



# Report to the London Borough of Hackney

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PLANNING AND COMPULSORY PURCHASE ACT 2004

SECTION 20

**REPORT ON THE EXAMINATION INTO THE LONDON BOROUGH OF  
HACKNEY CORE STRATEGY**

**DEVELOPMENT PLAN DOCUMENT**

Document submitted for examination on 4 March 2010

Examination hearings held between 20 and 28 July 2010

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## **Non-technical Summary**

This report concludes that the London Borough of Hackney Core Strategy Development Plan Document provides an appropriate basis for the planning of the borough over the next 15 years. The Council has sufficient evidence to support the strategy and can show that it has a reasonable chance of being delivered.

A limited number of changes are needed to meet legal and statutory requirements and to ensure that the Core Strategy is in general conformity with the London Plan and accords with national policies. These can be summarised as follows:

- Providing greater clarity on how much housing and employment floorspace is proposed for the borough's growth areas.
- Updating housing supply information, including a reduced reliance on non-identified ('windfall') sites and an amended housing trajectory.
- Greater support for residential extensions in meeting local housing needs.
- Minor changes to the requirements for gypsies and traveller sites to accord with national policy and the local evidence base.
- Introducing a sequential test for town centre uses and providing more clarity on the type of uses that are acceptable in designated employment areas.
- Providing more detail on how the Council will address negative impacts arising from evening and night-time uses in South Shoreditch and elsewhere.
- Clarifying the policy on tall buildings, including enhanced references to heritage protection.
- Deletion of one Locally Significant Industrial Location.

All of the changes recommended in this report are based on proposals put forward by the Council in response to points raised and suggestions discussed during the public examination. They do not alter the thrust of the Council's overall strategy. As agreement has been reached on all of the matters of soundness identified in this report, no additional changes have been sought from the Council.

## 1. Introduction

- 1.1 This report contains my assessment of the London Borough of Hackney Core Strategy Development Plan Document (DPD), henceforth referred to as the Core Strategy, in terms of Section 20(5) of the Planning and Compulsory Purchase Act 2004. It considers whether the Core Strategy satisfies relevant legal requirements and whether it is sound. Planning Policy Statement 12 (PPS 12) makes it clear that to be sound, a DPD should be **justified, effective and consistent with national policy**.
- 1.2 In line with national policy, the starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan. Prior to the Core Strategy's submission, the Council published a schedule of Proposed Pre-Examination Changes, which formed the subject of a consultation exercise between December 2009 and January 2010. I agree with the Council that these changes do not significantly affect the overall thrust of the Core Strategy and, as such, I have treated them as forming part of the Core Strategy as submitted. A consolidated version of the Core Strategy incorporating these changes was made available at the Pre-Hearings Meeting and on the examination website. All detailed references in my report refer to that document.
- 1.3 My report firstly considers the legal requirements, and then deals with the relevant matters and issues considered during the examination in terms of testing justification, effectiveness and consistency with national policy. **I conclude below that the Core Strategy is sound, provided that it is changed in the ways that are specified in this report.** All of these changes have been proposed by the Council, many in consultation with relevant representors, and are set out in Appendix A. They are referred to in the body of my report using the reference number from the Council's schedule of changes<sup>1</sup>. None of these changes should materially alter the substance of the overall plan and its policies, or undermine the sustainability appraisal and participatory processes already undertaken. In a small number of cases I have not accepted suggested changes as being necessary for soundness reasons: these are described in my report.
- 1.4 The Council wishes to make a number of minor changes to the submitted Core Strategy in order to clarify, correct and update various parts of the text. Although they do not address key aspects of soundness, I endorse those set out in Appendix B in the interests of clarity and accuracy. While corrections to misspellings, typographical errors and renumberings have generally been excluded, I am content for the Council to make any such changes – including any consequential amendments that arise from other endorsed changes.
- 1.5 During the examination I made unaccompanied visits to the locations mentioned by representors, viewing the sites and areas concerned from public roads and footpaths. These included a late night visit to South Shoreditch between the hours of 11.00pm on Friday 13 August and 02.00am on Saturday 14 August 2010.

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<sup>1</sup> These are shown in square brackets and bold text, thus **[1]**.

## 2. Legal Requirements

- 2.1 The Core Strategy is contained within the Council's Local Development Scheme (LDS) 2010-2013, approved in January 2010. There, it is shown as having a submission date of February 2010, with the examination hearings scheduled for June 2010. As only a limited degree of slippage has occurred, I am satisfied that Core Strategy's timing and content accords with the LDS, as required by section 19(1) of the 2004 Act.
- 2.2 The Council's Statement of Community Involvement has been found sound by the Secretary of State and was formally adopted by the Council before the examination took place. While concerns have been raised by some representors about arrangements to publicise the Core Strategy, it is evident from the documents submitted by the Council, including the Regulation 30(1)(d) and 30(1)(e) Statements and its Self Assessment Paper, that the relevant requirements have been met. The dates and venue of the Core Strategy hearings were published in the local press (the Hackney Gazette) and posted on the examination website<sup>2</sup>.
- 2.3 Alongside the preparation of the DPD it is evident that the Council has carried out a parallel process of sustainability appraisal. An Appropriate Assessment has been undertaken in accordance with the Habitats Directive. I am satisfied that there would be no adverse effects on the integrity of any European or international sites of nature conservation interest as a result of the policies and proposals within the Core Strategy.
- 2.4 I am also satisfied that the Core Strategy has had regard to national policy. However, as will be apparent from my later conclusions, I agree with the Council that a number of changes are required in order to ensure that it is consistent with such policy. I set these out later in my report.
- 2.5 In its initial representations, the Greater London Authority (GLA) stated that the Core Strategy was not in general conformity with the Spatial Development Strategy, which comprises the London Plan (as amended) 2008. Most of these concerns were addressed by pre-submission changes made by the Council. The remaining matter, relating to the location of town centre uses, is the subject of a further change agreed with the Council during this examination (detailed below). Subject to this change, the GLA considers that the Core Strategy is in general conformity with the London Plan. I agree with that assessment.
- 2.6 I am satisfied that the DPD has had regard to Hackney's Sustainable Community Strategy 2008-2018 and that the Core Strategy complies with the specific requirements of the 2004 Regulations (as amended) including the requirements in relation to publication of the prescribed documents; availability of them for inspection and local advertisement; notification of DPD bodies and provision of a list of superseded saved policies.
- 2.7 Accordingly, and subject to the relevant changes that I describe, I consider that the legal requirements have all been satisfied.

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<sup>2</sup> <http://www.hackney.gov.uk/core-strategy-examination-page.htm>

### 3. Main Issues

3.1 Bearing in mind the evidence before me, the representations that have been made and the discussions that have taken place at the examination hearings, I have identified 5 main issues upon which the Core Strategy's soundness depends. I deal with each below.

