered for some of the site allocations which could reduce these negative effects. The strategic policies are expected to have a <u>minor positive</u> impact on this objective, as the provision of high quality, culturally suitable accommodation for Gypsy and Traveller residents is considered to reduce health inequalities.	and is considered <u>minor positive</u> overall. The proposed use of the site allocations for Gypsy and Traveller accommodation is considered to contribute positively to reducing health inequalities for Gypsy and Traveller residents. The impacts of loss of areas of estate amenity space on one council estates in terms of wider health and wellbeing for residents, including groups sharing protected characteristics such as elderly residents, children and disabled people, is a minor negative effect. However in both cases there are more prominent areas of estate amenity space that can be accessed by residents. It is also noted that overall with the removal of two sites which had negative affects on the provision of amenity the negative effect is reduced. The strategic policies are expected to have a <u>minor positive</u> impact on this objective, as the provision of high quality, culturally suitable accommodation for Gypsy and Traveller residents is considered to reduce health inequalities.

IIA Objective	Cumulative effects for the Draft Gypsy and Traveller Local Plan – Sites and Policies (Reg 18 assessment)	Cumulative effects for the Draft Gypsy and Traveller Local Plan – Sites and Policies (Reg 19 assessment)
8. Foster sustainable economic growth and increase employment opportunities	The cumulative impacts of the site allocations and strategic policies in relation to economic growth and employment opportunities is considered to be <u>neutral</u> .	The cumulative impacts of the site allocations and strategic policies in relation to economic growth and employment opportunities is considered to be <u>neutral</u> .
9. Minimise the need to travel and create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking	The cumulative impacts of the site allocations in relation to minimising the need to travel are finely balanced and considered to be <u>minor negative</u> . Some of the site allocations would involve the redevelopment of existing car parking which is supported as part of the wider commitment to driving model shift towards more sustainable transport methods. However on all sites the proposed developments would enable the use of private vehicles, although it is recognised that there needs to be provision for vehicles to tow caravans to support Gypsy and Travellers way of life. The strategic policies are considered to have a neutral impact in relation to this objective.	The cumulative impacts of the site allocations in relation to minimising the need to travel are finely balanced and considered to be <u>minor negative</u> . Some of the site allocations would involve the redevelopment of existing car parking which is supported as part of the wider commitment to driving model shift towards more sustainable transport methods. However on all sites the proposed developments would enable the use of private vehicles, although it is recognised that there needs to be provision for vehicles to tow caravans to support Gypsy and Travellers way of life. The strategic policies are considered to have a neutral impact in relation to this objective.

IIA Objective	Cumulative effects for the Draft Gypsy and Traveller Local Plan – Sites and Policies (Reg 18 assessment)	Cumulative effects for the Draft Gypsy and Traveller Local Plan – Sites and Policies (Reg 19 assessment)
10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	Cumulatively the impact of the site allocations in terms of protecting and enhancing open space is finely balanced and is considered <u>minor negative</u> . While some of the site allocations would have a neutral impact on this objective as they are vacant or in use as car parking, several site allocations would involve the loss of open space either in the form of estate amenity space or public open space. The strategic policies are considered to have a neutral impact in relation to this objective.	Cumulatively the impact of the site allocations in terms of protecting and enhancing open space is finely balanced and is considered <u>minor negative</u> . While some of the site allocations would have a neutral impact on this objective as they are vacant or in use as car parking, two of the site allocations would involve the loss of estate amenity space. In both cases other more prominent estate amenity space remains available, and residents' access to open space is not considered to be significantly limited. The strategic policies are considered to have a neutral impact in relation to this objective.
11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	The cumulative impacts of the site allocations in terms of biodiversity are considered to be <u>minor negative</u> . While some of the site allocations would have a neutral impact on this objective as they are in use as car parking, several site allocations would impact on existing amenity space, including trees and planting. The possibility of mitigation may be considered for	The cumulative impacts of the site allocations in terms of biodiversity are considered to be <u>minor negative</u> . While some of the site allocations would have a neutral impact on this objective as they are in use as car parking, several site allocations would impact on existing amenity space, including trees and planting. The tree surveys indicate that

IIA Objective	Cumulative effects for the Draft Gypsy and Traveller Local Plan – Sites and Policies (Reg 18 assessment)	Cumulative effects for the Draft Gypsy and Traveller Local Plan – Sites and Policies (Reg 19 assessment)
	some of the site allocations which could reduce these negative effects. Cumulatively, the strategic policies are considered to have a <u>neutral</u> impact, as a requirement for elements of green infrastructure and sustainable design is included as part of the site design policy.	overall no loss of high quality trees would be required, although a number of low and moderate quality trees would need to be removed, and some may require pruning. The ecology surveys indicate that the intrinsic ecological value of the sites is low and low to moderate and there are no prohibitive ecological constraints. The possibility of mitigation may be considered for some of the site allocations which could reduce these negative effects. Cumulatively, the strategic policies are considered to have a <u>neutral</u> impact, as a requirement for elements of green infrastructure and sustainable design is included as part of the site design policy.
12. Reduce contribution to climate change	The cumulative impacts of the site allocations in terms of contribution to climate change are considered to be <u>minor negative</u>. While some of the site allocations would have a neutral impact on this objective as they are in use as car parking, several site allocations would impact on existing amenity space, including trees and planting.	The cumulative impacts of the site allocations in terms of contribution to climate change are considered to be <u>minor negative</u>. While some of the site allocations would have a neutral impact on this objective as they are in use as car parking, several site allocations would impact on existing amenity space, including trees and planting. The tree surveys indicate that overall no loss of high

IIA Objective	Cumulative effects for the Draft Gypsy and Traveller Local Plan – Sites and Policies (Reg 18 assessment)	Cumulative effects for the Draft Gypsy and Traveller Local Plan – Sites and Policies (Reg 19 assessment)
	Cumulatively, the strategic policies are considered to have a <u>neutral</u> impact, as a requirement for elements of green infrastructure and sustainable design is included as part of the site design policy.	quality trees would be required, although a number of low and moderate quality trees would need to be removed, and some may require pruning. The ecology surveys indicate that the intrinsic ecological value of the sites is low and low to moderate and there are no prohibitive ecological constraints Cumulatively, the strategic policies are considered to have a <u>neutral</u> impact, as a requirement for elements of green infrastructure and sustainable design is included as part of the site design policy.
13. Promote climate change adaptation	The cumulative impacts of the site allocations in terms of climate adaptation are considered to be <u>minor negative</u>. While some of the site allocations would have a neutral impact on this objective as they are in use as car parking, several site allocations would impact on existing amenity space, including trees and planting. The possibility of mitigation may be considered for some of the site allocations which could reduce these negative effects.	The cumulative impacts of the site allocations in terms of climate adaptation are considered to be <u>minor negative</u>. While some of the site allocations would have a neutral impact on this objective as they are in use as car parking, several site allocations would impact on existing amenity space, including trees and planting. The tree surveys indicate that overall no loss of high quality trees would be required, although a number of low and moderate quality trees would need to be

IIA Objective	Cumulative effects for the Draft Gypsy and Traveller Local Plan – Sites and Policies (Reg 18 assessment)	Cumulative effects for the Draft Gypsy and Traveller Local Plan – Sites and Policies (Reg 19 assessment)
	Cumulatively, the strategic policies are considered to have a <u>neutral</u> impact, as a requirement for elements of green infrastructure and sustainable design is included as part of the site design policy.	removed, and some may require pruning. The ecology surveys indicate that the intrinsic ecological value of the sites is low and low to moderate and there are no prohibitive ecological constraints. The possibility of mitigation may be considered for some of the site allocations which could reduce these negative effects. Cumulatively, the strategic policies are considered to have a <u>neutral</u> impact, as a requirement for elements of green infrastructure and sustainable design is included as part of the site design policy.
14. Promote resource efficiency by decoupling waste generation from economic growth and enabling a circular economy that optimises resource use and minimises waste	The cumulative impacts of the site allocations and strategic policies in relation to resource efficiency is considered to be <u>neutral</u> .	The cumulative impacts of the site allocations and strategic policies in relation to resource efficiency is considered to be <u>neutral</u> .

IIA Objective	Cumulative effects for the Draft Gypsy and Traveller Local Plan – Sites and Policies (Reg 18 assessment)	Cumulative effects for the Draft Gypsy and Traveller Local Plan – Sites and Policies (Reg 19 assessment)
15. Maximise protection and enhancement of natural resources including water, land and air	The cumulative impacts of the site allocations and strategic policies in relation to protection and enhancement of natural resources is considered to be <u>neutral</u> .	The cumulative impacts of the site allocations and strategic policies in relation to protection and enhancement of natural resources is considered to be <u>neutral</u> .

Appendix 1: Sustainability Appraisal assessment matrix

TOPIC	IIA OBJECTIVE	PROMPT QUESTIONS
HIGH QUALITY ENVIRONMENT	1. Promote a high quality, inclusive, safe and sustainable built environment	Will the policy... • Secure high quality development that conserves or enhances local character and distinctiveness? • Promote location sensitive density and design? • Create robust and adaptable buildings that can respond to change over their life? • Make the built environment safer? • Ensure development is inclusive? • Promote an approach to design that places people at the heart of the design process? •
EFFICIENT USE OF LAND	2. Ensure efficient use of land, buildings and infrastructure	Will the policy... • Optimise use of previously developed land, buildings and existing infrastructure?

TOPIC	IIA OBJECTIVE	PROMPT QUESTIONS
		• Optimise the use of previously developed sites and new builds to implement Green Infrastructure in unused areas such as footpath sides, blank walls and roof space? • Focus development in the most appropriate locations? • Balance competing demands between land uses to provide for the full range of development needs of the area and the accommodation needs identified for the Gypsy and Traveller community? • Provide the necessary infrastructure in the right locations to support development e.g. water, sewerage, energy transport etc? • Ensure that development is sufficiently flexible and adaptable to accommodate evolving social and economic needs?
HERITAGE	3. Conserve or enhance the significance of heritage assets and their settings, and the wider historic and cultural environment.	Will the policy... • Protect sites, features and areas of historical, archaeological and cultural value and their setting in and around Islington? • Protect views of historically important landmarks and buildings and valued local views? • Ensure Islington's historic environment contributes to social and cultural life in the borough?

TOPIC	IIA OBJECTIVE	PROMPT QUESTIONS
LIVEABLE NEIGHBOURHOODS	4. Promote liveable neighbourhoods which support good quality accessible services and sustainable lifestyles	Will the policy... • 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. • Reduce the impacts of noise, vibration and pollution on the public realm? • Support the expansion and enhancement of cultural provision and maximise opportunities for the cultural life of the borough to flourish?
MEETING NEEDS	5. Ensure that Gypsy and Traveller residents have access to good quality, well-located, affordable accommodation	Will the policy... • Ensure Gypsy and Traveller accommodation is of a good standard, including for energy efficiency? • Increase the supply of affordable and culturally suitable Gypsy and Traveller accommodation to meet identified need as far as possible? • Provide for housing that meets the diverse and changing needs of the population?

TOPIC	IIA OBJECTIVE	PROMPT QUESTIONS
SOCIAL INCLUSION	6. Promote social inclusion, equality, diversity and community cohesion	Will the policy... • Reduce inequality and the negative consequences of relative poverty? • Reduce social exclusion and discrimination experienced by Gypsy and Traveller communities and ensure that everyone have access to the same opportunities? • Promote fairness, social cohesion and integration between Gypsy and Traveller communities and the wider community? • Promote equity between population groups and those with protected characteristics? • Support active engagement of both the wider community and the Gypsy and Traveller community in decisions that affect their area? • Encourage active and connected, strong and cohesive community?

TOPIC	IIA OBJECTIVE	PROMPT QUESTIONS
HEALTH AND WELLBEING	7. Improve the health and wellbeing of the population and reduce health inequalities	Will the policy... • Improve mental and physical health and wellbeing? • Increase use and ease of access to green spaces and sport and leisure facilities for all residents, particularly those with mental and physical health concerns? • Reduce health inequalities affecting Gypsy and Traveller residents? • Improve access to a full range of coordinated health and social care services/facilities in all sectors for all residents? • Ensure that the built and natural environments promote health and wellbeing, including by facilitating physical activity and active travel and encouraging social interaction? • Reduce fuel poverty? • Manage noise, light and vibration issues and their effect on individual health? • Improve air quality?

TOPIC	IIA OBJECTIVE	PROMPT QUESTIONS
ECONOMIC GROWTH	8. Foster sustainable economic growth and increase employment opportunities	Will the policy... • Support a range of businesses of different types and sizes? • Provide sufficient space in the right locations for different types of businesses to develop, grow and thrive? • Support the development of green industries and a low carbon economy? • Widen the opportunities for local residents to access employment, particularly those groups experiencing above average worklessness? • Provide a range of employment opportunities? • Tackle barriers to employment, such as affordable childcare and skill levels? • Provide training and job opportunities for local residents?

TOPIC	IIA OBJECTIVE	PROMPT QUESTIONS
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	Will the policy... • Encourage a shift to more sustainable forms of travel and away from private vehicle use? • Reduce the need to travel, especially by car? • Improve road safety for all, particularly pedestrians and cyclists? Provide facilities that will support sustainable transport options? • Reduce harmful emissions from transport? • Reduce the negative impacts of servicing and freight?
OPEN SPACE / ACCESSIBLE	10. Protect and enhance open spaces that are high quality, networked, accessible and multi-functional	Will the policy... • Protect existing public and private open spaces? • Contribute to meeting the increasing need for open space? • Prioritise open space in areas of deficiency? • Improve the quality of open space? • Promote or improve public accessibility of open space now and in the future? • Improve inclusive access to a range of open space types to meet local needs?

TOPIC	IIA OBJECTIVE	PROMPT QUESTIONS
BIODIVERSITY	11. Create, protect and enhance suitable wildlife habitats wherever possible and protect species and diversity.	Will the policy... • Increase protection, and enhance and improve opportunities for biodiversity? • ensure that development can mitigate harmful effects on biodiversity • Ensure development does not increase flood risk including surface water flood risk? • Protect existing trees and increase tree planting? • Increase biodiverse green roofs, green walls and soft landscaping? • Protect the populations of priority species identified in Islington's Biodiversity Action Plan? • Maximise opportunities to enhance biodiversity? • Impact on access to nature? • Increase green infrastructure and improve connectivity? • Maximise opportunities for engagement with wildlife, including environmental education?

