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**From:** Helen Chen  
**Sent:** 10 December 2009 10:38  
**To:** Michael Toyer  
**Subject:** FW: Hackney Green Party comments on LDF Core Strategy August 2009

-----Original Message-----

**From:** Mischa Borris [mailto:mischa.borris@hackney.greenparty.org.uk]  
**Sent:** 06 August 2009 22:14  
**To:** LDF  
**Subject:** Hackney Green Party comments on LDF Core Strategy August 2009

## Hackney Green Party comments on LDF Core Strategy August 2009

**Submitted by Mischa Borris, 38 Windus Road N16 6UP on behalf of Hackney Green Party**

### Introduction

We welcome many of the changes made to the current document, the structure is far less muddled than previously. We are also pleased that the document now includes some of our earlier suggestions.

However, we believe that, given the time period covered, the Core Strategy should be more ambitious, to meet the challenges of the projected increase in Hackney residents (all needing homes, community infrastructure, jobs and open spaces) and of climate change.

Areas where it is still weak are job creation and the environment. The development plan makes adequate provision for retail, but fails to provide any vision for other forms of employment. Given Hackney's serious problem with unemployment, this is a serious oversight. Equally plans to combat climate change and safeguard the environment are vague and undeveloped, clinging weakly to national targets rather than developing a coherent local strategy.

Central government is currently concerned with giving local authorities increased responsibility for the 'well-being' of their areas (even if not giving increased financial aid or the reforms in planning law that would make a real difference). **We believe that, where we have made comments that depart from national policy, it is in order to strengthen Hackney Council's ability to ensure that all development really is in the best interests of Hackney. That should be the overarching principle for all development.**

We consider that Hackney should use its Core Strategy to become a beacon authority for sustainable urban development. All new developments should reflect this. Wherever possible the Core Strategy should combine principles of environmental conservation and improvement with provision of jobs and alleviation of poverty. Hackney should build on its tradition of light industry and aim to develop a new green economy, encouraging new green business to locate and start up in the borough (for example around Mare Street, Dalston Junction and Hackney Wick) to provide sustainable, long-term employment.

There are many sound policies in the Core Strategy. However, the 'devil will be in the detail'. It is, as it says, a framework – much of the detail of how the policies will be applied will be in the Supplementary Planning Documents and other guidance. It will be vital that the principles and policies of the LDF are not let down by weak SPDs or poor application.

## **Energy production and conservation**

Although energy is covered in the chapter on Climate Change and Sustainability we think this is crucial to the future sustainability of Hackney and given relative poverty in Hackney, a supply of local affordable energy is imperative. We believe the subject requires its own chapter, or the promise of a coherent Energy Strategy for Hackney. Without such a strategy talk of reducing CO2 emissions is meaningless.

The Council should implement a free insulation programme, thus generating local jobs and ensure that more money circulates in the local economy.

There are local economic and community benefits to be derived from greener local energy production and from insulation. Community, school and estate microgeneration should be able to benefit economically from the forthcoming Feed-in Tarriff to earn money from excess energy produced or potentially lead to zero fuel costs.

The document should:

- Emphasise the need for energy conservation and production at the point of use.
- Support an energy plan for decentralised energy production. Identify sites for construction of new CHP plants around the borough, preferably built into the fabric of the proposed developments at town centre hubs (Dalston, Hackney Central, etc). All new-builds should both produce energy and include the possibility of connection to a local grid.
- In renovating existing developments, provision of renewables should be a priority, recognising that it not only benefits the environment, but also brings the poorest and most vulnerable out of fuel poverty. The document should emphasize solar thermal as the cheapest and most viable source of renewable energy in an urban setting.
- New developments should include facilities to create at least 20% of their own energy, and must be built to meet the Building Regs, level L (eco levels), (which include insulation and microgenerated energy production).
- Where it is impractical for a renovated or new development to meet the on-site renewable targets, the developer should contribute to off-site CHP plants or other community energy generation schemes through s106 requirement.