#### **Main Issue 1: Are the Core Strategy's proposals for sustainable growth and the provision of new housing deliverable, clear, sufficiently justified and consistent with the London Plan and national policy in Planning Policy Statement 3: *Housing* (PPS 3)?**

- 3.2 Before the start of the hearing sessions, PPS 3 was re-issued with an amendment to the definition of previously developed land (excluding private residential gardens), together with the deletion of the national indicative minimum density of 30 dwellings per hectare. Representors' views were sought on these changes, but no responses were received. The Council confirms that it has taken this matter into account in preparing its submissions to the examination.
- 3.3 The Core Strategy identifies a number of growth locations, comprising: Town Centres (Dalston and Hackney Central), Improved Railway Corridors, South Shoreditch (City Fringe) and New Communities (Woodberry Down/Manor House and Hackney Wick). While suggestions have been made for additional locations to be added to this list, notably Stamford Hill and Stoke Newington, I accept the Council's view that such areas do not contain the development potential sufficient to justify growth location status. To my mind, the identified areas relate appropriately to the availability of sites for new development and the presence of existing (or committed) infrastructure. Specifically, they respond to the enhanced accessibility resulting from the London Overground services on the East and North London lines. Infrastructure requirements and delivery details are set out in a separate delivery plan. I have seen no substantive evidence that this is not soundly based. However, the Council accepts that further clarity should be provided about its approach to seeking developer contributions, and I endorse its suggested change [29] in that regard as being necessary for reasons of effectiveness.
- 3.4 Following pre-submission changes to the Core Strategy, proposals for the growth areas are detailed in policies 1 to 5. In principle, there is merit in this approach. However, I have several concerns about the way in which these policies have been presented:
- In some cases, notably policies 1, 2 and 5, the stated housing figures are inconsistent with the evidence base, as summarised in table 7.1. This calls into question the validity of the stated figure.
  - Floorspace and housing figures are presented in an inconsistent way – for example:
    - Housing numbers are expressed variously as maxima (policy 1), an exact figure (policy 4) and an approximate total (policy 5). This range of approaches is not supported by the evidence base.

- Table 7.1 anticipates some 530 dwellings in the South Shoreditch growth area, but no reference to this scale of development is made in the policy itself (policy 3).
  - It is unclear whether policy 4 (Woodberry Down) refers to gross or net housing numbers.
  - In policy 5 (Hackney Wick), the reasoned justification suggests that the figure of 500 units is a minimum, but this caveat is not reflected in the policy.
  - A number of the employment floorspace totals are expressed very precisely. For example policy 5 refers to 87,141 square metres of employment space at Hackney Wick. This appears unduly inflexible, as well as being at odds with the plan's strategic nature.
  - In a number of cases, greater clarity needs to be provided about how proposals will be carried forward in policy terms, with reference to specific forthcoming Local Development Documents (LDDs).
  - Although the details will be set out in a forthcoming Area Action Plan (AAP), greater clarity should be provided regarding the effect of the Olympic Legacy on the future development of Hackney Wick.
- 3.5 The Council accepts all of these points, and, in consultation with relevant representors, has proposed changes accordingly **[9, 12, 13, 16, 18, 20, 21, 22, 23, 24, 59]**. I endorse these as being necessary for soundness reasons, specifically in relation to the requirements of being justified and effective. These changes also incorporate updated figures arising from a review of the housing supply evidence – a matter that I address below.
- 3.6 Although the growth areas include the major redevelopment project at Woodberry Down, they exclude a number of other estate renewal schemes. These are listed in table 7.1 and are likely to contribute significantly to housing delivery during the Core Strategy period. While I accept the Council's view that these projects are different in character to those located within the Growth Areas, being of a generally more local scale, it is important that their contribution to the overall housing supply is clearly acknowledged. As such, I endorse the Council's proposed change **[7]** as being necessary for soundness reasons.
- 3.7 The London Plan sets a ten year minimum target of 10,850 net additional homes for Hackney to 2016/17 – equivalent to an annual target of 1,085. The Draft Replacement London Plan (DRLP) proposes a somewhat higher 10 year requirement (2011-2021) of 11,600 homes – 1,160 per year. Table 7.1 and figure 7.1 set out the anticipated housing trajectory from 2006/11 to 2025/26, incorporating the increased DRLP requirement from 2011 onwards. The overall housing supply figure in this table (22,460 homes) exactly equates to the London Plan total.
- 3.8 In response to written questions that I posed before the hearing sessions, the Council has updated and augmented its housing evidence base. This has included the preparation of a housing trajectory paper (March 2010) and a subsequent background paper (April 2010). These documents were amplified by the Council's statement (June 2010) for the first hearing session. A further update of table 7.1 was produced at the hearing sessions: a revised version of this table is contained in the schedule of

changes (Appendix A.1). This final version removes a number of errors in the original version, notably due to double-counting, as well as providing a clearer breakdown of the respective supply components and clarification of the position regarding windfall housing (discussed further below).

I endorse its inclusion, with other consequent updating, **[5, 53, 56]** for soundness reasons. The revised housing supply total (some 23,825 homes) is in excess of the above-noted London Plan figure. This is in line with the London Plan's requirement that its housing targets are minimum figures. It also provides a welcome degree of flexibility.

- 3.9 Table 7.1 in the Core Strategy as submitted includes a windfall element of some 5,295 homes: of these some 960 are scheduled for the 2<sup>nd</sup> tranche of supply (2011/16) and 2,080 for the 3<sup>rd</sup> tranche (2016/21), most of which lies within the 10 year post-adoption period. As such, a significant allowance has been made for windfall housing in the first 10 years of land supply. However, with reference to the detailed breakdown in the Council's March and April 2010 background papers, it is clear that this windfall figure includes a number of sites that have been included in the London Strategic Housing Land Availability Assessment (SHLAA) and that will be proposed for allocation in future DPDs. Although not specific Core Strategy proposals, these sites have been identified as being available in the development plan process: as such, they do not comprise windfalls in the terms of PPS 3. As submitted, table 7.1 therefore overstates the reliance on windfall developments.
- 3.10 Nevertheless, a windfall estimate remains within the Council's housing supply assumptions – amounting to some 640 and 1555 homes in the 2<sup>nd</sup> and 3<sup>rd</sup> tranches respectively. As already noted, most of these would fall within the 10 year post-adoption period. Paragraph 59 of PPS 3 states that allowances for windfalls should not be included in this period unless robust evidence can be provided of genuine local circumstances that prevent specific sites from being identified. In the present case, while the Council depends almost exclusively upon 'brownfield' sites for housing development, the availability of such sites within the borough is limited. Historically, development has tended to come forward on smaller sites that are, by their very nature, difficult to identify. While consideration was given to a wide range of potential sites during the SHLAA exercise, the majority were discarded for reasons that are set out in more detail in the above-noted background papers. Such reasons include, for example, the lack of certainty around plans to rationalise health care premises or educational facilities. Although such sites may come forward in the future, the evidence base does not support their present inclusion in the housing land supply total. I note that the GLA has worked closely with the Council in respect of housing supply matters and has raised no objection to the Council's methodology.
- 3.11 Furthermore, as will be discussed below, the Core Strategy represents a shift of emphasis from protecting employment land to facilitating mixed use, and employment-led, developments – particularly in the newly-defined Priority Employment Areas (PEAs). Such schemes may include an element of housing. However, where sites are in active employment use, the scale of any future housing yield is difficult to predict with accuracy.

