

# GREATER LONDON AUTHORITY

## Mayor's Office

City Hall  
The Queen's Walk  
More London  
London SE1 2AA  
Switchboard: 020 7983 4000  
Minicom: 020 7983 4458  
Web: [www.london.gov.uk](http://www.london.gov.uk)  
**Our ref:** LDF12LDD05/03/03  
**Date:** 5 August 2009

**Robert Dolata**  
Team Leader Policy  
Hackney Planning Service  
263 Mare Street  
London E8 3HT

Dear Mr Dolata,

**Planning and Compulsory Purchase Act 2004 (as amended); Town and Country Planning (Local Development) (England) Regulations 2004 (as amended)  
Hackney Council Local Development Framework: Pre Submission of the Core Strategy and Proposals Map Development Plan Document**

**Statement of general conformity with the London Plan**

Thank you for your letter of 29 June 2009, consulting me on the above documents. Attached to this letter is the relevant report I considered on these documents, along with appendices, which represent my formal representations to the pre-submission consultation.

As you will be aware, by virtue of section 24(1)(b) of the Planning and Compulsory Purchase Act 2004, all development plan documents must be in general conformity with the London Plan. However, it is my opinion that the pre-submission documents are currently not in general conformity with the London Plan in respect of the following matters:

- Housing mix
- Land for transport functions
- Promoting Town Centre uses in out of Town Centre locations (PEA's)

If you would like to discuss any of my representations in more detail, please contact Michael Mulhern (020 7983 6535) who will be happy to discuss and arrange further meetings.

Yours sincerely



**Boris Johnson**  
Mayor of London

cc Jennette Arnold, London Assembly Constituency Member  
Nicky Gavron, Chair of London Assembly Planning and Spatial Development Committee  
Chris Baker, GoL.  
Colin Lovell, TfL  
Javiera Maturana, LDA



5 August 2009

### Core Strategy Pre Submission, Development Plan Document

#### Hackney Council Local Development Framework

##### Consultation on Pre-Submission Document

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Planning and Compulsory Purchase Act 2004 (as amended); Town and Country Planning (Local Development) (England) Regulations 2004 (as amended).

##### Strategic issues

- Housing mix
- Safeguarding land for transport functions
- Promoting Town Centre uses in out of centre locations – Priority Employment Areas

##### Recommendation

That the Mayor agrees to submit the comments set out in this report and in the attached appendix to Hackney Council as the formal response to the Pre-Submission consultation stage of the Core Strategy, and that Hackney Council be advised that the proposed Submission Document is currently not in general conformity with the London Plan in relation to the above strategic issues.

##### Context

1. On 3 July 2009 Hackney Council consulted the Mayor of London on the above Document. This report sets out information for the Mayor's use in deciding what comments to make. The consultation period ends on 7 August 2009.
2. The Planning and Compulsory Purchase Act 2004 ("the Act") introduced a new system of preparing development plans. This requires boroughs to progressively replace existing unitary development plans with a portfolio of local development documents that will collectively form the local development framework for each of the boroughs. The local development framework together with the London Plan provides the essential framework for planning at the borough level. The "development plan" in London for the purposes of section 38(6) of the Act is:
  - The London Plan (consolidated with alterations since 2004), and
  - Development plan documents produced by the borough councils (and saved unitary development plan policies in transitional period).
3. There are three types of local development documents: development plan documents (DPDs); supplementary planning documents (SPDs); and statements of community involvement. The document now being consulted on is a DPD with development plan status, which will be subject to an examination to test the 'soundness' of the plan.

4. Planning Policy Statement 12 (*'Creating strong, safe and prosperous communities through Local Spatial Planning'*) sets out that to be 'sound' a core strategy should be justified, effective and consistent with national policy. Paragraph 4.50 of PPS 12 sets out that an Inspector is charged with checking that the plan has complied with legislation, which will include checking that the plan conforms generally to the London Plan.

## **The Mayor's role**

5. All development plan documents must be in general conformity with the London Plan, in accordance with Section 24(1)(b) of the Act. It is also a statutory requirement for local planning authorities to request the Mayor's opinion on general conformity at the same time as it publishes the document prior to submitting it to the Secretary of State. Regulation 27 requires consultation at the pre-submission stage. The Mayor issues this opinion on DPD general conformity in accordance with Section 24(5) of the Act.