The Council needs to include in its strategy provision for low-energy businesses, helping existing businesses to convert and providing free insulation and advice on lowering energy use.

We recommend that low-carbon zones be established in Hackney, including a block-by-block approach to housing retrofit programmes.

We recommend that the Council establish an energy service company (ESCO) in Hackney. We quote the New Economic Foundation report: “ESCOs can help break down barriers to energy efficiency and micro-generation, by providing information, finance, installation, operation and maintenance within a defined area under a long-term contract. They offer an accessible approach to helping reduce CO2 emissions in communities. ESCOs are a proven mechanism for implementing community energy systems which increase security of the energy supply by buffering users against energy price variations. Revenues from schemes could be used to further develop the decentralised energy system, and can also be reinvested within the community to, for example, improve the thermal characteristics of the housing stock.”

## **Planning and Development**

- All local planning decisions must have minimum negative impact on the local environment

and preferably provide a net overall improvement on completion. There should be an aim that new development should not generate significant additional car travel and all developments should require green travel plans.

- All future development and regeneration should always seek to put the best interests of Hackney foremost.
- Hackney should be confident of its own identity and dictate what developers can build rather than the contrary. The Council should actively seek out innovative developers able to create genuinely sustainable developments.
- All development should wherever possible actively seek to mitigate the effects of climate change.
- Current legislation requires 10% of energy used to be generated on site (the development at Dalston Square has adopted this minimum). Future new development in Hackney should aim for 30%, with a minimum of 20% in all new-build. This is easily attainable given current technology.
- Hackney should abandon what is inappropriate development. Tower blocks such as those at Dalston Square and London Fields have little public support and should be scrapped.
- All new development should have a minimum requirement for tree planting on sites over a certain size, or alternative greening of the sites such as green walls or roofs.
- Priority should be upgrading existing buildings rather than new-build.
- Council should insist on sustainable construction materials in all new-build in Hackney. Developers should be audited to ensure compliance.
- We welcome the inclusion of our suggestion on “lifetime homes”, which are flexible and adaptable to the changing needs and physical abilities of their residents through their lives, thus lessening the need to move and aiding stable communities. CSP19, p,87 should include reference to this.
- As well as new build, the Council should encourage currently unused residential accommodation to be brought back into use, for example former flats above shops.
- The document currently requires residential development to be built to Level 4 of the Code of Sustainable Homes. We understand that this is now standard for construction anyway. That should be a minimum requirement and developers will be expected to build to 5 or 6, unless they can demonstrate why this is impractical.
- Sustainable construction methods should include Passivhaus principles and wherever practical reuse of materials.
- Development alongside the River Lea and Cut should be of direct benefit to the users of the river and adjacent green spaces.
- Hackney Wick is close to the Marshes, the River and the new green space to be created as part of the Olympics Legacy. CSP5 p.33 should acknowledge and protect these nearby green spaces.
- CSP6 p.35 should include an aim that new development should not generate significant additional car travel and all developments should require green travel plans.
- Residential developments should be car-free with no parking on site (save if special circumstances apply, for example for disabled residents or car club bays).
- We reiterate our point that in any proposed new development, how the occupants will travel must be a core consideration.

### **Housing, neighbourhoods and community**

- We recommend that Hackney Council urgently draw up a plan for building new council housing to tackle the current housing crisis.
- Neighbourhoods should also provide neighbourhood community facilities, particularly community centres (which could double up with other uses), since there is a lack of these, apart from community halls on estates. Paragraphs 5.3 and 5.6 mention provision of community services, but there is little detail and we feel this section should be expanded. The Council should draw up a plan for youth centres and community centres in every local

neighbourhood, thus providing free meeting venues for local organisations.