Further detailed analysis is proposed as part of the work on a forthcoming Site Specific Allocations DPD and early indications suggest that there may be potential for more sites to be allocated for mixed-use or housing development. While I can only attach limited weight to this possibility, as the analysis has yet to be completed, any such sites would further reduce the reliance upon windfall provision.

- 3.12 Drawing these matters together, I am satisfied that the Council has provided the robust evidence that PPS 3 requires to justify an allowance on windfall housing provision in the first 10 years of housing supply. Furthermore, I consider that the suggested scale of this allowance is justified in the light of previous and projected trends of windfall housing supply in the borough.
- 3.13 As already noted, changes are required in order to ensure that the Core Strategy's growth area proposals are in line with the expected housing supply figures. However, I have seen no substantive evidence suggesting that the level of supply that is expected for these areas is unrealistic. Representors have not queried the deliverability or developability of specific sites. As such, and subject to the updating that I have referred to above, it seems to me that the remainder of table 7.1's figures and underlying assumptions are soundly based. Accordingly, and subject to the changes that I have endorsed in respect of this main issue, I conclude that the Core Strategy's proposals for sustainable growth and the provision of new housing are deliverable, clear, sufficiently justified and consistent with the London Plan and national policy in PPS 3.

**Main Issue 2: Is the Core Strategy effective in meeting local housing needs, including the provision of an appropriate mix of housing, the delivery of affordable housing and satisfactory provision for the needs of gypsies and travellers?**

- 3.14 Initial concerns by the Greater London Authority regarding the Core Strategy's approach to housing mix were resolved prior to submission. I agree with the GLA that the Council's intention to include detailed housing mix information in the forthcoming Development Management DPD is appropriate. However, the Core Strategy presently refers to a Housing SPD in this context: this is at odds with the suggested approach and I endorse the Council's clarification of this matter [58] for soundness reasons.
- 3.15 Concerns have been raised by a significant number of representors about the Core Strategy's approach to the provision of homes that are suitable for larger families. The context for these concerns arises from the particular needs of Hackney's substantial Orthodox Jewish (Charedi) community, which is centred on the Stamford Hill area. Demographic data supplied by representors supports the broad conclusions of the Council's 2009 Housing Needs Assessment (HNA) that, first, household size within this community is generally large and, second, that the community's levels of housing need are likely to be very high.

- 3.16 The HNA's suggestion regarding further study of this community's housing needs was not followed up, and there may be merit in undertaking such an exercise as part of the evidence base for future LDDs. Nevertheless, the Council does not dispute either the broad scale or particular nature of what is required. Given the relative lack of development opportunities in the Stamford Hill area, I share the view of both the Council and the local community that residential extensions should play an important role in meeting these needs. At present, this aim is not clearly articulated in the Core Strategy: while policy 19 promotes the provision of new family accommodation (3 bedrooms or more), it does not specifically address the value of house extensions in providing for larger families. As such, I endorse the Council's proposed changes to that policy and its reasoned justification **[54, 57]** for soundness reasons. The proposed rewording provides appropriate guidance for more detailed policies in subsequent LDDs. I do not accept the views of representors that more specific policies, such as the setting of house size targets, should be included in the Core Strategy – which is a document that sets an overall vision and strategic objectives. As already noted, the future Development Management DPD will address housing mix. I agree with the Council that detailed guidance on residential extensions is more appropriately set out in a supplementary planning document (SPD) – an approach that I note is being taken by a neighbouring planning authority.
- 3.17 Policy 20 sets out the Core Strategy's affordable housing policy. The borough-wide 50% target, which is in line with the London Plan, is supported by a viability study – the methodology and findings of which have not been substantively challenged. This concludes that such a target is achievable in many cases on the types of sites that are likely to come forward for development over the plan period. Although this conclusion suggests that some schemes may experience viability problems, adequate flexibility is provided by policy 20's provision that this target is subject to site characteristics, location and overall scheme viability. While the proposed tenure split of 60% social rented and 40% intermediate housing accords with the DRLP, rather than the extant London Plan, I am satisfied that this requirement derives from the borough's specific circumstances – notably the significant proportion of social rented housing within the affordable sector. The GLA has not raised concerns about this approach.
- 3.18 The Council confirms that detailed policy guidance on affordable housing will be set out in a range of forthcoming DPDs and SPDs. This is not presently made clear in the Core Strategy and, for effectiveness reasons, I endorse the Council's proposed clarification **[60]**. However, I have seen no substantive evidence to support the views of some representors that mixed use development should be excluded from affordable housing requirements. Bearing in mind that such schemes are likely to contribute significantly to overall land supply in the borough (as discussed elsewhere in this report), such an exclusion could seriously reduce affordable housing delivery. The viability assessment suggests that there is no quantitative difference between the viability of mixed and single use schemes. Furthermore, I note that, in practice, the Council has secured affordable housing from a number of significant mixed use developments.

- 3.19 While pre-submission changes were made to Core Strategy policy 23 (regarding gypsies and travellers), I share the views of some representors that the amended wording remains unduly restrictive. In particular, its final paragraph, which requires compliance with all of the stated criteria, is inconsistent with other similar Core Strategy policies (such as policy 24). As such, it could be seen as placing a more onerous requirement on sites for gypsies and travellers than for other proposals. The Council accepts these comments and proposes further changes [62, 63, 64] to the policy and supporting text. I endorse these for soundness reasons.
- 3.20 Subject to the changes that I have endorsed in respect of this main issue, I conclude that the Core Strategy is effective in meeting local housing needs, including the provision of an appropriate mix of housing, the delivery of affordable housing and satisfactory provision for the needs of gypsies and travellers.