TOPIC	IIA OBJECTIVE	PROMPT QUESTIONS
CLIMATE CHANGE MITIGATION	12. Reduce contribution to climate change	Will the policy... • Improve energy efficiency and carbon emissions associated with buildings and transport? • Promote the use of low and zero carbon technologies including decentralised energy networks? • Improve energy security? • Encourage buildings and places designed to respond to changing conditions? • Improve the microclimate? • Reduce greenhouse gas emissions? • Reduce fuel poverty? • Provide the necessary infrastructure to support development?
CLIMATE CHANGE ADAPTATION	13. Promote climate change adaptation	Will the policy... • Reduce the impact of climate change, including flooding and urban heat island effect? • Steer development to the areas at lowest risk of flooding in the borough?

TOPIC	IIA OBJECTIVE	PROMPT QUESTIONS
		• Enhance community resilience to climate change impacts?
RESOURCE EFFICIENCY	14. 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... • Use local, sustainable materials and resources? • Promote the use of renewable sustainable energy sources? • Minimise the use of non-renewable resources? • Ensure design is appropriate for lifetime of development? • Support the circular economy? • Minimise the volume of waste produced in Islington, including construction and deconstruction waste, food and household waste? • Support movement of waste up the 'Waste Hierarchy'? • Increase the proportion of waste recycled or composted?

TOPIC	IIA OBJECTIVE	PROMPT QUESTIONS
NATURAL RESOURCES	15. Maximise protection and enhancement of natural resources including water, land and air	Will the policy... • Minimise air, water, and soil pollution and their negative impacts on human health? • Improve air quality in line with national and international standards? • Protect surface and groundwater quality? • Promote the sustainable use of water resources? • Prevent soil pollution and restore contaminated land? • Ensure sustainable use and protection of natural resources? • Ensure the necessary water and sewerage infrastructure to service development?

Appendix 2: Equalities Impact Assessment: Full Assessment

We strongly recommend you start by reading this guidance document, which will save you time by ensuring you have the information you need.

Please allow three weeks from submission to your proposed sign off date when preparing your papers. This allows sufficient time for a thorough review and dialogue, to ensure the EQIA contributes meaningfully to decision making.

For further help and advice please contact eqia@islington.gov.uk.

Summary of proposal

Name of proposal	Gypsy and Traveller Local Plan Review
Reference number (if applicable)	
Service Area	Planning Policy – Community Wealth Building
Date assessment completed	September 2025 Updates made June 2026

1. Please provide a summary of the proposal.

Please provide:

- Context on how the service currently operates (if relevant) and the scope of suggested changes
- The intended beneficiaries and outcomes of the proposal
- Reference to any savings or income generation

- **Context on how the service currently operates (if relevant) and the scope of suggested changes**

The council is required by national policy and the London Plan to ensure that the needs of Gypsies and Travellers in Islington are met. There are currently no sites with pitches for caravans in the borough. However, a need for Gypsy and Traveller accommodation has been identified from Gypsies and Traveller who currently live in the borough in conventional housing.

Islington's latest Local Plan was adopted in September 2023 and sets out the requirement for the immediate focused review of the policy for Gypsy and Traveller accommodation. The Gypsy and Traveller Local Plan Review started in March 2024 with the public consultation on the Scope of the Review paper. There was a further consultation on the criteria and process for selecting sites and an invitation to stakeholders to submit ideas for potential Gypsy and Traveller sites as part of a 'Call for Sites' which took place between January-March 2025.

This EqIA relates to the proposal to consult on the Draft Gypsy and Traveller Local Plan, in line with Regulation 18 of the Town and Country Planning Act 2012. The Draft Gypsy and Traveller Local Plan will seek to identify suitable sites to meet the accommodation needs of local Gypsy and Traveller residents, and to provide a strategic policy that would ensure any provision of sites would be aligned with the overall Local Plan objectives and requirements, including to ensure high-quality residential development, inclusive and sustainable design.

This will be followed by a further stage of consultation in line with Regulation 19 of the Town and Country Planning Act 2012. Further to revisions being made to take into account consultation responses and additional evidence, the final Gypsy and Traveller Local Plan document would be submitted for independent examination. If Planning Inspectors find the Plan to be sound, this will be recommended for adoption by Full Council.



Please provide:

- Context on how the service currently operates (if relevant) and the scope of suggested changes
- The intended beneficiaries and outcomes of the proposal
- Reference to any savings or income generation

It should be noted that this EqIA refers to the plan-making process in relation to the Gypsy and Traveller Local Plan Review. There are other strands of activity taking place in parallel, such as the development of a draft lettings policy for potential sites, which would be subject to a separate EqIA.

Updates made June 2026 following Regulation 18 consultation

The public consultation on the Draft Gypsy and Traveller Local Plan took place between December 2025-February 2026. The Draft Plan sought to identify suitable sites to meet the accommodation needs of local Gypsy and Traveller residents, and to provide a strategic policy that would ensure any provision of sites would be aligned with the overall Local Plan objectives and requirements, including to ensure high quality residential development, inclusive and sustainable design.

This EqIA relates to the Draft Gypsy and Traveller Local Plan version for consultation in line with Regulation 19 of the Town and Country Planning Act 2012. The EqIA is part of a wider Integrated Impact Assessment which 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 Gypsy and Traveller Local Plan review, and provides detailed assessments for the proposed strategic policies and site allocations.

Further to revisions being made to take into account consultation responses and additional evidence, as well as approval by the Executive and Full Council in November-December 2026, the final Gypsy and Traveller Local Plan document will be submitted for independent examination. If Planning Inspectors find the Plan to be sound, this will be recommended for adoption by Full Council.

It should be noted that this EqIA refers to the plan-making process in relation to the Gypsy and Traveller Local Plan Review. Individual sites will be subject to Equality Impact Assessments at a later stage if appropriate. There are other strands of activity taking place in parallel to the plan-making process, such as the

Please provide:

- Context on how the service currently operates (if relevant) and the scope of suggested changes
- The intended beneficiaries and outcomes of the proposal
- Reference to any savings or income generation

development of a draft lettings policy for potential sites, which would be subject to a separate EqIA.

- **The intended beneficiaries and outcomes of the proposal**

The intended beneficiaries of the proposal would be local residents who are part of the Gypsy and Traveller community. For many Gypsies and Travellers, living in a caravan is an essential part of their ethnic identity and social and cultural heritage, and conventional bricks and mortar housing is considered unsuitable. Many Gypsy and Traveller residents live in socially rented homes in the borough. The outcomes of the Draft Gypsy and Traveller Plan [Regulation 19](#) consultation would be to provide feedback on the soundness of the proposed policy approach, and on the proposed site allocations for Gypsy and Traveller accommodation. This will support officers in ensuring that the final version of the Plan that will be submitted for examination by independent Planning Inspectors would be robustly evidenced.

- **Reference to any savings or income generation**

The Draft Gypsy and Traveller Local Plan in itself will not result in savings or income generation.

If the Gypsy and Traveller Local Plan is successfully adopted and leads to the provision of new affordable homes for Gypsy and Traveller residents, there will be cost implications associated with this. However this should be considered in the context of contributing to address some of the prevalent inequalities and discrimination experienced by local Gypsy and Traveller residents. Meeting the accommodation needs of Gypsy and Traveller residents would also generate rental income and facilitate movement from within the existing social rented housing stock.

2. What impact will this change have on different groups of people?

Please consider:

- Whether the impact will predominantly be external or internal, or both?
- Who will be impacted – residents, service users, local communities, staff, or others?
- Broadly what will the impact be – reduced access to facilities or disruptions to journeys for example?

- **Whether the impact will predominantly be external or internal, or both?**

The impact will be predominantly external.

- **Who will be impacted – residents, service users, local communities, staff, or others?**

The Draft Gypsy and Traveller Local Plan is most likely to have impacts predominantly for existing residents who are part of local Gypsy and Traveller communities.

While the Gypsy and Traveller Local Plan review is focused on a single policy issue, it is recognised that the proposals will generate significant interest from the wider community and other stakeholders who may wish to respond to the public consultation.

Updates made June 2026 following Regulation 18 consultation

At the Regulation 18 stage, there were consultation responses from over 1,100 respondents, the majority being residents who objected to the proposals. There was a small number of positive responses to the proposals, which came from residents, Gypsy and Traveller residents and supportive community organisations.

- **Broadly what will the impact be?**

The Draft Gypsy and Traveller Local Plan is expected to have positive impacts related to increasing access for local Gypsy and Traveller residents to culturally suitable accommodation. The allocation of sites for this use is likely to increase the certainty around the delivery of Gypsy and Traveller homes.

Please consider:

- Whether the impact will predominantly be external or internal, or both?
- Who will be impacted – residents, service users, local communities, staff, or others?
- Broadly what will the impact be – reduced access to facilities or disruptions to journeys for example?

In the future, there may be some resource implications internally for the Community Wealth Building and the Homes and Neighbourhoods directorates, if the Gypsy and Traveller Local Plan is adopted, as the Council would be leading on the delivery of sites, the allocation of pitches and the management of new homes.

Updates made June 2026 following Regulation 18 consultation

While two sites were removed from the final Draft Plan following the Regulation 18 consultation, currently the number of sites identified is sufficient to address the need identified for pitches in the borough across seven sites which have an estimated capacity of 9 to 12 pitches.

Consultation responses received at the Regulation 18 stage raised a range of key issues regarding the potential impact of the proposals on residents, such as loss of estate amenity space, loss of estate parking, as well as potential amenity impacts. These issues are explored in further detail in Sections 3 and 4 below.

3. What impact will this change have on people with protected characteristics and/or from disadvantaged groups?

This section of the assessment looks in detail at the likely impacts of the proposed changes on different sections of our diverse community.

3A. What data have you used to assess impacts?

Please provide:

- Details of the evidence used to assess impacts on people with protected characteristics and from disadvantaged groups (see guidance for help)
- A breakdown of service user demographics where possible
- Brief interpretation of findings

- **Details of the evidence used to assess impacts on people with protected characteristics and from disadvantaged groups**

There is limited available data specifically addressing the characteristics and experiences of local Gypsy and Traveller communities in Islington.

The following reports and data sources have been analysed and used as baseline evidence for the purpose of the EqIA:

Local evidence

- RRR Consultancy, July 2019, London Borough of Islington – Gypsy and Traveller Accommodation Assessment Report – this report is the evidence document for the identified accommodation need of 10 pitches within the borough. It is based on anonymised interviews with local Gypsy and Traveller residents, as well as analysis of Census 2011 data. The report provides some qualitative insights related to household characteristics, as well as the lived experience of Gypsy and Traveller residents in Islington, including in terms of accommodation, discrimination and access to services.
- Engagement with local Gypsy and Traveller residents as part of the Draft Gypsy and Traveller Local Plan Review process (Sept 2024, Oct 2024 and Apr 2025) –three engagement meetings have been facilitated by London Gypsies and Travellers (LGT). LGT are a charity and Islington-based organisation who work with Gypsy and Traveller communities on issues related to accommodation, equality and discrimination. LGT provide support to households experiencing homelessness and housing inequalities, and work with Gypsy and Traveller communities to support participation in plan-making across London. The engagement meetings focused on seeking feedback on site characteristics, the site assessment process and principles for allocating potential pitches. Wider insights about the lived experience of Gypsy and Traveller residents have been shared

Please provide:

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as part of the meetings, reflecting the adverse impacts experienced by the communities due to a lack of culturally suitable homes and persistent discrimination.

- Report provided by London Gypsies and Travellers (Summer 2025) - the organisation was commissioned to research and produce a supporting paper for the EqIA, based on engagement with local Gypsy and Traveller residents, focused on challenges related to accommodation, how these are linked to wider inequalities and how they are experienced by community members across the wider range of protected characteristics. The engagement took place during Summer 2025 in the form of an informal focus group and interviews with community members representing multigenerational family groups. The evidence report noted the limitations of the research were that only Traveller residents took part in the discussion, and there was no direct representation of the views of Romany Gypsy residents.

Census data

- Islington Council – 2021 Census: White Roma and White Gypsy or Irish Traveller Population Overview – provides an analysis of Census 2021 data related to Islington
- Office for National Statistics (ONS), [Gypsy or Irish Traveller populations, England and Wales: Census 2021](#) – provides an analysis of Census data at the national level, with insights on demographics and a number of themes such as accommodation, health, disability, education and work.

Other reports

- Equality and Human Rights Commission, March 2016. *England's most disadvantaged groups: Gypsies, Travellers and Roma*. Report available at: <https://www.equalityhumanrights.com/sites/default/files/is-england-fairer-2016-most-disadvantaged-groups-gypsies-travellers-roma.pdf> ;
- NHS Race & Health Observatory, September 2023. *Inequalities in Mental Health Care for Gypsy, Roma, and Traveller Communities*. Report and

Please provide:

- Details of the evidence used to assess impacts on people with protected characteristics and from disadvantaged groups (see guidance for help)
- A breakdown of service user demographics where possible
- Brief interpretation of findings

recommendations available at: <https://nhsrho.org/wp-content/uploads/2023/05/Inequalities-in-mental-health-care-for-Gypsy-Roma-and-Traveller-communities.pdf> ;

- The British Journal of Social Work, Dan Allen and Victoria Hamnett, October 2022. *Gypsy, Roma and Traveller Children in Child Welfare Services in England*. Article available at: <https://academic.oup.com/bjsw/article-abstract/52/7/3904/6500256> .
- Friends, Families and Travellers, 2022, Briefing: Health inequalities experienced by Gypsy, Roma and Traveller communities Available at: [Briefing Health-inequalities-experienced-by-Gypsies-and-Travellers-in-England.pdf \(gypsy-traveller.org\)](https://www.gypsy-traveller.org/Briefing_Health-inequalities-experienced-by-Gypsies-and-Travellers-in-England.pdf)
- Office for National Statistics (ONS), released 7 December 2022, ONS website, statistical bulletin, [Gypsies' and Travellers' lived experiences, culture and identity, England and Wales: 2022](https://www.ons.gov.uk/peoplepopulationandcommunity/ethnicity/articles/gypsiesandtravellerslivedexperiencescultureandidentityenglandandwales/2022)
- Greenfields, M. & Rogers, C. (2020). Hate: "As Regular as Rain" A pilot research project into the psychological effects of hate crime on Gypsy, Traveller and Roma (GTR) communities. Bucks New University/GATE Herts Available at: [Rain-Report-201211.pdf \(gateherts.org.uk\)](https://www.gateherts.org.uk/Rain-Report-201211.pdf)
- Finney, N., Nazroo, J., Bécares, L., Kapadia, D., & Shlomo, N. (Eds.). (2023). *Racism and Ethnic Inequality in a Time of Crisis*. Bristol, UK: Policy Press. Retrieved Aug 28, 2025, from <https://doi.org/10.51952/9781447368861> - based on data from the Evidence for Equality National Survey

- **A breakdown of service user demographics where possible**

Based on the 2021 Census data for Islington:

- 108 individuals (0.05% of Islington's population) identify as White Gypsy or Irish Traveller
- the White Gypsy or Irish Traveller population is **60% female** (62 People) and **40% male** (42 People).