- The stated policy is to encourage “high-density mixed use development”. There should be a stated principle that it is of high quality and sustainable. Past experience suggests that high - density development can lead to a poor quality of life for residents, and deficient building standards.
- Much new housing termed “affordable” is in fact anything but for many people in Hackney, because of the minimum income requirements. There should also be a stated principle that Hackney should encourage and promote housing co-ops a way of increasing the mix of housing tenure and creating more truly affordable housing.
- Hackney Estate Renewal Programme should include upgrading environmental performance of existing buildings: insulation, new boilers, energy efficient appliances, CHP where possible, solar thermal in at least 20% of all estates by 2012. Energy monitors should be installed in new/refurbished dwellings and, dependant upon funding, the Council should give away energy monitors to other residents.
- The document should provide for encouragement (or coercion) to private owners to bring back unused residential accommodation into use can also help to meet the demand for housing.
- Energy centres at appropriate locations such as Dalston, Hackney Central and Woodberry Down should not encourage biomass installations which use crops grown as fuel (rather than genuine waste), since this cannot be considered to be genuinely renewable energy.
- One way of ensuring that people have community facilities and improved health is by linking them with locally sourced food produce. This would strengthen communities along the whole line, from suppliers to end users, creating more of a cooperative communal spirit. The same could be investigated for school meals - locally sourced, healthy produce.
- Although there is a programme of school building going on in Hackney, there are no specific references to school buildings. As with any other large, energy consuming building, these should be built to the best sustainable standards, both in terms of construction and on-site energy production and conservation.
- Chapter 7 p.16 includes reference to Stokefest. Since this popular community event is not being staged this year, this reference should be deleted.
- Hackney's inner London location, its culture, young demographic and creative communities call for a more pronounced positive attitude to street art, recognising its social, artistic value, which in many ways puts Hackney on the cultural map. This is good for Hackney economically and strengthens Hackney as a cultural destination.

## Local Economy

- As noted in para 6.2, jobs in manufacturing and related industries in Hackney have fallen from 11,000 in 1991 to 6,000 in 2001. It seems reasonable to assume that this figure has fallen further still in the last 8 years. While the Council is of course quite right to ensure that Hackney benefits from expanding sectors like retail and entertainment, it should also commit to reviving light industry including manufacturing and green industries in Hackney. This will help to ensure there is a range of occupations and trades available to the local workforce, without having a concentration on the service industries, which are not suitable for every worker.
- The document should address the need to diversify the local economy so that local jobs are less dependent on particular industries or sectors.
- The Council should initiate – as a matter of urgency – research to investigate how to optimise local employment. Currently there is a political tendency to favour high cost infrastructure projects – which are extremely limited in terms of employment provision. Instead particular consideration should be given jobs that would suit a wide number of people – and would also fit in with family and care responsibilities.
- In the long term, international energy costs will continue to rise. For economic, political and geological reasons it is prudent to assume that energy costs are unlikely to recede significantly. Reliance on imported energy will harm the UK economy. A healthy economic future for

Hackney will require investment in diverse local low-carbon industries and economic activity, with more Hackney people being able to work locally. With a long manufacturing tradition and a strong further education base in manufacturing and creative industry, Hackney is well placed to answer that call.

- Once again we call on the Council to amend the LDF to encourage growth in local manufacturing, rather than accepting the continuing decline in the sector as given.
- The Council should recognise that locally-owned businesses recirculate far more of their turnover within the local community than do multiples, especially multinationals. In order to tackle the issue of money being unnecessarily drained from the Hackney economy, the Council should seek to prioritise locally-owned business, particularly in the area of retail.
- CSP15 p68 mentions “managed expansion of Hackney's diverse evening and night time economy will be encouraged” taking account of impact on residents. This needs to be thought through in advance, to avoid the problems existing in the SPA, where a large number of licensed premises, and people coming in to Hackney to visit them, do cause problems for residents. It is especially important that the expansion be properly managed in Dalston, since once the tube arrives it is reasonable to expect this will become more popular as a night-time destination.
- Given the enormous contribution street markets make to their immediate locality's economic and social environment, we welcome the Council's decision to the “encouragement of new markets or an increase in pitches”. We would like to see further plans on this in the document.
- The final paragraph of CSP13 refers to “protecting shops providing for essential day to day needs. Although there is now no shortage of places where one can buy alcohol to take away, and lots of bars in Hoxton, Shoreditch and increasingly Dalston, over the past decade there has been a loss of more local pubs. The CSP should recognise the role that pubs also can be community resources, and also have a part to play in the local economy.