**Main Issue 3: Are the Core Strategy's approaches to economic development and town centre uses clearly articulated, sufficiently justified and in line with the London Plan and national policy in Planning Policy Statement 4: *Planning for Sustainable Economic Growth* (PPS 4)?**

- 3.21 At the hearings, the Council explained that the Core Strategy represents a shift of emphasis from protecting employment land to facilitating mixed use employment-led developments. A tiered approach to employment designations has been adopted, namely: a Strategic Industrial Location (SIL) at Hackney Wick, Locally Significant Industrial Sites (LSIS), Other Industrial Areas (OIAs) and Priority Employment Areas (PEAs). It was explained that the first two designations, which accord with the London Plan, are intended to have a significant degree of protection, while a more flexible policy regarding new uses is proposed for OIAs and PEAs.
- 3.22 Such approach is, to my mind, justified by the evidence base. Since the 1980s, Hackney has experienced a significant decline in manufacturing, coupled with a rise in service sector employment. Previous employment sites have been redeveloped for a variety of uses and there remains, in general terms, a mismatch between the type of premises that are available and the current demand from new business sectors – notably small enterprises. While it has not been demonstrated that there is a quantitative need for new employment sites to be allocated, the Council's employment studies (published in 2006, with an update in 2010) support both the managed transfer of industrial sites to alternative uses and a qualitative improvement in the supply of employment land and premises in the borough. These findings underpin the Core Strategy's hierarchy of employment designations.
- 3.23 An important consequence of this approach is that existing employment areas are clearly identified: the supporting evidence base should therefore be accurate and up to date. A number of representations have been made in this context, particularly with respect to specific PEAs and LSISs. However, I am satisfied that the proposed boundaries (with one exception) are soundly based and that the designated areas satisfy the

relevant criteria set out in the Core Strategy and supporting employment studies. Each area was subject to a detailed assessment in the 2006 study, which was then updated in 2010. A number of boundary changes have been made as a result of these reassessments. The Council accepts that one further change (relating to Lesney Toy Factory) is now justified as a result of recent developments **[92]** and I endorse this for soundness reasons. With this exception, I do not recommend that any additional changes are made to the boundaries of employment designations.

- 3.24 Nevertheless, I am concerned that the Core Strategy as submitted does not clearly and unambiguously articulate the Council's policy stance as summarised above. In particular, the blanket level of protection afforded by policy 18 does not accord with the tiered approach that is both intended by the Council and supported by the evidence base. For example, the Council's view that housing development would be acceptable in PEAs (with certain restrictions), but not on SIL, is not made clear. Furthermore, the distinctive aims and objectives of each policy designation are not immediately apparent from the text of chapter 6. In addition, the definition of employment generating uses needs to be updated in line with PPS 4. The Council accepts these points, and has proposed changes accordingly **[40, 42, 43, 46, 48, 49, 51, 52, 83]**: I endorse these for soundness reasons.
- 3.25 As submitted, policy 17 supports the location of a number of town centre uses, as defined in PPS 4, within PEAs. A caveat was introduced in the pre-submission changes restricting C1 and D1 uses to those PEAs with better public transport accessibility. However, bearing in mind that some of the PEAs lie outside both identified town centres and the Central Activities Zone (CAZ), I agree with the GLA that the resulting policy fails to fully apply the sequential approach required by both PPS 4 and London Plan policies 3D.1 and 3D.2. The Council accepts this point, and has agreed amended text **[included in 49]** with the GLA. I endorse this change in order to accord with national policy and the London Plan.
- 3.26 In addition, I agree with some respondents that paragraph 5.9's encouragement for new places of worship to be located in town centres could be read as discouraging their location elsewhere. This would be out of step with saved UDP policy CS8, which gives general support for such uses subject to other planning policies. I therefore endorse the Council's proposal **[27]** to delete this text. I note that more detailed policies on the location of places of worship are intended for subsequent DPDs.
- 3.27 A number of respondents have proposed amendments to the town centre hierarchy set out in policy 13. However, I accept the Council's case that this hierarchy, which is consistent with the London Plan, is broadly supported by the submitted evidence base – notably the Hackney Retail and Leisure Study (2005) and more recent land use surveys. Specifically, I agree with the Council that neither Shoreditch nor Hackney Wick contains a sufficient number or range of retail uses to justify designation as District Centres. However, bearing in mind that Shoreditch is located within the CAZ, and that policy 5 identifies retail as one of the uses to be considered in the Hackney Wick AAP, I am satisfied that the Core Strategy

(incorporating proposed Council changes discussed elsewhere in this report) allows appropriate flexibility for the establishment of new retail uses of an appropriate scale in both localities.

- 3.28 Subject to the changes that I have endorsed in respect of this main issue, I conclude that the Core Strategy's approaches to economic development and town centre uses are clearly articulated, sufficiently justified and in line with the London Plan and PPS 4.

**Main Issue 4: Does the Core Strategy provide clear policy guidance in respect of the evening and night time economy, with particular reference to South Shoreditch?**

- 3.29 In recent years South Shoreditch, which lies within London's Central Activities Zone, has seen an increase in evening and night-time activity. The Council's evidence base confirms that this has had a negative effect on conditions for residents and has reduced the area's attractiveness for visitors. In response to these concerns, the Council has designated a Special Policy Area (SPA) broadly bounded by Great Eastern Street, the north side of Hoxton Square and properties on the east of Shoreditch High Street. Although primarily a tool of licensing policy, being designated under the Licensing Act 2003, the SPA is also the subject of detailed policies in the South Shoreditch SPD. In summary, these resist proposals for new night-time economy uses unless the applicant can demonstrate that they will not add to the cumulative impact already being felt in the area. At the examination hearings, the Council confirmed that it is considering proposals to extend the SPA in South Shoreditch, together with the potential designation of other SPAs elsewhere in the borough.
- 3.30 Bearing this context in mind, I share the concerns expressed by many local residents about policy 15's encouragement for the 'managed expansion' of the evening and night-time economy in 'Shoreditch outside the SPA'. It was clear from the hearing discussion that there is some uncertainty about the extent of the area to which this policy refers. As such, I endorse the Council's suggested clarification [6] as being necessary for soundness reasons: further changes (to refer consistently to 'South Shoreditch' in this context) are also proposed in the schedule of minor changes. Taking account of this clarification, it seems to me that the area of 'Shoreditch outside the SPA' is not extensive – and, indeed, would be reduced further by any extension of the SPA. Furthermore, while the area concerned lies within a night-time economy cluster of strategic importance (as identified in the London Plan), there is little evidence that there is significant potential for further evening and night-time uses to be accommodated outside the SPA.
- 3.31 As such, I consider that policy 15's encouragement for the managed expansion of such uses outside the SPA is not fully supported by the evidence base. Bearing in mind the acknowledged problems within the SPA, and noting the Council's consideration of an extension to the SPA, I feel that a more cautious approach is justified. This has been accepted by the Council, which proposes that policy 15 should be reworded, first, to clarify that any expansion of such uses in South Shoreditch (outside the

SPA) would be 'limited' and, second, to support the designation of SPAs elsewhere in the borough where evidence indicates cumulative negative impacts [37]. Changes are also proposed to relevant supporting text [35, 36, 38].

- 3.32 Taken together, I am satisfied that these changes strike an appropriate balance between enabling a wider range of complementary (and non-alcohol based) evening and night-time uses to become established within South Shoreditch, should such uses come forward, and ensuring that existing problems are not worsened. I endorse them for soundness reasons. However, bearing in mind that the South Shoreditch Inset Area is already shown on the Proposals Map, its inclusion as a specific change in respect of the Core Strategy is not necessary. Given the possibility of further changes to the SPA, it would not be appropriate to include the South Shoreditch SPA boundary on the Proposals Map. This boundary is already set out in the relevant SPD. I do not therefore endorse the Council's suggested changes in respect of these matters<sup>3</sup>.
- 3.33 I have considered whether additional changes should also be made to policy 3 (over and above those already discussed), which refers to 'managing the impact of the evening economy' in South Shoreditch. However, I am satisfied that, when read together, policies 3 and 15 adequately express the Council's policy stance, as described above. Subject to the changes that I have endorsed in respect of this main issue, I conclude that the Core Strategy provides clear policy guidance in respect of the evening and night time economy.