Please provide:

- Details of the evidence used to assess impacts on people with protected characteristics and from disadvantaged groups (see guidance for help)
 - A breakdown of service user demographics where possible
 - Brief interpretation of findings
- The White Gypsy or Irish Traveller population is less concentrated in the **25–44 age group**, with 21% of females and 17% of males falling into this range. The White Gypsy or Irish Traveller has a higher proportion of **females aged 0-9 (17%)** compared to Islington average (**5%**).
 - 14% **provide unpaid care**, higher than Islington average of 7%.
 - 29% have **Level 4 qualifications or above**, lower than the Islington overall of 57%.
 - The percentage of **economically inactive** individuals in the Islington White Gypsy or Irish Traveller population is **59%**, higher than the Islington **average** (32%).
 - 16% live in **private rented/other accommodations**, lower than the Islington average of 30%. 71% live in **social rented housing**, which is higher than the average of 42%.
 - **29%** of the White Gypsy or Irish Traveller population reported being **disabled** under the Equality Act, which is higher than the Islington average (16%). Of these, 14% are limited a little and 14% are limited a lot (compared to 9% and 7% in Islington).
 - The Islington White Gypsy or Irish Traveller population experiences **higher overcrowding** at **19%**, compared to 17% in Islington overall **average**.
 - In Islington, **58%** of the White Gypsy or Irish Traveller population reported being in "**good or very good health**" (62 people), which is **lower** than the Islington **average** of 84%.
 - **13%** (14 people) rated their health as "**bad or very bad**", **higher** than the Islington **average** of 6%.

The LGT report draws from an overview of the organisation's service users based in Islington and from focus groups with local Gypsy and Traveller residents. The key demographic information includes:

- The organisation estimates that there are approximately 300 Gypsy and Traveller community members living in Islington.

Please provide:

- Details of the evidence used to assess impacts on people with protected characteristics and from disadvantaged groups (see guidance for help)
 - A breakdown of service user demographics where possible
 - Brief interpretation of findings
- 17 Irish Traveller households have worked with the organisation on problems related to their accommodation. Twelve of these households sought support in their engagement with homelessness services, two concerned rent arrears and welfare payments, and three were about accommodation for prison leavers. All the households were living in socially rented properties: either temporary accommodation, council housing, or housing associations. None could afford to procure a mortgage or purchase a piece of land within commuting distance of Islington.
 - One focus group representing one extended family and interviews with two other extended families were facilitated by LGT. The findings of the engagement are estimated to cover the experiences of 80 people.
 - Across this cohort, community members reported the following age composition:
 - Twelve Traveller residents in Islington over 60 years of age, of whom one was above the age of 80.
 - Twenty between the ages of 40 and 60.
 - Twenty-two between the ages of 20 and 39.
 - Twenty-six under the age of 20.
 - The following information was reported in relation to disability among this cohort:
 - Eleven adults were known to have physical disabilities.
 - Nine adults disclosed that they had mental health problems, classified as disabilities, such as life-limiting anxieties and depression.
 - Four adults were known to have alcohol or substance use disorders.
 - Four out of the 26 children and young people were diagnosed as autistic.
 - Of the 54 adults in Islington's Traveller community identified by the focus groups, 30 were mothers.
 - **Brief interpretation of findings**

Please provide:

- Details of the evidence used to assess impacts on people with protected characteristics and from disadvantaged groups (see guidance for help)
- A breakdown of service user demographics where possible
- Brief interpretation of findings

Discrimination and prejudice

Data from the 2023 Evidence for Equality National Survey, reveals that Gypsy and Traveller groups face some of the highest levels of racial discrimination across multiple settings. Nearly half (49.4%) of Gypsy/Traveller respondents reported experiencing racial discrimination in public spaces, and over a third (34.6%) reported discriminatory treatment by the police. 41% of Gypsy/Traveller individuals reported being victims of racist assaults—verbal, physical, or involving property damage—making them one of the most targeted groups.

The LGT report of the focus group discussions highlights that the local Traveller community have been exposed to racial prejudice from neighbours, and felt they were not protected by council services. One incident was mentioned in which a Traveller family living on a council estate was subject to abuse and assaults due to their ethnicity, who were moved into a hotel room that had to accommodate five young children.

The Islington GTANA also refers to households who experienced discrimination due to their cultural identity and have considered necessary to hide their ethnicity in order to access services. Few of the households felt they could trust the authorities when reporting incidents of discrimination.

Housing inequalities

For many Gypsy and Traveller households, living in a caravan is an essential part of their ethnic identity and social and cultural heritage, and conventional 'bricks and mortar' housing is considered unsuitable. Across London there is a documented lack of culturally suitable accommodation for Gypsy and Traveller communities. This is linked to negative impacts experienced by Gypsy and Traveller communities in relation to family, community, culture and support systems, and wider implications in terms of health, welfare and wider opportunities.

Please provide:

- Details of the evidence used to assess impacts on people with protected characteristics and from disadvantaged groups (see guidance for help)
- A breakdown of service user demographics where possible
- Brief interpretation of findings

The need for culturally suitable accommodation identified in Islington for ten caravan pitches arises from households living in bricks and mortar accommodation, who have not been able to access culturally suitable homes, as these were never provided in the borough. Both the LGT report and Islington GTANA mention that some households have a cultural need for living on a caravan pitch, while others would prefer to continue living in conventional homes.

The local evidence refers to Gypsy and Traveller family groups living in the borough since the 1970s and 1980s, initially stopping in caravans on sites where they were evicted from. Due to the lack of site provision by the council, families were eventually forced to move into flats, where they were isolated from their community and culture. One example provided is from a Traveller family who in the 1980s lived in caravans near the disused railway line that has been converted into Parkland Walk. The family were evicted from the site and separated, having to move into flats in other parts of the borough, which community members attributed as a cause of isolation and mental health impacts. The site was developed into a council estate in the mid-1980s.

In addition to cultural unsuitability for parts of the community, other accommodation issues include unaffordability and overcrowding. The local evidence from Islington shows that the majority of Gypsy and Traveller residents live in socially rented housing, at a significantly higher rate than the average population of the borough. The LGT report refers to households living in temporary accommodation, council housing and housing association properties and those seeking support in engaging with homelessness services. None of the Traveller households in the borough known to LGT could afford to procure a mortgage or purchase a piece of land within commuting distance of Islington. Community members could recall one intergenerational family who was able to purchase land outside of London for a private site in the early 2000s.

Community and care networks

The LGT report from focus group discussions highlights the importance of care and support networks and the ability to live in intergenerational accommodation.

Please provide:

- Details of the evidence used to assess impacts on people with protected characteristics and from disadvantaged groups (see guidance for help)
- A breakdown of service user demographics where possible
- Brief interpretation of findings

Community members described intergenerational living as rooted in care, sociability, and solidarity, with extended families sharing responsibilities like food, childcare, and elder care daily. Young children were mainly looked after by mothers and grandmothers. Older teenagers supported adults by helping with literacy and digital tasks, especially in navigating council services. Adults in mid-life often balanced caregiving with their own needs, particularly when facing health or addiction challenges. Many women are registered as carers, and they emphasised the practicality of communal living, especially in caravan sites, for sustaining this dense network of mutual support. It was mentioned that the teenage boys would find male role models in the communal setting of the Traveller site that would make up for the absence of fathers.

Another issue highlighted in the LGT report relates to opportunities for socialising for young people within their community, while adhering to cultural norms and staying safe, which are considered to be affected by the lack of communal sites. The afterschool clubs and extracurricular activities that were offered to schoolchildren of a comparable socioeconomic profile were felt to be inaccessible to Traveller children. An inclusive sports club was reported as providing a base for teenage boys to find mentorship.

Health inequalities

Gypsy and Traveller people are reported to have life expectancies between ten and 25 years shorter than the general population and experience significantly higher prevalence of long-term illness, health problems or disabilities, which limit daily activities or work. Research into the incidence of hate crime and discrimination draws links between poor mental health and high risk of suicide and the everyday prejudice, bullying and institutional racism experienced by Gypsies and Travellers.

Both the Census data for Islington and the LGT report highlight the high prevalence of disability among Gypsy and Traveller residents. Community members who took part in the focus groups referred to physical disabilities, life-limiting mental health and autism, as well as alcohol and substance use

Please provide:

- Details of the evidence used to assess impacts on people with protected characteristics and from disadvantaged groups (see guidance for help)
- A breakdown of service user demographics where possible
- Brief interpretation of findings

disorders. The latter are linked by community members to the experience of poor accommodation and cultural dispossession.

One example provided by community members in one of the focus group discussions referred to a young family who was housed for six years in temporary accommodation which was reported as unsuitable due to the lack of adjustments for the mother's disabilities and had an impact on her mental health.

Work and economic inequalities

Findings from the 2023 Evidence for Equality National Survey showed that people from Roma and Gypsy/Traveller ethnic groups experience the some of the highest levels of socioeconomic deprivation; they are more likely to have no educational qualifications, less likely to be in the highest occupational positions, and have high rates of financial difficulties and benefit receipt.

The Islington GTANA indicates that in terms of work opportunities accessed by local Gypsy and Traveller residents, employment status varied, including the majority of households with the main earner being self-employed, followed by unemployed, carers and retired household members. Other careers included education sector, administration, beauty, building and construction work, retail and health care.

The LGT report indicates that the cycle of poverty and homelessness affecting the fourth generation of Travellers in Islington, was difficult to break due to the cultural loss that dispossessed the Travelling men in particular.

3B: Assess the impacts on people with protected characteristics and from disadvantaged groups in the table below.

Please first select whether the potential impact is positive, neutral, or negative and then provide details of the impacts and any mitigations or positive actions you will put in place.

Please use the following definitions as a guide:

Neutral – The proposal has no impact on people with the identified protected characteristics

Positive – The proposal has a beneficial and desirable impact on people with the identified protected characteristics

Negative – The proposal has a negative and undesirable impact on people with the identified protected characteristics

Characteristic or group	Positive/Neutral/Negative	What are the positive and/or negative impacts?	How will potential benefits be enhanced or negative impacts be eliminated or reduced?
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Age	Positive	The Draft Gypsy and Traveller Local Plan will have a positive impact in terms of identifying potential sites that are suitable for intergenerational accommodation for Gypsy and Traveller households. This would support community care networks which benefit children, young people as well as older Gypsy and Traveller residents. Updates made July 2026 following Regulation 18 consultation It is acknowledged that the loss of some areas of estate amenity space on two of the council estates where sites are proposed at the Regulation 19 stage (Aubert Court Estate and Upper Hilldrop Estate) may	The Draft Gypsy and Traveller Local Plan will enhance potential benefits through seeking to ensure that sites would be designed to achieve a high quality of accommodation and good level of amenity for future occupiers, and provide sufficient space and flexibility for pitches to be used by multigenerational households. To mitigate this potential impact, other areas of amenity space on these estates remain accessible and in the case of Aubert Court planned landscaping works will improve the quality of and
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		have potential impacts on older residents and children. In relation to proposals that would result in the loss of car parking or garage spaces on Aberdeen Lane, Athenaeum Court, Mayville Estate and Mora Street, which may have impacts on older residents.	accessibility of the amenity space. To mitigate the risk of impact relating to parking, the council will seek to engage further with residents who are potentially impacted by the proposals and will explore options for alternative provision, where required.
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Disability (include carers)	Positive	The Draft Gypsy and Traveller Local Plan will have a positive impact in terms of identifying potential sites that are suitable for intergenerational accommodation for Gypsy and Traveller households. This would support community care networks which benefit Gypsy and Traveller residents with disabilities, as well as carers. Updates made July 2026 following Regulation 18 consultation It is acknowledged that the loss of some areas of estate amenity space on two of the council estates where sites are proposed at the Regulation 19 stage (Aubert Court Estate and Upper Hilldrop Estate) may	The Draft Gypsy and Traveller Local Plan will enhance potential benefits through seeking to ensure that sites would meet inclusive design requirements, and would be accessible and adaptable to meet changing occupier circumstances over the lifetime of the development. To mitigate this potential impact, other areas of amenity space on these estates remain accessible and in the case of Aubert Court planned landscaping works will improve the quality of and
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		have potential impacts on disabled residents. There is a risk that proposals would result in the loss of car parking or garage spaces which are leased by Blue Badge holders and other disabled residents on Aberdeen Lane, Athenaeum Court, Mayville Estate and Mora Street.	accessibility of the amenity space. The council will seek to engage further with residents who are potentially impacted by the proposals and will explore options for alternative provision, where required.
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Race or ethnicity	Positive	The Draft Gypsy and Traveller Local Plan will have a positive impact in terms of seeking to meet the need for culturally suitable accommodation for local Gypsy and Traveller residents. This would contribute to reducing inequalities experienced by Gypsy and Traveller residents, particularly in relation to housing and health.	The Draft Gypsy and Traveller Local Plan will enhance potential benefits through seeking to ensure that sites are designed to achieve a high-quality standard of accommodation, and a good level of amenity for future occupiers and for neighbouring residents. Engagement with local Gypsy and Traveller residents will continue throughout the Gypsy and Traveller Local Plan process. The Draft Gypsy and Traveller Local Plan consultation materials included an anti-racism engagement statement and FAQs that seek to counter stereotypes.
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Religion or belief (include no faith)	Neutral	The Draft Gypsy and Traveller Local Plan is not considered to have direct impacts related to religion or belief.	It is noted that the local evidence indicated that members of the Traveller community are Roman Catholic and practice their religion at welcoming local churches. Further positive impacts for this group may be achieved through other initiatives outside the scope of the Gypsy and Traveller Local Plan.
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Gender and gender reassignment (male, female, or non-binary)	Neutral	The Draft Gypsy and Traveller Local Plan is not considered to have direct impacts related to gender reassignment.	In relation to gender, the local evidence indicated that Gypsy and Traveller sites would provide a safe and culturally appropriate setting for girls and boys to socialise with their peers. Further positive impacts for this group may be achieved through other initiatives outside the scope of the Gypsy and Traveller Local Plan.
Maternity or pregnancy	Positive	The Draft Gypsy and Traveller Local Plan will have a positive impact in terms of identifying potential sites that are suitable for intergenerational accommodation for Gypsy and Traveller households. This would support community care networks which benefit mothers and infants.	The Draft Gypsy and Traveller Local Plan will enhance potential benefits through seeking to ensure that sites would meet inclusive design requirements, and would be accessible and adaptable to meet changing occupier circumstances over the lifetime of the development.

