

By Email & Post

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Dear Sir / Madam,

**LBH LDF Core Strategy - Proposed Submission Document  
Representations made by CMA Planning**

We are writing in regard to the above document and would like set out our views on the issues raised. We are writing on behalf of our clients in general, taking on board our experience of working within the Borough. As you may know, CMA Planning is one of the leading town planning consultancies active within Hackney and work for a wide range of clients including land owners, private developers, house builders, housing associations, commercial operators and public bodies.

We have to date been active in commenting on the new policy documents published by the Council and in general we support the work the Council is undertaking and feel that in due course the Core Strategy will become a useful and respected document. However, there are a number of areas of concern, which we have set out below.

On the Key Diagram (map 4.1) we feel that more of the area at Hackney Wick should be shown as a growth area, especially the area to the west of the River Lea, around the station. We also feel that railway stations should be shown, as well as tube stations.

There is an error, where the new Hoxton tube station has been labelled as Homerton.

We support the principle of Policy 2, but do feel this should relate to railways fully, not just the new tube line. The London Overground Line is being upgraded and as such areas around stations on this route would be suitable locations to direct growth.

We support the principle of a separate Policy, Policy 5, for Hackney Wick. It is a key regeneration opportunity for the Borough, and specific guidance would assist in formulating proposals for the area. Whilst we support the need for development in Hackney Wick, we question why it should be employment led.

Employment floorspace is important, but if the area is to become a mixed use hub, a wider range of uses is required than would be possible if it was employment led. In addition, in order for a neighbourhood to work and function, people have to live and work there. What is missing at present, especially in the area around the station, are any residential units.



For the area to function properly, day and night, moving away from the existing mono culture nature of the place, the policy should actively encourage residential, retail and leisure uses. Employment should be provided, but this could be on the basis of the no net loss approach.

In Policy 17, we support the range of preferred uses in PEAs, including Hotels, given the positive contribution they can make. However, we are unclear why B1 use is not included as a preferred use for industrial locations. A B1c light industrial use would seem to be appropriate for these areas.

Whilst the approach of Policy 18 is supported, we feel that the second paragraph should be reworded slightly, just to change the emphasis. We suggest that the words "*.....surrounding area and meet the identified.....*" be changed by adding the word "*or*" to them, as follows, "*.....surrounding area and / or meet the identified.....*" (the underlining is just for emphasis). Otherwise the Policy would only allow redevelopment if all of the points were met. Whilst proposals would often meet a number of them, it would be difficult for all to be achieved.

We feel that Map 6.1 should be amended, as per our comments below on the Proposals Map.

At Policy 22, it is unclear why PTAL 5 was selected, given the London Plan density matrix has the higher density band as being in areas with a PTAL of 4 to 6. We feel that this Policy should reflect the London Plan and should refer to PTAL 4.

## Glossary

We object to the definition of Employment Generating Uses. This should be expanded to include A1 (without any caveats), A2 and D2. People work in supermarkets, shops, banks, estate agents, gyms, etc. These uses therefore generate employment and should be included.

For Family Units, we feel the word "garden" should be changed to "amenity". Often family units are provided above ground, and would have access to a balcony, rather than a garden. This would be a useful clarification.

## Proposals Map

We note that the Lesney Toy Factory on Homerton Road is shown as a Locally Strategic Industrial Site (ref 131 - Kingsmead Way LSIS). As you will be aware, major mixed use proposed were approved by the Planning Committee for this site last month (LBH Ref: 2009/1042). As such, this designation seems a contradiction considering the Council's obvious support for a mixed use development we would suggest it is removed.

We would raise a similar issue with the designation of Priority Employment Area (PEA) 116 Kingsland PEA. The site is located in an area that has changed significantly in recent years and of particular note, are planning permissions granted in the locality for residential led mixed use proposals. These include numerous proposals around the Kingsland Basin, and more on the north side of Orsman Road, many of which have been completed and are occupied with people living in them.

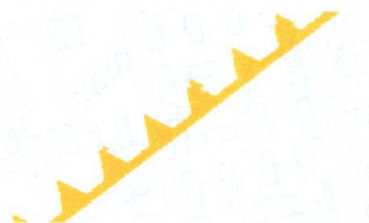


Again, this designation seems a contradiction to these approvals and we would suggest it is removed.

The same is also true of the Dalston PEA (ref 118) located between Dalston Lane and the railway. Here there have been several permissions granted in recent years for residential led mixed use proposals at 15 Ramsgate Street, Senate House, Tyssen Street and 26-28 Ramsgate Street for example, some of which are now under construction. As above, this designation seems a contradiction to these approvals and we would suggest it is removed.

We note that Hackney Wick is shown as an Other Industrial Area, reference 137. Given the current approach to this area to create a new community, as set out at Policy 5, and taking into consideration the on-going work on the Hackney Wick masterplan, this designation seems at odds. We would a different approach should be taken, perhaps a general mixed use designation or similar.

In addition, the markings for the Areas of Archaeological Priority are unclear, especially where the zones are at the edge of the Borough. For example, it is confusing when looking at Lower Clapton, which side of the dotted line falls within the Area. Perhaps the markings could be improved, to say something like this example.



We hope you find these comments helpful and that they aid the development of the Core Strategy. We look forward to seeing the next Core Strategy document the Council produce in due course. If you have any queries or need any clarification on the points we have raised, do please contact us.

Yours faithfully

Tim Gaskell  
CMA Planning