**Main Issue 5: Does the Core Strategy take adequate account of the effects of development on the built and natural environment? Are its proposed measures to tackle climate change effective, justified and in line with national policy in PPS 1's Climate Change Supplement?**

- 3.34 Many respondents commented on the Core Strategy's approach to tall buildings – some seeking greater flexibility, others raising concerns that the plan is insufficiently restrictive. The Council's policy on this matter derives from the Hackney 2005 Tall Buildings Strategy (TBS), which comprises baseline studies, urban analysis and detailed area studies. I have seen no substantive objections to the methodology used in formulating the TBS and I am satisfied that it represents a sufficiently robust underpinning of the Core Strategy. As such, I reject calls that some of the identified Tall Building Opportunity Areas should be deleted or that greater support should be given to proposals for tall buildings outside identified areas. While the Council intends to 'refresh' the TBS, it was clarified at the hearings that this would not involve any change to its overall thrust or direction.
- 3.35 Nevertheless, I consider that the TBS's stated presumption against new tall buildings outside identified opportunity areas should be represented more clearly in the Core Strategy. Reference should also be made to the

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<sup>3</sup> These were originally numbered as changes 88 and 90 in the Council's schedule. I have retained the original numbering of successive changes in that document.

potential effect on heritage assets, including those (such as the Tower of London World Heritage Site) outside the borough. The Council accepts these concerns and has proposed changes accordingly **[67, 68]**.

I endorse these for soundness reasons. However, an absolute prohibition on tall buildings outside identified opportunity areas (as has been suggested by some parties) is at odds with the “presumption against” proposed by the TBS. To my mind, the Council’s suggested rewording (which includes the caveat “normally”) provides an appropriate level of flexibility in this regard – enabling the Council to determine planning applications and set policy in future DPDs with reference to the specific local context, whilst remaining within the overall framework outlined in the Core Strategy and TBS.

- 3.36 In consultation with English Heritage, the Council proposes a number of amendments relating to the Core Strategy’s approach to heritage assets. Most of these are of a minor nature, and are set out in Appendix B. However, changes are required to policy 25 and the glossary **[71, 85]** in order to reflect Planning Policy Statement 5: *Planning for the Historic Environment* (PPS 5). I endorse these accordingly.
- 3.37 Core Strategy policy 26 sets out a two-tier approach to open space protection: as a result, the submission proposals map excludes areas of ‘amenity green space’, but includes other areas of protected open space. To my mind, this approach, which is supported by an Open Space Assessment (2005), is adequately justified and broadly in accordance with national policy in Planning Policy Guidance Note 17: *Planning for Open Space, Sport and Recreation* (PPG 17). While some Core Strategy proposals differ from the assessment’s recommendations, I am satisfied that such changes reflect necessary updating – for example in respect of sites lost to the existing Olympic development and sites that are now intended as part of the Olympic legacy. The Council proposes to amend the text of the Core Strategy to provide greater clarity in respect of the potential designation of the linear park at Hackney Wick (part of the Olympic Legacy proposals) as Metropolitan Open Land **[75]**. I endorse this for reasons of effectiveness.
- 3.38 Part of the Core Strategy area lies within the Lee Valley Regional Park, within which the Lee Valley Regional Park Authority has a variety of statutory responsibilities. The Council accepts that references to the Park Authority require expanding and updating, and has proposed to reword text accordingly **[74]**. I endorse this for reasons of effectiveness. However, bearing in mind that the Park Authority’s obligations and duties are set out fully elsewhere, and mindful that the new Park Plan is yet to be finalised, I do not consider that further changes are needed in order to make the Core Strategy sound in respect of this matter.
- 3.39 The Core Strategy does not set specific local requirements for sustainable buildings, referring instead to relevant national standards. While the possibility of seeking higher performance standards in growth areas is mentioned, such standards are not detailed. In principle, I am satisfied that the potential to achieve higher standards in such areas is consistent with the likely scale of development proposed for those areas. However,

any specific local requirements would need to be set out in future DPDs, as is intended by the Council, and justified in the terms set out in PPS 1's Climate Change Supplement.

- 3.40 Core strategy policy 30 states that district heating networks will be sought in a number of named growth areas. However, while initial work has been carried out, including a recent heat mapping study, the Council has yet to undertake detailed assessments of the potential for such schemes. For example, evidence has not been presented in relation to scheme viability, likely target percentages for decentralised energy use, operator details and the availability of key funding elements. As described above in relation to sustainable buildings, any detailed policy requirements in respect of decentralised energy would need to be set out in relevant DPDs and justified in the terms of PPS 1's Climate Change supplement. Nevertheless, I am satisfied that the approach set out in policy 30, which does not place specific requirements on developers, is commensurate with the evidence base as presently available. In this context, I endorse the Council's suggested change [79], which provides additional flexibility (regarding feasibility) in respect of decentralised network routes. However, I do not consider that the introduction of a reference to the heat map (or indeed the inclusion of the heat map itself) is necessary for soundness reasons: this is only one of the factors that would normally bear on scheme feasibility. This change does not therefore appear in Appendix A.
- 3.41 Subject to the changes that I have endorsed in respect of this main issue, I conclude that the Core Strategy takes adequate account of the effects of development on the built and natural environment and that its proposed measures to tackle climate change are effective, justified and in line with national policy.

#### **4. Overall Conclusions**

- 4.1 I conclude that with the changes proposed by the Council, set out in Appendix A of this report, the London Borough of Hackney Core Strategy satisfies the requirements of section 20(5) of the 2004 Act and meets the tests of soundness in PPS 12. I recommend that the plan be changed accordingly. And for the avoidance of doubt, I endorse the Council's proposed minor changes set out in Appendix B.

*M J Hetherington*

INSPECTOR

#### **List of Appendices**

Appendix A – Recommended Council Changes

Appendix B – Recommended Minor Changes Proposed by the Council

Appendix C – List of Abbreviations used in this Report

**Appendix C**  
**List of Abbreviations used in this Report**

AAP	Area Action Plan
CLG	Communities and Local Government
DPD	Development Plan Document
DRLP	Draft Replacement London Plan
GLA	Greater London Authority
HNA	Housing Needs Assessment
LDD	Local Development Document
LDF	Local Development Framework
LDS	Local Development Scheme
LSIS	Locally Significant Industrial Site
ODPM	Office of the Deputy Prime Minister
PEA	Priority Employment Area
PPG	Planning Policy Guideline
PPS	Planning Policy Statement
SCS	Sustainable Community Strategy
SHLAA	Strategic Housing Land Availability Assessment
SIL	Strategic Industrial Location
SPA	Special Policy Area
SPD	Supplementary Planning Document
TBS	Tall Buildings Strategy
UDP	Unitary Development Plan

## Appendix A Recommended Council Changes

[Reference numbers are consistent with those in the Council's final schedule of changes].