6. The Mayor of London's comments will be made available on the GLA website [www.london.gov.uk](http://www.london.gov.uk).

## **Previous representations**

7. The Mayor made representations on the proposals consultation stage of the plan preparation process on 29 May 2008, (planning report PDU/LDF12/LDD05/02/01), and representations were made by officers under delegated authority to the (Issues and Options) consultation stage on 27 February 2006. A number of the issues that were raised at these stages have been satisfactorily resolved.

## **Background**

8. The Hackney Local Development Framework will replace the adopted 1995 Hackney Council Unitary Development Plan. It will set the Council's approach to the planning of the borough up to 2025 and will consist of the Core Strategy, Proposals Map, Development Control Policies and Site Specific Allocations Documents and a number of supplementary planning documents.

## **Proposed representations**

9. The proposed pre-submission stage Core Strategy is, on the whole, consistent with the London Plan. However, there are some outstanding issues of general conformity that will need to be addressed in more detail, including; the lack of an identified housing mix, safeguarding land for transport functions and the promotion of Town Centre uses in out of centre locations (Priority Employment Areas). These issues are discussed in more detailed in this report.

10. More detailed comments on specific areas within the Core Strategy are also set out in the attached appendix. The appendix includes comments on a range of proposed policy areas, which are generally in conformity with the London Plan, but that require some strengthening particularly on; transport, employment, affordable housing, waste and noise. In addition, it is recommended that the Core Strategy make further references to, and the opportunities for Hackney presented by the 2012 Olympic Games and emerging Crossrail policies. The appendix sets out all of the issues identified and includes a number of areas that do not raise issues of conformity, however, both this report and appendix should be treated as formal representations made by the Mayor that should be considered prior to the Examination in Public, in order to improve the clarity and robustness of the Core Strategy.

## Housing mix

11. Paragraph 7.24 of the proposed pre-submission Core Strategy states that... *'A detailed breakdown of the Council's specific targets for size and mix across all tenures will be included in a Housing SPD'*. London Plan policy 3A.5 on 'Housing choice', requires DPD policies to ensure that new developments offer a range of housing choice in terms of mix of housing sizes and types. In this regard the lack of an identified housing mix is not in conformity with London Plan policy 3A.5. To address this, the Core Strategy should set out a borough wide housing mix target, which should be evidence based. Local variations on housing mix can in turn be addressed in more detail in the proposed Housing SPD.

12. Given increasing pressure on student accommodation, the Council may consider the opportunity to include a policy supporting student accommodation in identified areas, and identify areas where such development may be inappropriate, and whether or not it may be appropriate to seek affordable housing in conjunction with such developments.

## Transport

13. Policy 6 on 'Transport' identifies the need to safeguard railway alignments and sites for public transport services. However, paragraph 4.53 of the supporting text goes on to state that *'depots should demonstrate that their land take is used efficiently, and exploit opportunities for employment led mixed use of depot sites'*. The reference to transport depots needing to demonstrate that their land take is used efficiently is not appropriate for inclusion in a core strategy and is not in conformity with London Plan policy 3C.4. Employment led, mixed-use development may not be compatible with the operational use of some transport depots. Although the introduction of compatible land uses on parts of depots that are under-utilised may be possible in exceptional cases, the presumption should be sites in transport use are protected in line with London Plan policy 3C.4 and the Land for Transport SPG. This must be made explicit in the wording used. The suggested indicator of mixed-use development of bus depots is inappropriate and should be deleted.

14. In line with PPS 12, TfL would expect an assessment of transport infrastructure required to support the core strategy. This should include information on timescales, delivery, status of projects and funding including the need for funding through section 106 agreements. In the same way that social infrastructure requirements are set out in policy 8, the Core Strategy should also include physical infrastructure requirements e.g. transport projects with details of importance and delivery. Future projects that are not fully funded should be listed separately from projects that are in the TfL Business Plan. TfL welcomes the commitment to use section 106 agreements including pooled contributions to support infrastructure development but it is important that relevant transport infrastructure projects are set out within the core strategy.