## Crime

- The document states the need for high-quality design to prevent crime. Part of this is ensuring where appropriate there is mixed use in developments, including attention paid to having ‘eyes on the street’, so that areas are overlooked and there are no blind spots.
- Where there are crime hotspots, a study should be commissioned as to how the planning process could feed into improving these hotspots. This is particularly important when considering future plans for Dalston and Hackney Central.
- One of the contributors to crime is a feeling of social exclusion. Measures to mitigate against this must be considered in development proposals, to ensure that the community feels included and sees some gains from local development. This could be in the form of s106 monies going to community services to improve social inclusion with a view to discouraging crime or anti-social behaviour, and not only to lighting and other safety features.

## Climate change and the environment

- We are concerned that given the Climate Change Strategy and Action Plan have not yet been delivered by Hackney Council, and given the importance of this strategy to the impact of local government the LDF should remain amendable pending the delivery of this strategy.
- The Council congratulates itself on having the lowest CO2 emissions of any London borough, this is clearly a result of low car ownership and relative poverty in the borough rather than the initiatives of the Council. We recommend that to produce an honest assessment, CO2 emissions from the large amount of building development planned for Hackney should also be included as an addendum to any future assessment.
- We reject the document's assertion that if requirements for CO2 reduction technology were higher “developers could be dissuaded from investing in Hackney”. Developers currently see

the borough as a soft touch and as a result existing developments have delivered little for local people in the way of social provision or higher environmental building standards.

- Paragraph 9.9 states that with regard to CO2 emissions retrofitting “ it may be appropriate” to seek higher standards of performance. This should be changed to “it will be appropriate”.
- Paragraph 9.10 states that “decentralised energy networks could also assist with work on tackling issues such as fuel poverty”. This should change to “must be harnessed to assist”.
- Paragraph 9.11 “New technology companies could be located in growth areas or locally significant industrial sites”. This should change to “must be located”: the Council should make this a priority of effective policy.
- Paragraph 9.18 states that the BREEAM assessment method is the most up to date and comprehensive system for assessing performance. The Passivhaus method is both more comprehensive and more recent.
- Paragraph 9.20 talks of energy generated from renewable sources but makes no case for how this will come about.
- As 9.43 makes clear the lamentable current figure of 26% for recycling in the borough is well below the government target of 41% by 2010. The document makes no provision for how this target might be attained. We have already suggested the following:
  - Upgrade recycling to include cartons (tetra pak, etc.) and plastic containers, and provide more street-level recycling provision for cartons and plastic containers. This measure is long overdue in Hackney.
  - Ensure adequate space for recycling bins and storage of recyclables pending collection in homes and offices
  - Require on-site composting or equivalent/better in greenhouse gas (GHG) terms for organic waste where feasible.
  - Large new developments should incorporate communal separated waste facilities with no individual wheelie bins. This makes wheelie bins and the necessity to remember to put them out unnecessary and separation of waste is carried out by the householder or business reducing the need for waste handling at the Materials Recycling Facility, and the reduced benefits from co-mingled collections for example as a result of mixing different colour glass.
  - Promote local neighbourhood community reuse, recycling and composting facilities, where viable, as the preferred method of dealing with household waste – in line with the policies in the London Plan. Require onsite composting or equivalent/better in GHG terms for organic waste
  - Provide information about benefits of reuse rather than recycling or disposal, through informatives.

### **Climate Change Strategy**

We note that the Council is still to produce this strategy document. So far reaching are its implications that we believe the LDF should be open to changes in light of conclusions from the Climate Change Strategy.

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