Sex and sexual orientation	Neutral	The Draft Gypsy and Traveller Local Plan is not considered to have direct impacts related to sexual orientation.	It is noted that the local evidence suggests that members of the Traveller LGBTQ+ community find Islington an inclusive place. Further positive impacts for this group may be achieved through other initiatives outside the scope of the Gypsy and Traveller Local Plan.
Marriage or civil partnership	Positive	The Draft Gypsy and Traveller Local Plan will have a positive impact in terms of identifying potential sites that are suitable for family accommodation for Gypsy and Traveller households. This would benefit couples, especially young families, as well as single parents who would be able to access community care networks.	Further positive impacts for this group may be achieved through other initiatives outside the scope of the Gypsy and Traveller Local Plan.

Other (e.g. people living in poverty, looked after children, people who are homeless or refugees)	Positive	The Draft Gypsy and Traveller Local Plan will have a positive impact in terms of seeking to meet the need for affordable and culturally suitable accommodation for local Gypsy and Traveller residents. This will benefit those residents on low incomes or facing homelessness. There is a risk that removal of amenity space as outlined above would have a disproportionate impact on residents from low incomes who may face barriers accessing green space.	Further positive impacts for this group may be achieved through other initiatives outside the scope of the Gypsy and Traveller Local Plan. To mitigate this potential impact, other areas of amenity space on the relevant estates remain accessible and in the case of Aubert Court planned landscaping works will improve the quality of and accessibility of the amenity space.
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4. How do you plan to mitigate negative impacts?

Please provide:

- An outline of actions and the expected outcomes
- Any governance and funding which will support these actions if relevant

No negative impacts have been identified as potentially resulting from the Draft Gypsy and Traveller Local Plan. However it is acknowledged that Gypsy and Traveller communities experience high levels of discrimination and prejudice. Previous consultation on the Islington Local Plan proposed site allocations for Gypsy and Traveller accommodation gave rise to numerous objections, including some comments which were considered discriminatory.

The approach to consultation and engagement for the Draft Gypsy and Traveller Local Plan has been developed in collaboration with the Council's Engagement and Equalities teams to ensure it meets the Public Sector Equality Duties, and to mitigate potential impacts on Gypsy and Traveller communities. Further details about the approach are provided in the next section of the EqIA.

Updates made June 2026 following Regulation 18 consultation

No overall negative impacts have been identified as potentially resulting from the Draft Gypsy and Traveller Local Plan. While two of the site allocations proposed at Regulation 18 stage have been removed, the total capacity of the remaining seven sites is considered sufficient to meet the identified need for the first ten years of the Plan, and potentially for the whole Plan period. However, it should be noted that the site capacity may change subject to additional evidence studies, further consultation and examination by Independent Planning Inspectors.

Consultation responses received at the Regulation 18 stage raised a range of issues regarding the potential impact of the proposals on residents of council estates. Two particular issues raised, the loss of estate amenity space and the loss of estate parking, may potentially have implications for groups sharing protected characteristics.

The loss of amenity space will be carefully considered by the Council, and ways to improve access to existing green and open spaces within the local



Please provide:

- An outline of actions and the expected outcomes
- Any governance and funding which will support these actions if relevant

area will be explored. It is acknowledged that the loss of some areas of estate amenity space on two of the council estates where sites are proposed may have potential impacts on older residents, children and disabled residents, however other areas of amenity space on these estates remain accessible and in the case of Aubert Court planned landscaping works will improve the quality of and accessibility of the amenity space.

In relation to proposals that would result in the loss of car parking or garage spaces which are leased by Blue Badge holders, the council will seek to engage further with residents who are potentially impacted by the proposals and will explore options for alternative provision, where required. Further evidence has been produced in relation to parking pressure and parking availability.

As part of this assessment we have considered equalities implications for people who share protected characteristics as it is likely that there are people with protected characteristics who might be affected by these proposals. For example, estate car parking being removed to accommodate a Gypsy and Traveller pitch might have an impact on older people or people with disabilities.

These impacts are not easy to quantify as they will be site specific, and whether or not individuals might be affected will vary over time. The proposed pitches will be delivered after the plan-making process has finished and will be subject to planning applications for each site which will take up to a couple of years and tenants or leaseholders who need a parking space might change over time.

We will continue to consider potential impacts on people with protected characteristics as this plan making process continues. We will seek to better understand these impacts and evaluate them before the Local Plan is submitted for Independent Examination, including through updating the Equalities Impact Assessment.

In addition, should sites be adopted as part of the Local Plan and progress to planning application in due course, further consideration will be given to specific impacts on people with protected characteristics and potential mitigation measures, including through completing Equalities Impact Assessments on specific sites if appropriate. For example, a mitigation



Please provide:

- An outline of actions and the expected outcomes
- Any governance and funding which will support these actions if relevant

measure for removing parking bays might involve reprovision of bays elsewhere in the vicinity if necessary.

It is acknowledged that Gypsy and Traveller communities experience high levels of discrimination and prejudice. Previous consultation on the Islington Local Plan proposed site allocations for Gypsy and Traveller accommodation gave rise to numerous objections, including some comments which were considered discriminatory.

The approach to consultation and engagement for the Draft Gypsy and Traveller Local Plan has been developed in collaboration with the Council's Engagement and Equalities teams to ensure it meets the Public Sector Equality Duties, and to mitigate potential impacts on Gypsy and Traveller communities. Further details about the approach are provided in the next section of the EqIA.

5. Please provide details of your consultation and/or engagement plans.

Please provide:

- Details of what steps you have taken or plan to take to consult or engage the whole community or specific groups affected by the proposal
- Who has been or will be consulted or engaged with
- Methods used or that will be used to engage or consult
- Key findings or feedback (if completed)

- **Consultation and engagement carried out so far**
- Scope of the Review – public consultation carried out through Let's Talk Islington and the Planning Policy mailing list (March - April 2024)
- Draft Gypsy and Traveller Site Assessment Methodology and Call for Sites - public consultation carried out through Let's Talk Islington and the Planning Policy mailing list (January – March 2025)
- Engagement with statutory consultees and neighbouring boroughs
- Engagement meetings with local Gypsy and Traveller residents to discuss the Review process, the site assessment criteria, initial principles for a potential site lettings policy and to present the proposed site allocations.



Please provide:

- Details of what steps you have taken or plan to take to consult or engage the whole community or specific groups affected by the proposal
- Who has been or will be consulted or engaged with
- Methods used or that will be used to engage or consult
- Key findings or feedback (if completed)

Updates made June 2026 following Regulation 18 consultation

- Draft Gypsy and Traveller Local Plan Regulation 18 consultation – public consultation on the proposed strategic policies and site allocations, carried out through Let's Talk Islington, the Planning Policy mailing list, with notification leaflets sent to over 3,200 addresses in proximity to the proposed sites. Six in-person information sessions were held at the Town Hall with officers available to provide details about the proposals and answer questions. Letters were sent to residents who lease parking spaces and garages on the council estates where sites are proposed, who will be directly affected by the proposals. (December 2025 – February 2026)

- **Methods that will be used to engage or consult**

The public consultation on the Draft Gypsy and Traveller Local Plan will involve a range of methods aiming to engage with local residents, including Gypsy and Traveller residents, as well as statutory consultees and other stakeholders.

- General awareness raising – Consultation materials will be published on the Council's website, social media channels and in the Islington Life magazine. Physical copies will be available at the Town Hall. The Draft Gypsy and Traveller Local Plan will be supported by a range of evidence base documents setting out robust justification for the proposed policy and potential site allocations, as well as accessible and visually engaging materials setting out initial site design options. The council will also produce Frequently Asked Questions to assist residents.
- Specific awareness raising using more tailored communications – This will include sending the notification of the consultation to the Planning Policy database and respondents who took part in previous consultation stages as part of the Gypsy and Traveller Local Plan review. All properties surrounding proposed sites will be sent information leaflets which will include details about the proposals such as the number of



Please provide:

- Details of what steps you have taken or plan to take to consult or engage the whole community or specific groups affected by the proposal
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- Methods used or that will be used to engage or consult
- Key findings or feedback (if completed)

pitches that could be provided, an indicative plan of the site layout and relevant development considerations, .

- Involvement and Engagement – The Let's Talk Islington consultation platform will be used to invite comments and feedback through online questionnaires. Responding by email or letters will also be possible to increase accessibility and opportunities for residents to have a say. There will be targeted involvement of Gypsy and Traveller residents with facilitation provided by the London Gypsies and Travellers organisation. Building on the lessons from the previous Local Plan consultation in 2022, the consultation strategy will avoid public meetings or other involvement formats that may create a forum for unmoderated debate, which have the potential for hostile or discriminatory comments and opinions to be expressed. The approach will also involve rejecting discriminatory and inappropriate comments.

Anti-racism engagement statement - In response to a request from local Gypsy and Traveller residents who have been engaging in the Local Plan review process, it is proposed that an anti-racist engagement statement is used in materials associated with the Gypsy and Traveller Local Plan Review consultation. This has been developed in collaboration with the Engagement and Equalities teams.

Updates made June 2026 following Regulation 18 consultation

The public consultation on the Draft Gypsy and Traveller Local Plan Regulation 19 will involve a range of methods aiming to engage with local residents, including Gypsy and Traveller residents, as well as statutory consultees and other stakeholders.

- General awareness raising – Consultation materials will be published on the Council's website and Let's Talk Islington. Physical copies will be available at the Town Hall. The Draft Gypsy and Traveller Local Plan will be supported by a range of evidence base documents setting out robust justification for the proposed policy and potential site allocations, as well as accessible and visually engaging materials setting out initial site



Please provide:

- Details of what steps you have taken or plan to take to consult or engage the whole community or specific groups affected by the proposal
- Who has been or will be consulted or engaged with
- Methods used or that will be used to engage or consult
- Key findings or feedback (if completed)

design options. The council will also produce Frequently Asked Questions to assist residents.

- Specific awareness raising using more tailored communications – This will include sending the notification of the consultation to the Planning Policy database and respondents who took part in previous consultation stages as part of the Gypsy and Traveller Local Plan review. All properties surrounding proposed sites will be sent information leaflets which will include details about the proposals such as the number of pitches that could be provided, an indicative plan of the site layout and relevant development considerations.
- Involvement and Engagement – The Let's Talk Islington consultation platform will be used to invite comments and feedback through online questionnaires. Responding by email or letters will also be possible to increase accessibility and opportunities for residents to have a say. There will be targeted involvement of Gypsy and Traveller residents with facilitation provided by the London Gypsies and Travellers organisation. Building on the lessons from the previous consultations, officers will hold in-person information sessions at the Town Hall where interested residents can ask questions and find out more about the proposals.
- Anti-racism engagement statement - In response to a request from local Gypsy and Traveller residents who have been engaging in the Local Plan review process, an anti-racism engagement statement is used in materials associated with the Gypsy and Traveller Local Plan Review consultation. This has been developed in collaboration with the Engagement and Equalities teams, and the wider approach to consultation has been discussed as part of the Consultation Working Group. The consultation approach will also involve rejecting discriminatory and inappropriate comments. Similar to the previous consultation, the consultation materials, including the Let's Talk page and consultation leaflets include the line 'Inappropriate comments that make use of stereotypes and discriminatory language to characterise the Gypsy and Traveller community will be rejected.' A further explanation of the council's values and Public Sector Equality Duties is set out in the anti-



Please provide:

- Details of what steps you have taken or plan to take to consult or engage the whole community or specific groups affected by the proposal
- Who has been or will be consulted or engaged with
- Methods used or that will be used to engage or consult
- Key findings or feedback (if completed)

racism engagement statement. A consultation statement will provide summaries of all the comments received, together with the council's response to each representation. Any points raised in the responses which make use of discriminatory language or stereotypes about the Gypsy and Traveller communities, and do not present a clear objection or make any points that are relevant to the consultation, are redacted and they are not taken into consideration, however the rest of the response containing points relevant to the consultation is taken into account. This will be clearly indicated in the consultation statement, which will be made publicly available on the consultation page.

6. Once the proposal has been implemented, how will impacts be monitored and reviewed?

Please provide details in the table below.

Action	Responsible team or officer	Deadline
Draft Gypsy and Traveller Local Plan Regulation 18 Consultation	Planning Policy Team	December 2025-January 2026
Gypsy and Traveller Local Plan Regulation 19 Consultation	Planning Policy Team	Summer 2026



Action	Responsible team or officer	Deadline
Submission of the Gypsy and Traveller Local Plan for independent examination	Planning Policy Team	December 2026

Please send the completed EQIA to eqia@islington.gov.uk for quality checking by Equalities Team. All Equality Impact Assessments must be attached with any report to a decision-making board and should be made publicly available on request.

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

Member	Name	Signed	Date
Staff member completing this form			17/06/26
Equalities Team			02/07/36
Director or Head of Service			17/06/26



Appendix 3: Habitats Regulation screening

Habitats Regulation Assessment (Habitats Directive 92/43/EEC) screening of Islington's Draft Gypsy and Traveller Local Plan

June 2026



ISLINGTON
For a more equal

Introduction

1. The purpose of this Habitats Regulations Assessment (HRA) is to assess the impacts of Islington's Draft Gypsy and Traveller Local Plan against the conservation objectives of European Sites and to ascertain whether it would adversely affect the integrity of any European sites.
2. Under Article 6 (3) and (4) of EU Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (the Habitats Directive), land-use plans including Local Plans are subject to Habitats Regulations Assessment (HRA). The Habitats Directive seeks to provide legal protection to habitats and species that are of European significance.
3. European sites are known as the Natura 2000 network, which provides ecological infrastructure for the protection of sites which are of exceptional importance in respect of rare, endangered or vulnerable natural habitats and species within the European Community¹. In preparation for the United Kingdom's departure from the European Union in 2020 a 'national site network' was created to retain the concept of a UK network of sites. The 'national site network' is defined as including Natura 2000 sites designated prior to EU exit and those Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) designated after the UK's exit². There are no European sites within the London Borough of Islington.
4. The HRA is a multi-stage process, and planning authorities need to undertake a screening of plans that are likely to have a significant effect on European sites prior to their adoption in order to fulfil the requirements of the Habitats Directive in respect of the land use planning system.
5. A HRA screening assessment was undertaken for the Islington Local Plan Proposed Submission Draft in 2019 which concluded the Plan was unlikely to have significant effects on identified sites of European importance for habitats or species, or an adverse impact on the integrity of the sites. Natural England had no comments to make on the HRA Screening Assessment, and no other comments were received on the HRA as part of the consultation,

Policies and Guidance

6. Article 6.3 of the Habitats Directive states that, 'Any plan or project not directly connected with or necessary to the management of the site but likely to have a

¹ Planning for the Protection of European Sites: Appropriate Assessment – Under the Conservation (Natural Habitats, &C) (Amendment) (England and Wales) Regulations 2006 Guidance for Regional Spatial Strategies and Local Development Documents (DCLG, August 2006).