15. Linked to the above, the Mayor has published for consultation draft London Plan alterations and a draft SPG on the use of planning obligations in the funding of Crossrail. Paragraphs 12 and 14 of the supplement to PPS1 'General Principles' make it clear that the Mayor's proposals are a material consideration. Paragraph 4.11 of the draft SPG is particularly relevant in that it states *"contributions should be sought in respect of office development in the Central Activities Zone (CAZ)... which involves a net increase of additional floorspace of 500 square metres."* This emerging policy is based on the strategic importance of Crossrail to Central London involving an assessment of which uses in which locations have the maximum impacts in terms of congestion. In view of the focus of the Core Strategy to include parts of the CAZ, it is important that a reference is made to a potential requirement for Crossrail contributions in line with emerging guidance from the Mayor.

16. In addition, the division of transport policies between policy 6 and policy 33 is potentially confusing with some overlap in topics covered by each policy, e.g. car parking and reducing the need to travel. It would be helpful to consolidate transport into a single overarching policy.

## **Employment**

17. Policy 17 on 'Economic Development' states *'that business (B1), hotel (C1) and non-residential (D1) uses will be preferred in Priority Employment Areas (PEA's)'*, which raises a concern. The submitted Proposals Map identifies a number of out of Town Centre PEA's. Promoting Town Centre uses in out of centre locations is not in conformity with London Plan policy 3D.1 and 3D.2. PEA's in out of Town Centre locations, or in areas with poor accessibility, should focus on promoting light industrial uses and space for small and medium enterprises.

18. In addition, the identification of a PEA within the Dalston Major Town Centre must be aligned with the Council's growth aspirations and identified housing provision for Dalston.

## **Olympics**

19. The role of the 2012 Olympics in bringing major investment and change to Hackney Wick is set out within the document. However, as set out in London Plan policy 3D.6 and the supporting text, the role of the Olympics in providing sustainable regeneration across east London, of which the wider area of the London Borough of Hackney plays an integral role, should be more clearly expressed. There may be an opportunity to examine this opportunity and its potential benefits in greater depth within the Core Strategy.

## **Legal considerations**

20. All local development documents must be in general conformity with the London Plan in accordance with Section 24(1)(b) of the Act. This is a key test of the soundness of plans. The Mayor's representations made at this stage will go forward to the examination in public and must include an opinion regarding general conformity with the London Plan. The test of general conformity is set out in Circular 1/2008 and states that LDDs should not be adopted unless they properly reflect the policies in the Spatial Development Strategy. The Circular states: *"The test is of general conformity and not conformity. In practice, this means that it is only where an inconsistency or omission in a development plan document would cause significant harm to the implementation of the spatial development strategy, that it should be considered to not be in general conformity."*

21. The Mayor's General Conformity Guidance Note (July 2006) confirms that the principle of general conformity applies to all policy areas of the London Plan and can apply to a single policy issue. The Guidance Note also confirms that the Mayor will make other comments on development plan documents. However, where these are made they must relate to one of the other tests of soundness.

22. The fact that a development plan document is inconsistent with one or more policies in the spatial development strategy, either directly or through the omission of a policy or proposal, does not, by itself, mean that the document is not in general conformity. Rather, the test is how significant the inconsistency is from the point of view of delivery of the spatial development strategy.

23. Any expression of opinion from the Mayor that the development plan document is not in general conformity will be treated as a representation to be dealt with by the Inspector at the examination. The Planning Inspectorate has stated that the view of the Mayor's opinion *"will be*

given considerable weight<sup>1</sup> and that a lack of general conformity with the London Plan will need to be fully justified on the basis of local circumstances, based on relevant evidence.

24. GOL Circular 1/2008 (Strategic Planning in London) confirms that the Mayor's opinion on general conformity will be the starting point for consideration of a DPD by an Inspector to ensure the Mayor's policies are fully considered when draft DPDs are examined. Paragraph 4.5 states that *"The Inspector will be expected to recommend changes to the DPD in accordance with the Mayor's opinion unless there are sound planning reasons for not doing so."*

25. Under the new development plan system the Inspector's recommendations are binding on the local planning authority, and there is no subsequent modifications stage. Accordingly, the Mayor should set out which policies are not in general conformity with the spatial development strategy.

26. The Mayor must also state why the policy is not in general conformity and his reasoning behind that opinion. The Inspector will determine whether he or she supports the opinion and recommend accordingly. The Mayor should provide the Inspector conducting the examination with any necessary additional information as appropriate, either through a representative or in writing according to the requirements of the Inspector. The examination in the present case is due to be held in January 2010.

