

Local Development Framework – Core Strategy Consultation

I would like to propose the following amendments to the Core Strategy.

Section 2.14 (Page 15)

The distinctive combination of arts, creative industries and the thriving night-time economy in Shoreditch Triangle, has seen the area become a model for inner city development.

As discussed earlier in this document, the Shoreditch suffers from exceptionally high rates of crime. Violent crime and very violent crime are commonplace and crime rates are increasing, against a backdrop of decreasing crime in the Borough and across London. The Police attribute this directly to the night time economy.

Noise levels are well above thresholds set by the WHO and other organizations and residents suffer disturbed sleep. There is evidence that this can lead directly to serious health problems.

It is also unclear whether the night time economy makes a positive contribution to the local economy,

Given the above, it is inappropriate to describe the area as a ‘model for inner city development’.

We would suggest that the wording be changed to:

‘The distinctive combination of arts and creative industries has made a positive contribution to the regeneration of the area. However, the Night Time Economy is causing problems of crime, disorder and noise which must be addressed urgently’

Core Strategy Policy 3 (Page 30)

Policy 3 refers to ‘managing the impact of the evening economy’. This is a vague statement and is open to interpretation. There is no definition of how it would be managed and there are no indicators defined to monitor it.

The situation with regard to crime, noise and so on describe in this document requires that the impact of the night time economy be reduced. As such, we would suggest the following amendment to Policy 3:

- ***Reduce the impact of the evening economy.***

and that the following be added to the ‘Indicators to monitor delivery of policy 3’:

- ***a reduction in crime and anti social behavior caused by the evening economy***

- *continued monitoring of ambient noise with a view to reducing levels below WHO guidelines*

Core Strategy Policy 13 (p.64)

Shoreditch is highlighted in the introduction to this chapter as lacking retail uses (p. 61), but policy 13 doesn't specifically identify it as an area for retail development. Local residents and business would welcome more daytime retail uses in the area as it will create a better balance of uses.

Suggested addition to Policy 13:

Daytime retail uses that are not alcohol based should be encouraged in Shoreditch where:

- *they provide a service to the local community*
- *they encourage daytime visitors to the area*
-

Core Strategy Policy 15 (p. 68)

'The managed expansion of Hackney's diverse evening and night time economy will be encouraged in ... South Shoreditch (outside the Special Policy Area), taking into account local residential amenity, community safety and transport in these areas.'

As discussed earlier in this document, the Shoreditch suffers from exceptionally high rates of crime. Violent crime and very violent crime are commonplace and crime rates are increasing, against a backdrop of decreasing crime in the Borough and across London. The Police attribute this directly to the night time economy.

Noise levels are well above thresholds set by the WHO and other organizations and residents suffer disturbed sleep. There is evidence that this can lead directly to serious health problems.

It is also unclear whether the night time economy makes a positive contribution to the local economy,

Given this context and the failure of the SPA to contain the impact of the Night time economy it is inappropriate to for the Core Strategy to encourage an expansion of the night time economy in Shoreditch. In fact, all of the hard evidence points to the contrary.

The Core Strategy document (6.26, page 68) bases its recommendation for expansion on the 2005 Night Time Economy Study; however we believe that the 2005 study is being misinterpreted.

The 2005 study (3.4 – Promoting Night Time Uses, page 94) specifically identifies Stoke Newington High Street, Hackney Central and Dalston as ***'areas with night time economies that would benefit from location of***

more A3 and D2 uses'. There is no mention at all of Shoreditch in this section, and in fact it talks about reducing the pressure for growth in Shoreditch – **'One way of reducing the pressure for further growth in Shoreditch could be to actively promote growth in other areas of Hackney'** (2005 Study - Identifying Opportunities - page 88) as well as how growth elsewhere should be managed **'However, it is extremely important that future growth of the night time economy elsewhere in the borough outside Shoreditch is carefully managed from the outset'** (2005 Study – page 88).