² Explanatory Memorandum to the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. Available from: [The Conservation of Habitats and Species \(Amendment\) \(EU Exit\) Regulations 2019](#)

significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives... the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned.'

7. The Conservation of Habitats and Species Regulations 2017 (as amended) transposed the land and marine aspects of the Habitats Directive and certain elements of the Wild Birds Directive (Directive 2009/147/EC) into English and Welsh Law. The 2017 Regulations were amended by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019, with the changes mainly aimed at transferring functions from the European Commission to appropriate authorities within England and Wales³.
8. Department for Environment, Food and Rural Affairs (Defra) guidance on HRA⁴ sets out requirements for undertaking an appropriate assessment of implications for European sites and European offshore marine sites. For Local Plans, the Local Planning Authority is required to undertake a HRA to test if a plan or project proposal could significantly harm the designated features of a European site. The effect of a proposal may depend on its location, which could be on the site, near the site or some distance away – for example by causing air, water or noise pollution or affecting a feeding area used by one of the site's designated species.
9. National Planning Practice Guidance (NPPG) on Strategic Environmental Assessment and Sustainability Appraisal states at paragraph 3 that 'a plan or project may also require an appropriate assessment, as set out in the Conservation of Habitats and Species Regulations 2017 (as amended), if it is considered likely to have significant effects on a habitats site. A sustainability appraisal should take account of the findings of an appropriate assessment, if one is undertaken'.
10. Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) are protected by the Habitats Regulations and any proposals that could affect them will require an HRA. Any proposals affecting potential SACs or SPAs, Ramsar sites (wetlands of international importance) or areas secured as sites compensating for damage to a European site also require an HRA.

Purpose of this report

11. This report is the Council's Habitats Regulations Screening Assessment of the Draft Gypsy and Traveller Local Plan (Regulation 19).
12. The objective of this assessment is to identify any aspects of the Draft Gypsy and Traveller Local Plan that would cause a likely significant effect on any relevant Natura

³ [Changes to the Habitats Regulations 2017 - GOV.UK](#)

⁴ [Habitats regulations assessments: protecting a European site - GOV.UK](#)

2000 (or European) sites, either in isolation or in combination with other plans and projects. These sites are: Special Areas of Conservation (SACs) which protect habitats and Special Protection Areas (SPAs) which protect birds. Ramsar sites which protect wetlands should also be considered.

13. The Habitats Directive applies the 'precautionary principle' to European sites. This means that plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the site(s) in question. Plans and projects with predicted adverse effects on European sites may still be permitted if there are no alternatives to them and there are imperative reasons of overriding public interest as to why they should go ahead. In such cases, compensation would be necessary to ensure the overall integrity of the Natura 2000 network. The legislation sets out a multi-stage process. An initial analysis (screening) is undertaken in order to determine whether there are likely to be 'significant effects' (as in this report). If it is not possible to conclude that there will not be likely significant effects, then in order to determine whether or not a site's integrity will be affected, an 'appropriate assessment' should be undertaken of the plan or project in question.
14. It should be noted that the Council has previously undertaken an HRA screening assessment of the Islington Local Plan, adopted in 2023, which concluded that the Plan was not likely to result in significant effects or impact on the integrity of any European sites. A HRA was also undertaken of the North London Waste Plan 2022, which concluded 'any potential harmful impacts on the nature conservation value of European sites that could arise from the implementation of the North London Combined Waste Plan can be avoided or mitigated'.
15. This HRA screening assessment will be published for comment alongside the Draft Gypsy and Traveller Local Plan (Regulation 19).

Methodology

16. Defra published guidance in February 2021 (updated in December 2023) to assist 'competent authorities' (such as the Council) in undertaking HRA. There are three main stages to an HRA:
 - (i) Screening – to check if the Plan is likely to have a significant effect on a European site's conservation objectives. If it is determined that it won't the following stages are not required.
 - (ii) Appropriate assessment – assess likely significant effects of the Plan in more detail and identify ways to avoid or minimise any effects.
 - (iii) Derogation – consider if proposals which would have an adverse effect on a European site qualify for an exemption.
17. Before starting an HRA, the first step is for the competent authority to decide whether the proposal is a project, a plan or neither. The draft Gypsy and Traveller Local Plan clearly falls within the definition of a plan given in the guidance: 'a plan sets out where

future activities or developments should take place within a certain area. This can include any changes that are proposed to an existing plan'. The draft Plan sets out how the housing needs of Gypsy and Traveller communities in the borough will be met over the next 15 years until 2041.

18. The next step is to determine if the proposal might affect a European site. There are no Natura 2000/Ramsar sites within the Plan area, however policies relating to Islington may have an impact on sites within a wider area. The main factor which is likely to cause the Plan to have an impact on a European site is the site's proximity to the Plan area. For the purposes of this screening assessment sites within approximately a 15km radius of Islington have been considered. The Plan is unlikely to have any measurable effects on sites beyond this due to the absence of reasonable impact pathways. The following sites are within the 15km radius:

- Lee Valley Ramsar site and Special Protection Area (SPA)
- Epping Forest Special Area of Conservation (SAC)
- Richmond Park SAC
- Wimbledon Common SAC.

19. The purpose of this screening exercise is to identify whether the plan policies are likely to have a significant effect on these European sites, triggering the subsequent step of 'appropriate assessment'. The significance of effects is determined in relation to the specific features and environmental conditions of the protected sites and considers the probability of the impact; the duration, frequency and reversibility of the impact. Where effects are considered significant, an appropriate assessment of the implications for the site should be undertaken.

20. The HRA guidance states that the competent authority must consult with Natural England following the screening assessment and 'appropriate assessment' stages of the HRA process but can ask for advice at any stage in the process.

Screening the Draft Gypsy and Traveller Local Plan

21. At the screening stage, a plan should be considered 'likely' to have an effect if the council (the 'competent authority') is unable, on the basis of objective information, to exclude the possibility that it could have significant effects on the European sites, either alone or in combination with other plans or projects. Effect will be 'significant' if it could undermine the site's conservation objectives. The 'test of significance' can generally be interpreted as any negative effects that are not negligible or inconsequential; 'likely' is interpreted as a simple question of whether the plan or project concerned is capable of having an effect. It is recommended that HRA is undertaken in conjunction with the Sustainability Appraisal (SA) as part of the iterative process, however the two are separate processes with their own legal requirements.

The screening would need to be reconsidered prior to adoption depending on any changes made as part of the examination process.

22. The scope of the work should be proportionate to the geographical scope of the option and the nature and extent of any effects identified. The assessment should be confined to the likely significant effects on the internationally important habitats and species for which the site is classified.
23. The guidance is clear that at the screening stage you should not consider any mitigation measures included by the proposer for the purpose of avoiding or minimising risk to a European site. Mitigation measures should be considered at the appropriate assessment stage.
24. The HRA Screening Assessment of Islington's draft Gypsy and Traveller Local Plan identifies no significant effects on protected European sites. The assessment is based on the effects of the Local Plan policies, which will naturally include some elements of mitigation with regard to the impact on climate change, biodiversity and other areas. In line with case law, the Screening Assessment does not include consideration of additional specific mitigation measures, such as case-specific design measures, to mitigate a particular identified significant effect.

Description of the European Sites

The Lee Valley Ramsar site and SPA

25. The Lee Valley SPA is located to the north-east of London, where the valley contains a series of wetlands and reservoirs. The Lee Valley comprises a series of embanked water supply reservoirs, sewage treatment lagoons and former gravel pits along approximately 24 km of the valley. The area is a designated Ramsar site and also a designated SPA. The area also comprises the Sites of Special Scientific Interest (SSSIs) at Amwell Quarry, Rye Meads, Turnford and Cheshunt Pits, and Walthamstow Reservoirs.
26. SPA status was granted in 2000 because of the site's European ornithological interest. The Lee Valley supports internationally important numbers of wintering gadwall and shoveler, and nationally important numbers of several other bird species. The site also contains a range of wetland and valley bottom habitats, both man-made and semi-natural, which support a diverse range of wetland fauna and flora. The site supports the nationally scarce plant species whorled water-milfoil (*Myriophyllum verticillatum*) and the rare or vulnerable invertebrate (*Micronecta minutissima*) (a water-boatman).
27. Parts of Lee Valley lie within 3km of Islington.

Epping Forest

28. Epping Forest Special Area of Conservation (SAC) is a 1,605 hectare site designated in 2005 in Essex, which is predominantly made up of broad-leaved deciduous woodland with dry grassland and steppes and some inland water bodies.
29. Epping Forest represents Atlantic acidophilous beech forests in the north-eastern part of the habitat's UK range. Although the epiphytes at this site have declined, largely as a result of air pollution, it remains important for a range of rare species, including the moss *Zygodon forsteri*. The long history of pollarding, and resultant large number of veteran trees, ensures that the site is also rich in fungi and dead-wood invertebrates.
30. Epping Forest is a large woodland area in which records of stag beetle *Lucanus cervus* are widespread and frequent; the site straddles the Essex and east London population centres. Epping Forest is a very important site for fauna associated with decaying timber, and supports many Red Data Book and Nationally Scarce invertebrate species.
31. Parts of Epping Forest lie within 6.5km of Islington.

Richmond Park

32. Richmond Park is also a designated SAC, made up of a mix of heath, scrub, maquis and garrigue and phygrana, broad-leaved deciduous woodland, improved grassland and dry grassland and steppes.
33. Richmond Park has a large number of ancient trees with decaying timber. It is at the heart of the south London centre of distribution for stag beetle *Lucanus cervus*, and is a site of national importance for the conservation of the fauna of invertebrates associated with the decaying timber of ancient trees.
34. Parts of Richmond Park lie within 16km of Islington. Whilst this is outside the scope of this screening assessment as set out in paragraph 9 (i.e. within 15km), it has been assessed as it is in close proximity to the edge of the 15km radius.

Wimbledon Common

35. Wimbledon Common is a designated SAC, made up primarily of a mix of dry grassland/steppes and broad-leaved deciduous woodland.
36. Wimbledon Common has a large number of old trees and much fallen decaying timber. It is at the heart of the south London centre of distribution for stag beetle *Lucanus cervus*, and a relatively large number of records were received from this site during a recent nationwide survey for the species (Percy et al. 2000). The site supports a number of other scarce invertebrate species associated with decaying timber.
37. Parts of Wimbledon Common lie within 15km of Islington.

Effects of Islington's draft Gypsy and Traveller Local Plan policies

38. Possible pathways of impact leading to likely significant effects from Islington's Draft Gypsy and Traveller Local Plan on the above European sites are considered in the screening assessment below. Assessment of the Draft Plan is taken as the whole plan and policies contained in it. Impacts are mainly likely to be due to increased levels of development which result in increased visitor pressure, increased air pollution and impacts on water resources. However, the level of development proposed by the Draft Plan is low and intended to accommodate existing residents of Islington, therefore impacts arising from the Plan's policies are likely to be minimal.

Table 1: Screening assessment of Islington's Local Plan

Possible impact of Islington's Local Plan on European sites	Probability, likely duration, frequency and reversibility of the impact	Significant effect on protected habitats/species? Y/N
Impacts of linkages between the sites by water, including water quality issues	Rivers or other water bodies (which are predominantly underground within Islington) primarily run (where they flow) from the borough into the Thames and therefore would not impact on the above European sites. The Regents Canal joins the River Lee just before it flows into the Thames; however, this is some way downstream of the Lee Valley Ramsar/SPA sites and thus is not likely to have an impact on them. Impacts on groundwater in Islington itself are likely to be minimal and thus would also be unlikely to have any effect on the European sites, in particular on important species and habitats within them.	N
Increased visitor access	The Local Plan policies are aimed at meeting the housing needs of Gypsy and Traveller communities already resident in the borough. The Plan will not lead to an increase in the borough's population that could lead to increased visitor numbers at the European sites, placing additional pressure on them and affecting the range of important species and habitats at the sites. In any case, increases in visitor numbers are considered unlikely to be significant given the distance of the sites from Islington. Impacts of visitor access could also be controlled or mitigated against to some extent by management practices at the sites.	N

Possible impact of Islington's Local Plan on European sites	Probability, likely duration, frequency and reversibility of the impact	Significant effect on protected habitats/species? Y/N
	Surveys of users of Epping Forest by City of London Corporation have identified that a large proportion of those accessing the forest live within 2km and visit on a regular daily or weekly basis evidencing it is under most pressure from visits from local residents. Therefore, visitors arising from new development in Islington are considered likely to be both few and to visit infrequently and are not judged to be significant.	
Light or air pollution	Light pollution increases as a result of increased development in Islington would be unlikely to have any impact on the European sites, particularly given the high levels of light pollution which exist across London currently. Possible impacts on the sites due to deteriorating air quality in Islington would be possible as a result of increased traffic, particularly as air quality is an issue affecting Epping Forest SAC; however, any increase in vehicle movements as a result of the proposed site allocations is expected to be minimal and have a negligible overall impact on traffic volumes in the area. Therefore, it is unlikely the protected habitats and species at the sites would be impacted by the Local Plan.	N
Spread of pest species	Policies within the Local Plan would be unlikely to have any impact on the spread of pest species.	N
Increased traffic	The European sites may be impacted as a result of poorer air quality in Islington as a result of increased traffic. Islington's Local Plan policies generally support car-free development and the use of sustainable transport modes. However, the draft Gypsy and Local Plan acknowledges that in order to support Gypsy and Travellers way of life the proposed sites will need to accommodate parking for touring caravans and/or vehicles used to tow caravans and will lead to some vehicle movements. Nevertheless, it is unlikely that any minor increases in traffic as a result of development would be significant enough to impact on the European	N

Possible impact of Islington's Local Plan on European sites	Probability, likely duration, frequency and reversibility of the impact	Significant effect on protected habitats/species? Y/N
	sites, and in particular on the important species or habitats at these sites.	
Flooding	It is unlikely that any flooding incident in Islington would impact on any of the protected habitats and species at the European sites. Increased levels of development may increase the chance of surface water flooding in Islington although Local Plan policy seeks to manage surface water runoff as close to its source as possible and any Gypsy and Traveller sites delivered would be expected to include sustainability measures. Most of Islington is already covered in hard surface therefore this impact is unlikely to be significant; indeed, new development should reduce overall rates of surface water runoff.	N
Increased water use from new development contributing to water stress within the region which may have a negative impact on water availability within the sites, for example water levels of the River Lee	The combination of climate change and increased new development is likely to increase water stress in the southeast of England. However, the impact of the proposed sites in Islington is likely to be minimal within the wider context, particularly given water efficiency policies within the wider Local Plan which require all new homes and other development to be water efficient. Water companies are also planning to minimise the impact any increase in water demand will have on sites of nature importance as well as the wider environment. Local Plan policy aims to ensure adequate water supply, surface water, foul drainage and sewerage treatment capacity exists to serve all new developments. Thames Water has been engaged as part of the Local Plan process.	N

Possible impact of Islington's Local Plan on European sites	Probability, likely duration, frequency and reversibility of the impact	Significant effect on protected habitats/species? Y/N
Increased CO2 emissions from new development may contribute to climate change which may have a negative impact on the sites	Total emissions have reduced significantly in Islington in recent years. It is likely that, in general, climate change will have a negative impact on European sites; however, the impact of CO2 emissions from Islington as a result of the draft Gypsy and Traveller Local Plan is likely to be minimal, given the limited scale of additional development proposed and the fact that the policies in the adopted Local Plan provide a strong basis to prevent/limit impacts on climate change where new development comes forward.	N
Improvement of quantity and quality of accessible open space in the borough	It is considered that policies within the draft Gypsy and Traveller Local Plan will not impact on the quantity of accessible open space in the borough. The proposed site allocations comprise areas of housing estate amenity space or car parking and not areas of accessible open space. Where housing estate amenity space is affected there may be some improvement made to the quality of accessible open space in the vicinity of the site. The small scale of the possible changes is unlikely to lead to any impacts on the European sites.	N

Consideration of other plans and programmes

39. The HRA guidance advises that a plan alone may have an effect that is not significant but when combined with other plans a likely significant effect could be identified. As part of this, competent authorities should check whether there are plans that have been drafted but not yet adopted.