## Conclusion

27. The proposed Core Strategy is, on the whole, consistent with the London Plan. However, there are some outstanding issues of general conformity that will need to be addressed in more detail, including; the lack of an identified housing mix, safeguarding land for transport functions, and the promotion of Town Centre uses in out of centre locations (Priority Employment Areas). In addition, more detailed comments on specific issues within the Core Strategy are also set out in the attached appendix.

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for further information, contact Planning Decisions Unit:

**Giles Dolphin, Head of Planning Decisions**

020 7983 4271 email [giles.dolphin@london.gov.uk](mailto:giles.dolphin@london.gov.uk)

**Martin Scholar, Strategic Planning Manager (Development Plans)**

0207 983 5750 email [martin.scholar@london.gov.uk](mailto:martin.scholar@london.gov.uk)

**Michael Mulhern, Senior Strategic Planner**

020 7983 6535 email [michael.mulhern@london.gov.uk](mailto:michael.mulhern@london.gov.uk)

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<sup>1</sup> Development Plans Examination – A Guide to the Process of Assessing the Soundness of Development Plan Documents (The Planning Inspectorate, 2005), paragraph 1.2.6



## London Borough of Hackney Core Strategy Submission Stage

Representations from the Mayor of London

Consultation period: 1 July 2009 – 7 August 2009

GLA Ref. No.	Submission Stage para/page & subject sub-heading	London Plan Policy cross ref.	Representations on the Submission Stage

### Delivering Sustainable Growth

1.	Policy 1 – Places of Growth (paragraph 4.16)	N/A	Para 4.16: The supporting text for Dalston Town Centre identifies an employment floorspace capacity of 16,073 sq.m, 2,719 sq.m for convenience shopping and 1,772 new mixed tenure homes. The Council should provide evidence justifying these proposed quanta. It is also recommended that these quanta be identified as targets.
2.	Policy 1 – Places of Growth (paragraph 4.17)	N/A	Para 4.17: For clarification this paragraph should indicate the proposed target of commercial floorspace for Hackney Central. The Council should provide evidence justifying this quantum.
3.	Policy 2 – Improved Railway Corridors	N/A	Para 4.21: Identifies the railway corridors as having the potential to provide 16,380 sq.m of employment space. The Council should provide evidence justifying this quantum.
4.	Policy 5 – Hackney Wick	N/A	Para 4.40: Hackney Wick has the potential to provide 87,141 sq.m of employment space. The Council should provide evidence justifying this quantum.
5.	Policy 6 – Transport	3C.1; 3C.2; 3C.3; 3C.4; 3C.23	The division of transport policies between policy 6 and policy 33 is potentially confusing with some overlap in topics covered by each policy, e.g. car parking and reducing the need to travel. It would be helpful to consolidate transport into a single overarching policy.
6.	Policy 6 – Transport	3C.4	The reference to transport depots needing to demonstrate that their land take is used efficiently is not appropriate for inclusion in a core strategy and is not in conformity with London Plan policy 3C.4. Employment led, mixed-use development may not be compatible with the operational use of some transport depots. Although the introduction of compatible land uses on parts of depots that are under-utilised may be possible in exceptional cases,



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			<p>the presumption should be sites in transport use are protected in line with London Plan policy 3C.4 and the Land for Transport SPG. This must be made explicit in the wording used. The suggested indicator of mixed-use development of bus depots is inappropriate and should be deleted.</p>
7.	Policy 6 – Transport	3C.1; 3C.2; 3C.3; 3C.4; 3C.23	<p>In addition to the points mentioned above there are number of more technical points in relation to proposed policy 6, which are set out below;</p> <ul style="list-style-type: none"> <li>• Transport policy should provide protection for land used for transport purposes including existing sites.</li> <li>• Whilst it is stated that car parking will be controlled in line with regional policy it should be made explicit that maximum car parking standards will be applied in line with the London Plan. In addition, TfL's guidelines on minimum standards for cycle parking should also be applied.</li> <li>• TfL welcomes the requirement for car club bays and electric vehicle charging provision.</li> <li>• A requirement for comprehensive Transport Assessments and Travel Plans to be prepared in line with TfL Best Practice Guidance should be set out.</li> </ul> <p>Detailed requirements for 'delivery and servicing plans' and 'construction logistics plans' should be included here or in the forthcoming Development Pan Documents.</p>