REF	LOCATION	ORIGINAL TEXT	REPLACEMENT TEXT
5	Para 4.4	1,085 net additional new dwellings  each year to 2018  Beyond 2018, 1,085 net additional new dwellings each year is assumed as the upper level target and rolled forward to 2026 <sup>1</sup> .	1,160 net additional new dwellings  each year from 2011 to 2021  Delete sentence
6	Para 4.6	Shoreditch Hackney's part of London's Central Activities Zone	South Shoreditch Includes Hackney's part of London's Central Activities Zone and extends to include southerly parts of Hoxton and the Kingsland Road.
7	Para 4.8		After this paragraph insert new paragraph as follows:  The Council's estate renewal programme, including those estates outside the growth areas identified, in total contributes a significant number of net additional new homes. It comprises comprehensive renewal of named housing estates to provide decent homes, create new and affordable homes, and address social and economic objectives such as community cohesion, safety, sustainable communities and social exclusion. (See Table 7.1 and paragraph 7.17 for further details of the programme.)
9	Policy 1	The Dalston AAP is expected to contribute 6,256 sqm of new employment space including 2,719 sqm of convenience shopping. This will be a mixed-use offer with office and workshop floor space supporting the creative cultural industries, up to 1,700 new homes, district heating, a library and public square, open space and children's play facilities.  <b>Hackney Central</b>  Up to 1,200 new homes,	The Dalston AAP will incorporate the Town Centre area, including Ridley Road Market, the Dalston Eastern Curve (a disused railway alignment) and the Priority Employment Areas (PEA). It will contribute 1,770 new homes. Dalston Town Centre is expected to contribute approximately 6,000 sqm of new employment space including approximately 3,000 sqm of convenience shopping.  This will be a mixed-use offer with office and workshop floor space supporting the creative cultural industries, new homes, district heating,  <b>Hackney Central</b>  Approximately 1,200 new homes,
12	Para 4.13		New sentence at the end of paragraph 4.13 as follows:  Work for the draft interim Hackney Central AAP suggests indicative capacity for approximately 14,000 sq m of new

REF	LOCATION	ORIGINAL TEXT	REPLACEMENT TEXT
			<p>employment space and approximately 25,000 sq m of new shopping.</p> <p>Insert endnote after “new shopping” as follows: Urban Design Led Indicative Capacity Analysis, November 2009.</p>
13	Policy 2	Major housing redevelopment is programmed at the Haggerston West and Kingsland Estates to accommodate 760 households.	Major housing redevelopment is programmed at the Haggerston West and Kingsland Estates. Overall, approximately 630 net additional new homes will be provided in the improved railway corridors.
16	Policy 3	<p>City Fringe: Shoreditch</p> <p>Shoreditch has the potential to contribute with 168,208 sq m City Road 7,571sq m. of new employment floorspace</p>	<p>South Shoreditch</p> <p>South Shoreditch has the potential to contribute approximately 530 net additional new homes, and approximately 168,000 sq m of new employment floorspace, with City Road contributing a further approximately 7,500sq m. of new employment floorspace</p>
18	Para 4.23	This links to the South Shoreditch SPD, adopted by Hackney Council in February 2006 which elaborates policy to balance objectives of maintaining the historic character and identity of the area, while facilitating appropriate development.	This links to the South Shoreditch SPD, adopted by Hackney Council in February 2006 which elaborates policy to balance objectives of maintaining the historic character and identity of the area, while facilitating appropriate development. The SPD area is smaller than that defined by the UDP 1995, predominately dealing with the area south of Old Street. A review of this SPD will be brought forward in the Local Development Scheme for 2010/13.
20	Para 4.26	With 4,664 new homes Woodberry Down will be the largest housing renewal project in Europe.	With 4,664 gross new homes Woodberry Down will be the largest housing renewal project in Europe.
21	Policy 4	<p>The Council will direct investment to create a new sustainable mixed community at Woodberry Down around the regenerated housing estate of 4,664 new homes.</p> <p>An AAP will be prepared for the existing Manor House town centre nearby to maximise the regeneration opportunities arising from the additional population at Woodberry Down, while respecting the function of the existing Green Lanes town centre in Haringey.</p>	<p>The Council will direct investment to create a new sustainable mixed community at Woodberry Down around the regenerated housing estate of 4,664 gross new homes, an increase of 2,665 net additional new homes.</p> <p>An AAP will be prepared for the existing Manor House town centre nearby to maximise the regeneration opportunities arising from the additional population at Woodberry Down, while respecting the function of the existing Green Lanes town centre in Haringey. The town centre is envisaged to contribute approximately 230 net additional new homes</p>
22	Policy 5	<p>The Olympic Legacy will bring significant regenerative change to this area, and the Council will prepare an AAP to maximise these opportunities.</p> <p>The AAP will aim to build a new integrated community in Hackney Wick.</p>	The Olympic Legacy will bring significant regenerative change to this area, and the Council will prepare an AAP to maximise these opportunities to not only shape its aspirations for Hackney Wick as a place for digital media and creative industry but also

REF	LOCATION	ORIGINAL TEXT	REPLACEMENT TEXT
		Key features of development proposals are 87,141 sq m of employment space, upgraded station and access improvements, with commercial development and approximately 500 new dwellings	create a new integrated and sustainable community.  Key features of development proposals are 87,000 sq m of employment space, upgraded station and access improvements, with commercial development and a minimum of approximately 620 net additional new homes.
23	Para 4.36		After Para 4.36 insert a new paragraph as follows:  Additionally Hackney Wick has three areas of residential use, the largest being the Trowbridge Estate. Despite the station on the North London Line (London Overground), Hackney Wick has poor accessibility due to its physical severance by major transport infrastructure routes: the M11 extension/A12 to the west, the Lea Navigation and River Lea to the east, the open spaces of Hackney Marshes to the North and the North London Line to the south. There is also, in effect, is a bus route watershed along the River Lea restricting access across the borough boundary to the strategic centre at Stratford.
24	Para 4.37	The key features of development proposals for Hackney Wick are 87,141 sq m of employment space, upgraded station and access improvements, with commercial development and (a minimum of) approximately 500 new dwellings.	Delete this sentence.
27	Para 5.9	As our dynamic population grows and changes so our faith profile will change and it will be important that the re-use of places of worship is made effectively and where there is a need for new places of worship it may be advantageous that these are located, like other elements of social infrastructure in town centres.	As our dynamic population grows and changes so our faith profile will change and it will be important that the re-use of places of worship is made effectively.
29	Para 5.16		After Para 5.16 insert a new paragraph as follows:  The nature, extent and prioritisation of contributions that may be required from certain types of development are set out in the Council's Planning Obligations Supplementary Planning Document (SPD) approved in November 2006. The qualifying criteria for different types of development are set out in Table 1 of the SPD. These contributions may be 'in kind' such as the building of affordable housing, the dedication of land for public highway purposes or they can take the form of financial contributions such as for education contributions on new housing development based on estimated 'child yield'. The SPD sets out the circumstances which would trigger the