40. The Draft Gypsy and Traveller Local Plan broadly aligns with other plans, in particular the adopted Islington Local Plan and London Plan, and it is considered that the combined effect of the Draft Plan with these other plans is not significant. Other plans considered include the Islington Air Quality Strategy and neighbouring borough Local Plans, it is noted that these have been subject to their own HRA process.

41. The Mayor is in the process of drafting the next London Plan. It is not anticipated that the draft London Plan will lead to the combined effects of the plans becoming significant, but this will be considered and the screening assessment updated as appropriate following the draft London Plan's publication and prior to the submission of the Gypsy and Traveller Local Plan for Examination.

Conclusion

42. The effects of Islington's Draft Gypsy and Traveller Local Plan policies and allocations on the identified European sites have been assessed through the Screening Assessment and are not considered to be significant. The effect 'in combination' with other plans is also not considered to be significant - the Draft Plan broadly aligns with a range of other plans and programmes. Therefore, it is 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'.

43. An Integrated Impact Assessment incorporating a Sustainability Appraisal has been carried out on the Draft Gypsy and Traveller Local Plan, as part of the iterative process to assessment. As part of this process, possible negative environmental impacts of the Draft Plan have been assessed. In order to effectively manage any less than significant impacts attributed to the Draft Gypsy and Traveller Local Plan's policies and allocations, the Sustainability Appraisal of the Local Plan will continue to evaluate the impacts of any further changes to the document.

Appendix 4: Health Impact Assessment

Health impact assessment of the Draft Islington Gypsy and Traveller Local Plan – Sites and Polices (Regulation 18), December 2025

January 2026

Contact:

Islington Public Health

Health Impact Assessment

Draft Islington Gypsy and Traveller Local Plan – Sites and Policies (Regulation 18), December 2025

Introduction

Islington is a small, diverse and densely populated borough, with substantial inequalities. Such inequalities are closely linked with worse health outcomes, both physical and mental, lower life expectancy and worse quality of life.

Inequalities are influenced by the environments in which we grow up, live, work, study and retire, shaping our health and wellbeing throughout our lives¹. Healthy environments are crucial for protecting and promoting health and preventing ill health and cover a range of factors from good air quality and access to safe drinking water, to the access people have to enabling and health-promoting settings and spaces².

The National Planning Policy Framework¹² includes a specific focus on the responsibilities of local planning authorities to ensure health and wellbeing are considered in plans and decision making, including creating places that support social interaction, promote safety and security and enable healthy lives.

Islington's Local Plan (Strategic and Development Management Policies, 2023)³ is underpinned by the vision *"To make Islington fairer and create a place where everyone, whatever their background, has the same opportunity to reach their potential and enjoy a good quality of life"*, with several key objectives including the delivery of decent and genuinely affordable homes for all, and creating a safe and cohesive borough for all. The plan specifically outlines the need for a focused review of provision for Gypsy and Traveller communities in Islington, an ethnic group

protected under the Equalities Act 2010⁴, whom the Council are required to provide culturally suitable accommodation for.

The terms Gypsy and Traveller are used to describe a range of ethnic groups or people with nomadic ways of life who are not from a specific ethnicity. According to the 2011 Census, there are 163 Gypsies and Travellers living in Islington, representing around 0.08% of the resident population, made up of 77 households, over half of which were residing in social housing⁵. The 2021 census reported 108 individuals self-identifying as Gypsy or Irish Traveller⁶. Census figures are likely underestimates, as 6 monthly Traveller caravan counts and school roll figures often give higher estimates than Census figures⁷.

Gypsy and Traveller communities experience significant health inequalities, and some of the worst health outcomes in the UK, including lower life expectancy, higher rates of multi-morbidity, and higher rates of long-term illness, health problem or disability, impacting mobility or limiting daily activities such as work^{7,8,9}. Gypsy and Traveller communities also show

poorer mental health, with increased rates of anxiety and depression than the general population, and higher rates of suicide⁷. They also show lower rates of immunisation, with only 45.2% of children from Gypsy and Traveller communities having had full MMR coverage.

Further, a lack of suitable sites, or sites being contested, often leads Gypsy and Traveller communities to settle in places that are close to pollutants (e.g. sewage, waste disposal)⁹, potentially contributing to increased risk of hepatitis A and gastrointestinal issues¹⁰. Sites are often socially segregated, isolated from wider communities⁹ and contributing to stigma, discrimination and social isolation.

The lack of safe, culturally appropriate accommodation in Islington for Gypsy and Traveller communities represents a significant inequality for the group, reinforcing existing determinants of poor health. The Gypsy and Traveller Local Plan – Sites and Policies, Regulation 18 draft (December 2025), provides an opportunity to address the determinants contributing to these health inequalities, and to avoid causing or exacerbating health issues in local Gypsy and Traveller populations.

An Integrated Impact Assessment (IIA) has already been conducted, including a Sustainability Appraisal and Equalities Impact Assessment. The IIA concluded that the plan will have balanced benefits, despite potential minor negative impacts on objectives such as liveable neighbourhoods, biodiversity and climate change due to reduction in open and estate amenity space. These were matched against a substantial positive effect from meeting the housing needs of Gypsy and Traveller communities, with no identified negative impacts on other groups with protected characteristics.

The Islington Gypsy and Traveller Local Plan – Sites and Policies Regulation 18 draft, December 2025 is referred to throughout the health impact assessment as the “draft GT Plan” for brevity.

Summary of recommendations

1. **Recommendation:** Amend Policy GTSP2 C to include requirement that the amenity building specifically on each site meets a good level of quality according to relevant elements of Policy H4 of the Islington Local Plan.
2. **Recommendation:** Include requirement to communicate with local emergency services in advance of site-development to ensure awareness of any significant changes in access to residential areas or community settings.
3. **Recommendation:** Consider mapping of local General Practices in site areas, to support Gypsy and Traveller access.
4. **Recommendation:** Require site-specific plans to include a waste management and recycling strategy, including additional shared bins to prevent overfill.
5. **Recommendation:** Require any planning and development considering use of existing parking/garage space to consult with local residents, to understand any accessibility requirements for parking, particularly regarding mobility/disability.
6. **Recommendation:** That the policy specify that amenity buildings are *required* to be compliant with ‘Wheelchair Adaptable Category M4 (3)(2)(a)’, as currently only states it is possible.
7. **Recommendation:** Site GT4 should include the sentence ‘alternative space for food bank provision may be explored with the Corporate Landlord, but this is outside of the scope of this plan’.
8. **Recommendation:** Include requirement to ensure sites are capable of digital

connectivity (e.g. Wifi, 5G), as part of essential infrastructure to be implemented at sites.

9. **Recommendation:** Include requirement for utilising renewable energy sources as part of construction and maintenance of amenity buildings where feasible.
10. **Recommendation:** Include requirement for amenity site development to feature appropriate temperature adaptation, including ventilation, shading and landscaping.
11. **Recommendation:** Include requirement for any biodiversity loss to be replaced, to avoid net biodiversity loss
12. **Recommendation:** Where biodiversity/amenities are to be removed, include requirement that available alternatives are accessible via safe walking routes
13. **Recommendation:** Where sites GT1 and GT9 are used, require Sustainable Drainage systems where feasible to reduce flood risk.
14. **Recommendation:** Require individual site planning to include specific monitoring metrics to capture experiences and outcomes.
15. **Recommendation:** Require a site-level health impact assessment as part of planning and pre-development stage.
16. **Recommendation:** Require that any replacement parking facilities meet existing resident accessibility needs.

Health Impact Assessment:

This Health Impact Assessment of the Islington Gypsy and Traveller Local Plan: Sites and Policies - Regulation 18 draft (December 2025)¹¹ assesses the draft plan in consideration of the wider determinants of health, and in consideration of the specific health inequalities known to impact the Gypsy and Traveller community.

The assessment used the framework developed by the Healthy Urban Development Unit (HUDU), specifically their “Rapid Health Impact Assessment Tool”¹³, which applies an evidence-based approach to the integration of health into urban planning, considering relevant regional and national policy. Not all elements of the tool were relevant to the current plan, and items which were not applied have detailed in the full health impact assessment table on pages 12 – 21.

The tool identifies eleven wider determinants most influenced by spatial planning:

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

The tool was used to analyse the policies and plans specified in the draft GT Plan. Additional evidence was used to support the identification of best practice and opportunities for enhancement or mitigation of health impacts.

Summary assessment and recommendations

Housing design and affordability

Housing represents a fundamental component of the plan, focused on the requirement for the council to provide culturally appropriate accommodation for Gypsy and Traveller communities.

The plan allocates 9 sites, with capacity for between 9 and 13 pitches (five sites with capacity for one pitch, and four with capacity for “*up to*” two pitches), addressing a significant, unmet need for culturally appropriate housing for Gypsy and Traveller communities. The plan includes requirements for high-quality design, specifically in relation to the amenity buildings to be developed on each site.

However, many sites have constraints (e.g. noise, flood risks, level changes) and mitigations are not always specified in measurable health terms. The draft plan could

be strengthened by adding clarity in terms of how these constraints must be mitigated, and inclusion of requirements that the amenity buildings on each site meet relevant building requirements such as 'Wheelchair Adaptable Category M4 (3)(2)(a)'.

Recommendation: Amend Policy GTSP2 C to include requirement that the amenity building on each site meets a good level of quality according to relevant elements of Policy H4 of the Islington Local Plan.

Access to health and care services

Access to health and social care services are essential for health and wellbeing, and particularly important to consider for Gypsy and Traveller communities, given their poorer health outcomes and reduced engagement with health services, such as a lower rate of GP registration.

The plan does not make direct mention of health service access, with the exception of mitigations for certain sites to ensure emergency service accessibility.

While some indirect positive impacts are likely as a part of providing improved, stable housing for Gypsy and Traveller communities, these are limited.

The plan could be improved by requiring planning and development for individual sites to engage with relevant local NHS, Council and Voluntary and Community Sector (VCS) providers, to support the development of outreach, care pathways and GP registration.

Recommendation: Include requirement to communicate with emergency services in advance of site-development to ensure awareness of any significant changes in access to residential areas or community settings.

Recommendation: Consider mapping of local General Practices in site areas, to support Gypsy and Traveller access.

Access to open space and nature

The plan includes proposals for development which may impact designated open spaces or Sites of Importance for Nature Conservation. Pleasant Place (Site GT7) is a designated open space, while Stephen's Ink Estate (Site GT1) is adjacent to Gillespie Park Local Nature reserve, a designated open space and Metropolitan Grade Site of Importance for Nature Conservation (SINC), and Ronalds Road is adjacent to Olden Gardens Open Space and Drayton Park/Olden Garden SINC. Pleasant Place (Site GT7) is a designated open space. The plan includes consideration that development should be designed to minimise impact on existing trees. Site GT2 requires some tree removal, and most sites require some form boundary treatment or landscaping. Multiple sites state that "Development should be

designed to minimise impact on existing trees” but doesn’t provide clarity on expected impact or tree removal.

The Integrated Impact Assessment¹² stated that while there will be minor negative impacts on biodiversity (linked to reductions in open and amenity space), this must be balanced against the significant benefit of meeting housing needs of Gypsy and Traveller communities.

The plan could be improved by requiring any development replaces any biodiversity loss where feasible, to ensure no net loss. However, this may not be fully feasible given the limited available space in the borough and the need to meet housing needs of Gypsy and Traveller communities representing the priority.

Air quality, noise and neighbourhood amenity

The plan identifies environmental constraints to several sites, including being placed in critical drainage areas and flood zones, above railway tunnels, or in place of existing car-parking amenity. The plan does include requirements for mitigation, but these are generally quite high-level. Several suggested sites cover existing car-parking or garage provision for local residents, and the plan acknowledges alternative provision may need to be provided, but no further assessment of need or alternatives for parking have been provided at this stage. Stephen’s Ink Estate (Site GT1) and Aubert Court (Site GT2) are currently in use as, and will incur loss of, existing estate amenity space.

The plan acknowledges the collection and management of waste and recycling should be considered, but does not provide specific requirements of how this is to be accomplished.

Environmental hazards are a particular concern for Gypsy and Traveller community health, as historically sites have often been located close to pollutants, or in areas with poor access to clean water or sanitation⁹. As such, it is important to consider appropriate mitigation for these factors, to avoid exacerbating inequalities or contributing to ill-health.

The plan could be improved by requiring an assessment of air quality, noise and other pollution risks, to be mitigated where appropriate. The plan should seek to engage with the local residents of estates to understand need and identify replacement car parking arrangements that meet accessibility requirements. The plan should require that planning on each site includes the development of a specific waste management strategy, in consideration of waste management for existing residents.

Recommendation: Require site-specific plans to include a waste management and recycling strategy, including additional shared bins to prevent overfill.

Accessibility and active travel

The plan policies require safe pedestrian and vehicular access to sites and surrounding estates, including emergency service vehicles. The plan also acknowledges ensuring sites are well located for public transportation accessibility, and provides manoeuvring space for large vehicles such as caravans and emergency service vehicles.

Some sites note overlaps with existing access routes to resident areas (e.g. gardens) but the plans acknowledge these and require access be retained. Several sites include challenging access routes, but the plan recognises these and requires mitigations.