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8.	Policy 7 – Working with Infrastructure Partners	3C.1; 3C.2; 6A.4; 6A.5	In line with PPS 12, TfL would expect an assessment of transport infrastructure required to support the core strategy. This should include information on timescales, delivery, status of projects and funding including the need for funding through section 106 agreements. In the same way that social infrastructure requirements are set out in policy 8, physical infrastructure requirements including transport projects should be identified alongside the importance to delivery of the strategy. Future projects that are not fully funded should be listed separately from projects that are in the TfL Business Plan. TfL welcomes the commitment to use section 106 agreements including pooled contributions to support infrastructure development but it is important that relevant transport infrastructure projects are set out within the core strategy.
<b>A Dynamic and Creative Economy</b>			
9.	Policy 16 – Employment Opportunities	2A.10	Para 2: States that ‘...future employment clusters, such as Hackney Wick, Priority Employment Areas and areas of high unemployment...’ <i>The text should include the following wording:</i> ‘...future employment clusters, such as Hackney Wick (subject to Strategic Industrial Land designations), Priority Employment Areas and areas of high unemployment...’
10.	Policy 17 – Economic Development	3D.1; 3D.2	Para 2: States that... ‘An appropriate mix of business types and premises will be sought on all employment generating developments...’ which raises a concern. It may not be appropriate for all employment generating developments to provide a mix of business types and clarification on this should be provided within the policy.  Para 3: In Priority Employment Areas (PEAs) – business (B1), hotel (C1) and non-residential (D1) uses will be preferred, which raises a concern. There are a number of out of Town



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			<p>Centre PEA's. Promoting Town Centre uses in out of centre locations is not in conformity with London Plan policy 3D.1 and 3D.2. PEA's in out of Town Centre locations, or in areas with poor accessibility, should focus on light industrial uses and space for Small and Medium Enterprises.</p> <p>Para 3: The identification of a PEA within the Dalston Major Town Centre must be aligned with the Council's growth aspirations and identified housing provision for Dalston.</p> <p>Para 4: The proposed definition of uses appropriate within Strategic Industrial Land should be expanded to include waste and recycling facilities.</p>
11.	Policy 18 – Promoting Employment Land	3D.1; 3D.2	<p>Similar to concerns raised with policy 17, there is a concern that paragraph 6.53 may encourage large office based development in out of Town Centre locations, which would not accord with London Plan policy 3D.1 and 3D.2.</p>
<b>Providing Better Homes</b>			
12.	Page 86 table 7.1 – housing growth areas	N/A	<p>The Council should provide the most up to date housing survey information; 'the Hackney Housing Needs Survey 2009'.</p>
13.	Policy 19 – Housing Growth	3A.5	<p>Para 1: States... 'the Council's approach to housing mix requirements will be based on up to date assessments of local need that will be prepared in the future.' The current policy does not provide sufficient information on the required housing mix and is not in conformity with London Plan policy 3A.5. The Council should set a borough wide housing mix target.</p>



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14.	Policy 20– Affordable Housing	3A.8; 3A.9; 3A.10	Para 1 : States... 'Affordable housing will be sought from residential only developments and mixed use developments.' Whilst this approach may be acceptable, the Council must define what 'mixed use development' would require the provision of affordable housing.
<b>Climate Change and Environmental Sustainability</b>			
15.	Policy 29	4A.3; 4A.4	The supporting text for policy 29 should further highlight the need to reduce carbon dioxide emissions through the energy efficient design of the site, buildings and services.
16.	Policy 29	4A.4	The supporting text for policy 29 should also make it clear that energy assessments should be undertaken in line with The Mayor's Energy Hierarchy (London Plan Policy 4A.1): energy efficiency, decentralised energy, and renewable energy.
17.	Policy 29	4A.4	This policy currently requires all major new developments to be rated against BREEAM and the Code for Sustainable Homes (CSH), however, no specific targets have been set. Supporting para 9.17 outlines the Government's requirement for social housing and Code for Sustainable Homes. The Council may want to encourage developments to achieve Code Levels in line with the Government's planned timetable for the revisions of Building Regulations, particularly in relation to Code Level 4, 5 and 6. In addition, the Council may want to consider setting higher code levels for carbon reduction targets in specific geographical areas of the boroughs where opportunities can be identified.
18.	Policy 30	4A.6	Para 9.19; states that... ' <i>In line with policy 30 where decentralised energy generation is operational, developments on nearby sites could be designed to connect to the local network.</i> ' The word 'could' should be changed to 'should'.