This is a clear indication that the proposal is to encourage the development of the night time economy in other areas of Hackney and **not** in Shoreditch. This finding is entirely in line with the findings in the rest of the study, for example **'The research and survey results for Shoreditch indicate that there has been a growth in the evening economy in the area and that the impacts of the evening economy are having a negative impact on the overall resident and visitor experience, for example rising crime, environmental degradation and noise pollution.** (2005 Study , page 87).

On page 89 of the 2005 Study however growth in Shoreditch is mentioned: **'The vision for Shoreditch is to preserve and enhance its special character and reputation, manage future growth of the night time economy and develop a mixed use character with more retail and local services for residents and employees, particularly concentrated on Shoreditch High Street'**. This is an acknowledgement that under the Licensing act 2003 it is not possible to implement an outright ban on expansion of the night time economy and therefore that any expansion needs to be managed. It is certainly not a recommendation that Shoreditch is targeted for expansion in the same way as Stoke Newington High Street, Hackney Central and Dalston.

In 2007 a follow up to the 2005 study was commissioned by Hackney Council (Shoreditch Night Time Economy Study – Evidence Base Review). The study recommends designating the area outside of the SPA as an 'Entertainment Management Zone as defined in the Mayor's Ambient Noise Strategy,' (2007 Study, page 78). This is clearly designed to control the impact of the Night Time economy in the area surrounding the SPA **'in order to mitigate growth which could culminate in cumulative impact'** (2007 Study page 78).

Given the problems of crime, violence and noise in Shoreditch, and the conclusions of both the 2005 and 2007 Night time economy studies it is clear that the negative effects of the Night Time economy must be reduced. The Special Policy Area introduced in Hackney's 2005 Statement of Licensing Policy has been shown to have failed to contain the problems and so a different approach must be taken in the Core Strategy.

We would suggest the following:

Paragraph 6.27 (page 68) be amended such that Shoreditch is not included.

Core Policy 15 be amended to:

‘The managed expansion of Hackney’s diverse evening and night-time economy will be encouraged in Hackney Central (district centre), Stoke Newington High Street (district centre), Broadway Market and Dalston major town centre taking account of its impact on local residential amenity, community safety and transport in these areas.

The night time economy in Shoreditch is at saturation point and any new premises would result in cumulative harm (1). In addition there is a lack of leisure and recreation facilities in the area that are not associated with the night time economy (2). New developments which promote day time uses, are not primarily alcohol based or which improve residential amenity should be encouraged.

New bar, club or restaurant uses, or intensification of existing uses will only be granted where: a) they will result in a net reduction of the cumulative impact of the night time economy or b) where any impact is significantly outweighed by benefits to local of borough residents and businesses.

Sources

- 1. South Shoreditch SSP Page 53**
- 2. South Shoreditch SSP Page 73**

Conclusion

Shoreditch is at a critical point in its regeneration. If Night Time uses continue to dominate then daytime uses, local businesses and residents will leave the area and it will become simply a destination for Alcohol Tourists.

It is vital that the area develops a more balanced mix of uses so that the daytime economy can be developed. This in turn will improve the quality of the night time economy as Shoreditch will be more than just a destination to visit in order to get drunk.