REF	LOCATION	ORIGINAL TEXT	REPLACEMENT TEXT
			<p>Council seeking contributions and the methodology to assess the level of financial contribution required. The extent of contributions will be determined primarily by the financial viability of the particular development proposal and where necessary by negotiation on a site-by-site basis. The process for prioritising the possible different types of contributions is set out in Figure 1 and Table 2 of the SPD.</p>
35	Para 6.26	<p>The Hackney Night-Time Economy Evidence Based Study (2005), and the Shoreditch Night-Time Economy Evidence Base Review 2007 indicate that the night time economy requires careful management. In particular in Shoreditch where evidence shows that there has been a growth in the evening and night time economy and that this is having a negative impact on the overall resident and visitor experience. For example rising crime, environmental degradation and noise pollution. To manage the evening and night time economy carefully, the Council has designated a Special Policy Area in Shoreditch. Here there is a presumption against granting any new planning permission and any new licenses, including the intensification of existing uses either by increase in their capacity or hours of uses, unless the applicant can demonstrate that this will not add to the cumulative impact already being felt in this area.</p>	<p>The Hackney Night-Time Economy Evidence Based Study (2005), and the Shoreditch Night-Time Economy Study (Evidence Base Review) 2007 indicate that the night time economy requires careful management. In particular in South Shoreditch, as defined by the 1995 UDP, evidence shows that there has been a growth in the evening and night time economy and the negative impact this is having on the overall resident and visitor experience through rising crime, environmental degradation and noise pollution. To manage the evening and night time economy carefully, the Council has designated a Special Policy Area in South Shoreditch. The Council is considering proposals to extend the current South Shoreditch Special Policy Area and to designate further Special Policy Areas, for example in Dalston and South of Dalston along the A10 and Stoke Newington. The details of these proposals will be carried forward in subsequent DPD documents (see paragraph 6.29)</p>
36	Para 6.27	<p>Notwithstanding the foregoing, the Hackney Night-Time Economy Evidence Based Study recognises</p> <p>; it adds positively to the mix of uses and contributes to the broader regeneration strategy for the area</p>	<p>Notwithstanding the foregoing, the Shoreditch Night-Time Economy Study (Evidence Base Review) recognises</p> <p>Delete this phrase</p>
37	Policy 15	<p>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, Dalston Major Town Centre and Shoreditch (outside the Special Policy Area), taking account of its impact on local residential amenity, community safety and transport in these areas.</p>	<p>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) with limited expansion in South Shoreditch (as defined in the 1995 UDP), taking account of its impact on local residential amenity, community safety and transport in these areas.</p> <p>Where evidence indicates cumulative negative impacts, the Council may designate Special Policy Areas (SPAs) within which any new planning permissions, including the intensification of existing uses either by increase in their capacity or hours of uses, will not normally be granted, unless the applicant</p>

REF	LOCATION	ORIGINAL TEXT	REPLACEMENT TEXT
			can demonstrate that this will not add to the cumulative negative impact already being felt in this area, and that they add positively to the mix of uses and contribute to the improvement of the area.
38	Indicators to monitor delivery of Policy 15, 3 <sup>rd</sup> bullet	Type and number of licensed premises in Hackney Central, Stoke Newington High Street, Broadway Market, Dalston Major Town Centre and Shoreditch (Outside the Special Policy Area) and other shopping centre locations.	Type and number of licensed premises in Hackney Central, Stoke Newington High Street, Broadway Market, Dalston Major Town Centre and South Shoreditch (as defined in the 1995 UDP) and other shopping centre locations.
40	Para 6.41		<p>Before Para 6.41 insert a new paragraph as follows:</p> <p>The economic changes described in the introduction to this chapter have had a significant impact on Hackney's employment structure in terms of its size, type and spatial distribution. To reflect the current and future economic roles of Hackney as well as regeneration and economic development priorities, the Hackney Employment Growth Options Study, 2006 established criteria-based employment designations, which will help achieve the economic potential of varied employment locations and sites in the Borough.</p> <p>After "employment designations" add an endnote as follows:</p> <p>Hackney Employment Growth Options Study, Atkins, March 2006</p>
42	Para 6.44	Priority Employment Areas (PEA) have been defined in and around town and local centres and other areas of high public transport accessibility or areas where a cluster of employment uses already exists	<p>Priority Employment Areas (PEA) have been defined in and around town and local centres and other areas of high public transport accessibility or areas where a cluster of employment uses exists</p> <p>Add endnote after "employment uses" as follows:</p> <p>The employment clusters were defined by major agglomerations of businesses in the B Use Classes. This included all existing 1995 Hackney UDP Defined Employment Areas, town centres and local centres and other significant and emerging concentrations of smaller employment sites (Hackney Employment Growth Options Study, Atkins, March 2006)</p>
43	Para 6.46	It is anticipated that employment clusters identified within the plan are likely to deliver up to 407,000 sq. metres of employment floorspace which is enough to meet identified demands for employment uses.	It is anticipated that employment clusters identified within the plan are likely to deliver up to 407,000 sq. metres of B class employment floorspace which is enough to meet identified demands for employment uses.

REF	LOCATION	ORIGINAL TEXT	REPLACEMENT TEXT
46	Para 6.48	The Council seeks to protect and promote affordable locations in the borough, especially in areas where clusters have developed, such as the creative arts cluster in Shoreditch, Dalston and along Kingsland Road.	<p>The main purpose of Priority Employment Areas (PEAs) is to protect and promote affordable business locations in the borough, especially in areas where clusters are well established.</p> <p>Add endnote as follows:                      Artists' Studio Provision in the Host Boroughs: a review of the potential impacts of London's Olympic Project, 2008                      Study of Small Business Workspace Provision in Hackney, 2006                      Creative Hackney – A cultural policy framework for the London Borough of Hackney, 2006</p>
48	Para 6.49		<p>After para 6.49 insert new paragraphs as follows:</p> <p>The Strategic Industrial Location (SIL) and Locally Significant Industrial Sites (LSIS) are designated in line with the London Plan. Part of Hackney Wick is subject to the sole SIL designation.</p> <p>Locally Significant Industrial Sites (LSIS) are close to but outside the SIL in Hackney Wick and are of particular importance for industrial uses.</p> <p>The Other Industrial Areas (OIA) are where existing industrial capacity is protected but where, to facilitate business redevelopment or improvement, the introduction of additional uses and activities would be considered. This could include introducing higher density development that increases employment and may enable the release of land for other uses</p> <p>Due to the small size of individual sites other employment locations are not identified in the Proposals Map. However they offer potential to support viable B use class activities and should be retained for employment generating use under the provisions of Policy 18.</p>
49	Policy 17	<p><b>Core Strategy Policy 17</b></p> <p><b>Economic Development</b></p> <p>The Council will encourage economic development, growth and promotion of effective use of land through the identification and regeneration of sites for employment generating uses, the promotion of employment clusters and the encouragement of mixed use development with a strong viable employment component that meets the identified needs of an area, as set out in the Delivering Sustainable Growth</p>	<p><b>Core Strategy Policy 17</b></p> <p><b>Economic Development</b></p> <p>The Council will encourage economic development, growth and promotion of effective use of land through the identification and regeneration of sites for employment generating uses, the promotion of employment clusters and the encouragement of mixed use development with a strong viable employment component that meets the identified needs of</p>