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19.	Policy 30	4A.6	<p>It is recommended that reference to the district heating networks in the two town centres of Hackney Central and Dalston be strengthened by highlighting the work the Council has done to take these networks forward and the leading role the Council intends to take to enable these networks. This could be set out in the supporting text.</p> <p>It is recommended that an additional paragraph be added to the supporting text for this policy to explain how individual developments should deal with decentralised energy, specifically with reference to policy 4A.6. Developments should connect to heating and cooling where these exist; or be specifically designed to connect to planned external heating networks and provide site wide CHP networks where feasible or communal heating and cooling.</p>
20.	Policy 32 - Waste	4A.22	<p>The policy states... 'The incorporation of integrated and well designed recycling, composting and residual waste storage facilities in all new developments, and reuse storage where appropriate', which is supported. However, the supporting text should make reference to the Mayor's Sustainable Design and Construction Supplementary Planning Guidance.</p>
21.	Policy 32 - Waste	4A.22; 4A.24	<p>The policy states that the Council is... 'Seeking to maximise self-sufficiency in waste management capacity in line with the London Plan', which is supported. However, this section should also provide a commitment to re-use surplus waste transfer sites for other waste uses and / or intensify the use of existing waste sites and facilities.</p>
22.	Policy 32 - Waste	4A.29	<p>This section should include proposals for minimising and managing hazardous waste.</p>



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### Omissions

Crossrail	<p>The Mayor has published, for consultation, a draft London Plan alteration and draft SPG on the use of planning obligations in the funding of Crossrail. Paragraphs 12 and 14 of the supplement to PPS 1 'General Principles' make it clear that the Mayor's proposals are a material consideration. This emerging policy is based on the strategic importance of Crossrail to Central London involving an assessment of which uses in which locations have the maximum impacts in terms of congestion. Paragraph 4.11 of the draft SPG is particularly relevant in that it states "contributions should be sought in respect of office development in the Central Activities Zone (CAZ)... which involves a net increase of additional floorspace of 500 square metres."</p> <p>In this regard the supporting transport policy text should make reference to emerging Crossrail policy and the potential requirement for Crossrail contributions.</p>
Student accommodation	<p>Given increasing pressure on student accommodation, the Council may consider the opportunity to include a policy supporting student accommodation in identified areas, and identify areas where such development may be inappropriate, and whether or not it may be appropriate to seek affordable housing in conjunction with such developments.</p>



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Noise		<p>The commitment to achieving high standards of design as set out in chapter 7 'Providing Better Homes' is welcomed. However, given the existing and proposed infrastructure network it would be prudent to acknowledge that ambient noise (from roads and railways) will have a significant impact in many development areas. An explicit commitment, in line with London Plan policy 4A.20, to minimise noise impacts on new developments and to seek to separate noise sensitive development from major noise sources wherever practicable (for example by locating habitable rooms on quieter facades) would be welcomed. This approach would also provide increased clarity for potential developers.</p> <p>In line with London Plan policy 4A.20 it is recommended that Hackney Council commit to identifying areas of relative tranquillity, which should be protected or enhanced.</p>
Olympics		<p>The role of the 2012 Olympics in bringing major investment and change to Hackney Wick is set out within the document. However, as set out in London Plan policy 3D.6 and the supporting text, the role of the Olympics in providing sustainable regeneration across east London, of which the wider area of the London Borough of Hackney plays an integral role, should be more clearly expressed. There may be an opportunity to examine this opportunity and its potential benefits in greater depth within the Core Strategy.</p>
<b>Inaccuracies</b>		
Pg 8 para 1.8		<p>'... in conformity with the 2008 version of the London Plan...'  <i>should read:</i>            '... in general conformity to the London Plan (Consolidated with Alterations since 2004)...'</p>