Recommendation: Require any planning and development considering use of existing parking/garage space to consult with local residents, to understand any accessibility requirements for parking, particularly regarding mobility/disability.

Recommendation: Require that any replacement parking facilities and/or garages are of equivalent quality and meet existing resident accessibility needs.

Recommendation: That the plan specify that amenity buildings are *required* to be compliant with 'Wheelchair Adaptable Category M4 (3)(2)(a)', as currently only states it is possible.

Crime reduction and community safety

The plan is not expected to impact crime or community safety, and the plan does not make specific mention to crime reduction. Requirements for suitable boundary treatments are discussed, and requirements for emergency service vehicle access.

Screening/landscaping is discussed at several sites to protect privacy, and plans include requirements to mitigate impacts on surrounding residential properties.

The plan could be improved by including a requirement for detailed safety provision, such as site lighting.

Access to healthy food

The plan does not make reference to healthy food access, or consider surrounding healthy food supply, for example distance to local supermarkets.

Site GT4 development considerations note the operation of a foodbank on some days of the week on the eastern part of the site. This provision is under a short-term agreement however, and alternative food bank provision options may be explored with the Corporate Landlord.

Recommendation: Site GT4 should include the sentence 'alternative space for food bank provision may be explored with the Corporate Landlord, but this is outside of the scope of this plan'.

Access to work and training

Improved housing stability should support more stable employment for Gypsy and Traveller communities, but the plan does not address these determinants explicitly, nor propose any partnerships with relevant services.

Social cohesion and inclusive design

Prejudice and discrimination are a significant issue, with up to 44% of the British public reporting a negative opinion of Gypsy and Traveller communities, contributing to social exclusion and isolation. Several site proposals in the plan are on existing residential/estate amenity space, which could be contested by existing local residents without appropriate consultation and engagement⁹.

The plan recognises the discrimination faced by Gypsy and Traveller communities, and the need for culturally appropriate housing provision. The plan has engaged with Gypsy and Traveller communities, and requires future engagement with them and the local communities at each site prior to submission of planning applications.

However, identification of one site large enough to meet need has not been possible, and all the sites that have been identified are small with most containing space for only 1 pitch, which may risk social isolation without co-ordinated support. While the plan requires consultation of existing local communities in relation to site design, it does not include any expectations or plan for ongoing consultation.

The plan could be improved by requiring site development to engage with relevant local voluntary sector and community groups, to support opportunities for positive social contact and community cohesion, and to build links between separate sites.

The plan could also consider including requirements for community co-design workshops, and a Gypsy and Traveller advisory group.

The plan should require that all amenity buildings on each site be compliant with 'Wheelchair Adaptable Category M4 (3)(2)(a)'.

Recommendation: Include requirement to ensure sites are capable of digital connectivity (e.g. Wifi, 5G), as part of essential infrastructure to be implemented at sites.

Minimising the use of resources

The plan states that allocated sites with greatest pitch capacity will be prioritised over sites with less capacity, and states that any sites delivered will be protected for this use and potential development must not involve a net loss of pitches, requiring the provision of replacement pitches and sites of equivalent quality and size.

Climate change

The plan specifies that the plan must follow the four key design principles of the Islington Local Plan, including ‘Sustainable – Gypsy and Traveller sites must be durable and adaptable; be able to incorporate elements of green infrastructure and sustainable design, including in relation to energy, water and drainage infrastructure’.

The plan does not mention seasonal weather variation, though it does include requirements for landscaping and boundary treatments. The plan requires impact to existing trees be mitigated, but for site GT2, some removal of existing trees is expected. Most sites also state that “Development should be designed to minimise impact on existing trees”, but does not provide clarity on what impact is expected or what design features should be considered.

The plan could be improved by including a requirement to use appropriate temperature adaptations to the amenity building.

The plan could be improved by specifying a requirement for renewable energy sources to be utilised where possible as part of the design process, and for the amenity building.

The plan could be improved by requiring the replacement of any biodiversity loss, to prevent net biodiversity loss. The plan should also require that where any loss of biodiversity/amenity loss occurs, replacements are accessible via safe walking routes.

Recommendation: Include specific requirement for utilising renewable energy sources as part of construction and maintenance of amenity buildings where feasible.

Recommendation: Include requirement for amenity building development to feature appropriate temperature adaptation, including ventilation, shading and landscaping.

Recommendation: Include requirement for any biodiversity loss to be replaced to avoid net biodiversity loss.

Recommendation: Where biodiversity/amenities are to be removed, include requirement that available alternatives are accessible via safe walking routes

Recommendation: Where sites GT1 and GT9 are used, require Sustainable Drainage systems where feasible to reduce flood risk.

Other considerations

- Monitoring

The plan includes only one suggested monitoring indicator, the number of pitches delivered over the plan period. This indicator will not be able to assess the quality of pitches, the experiences of residents living on them or any health outcomes.

The plan could be improved by including one or more additional monitoring outcomes capturing experiences/health outcomes of residents, or requiring plans for individual sites to develop monitoring outcomes.

Recommendation: Require individual site planning to include specific monitoring metrics to capture outcomes and a feedback mechanism to allow for evaluation of sites collectively

Site complexity

The plan focuses on the development of Gypsy and Traveller sites across multiple locations, with varied qualities and constraints, as well as the need to consider possible windfall sites becoming available at a later date. Considering this variation, a single HIA can only provide a limited overview of the health impacts of the general plan. A detailed Health Impact Assessment for each site, at planning stage, could provide more detailed insights into the potential health impacts and mitigations needed at each site.

Recommendation: Require a site-level health impact assessment as part of planning and pre-development stage.

Additional health and wellbeing considerations

In addition to the Health Impact Assessment framework items, there are some other observations that may be worth considering as part of the planning process. These are likely outside of the scope of the current planning stage, but would be useful to consider as part of site-specific plans and developments, as opportunities to address health inequalities of Gypsy and Traveller communities.

- Health, care & social infrastructure access

Gypsy and Traveller communities show significantly lower rates of engagement with health services, including low rates of GP registration and vaccination uptake.

Similarly, educational attainment and access to good employment among Gypsy & Traveller communities is often low.

Fixed sites for Gypsy and Traveller communities in the borough offer an opportunity to build links between Gypsy and Traveller communities and the surrounding health

and social infrastructure system, including local GPs, voluntary and community sector provision, schools and employment services.

Site-development plans could include strategies to engage with local partners in Public Health, Adult Social Care, Children's services, NHS and VCS providers, to support outreach and enable the development of pathways to address inequalities.

- **Ongoing consultation**

The plan includes provisions to consult with Gypsy and Traveller communities, and local communities, for each site prior to development, but provides no specifics of what this should look like.

Gypsy and Traveller sites can sometimes be contested by local residents and groups⁸, and Gypsy and Traveller communities often experience prejudice and discrimination.

A clear strategy for community consultation and co-design could support effective integration of sites and avoid potential issues of conflict or contesting of sites. This could include co-design workshops supported by Islington Engagement teams, collaborative advisory groups or community liaison officers.

- **Small site size**

The majority of sites proposed by the plan have capacity for only one pitch, with the remaining sites having capacity for "up to" two pitches. This risks contributing to social isolation of those living on the sites, limiting the ability of residents to reside with wider family or social groups.

An effective strategy at site-planning stage for building links between sites, such as cultural events, community development support or improving access to community facilities could help to mitigate this. Future planning could consider identifying larger developments with capacity to allocate larger sites for Gypsy and Traveller pitches within them.

Conclusions

The draft Gypsy and Traveller Local Plan responds to a specific health inequality in Islington, the lack of available, culturally appropriate accommodation for Gypsy and Traveller communities. As such, its policies are specifically focused on reducing inequalities in Islington, and will provide a significant benefit to Gypsy and Traveller communities.

This Health Impact Assessment assessed the draft Gypsy and Traveller Local Plan in consideration of the wider determinants of health, and the specific health inequalities impacting Gypsy and Traveller communities.

Overall, the Health Impact Assessment concludes that the policies in the draft plan support health improvement and reduce inequalities for Gypsy and Traveller

communities living in Islington. The draft plan aligns with Islington Council's Local Plan aims, to make Islington fairer, and provide the same opportunities for everyone to enjoy a good quality of life.

The Health Impact Assessment makes a number of recommendations for where the plan could better capitalise on opportunities to address existing health inequalities within Gypsy and Traveller communities, and embed collaboration with relevant organisations to improve outcomes. The assessment also suggests some additional considerations that could be utilised in future planning, that could further improve outcomes for Gypsy and Traveller communities.

Detailed Health Impact Assessment

Housing Does the proposal seek to meet all 16 design criteria of the Lifetime Homes Standard or meet Building Regulation requirement M4 (2)? The plan does not make reference to the Lifetime Homes Standard, or Building Regulation requirement M4 (2). However, the only building that will be developed on each site is the amenity building, which is expected to be single-story, with living space, kitchen/dining and bathroom. The plan states it is possible for the amenity building on each site to be at least compliant with 'Wheelchair Adaptable Category M4 (3)(2)(a)'.
Does the proposal address the housing needs of older people, i.e. extra care housing, sheltered housing, lifetime homes and wheelchair accessible homes? Gypsy and Traveller communities report higher rates of disability than the general population, affecting mobility and day to day tasks. Opportunities to address individual caravans may be limited, but Policy 4.15 states Gypsy and Traveller sites must provide a high standard of inclusive design, providing accommodation that is adaptable, functional and resilient. Further, it states it is considered possible for the amenity buildings on each pitch, which include bathroom, kitchen/dining and living space to be compliant with 'Wheelchair Adaptable Category M4 (3)(2)(a) standards as a minimum. GTSP-iii states sites must be adaptable, functional and resilient, and be able to respond to the needs of the occupiers over the lifetime of the development. GSTP-iv states sites must be durable and adaptable, though this is predominantly focused on sustainability rather than for changes in living. Recommendation: That the plan state that amenity buildings are <i>required</i> to be compliant with 'Wheelchair Adaptable Category M4 (3)(2)(a)' standards as a minimum.
Does the proposal include homes that can be adapted to support independent living for older and disabled people? As above.
Does the proposal promote good design through layout and orientation, meeting internal space standards? 4.17 – States that policy H4 has limited relevance given nature of the sites, but states that the following considerations should be addressed: the quality of the amenity building; the provision of sufficient storage space, the storage, collection and management of waste and recycling; the mitigation of potential noise and vibration impacts.

Recommendation: Include requirement that site design ensures the amenity building on each site meets a good level of quality according to relevant elements of Policy H4 of the Islington Local Plan.

Does the proposal include a range of housing types and sizes, including affordable housing responding to local housing needs?

Not relevant.

Does the proposal contain homes that are highly energy efficient (e.g. a high SAP rating)?

The plan does not specifically reference SAP ratings, but Policy GTSP2 – B iv states that Gypsy and Traveller sites must be durable and adaptable; be able to incorporate elements of green infrastructure and sustainable design, including in relation to energy, water and drainage infrastructure.

Access to health and social care services and other social infrastructure

Does the proposal retain or re-provide existing social infrastructure?

Site proposals provide consideration to level changes, and include provisions to minimise impact on existing trees on sites, and on existing residential properties.

Site GT1: Proposal to develop on existing estate amenity space.

Site GT2: Proposal would involve some tree removal and removal of on-street car parking. Considerations given to any level changes needed.

Site GT3: Proposal includes retention of access through site to the garden at the rear of the estate. Site is a car park, and may require replacement provision

Site GT4: Part of site is in use as a food bank on some days, but this use is temporary and replacement is outside the scope of the plan.

Site GT5: States that alternative car parking provision will be required as part of any development.

GT6: Site accommodates car parking/garages for estate, may need alternative provision.

GT7: States path providing access to rear of flats should be retained. Site sits within conservation area, impact on these to be considered as part of design process.

GT8: Site provides car parking, may need alternate provision. Sits in conservation area, impact of proposals on these settings should be considered.

GT9: States there may be potential to extend site boundary by including some of the adjacent car parking space.

Does the proposal assess the impact on health and social care services and has the local NHS been contacted?

The plan does not make reference to broader impact on local health and care services, e.g. GP capacity or pharmacy provision but given the small number, and dispersed nature, of the potential pitches on the proposed sites, there is unlikely to be a significant impact on demand for health and social care services as a result of these proposals.

Gypsy and Traveller communities show a lower rate of engagement with health and care services, such as lower GP registration. The draft GT plan represents a good opportunity to support the development of improved care pathways and increase engagement with local communities.

Several sites (GT4 and GT5) state requirements to accommodate pedestrian/vehicular access to locations (e.g. estates, community centres), including access and turning space for emergency vehicles.

Recommendation: Include requirement to communicate with emergency services in advance of site-development to ensure awareness of any significant changes in access to residential areas or community settings.

Does the proposal include the provision, or replacement of a healthcare facility and does the facility meet NHS requirements?

Not relevant.

Does the proposal assess the capacity, location and accessibility of other social infrastructure, e.g. schools and community facilities?

The plan does not make reference to broader impact on local health and care services, e.g. GP capacity or pharmacy provision.

The plan does not make reference to other social infrastructure (outside of green infrastructure) such as schools, libraries and other community centres. Part of the Islington Local Plan encourages a focus on community cohesion and social integration, and local community infrastructure could help facilitate this.

In both cases, given the small number, and dispersed nature, of the potential pitches on the proposed sites, there is unlikely to be a significant impact on demand for health and other community services as a result of these proposals.

Recommendation: Consider mapping of local General Practices in site areas, to support Gypsy and Traveller access.

Does the proposal explore opportunities for shared community use and co-location of services?

Shared community use is limited by size of sites, and by need for a level of privacy for site residents as their primary accommodation. However, where sites are large

enough, shared community use of certain sites (e.g. the provision of child play areas) could enhance community cohesion and reduce social isolation.

Access to open space and nature

Does the proposal retain and enhance existing open and natural spaces?

The nature of the plan involves development of pitch sites on existing space, in some cases open/green space. The plan requires mitigation of impact from this where possible.

Sites include consideration that impact on existing trees should be minimised, and two sites include requirements to maintain access to existing community spaces for residents, including an estate garden.

One site states the removal of trees may be required.

In areas of deficiency, does the proposal provide new open or natural space, or improve access to existing spaces?

The plan contains proposals to develop sites on (Site GT7 – Pleasant Place) or adjacent to (Site GT1 – Stephens Ink Estate,) designated open spaces and/or Sites of Importance for Nature Conservation, and is therefore increasing deficiency of open space. The plan contains proposals to maintain access for local residents to existing open spaces, but does not include provision of replacement open space.

Does the proposal provide a range of play spaces for children and young people?