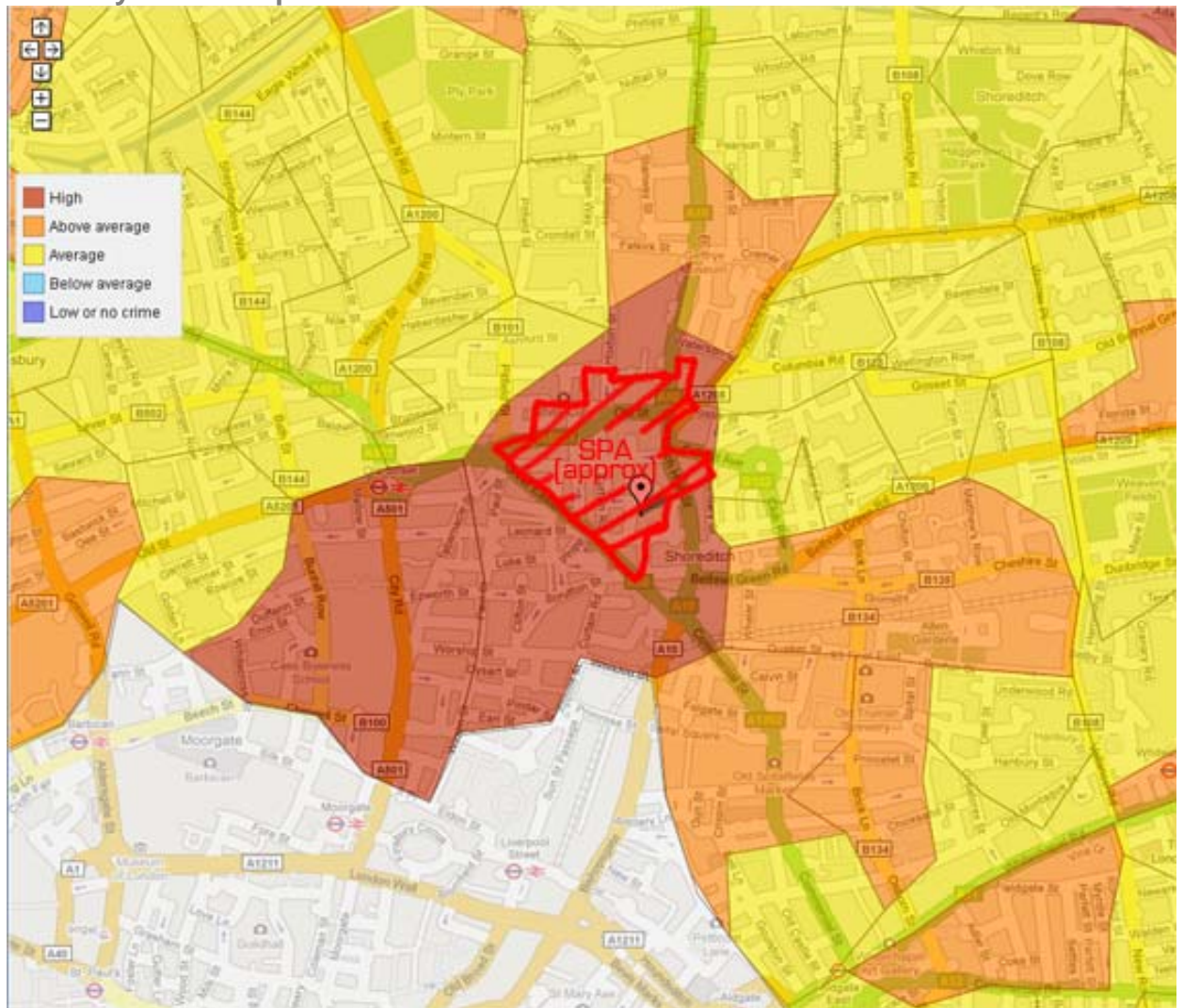
Policies designed to control the Night time economy to date have failed. The Core Strategy is an opportunity to implement effective policy to help Shoreditch develop in a way that will be beneficial to local residents and businesses and the borough and we believe that the recommendations made in this document will be an effective way to do so.

Anissa Helou

August 2009

APPENDIX A – Crime Statistics

Hackney Crime Map



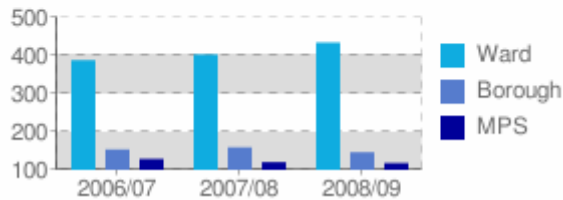
Crime Detail

Sub Ward (E01001771)

Total notifiable offences trends.