The plan does not make reference to play areas for children and young people, however this is constrained by the limited size of available sites in Islington.

Does the proposal provide links between open and natural spaces and the public realm?

Not relevant.

Are the open and natural spaces welcoming and safe and accessible for all?

The plan does not include the provision of open/natural spaces.

Does the proposal set out how new open space will be managed and maintained?

Not relevant.

Air quality, noise and neighbourhood amenity

Does the proposal minimise construction impacts such as dust, noise, vibration and odours?

Site considerations state that development should mitigate any impact on surrounding residential properties, but this is high level and specifics are not provided. Waste management is considered, but specifics are not provided.

The plan outlines 9 separate sites, with varying qualities and constraints. As a result, individual environmental hazards will vary depending on the site, and specific mitigations for each site will be necessary.

Recommendation: Require site-specific plans to include a waste management and recycling strategy, including additional shared bins to prevent overfill.

Does the proposal minimise air pollution caused by traffic and energy facilities?

The plan does not make reference to air pollution caused by traffic or energy facilities, but does state that sites must be able to incorporate elements of green infrastructure, and sustainable design, including in relation to energy, water and drainage infrastructure.

Does the proposal minimise noise pollution caused by traffic and commercial uses?

Site GT4 is based over a railway tunnel, and includes a development consideration that noise from the tunnel must be adequately mitigated, however specifics are not provided.

Accessibility and active travel

Does the proposal address the ten Healthy Streets indicators?

The plan does not reference the ten Healthy Streets indicators.

Does the proposal prioritise and encourage walking, for example through the use of shared spaces?

Policy GTSP2 – Bii states that sites must have safe and suitable access for pedestrians, and must be accessible to public transport.

Does the proposal prioritise and encourage cycling, for example by providing secure cycle parking, showers and cycle lanes?

The plan does not make reference to cycling infrastructure.

Does the proposal connect public realm and internal routes to local and strategic cycle and walking networks?

The plan does not make reference to cycle or walking networks.

Does the proposal include traffic management and calming measures to help reduce and minimise road injuries?

Not relevant.

Is the proposal well connected to public transport, local services and facilities?

4.14 – States sites are expected to be well-connected, including through safe and suitable access to the road network for pedestrians and vehicles, and through ensuring access to public transport, services and facilities.

Islington itself is very well connected in terms of public transport, with many areas rating 6a or 6b and as such, most of the borough has good public transport connectivity.

Does the proposal seek to reduce car use by reducing car parking provision, supported by controlled parking zones, car clubs and travel plans measures?

The plan states that while Islington has adopted a car-free policy in the Local plan, there needs to be provision for space for vehicles to tow caravans to support the way of life of Gypsy and Traveller communities. As such, the plan states that proposed site capacity includes space for a single vehicle and touring caravan, with additional parking requirements to be considered further during the planning process.

Several sites are placed or partially overlap existing car-parking space or garages, and that alternative provision may need to be identified.

Recommendation: Require any planning and development considering use of existing parking/garage space to consult with local residents, to understand any accessibility requirements for parking, particularly regarding mobility/disability.

Does the proposal allow people with mobility problems or a disability to access buildings and places?

Gypsy and Traveller communities report higher rates of disability than the general population, affecting mobility and day to day tasks. Opportunities to address individual caravans may be limited, but Policy 4.15 states it is considered possible for the amenity buildings on each pitch, which include bathroom, kitchen/dining and living space to be compliant with 'Wheelchair Adaptable Category M4 (3)(2)(a) standards as a minimum.

Several sites are placed or partially overlap existing car-parking space or garages, and that alternative provision may need to be identified.

Recommendation: Require that any replacement parking facilities and/or garages are of equivalent quality and meet existing resident accessibility needs.

Recommendation: That the plan make specific provisions that amenity buildings are *required* to be compliant with 'Wheelchair Adaptable Category M4 (3)(2)(a)'. Currently only states its possible.

Crime reduction and community safety

Does the proposal incorporate elements to help design out crime?

The plan does not specify any proposals for designing out crime.

Does the proposal incorporate design techniques to help people feel secure and avoid creating 'gated communities'?

The plan considers consideration of screening/landscaping around the site boundary to protect the privacy or occupiers, and states plans should mitigate impact on surrounding residential properties.

Has engagement and consultation been carried out with the local community and voluntary sector? 3.12 – 3.14: Consultation with local Gypsy and Traveller residents, statutory consultees and neighbouring boroughs took place prior to initial plans. Consultation with local community and voluntary sector not mentioned. Sites state that consultation with Gypsy and Traveller community and local community should be undertaken prior to the submission of a planning application.
Access to healthy food
Does the proposal facilitate the supply of local food, ie allotments, community farms and farmers' markets? The plan does not facilitate local food, but site GT4 states a foodbank is in operation on some days on the eastern part of the site. However, this provision is under a short-term agreement, and alternative provision is outside of the scope of this plan. Recommendation: Site GT4 should include the sentence 'alternative space for food bank provision may be explored with the Corporate Landlord, but this is outside of the scope of this plan'.
Is there a range of retail uses, including food stores and smaller affordable shops for social enterprises? Not relevant
Does the proposal avoid contributing towards an over-concentration of hot food takeaways in the local area? Not relevant.
Access to work and training
Does the proposal provide access to local employment and training opportunities, including temporary construction and permanent 'end-use' jobs? The plan does not reference employment or training opportunities.
Does the proposal provide childcare facilities? The plan does not make a specific reference to childcare facilities
Does the proposal include managed and affordable workspace for local businesses? Not relevant.
Does the proposal include opportunities for work for local people via local procurement arrangements? The plan does not reference employment opportunities.
Social cohesion and inclusive design

Does the proposal consider health inequalities by addressing local needs through community engagement?

The plan is explicitly aimed at reducing health inequalities among Gypsy and Traveller communities by providing culturally appropriate housing, informed by consultation with local communities. Sites state that consultation with both Gypsy and Traveller, and other local communities, will take place in advance of any specific design/development work on these sites, though does not provide details on how this will take place.

- 4.14 – States site-design should demonstrate how opportunities to create positive social contact and increased community cohesion have been explored.
- 4.16 – States that site design should seek to integrate elements of sustainable design in relation to energy, water and drainage, including green infrastructure that contribute to meeting local plan objectives while also having potential positive social and economic effects for future occupiers, such as improving health outcomes and reducing fuel poverty.

The plan references past consultation, and describes intention to engage in future consultation on each site, but does not provide clear expectations for ongoing engagement.

Gypsy and Traveller communities often experience health inequalities relating to education and employment, alongside healthcare needs. Issues of digital exclusion can create barriers to communities effectively accessing support and resources available.

Recommendation: Include requirement to ensure sites are capable of digital connectivity (e.g. Wifi, 5G), as part of essential infrastructure to be implemented at sites.

Does the proposal connect with existing communities, i.e. layout and movement which avoids physical barriers and severance and land uses and spaces which encourage social interaction?

Several of the sites include development on existing amenity space (e.g. car-parks, on street parking, space used as food bank), and in some cases includes development on existing access routes, for example to an private garden (Site GT3), or rear access to flats (GT7). The plan includes requirements to mitigate impact on existing trees, recommends the provision of alternative car-park space where needed and requires access be maintained to shared spaces or access routes for existing residents.

Five of the proposed sites (GT3, GT5, GT7, GT8, GT9) have space only for one pitch, with the others having space for “up to” two pitches. Small sites could contribute to social isolation of communities, limit community cohesion and restrict peer support networks.

The Draft GT Plan item 4.14 states: “Site design should demonstrate how opportunities to create positive social contact and increased community cohesion have been explored”.

The small nature of the sites may limit the ability of residents to live alongside families and other members of their community, which may contribute to social isolation.

Does the proposal include a mix of uses and a range of community facilities?

Not relevant.

Does the proposal provide opportunities for the voluntary and community sectors?

The plan does not make reference to voluntary and community sector opportunities.

More broadly, the plan does not contain mechanisms or requirements for collaboration with relevant departments as part of planning or development, to improve health outcomes. Gypsy and Traveller communities experience significant health and access inequalities, and the development of new sites provides an opportunity to develop collaboration and improve outcomes.

Does the proposal take into account issues and principles of inclusive and age-friendly design?

Addressed in accessibility section.

Minimising the use of resources

Does the proposal make best use of existing land?

Policy GTSP1 – B states that allocated sites with greatest pitch capacity will be prioritised over sites with less capacity.

GTSP1 – F: States any sites delivered will be protected for this use and potential redevelopment must not involve net loss of pitches, and will be required to provide replacement pitches and sites of equivalent quality and size.

4.4 states that a number of sites have been identified where evidence suggests that two pitches could be delivered, these will be prioritised.

4.11 discusses efficient use of sites. Site allocations set out estimated capacity for number of pitches considered possible, based on initial site appraisals and design options.

Does the proposal encourage recycling, including building materials?

Policy GTSP2 – B(iv) states sites must be durable and adaptable; be able to incorporate elements of green infrastructure and sustainable design, including in relation to energy, water and drainage infrastructure. This is considered in relation to the specific context and constraints of each site, rather than broadly.

Does the proposal incorporate sustainable design and construction techniques?

4.16 states - "site design is expected to consider sustainability requirements holistically...should seek to integrate elements of sustainable design-including in relation to energy, water and drainage - and green infrastructure that contribute to meeting the Local Plan objectives.

Climate change

Does the proposal incorporate renewable energy?

The plan does not make specific reference to renewable energy, but does specify that site design should seek to integrate elements of sustainable design-including in relation to energy, water and drainage – and green infrastructure that contributes to meeting the local plan objectives. The plan further references the Sustainable Design chapter of the Local Plan (Policies S10-S10) and the Green Infrastructure chapter (Policies G1-G5) for specific requirements.

Recommendation: Include specific requirement for utilising renewable energy sources as part of construction and maintenance of amenity buildings where feasible.

Does the proposal ensure that buildings and public spaces are designed to respond to winter and summer temperatures, i.e. ventilation, shading and landscaping?

The plan does not mention seasonal weather, though this would likely only apply to the amenity building to be developed on each site.

Recommendation: Include requirement for amenity site development to feature appropriate temperature adaptation, including ventilation, shading and landscaping.

Does the proposal maintain or enhance biodiversity?

The plan includes provision that impact to existing trees should be mitigated as part of any development processes. The plan also states that one site might require the removal of some trees.

Recommendation: Include requirement for any biodiversity loss to be replaced to avoid net biodiversity loss

Recommendation: Where biodiversity/amenities are to be removed, include requirement that available alternatives are accessible via safe walking routes

Does the proposal incorporate sustainable urban drainage techniques?

Policy GTSP2B iv of the plan states sites must be able to incorporate elements of green infrastructure and sustainable design, including in relation to energy, water and drainage infrastructure.

Sites GT1 and GT9 sit within critical drainage areas.

Recommendation: Where sites GT1 and GT9 are used, require Sustainable Drainage systems where feasible to reduce flood risk.

Other

Monitoring

The plan includes only one suggested monitoring indicator, the number of pitches delivered over the plan period. This indicator will not be able to assess the quality of pitches, the experiences of residents living on them or any health outcomes.

Recommendation: Require individual site planning to include specific monitoring metrics to capture outcomes and a feedback mechanism to allow for evaluation of sites collectively

Site complexity:

Given the variation in the qualities and constraints of each of the individual sites, a single HIA can only provide a limited overview of the general plan. A detailed Health Impact Assessment for each confirmed site, at planning stage, could provide more detailed insights into the potential health impacts and mitigations needed.

Recommendation: Require a site-level health impact assessment as part of planning and pre-development stage.

References:

1. Islington Council, Public Health, 2025. [Annual Public Health Report 2025: The impact of the physical environment on health and wellbeing](#)
2. World Health Organisation, 2022. [Healthy environments to promote health and sustainable societies](#)
3. Islington Council, 2023. [Islington Council Local Plan: Strategic and Development Management Policies](#)
4. Legislation.gov.uk, 2010. [Equality Act 2010](#)
5. ONS, 2011. [2011 Census](#)

6. Office for Health Improvement and Disparities, 2026. [Inclusion Health Dashboard](#).
7. Parry, G. Cleemput, P. V., Peters, J., Walters, S., Thomas, K. & Cooper, C. (2007). [Health status of Gypsies and Travellers in England](#). *Journal of Epidemiology and Community Health*. 61(3), 198-204.
8. Bloch, A. (2025). [Environmental racism, segregation and discrimination: Gypsy and Traveller sites in Great Britain](#). *Critical Social Policy*, 45(1), 94-114.
9. Friends, Families & Travellers, 2022. [Briefing: Health Inequalities experienced by Gypsy, Roma and Traveller communities](#)
10. Healthy Urban Development Unit, 2019. [HUDU Rapid HIA Tool October 2019](#)
11. Islington Council, 2019. [London Borough of Islington - Gypsy and Traveller Accommodation Assessment](#).
12. Ministry of Housing, Communities & Local Government, 2024. [National Planning Policy Framework](#).

Appendix 5: Sequential flood risk consideration of site allocations

The matrix below demonstrates that the level of flood risk for each of the proposed site allocations is deemed to be acceptable following the application of the sequential test. While four of the nine proposed sites are located within a CDA, only one is located in a LFRZ – two of the sites GT1 and GT7 have been removed from the plan. As explained above, the location of a development within a CDA does not necessarily mean it is at higher risk from surface water flooding, but that it is within a catchment area which contributes to a flooding in a LFRZ. Only one site includes an EA RoFSW High Risk Area, one site includes a Medium Risk Area, and one site is a Low Risk Area only. For each of the three sites that shows some degree of flood risk, the risk areas cover less than half of the total site area.

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?
Aubert Court Estate	GT2							N/A	N/A
Aberdeen Lane	GT3							N/A	N/A
Ronalds Road	GT4						Half of site in CDA.	N/A	N/A
Athenaeum Court	GT5						Some EA RoFSW low risk area, on less than half of the site area.	N/A	Yes
Mayville Estate	GT6						Some EA RoFSW Medium and Low risk areas,	Site is majority hardstanding with a small grassed area. As part of landscaping,	Yes

							on less than half of the site area.	greening will be introduced to reduce surface water run off and flood risk and any new surfacing will be permeable. .	
Mora Street Car Park	GT8							N/A	N/A
Upper Hilldrop Estate	GT9							N/A	N/A

Legend

-  SWMP Critical Drainage Area (CDA)
-  SWMP Local Flood Risk Zone (LFRZ)
-  EA RoFSW High Risk Area - 1 in 30 year (3.3% annual probability)
-  EA RoFSW Medium Risk Area- 1 in 100 year (1% annual probability)
-  EA RoFSW Low Risk Area- 1 in 1000 year (0.1% annual probability)