[Monthly trends](#) **Annual trends**



Crime rates per 1000 population



Sub Ward (E01001771)

Your Ward: **Haggerston**

Your Borough: **Hackney**

■ Crime rate is **High**  

Total notifiable offences

Month	Crimes	Rate
March 2009	293	201.65
February 2009	245	168.62



Sub Ward (E01001771)

Total notifiable offences in March 2009

Your Area	Crimes	Crime rate
■ Sub Ward	293	201.65
■ Haggerston	425	41.00
■ Hackney	2629	12.96

Crime Mapping text view: Total notifiable offences, March 2009

You are in > [London](#) > [Hackney](#) > Haggerston

Sub-wards in Haggerston

Sub-ward ▲	Crime count	Crime rate
E01001771	293	201.65
E01001772	10	6.51
E01001773	26	17.25
E01001774	19	13.40
E01001775	17	11.70
E01001776	19	13.56
E01001777	41	25.64

Nearby wards

Ward ▲	Crime count	Crime rate
Bethnal Green North	175	14.87
Bethnal Green South	179	13.09
Bunhill	241	23.97
Canonbury	101	10.20
De Beauvoir	114	11.48
Haggerston	425	41.00
Hoxton	118	11.03
Queensbridge	151	14.83
Spitalfields and Banglatown	438	52.25
Weavers	174	14.89
Whitechapel	171	14.20

Crimes in Haggerston

Crime type	Crime count	Crime rate
Total notifiable offences	425	41.00
Residential burglary	10	0.96
Burglary other	17	1.64
Theft of motor vehicle	6	0.58
Theft from motor vehicle	13	1.25
Robbery business	1	0.10
Robbery personal	5	0.48
Violence against the person	61	5.88
Most serious violence	3	0.29
Anti-social behaviour	135	13.02

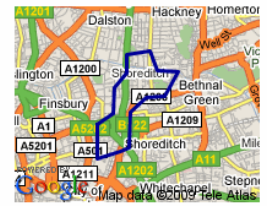
Last three months trend

Area	January	February	March
Haggerston	368	353	425
Hackney	2329	2155	2629
MPS	68240	62999	73647

Annual crime count

Area	2006/07	2007/08	2008/09
Haggerston	4023	4180	4503
Hackney	31160	32275	29701
MPS	921779	862866	844245

Area map



Related links

- [Hackney homepage »](#)
- [Haggerston Safer Neighbourhoods team »](#)
- [Crime prevention »](#)
- [Safer Neighbourhoods »](#)
- [Crime Mapping feedback »](#)

Crime Mapping text view: Total notifiable offences, March 2009

You are in > [London](#) > [Hackney](#) > [Haggerston](#) > Sub-ward E01001771

Sub-wards in Haggerston

Sub-ward ▲	Crime count	Crime rate
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E01001773	26	17.25
E01001774	19	13.40
E01001775	17	11.70
E01001776	19	13.56
E01001777	41	25.64

Nearby sub-wards

Sub-ward ▲	Crime count	Crime rate
E01001771	293	201.65
E01001777	41	25.64
E01001778	26	16.96
E01001780	29	19.63
E01001781	9	5.92
E01001784	10	6.54
E01002704	87	57.73
E01004307	66	41.88
E01004311	18	11.88
E01004315	25	15.84
E01004316	11	7.54
E01004317	72	47.06

Crimes in E01001771

Crime type	Crime count	Crime rate
Total notifiable offences	293	201.65
Residential burglary	2	1.38
Burglary other	12	8.26
Theft of motor vehicle	1	0.69
Theft from motor vehicle	6	4.13
Robbery business	0	0.00
Robbery personal	3	2.06
Violence against the person	31	21.34

Last three months trend

Area	January	February	March
E01001771	256	245	293
Haggerston	368	353	425
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