REF	LOCATION	ORIGINAL TEXT	REPLACEMENT TEXT
		<p>chapter of this document. The Council expects to be able to deliver approximately 407,000sqm of employment floorspace to meet future demand.</p> <p>Hackney will encourage economic diversity, support existing businesses and business development by facilitating the location of micro, small and medium companies in the borough. A mix of business types and premises, where appropriate, will generally be sought on employment generating developments, providing opportunities for businesses to prosper in a diverse economic environment.</p> <p>Business (B1), Hotels (C1) and Non-residential (D1) Institutions will be the preferred uses in Priority Employment Areas (PEAs). C1 and D1 uses will only be allowed in PEAs with a PTAL score of 5 or above or PEAs adjacent to the identified town centres. New A uses may also be acceptable in PEAs, as long as auxiliary to business, hotel and non-residential institutions development and as long as it is not considered to draw trade away from existing retail centres identified in Policy 13 to the detriment of their vitality and viability.</p> <p>Strategic Industrial Locations, Locally Significant Industrial Sites and Other Industrial Areas are the preferred locations for, waste and recycling facilities industrial, manufacturing and storage and distribution uses, specifically General Industry (B2) and Storage and Distribution (B8) uses.</p> <p>General Industry (B2) and Storage and Distribution (B8) uses may also be allowed outside identified industrial areas where existing or proposed physical barriers for example railway arches, canals, roads or landscaping features, minimise inherent environmental impacts from industrial activity to the surrounding area such as visual intrusion, noise, vibration and general disruption from servicing and vehicular access.</p> <p>Any development within PEAs, Strategic Industrial Locations, Locally Significant Industrial Sites and Other Industrial Areas is expected to make positive contributions to its dynamics, contribute to the Delivering Sustainable Growth chapter and reinforce the character of the area</p>	<p>the area, as set out in the Delivering Sustainable Growth chapter of this document. The Council expects to be able to deliver approximately 407,000sqm of employment floorspace to meet future demand.</p> <p>The Council will encourage economic diversity, support existing businesses and business development by facilitating the location of micro, small and medium companies in the borough.</p> <p><b>Designated Areas in the Proposals Map</b></p> <p>Strategic Industrial Locations (SIL), Locally Significant Industrial Sites (LSIS) and Other Industrial Areas (OIA) are the preferred locations for: waste management and recycling facilities, industrial, manufacturing and storage and distribution uses, specifically General Industry (B2) and Storage and Distribution (B8) uses. However, in identified growth locations, where there are clear planning and regeneration objectives, the Council through formulation of detailed policy in its AAPs, will give more detailed guidance to those uses which best deliver these aspirations.</p> <p>In Priority Employment Areas (PEAs) Business (B1), Hotels (C1) and Non-residential (D1) Institutions will be the preferred uses. C1 and D1 uses will only be allowed in PEAs with a PTAL score of 5 or above or PEAs adjacent to the identified town centres.</p> <p>In PEAs outside town centres and the Central Activity Zone (CAZ), a sequential approach should be followed by any proposer of a use prioritised for town centres as set in the London Plan and PPS4. New A class and residential (C3) uses may be acceptable in PEAs, as long as auxiliary to business, hotel and non-residential institutions development and where not considered to draw trade away from existing retail centres identified in Policy 13 to the detriment of their vitality and viability.</p> <p><b>Outside Designated Areas in the Proposals Map</b></p> <p>General Industry (B2) and Storage and Distribution (B8) uses may be appropriate where existing or proposed physical barriers for example railway arches, canals, roads or landscaping features, minimise environmental impacts from industrial activity to the</p>

REF	LOCATION	ORIGINAL TEXT	REPLACEMENT TEXT
			surrounding area such as visual intrusion, noise, vibration and general disruption from servicing and vehicular access.
51	Para 6.53	Although the Council recognises the benefit and welcomes the redevelopment of under-used, vacant and outdated sites, any loss of employment space reduces opportunities to address unemployment within the borough.	Although the Council recognises the benefit and welcomes the redevelopment of under-used, vacant and outdated sites, any loss of employment space, premises and their site curtilage, reduces opportunities to address unemployment within the borough.
52	Policy 18	<p>The Council will protect employment land or land last used for employment purposes anywhere in the borough.</p> <p>Redevelopment of existing employment land will be allowed when this redevelopment will clearly contribute to addressing worklessness within the borough, improve quality and uptake of existing employment space, the surrounding area and meet the identified needs of businesses within the area.</p> <p>Any employment space provided should contribute to the economic objectives of the borough set in the Delivering Sustainable Growth chapter, be of high quality, flexible, inclusive, have natural light and be easily adaptable.</p>	<p>The Council will protect employment land and floorspace last used for employment purposes anywhere in the borough.</p> <p>Redevelopment of existing employment land and floorspace may be allowed, as provided for in Policy 17 (Economic Development), when it will clearly contribute to: addressing worklessness; improving business function and attractiveness; enhancing the specification of business premises; improving the immediate area; increasing the take-up of existing employment floorspace; and meeting the identified up-to-date needs of businesses located, or wishing to locate, in the borough.</p> <p>Any employment floorspace provided should contribute to the economic objectives of the borough set in the Delivering Sustainable Growth chapter, be of high quality, flexible, have natural light and be easily adaptable to the modern needs of businesses.</p>
53	Para 7.20, bullet points	<p>The key components of each tranche are summarised below.</p> <ul style="list-style-type: none"> <li>Tranche 1: 2006/07 to 2010/11: contains the known dwellings currently under construction, unexpired planning permissions that have yet to start (on past trends 90% of planning permissions result in on-site starts), development sites allocated in town centre growth areas, opportunity areas and sites outside the designated growth areas that are expected to come forward for housing development. Supply in Tranche 1 is expected to exceed the cumulative 5 year target by 1,922 dwellings.</li> <li>Tranche 2: 2011/12 to 2015/16: contains the bulk of the planned estate renewal programme, further phases of town centre growth, the estimated capacity of the identified opportunity areas and contributions from sites outside of the designated growth areas. Due to the anticipated phases of development supply is expected to</li> </ul>	<p>The key components of each tranche are summarised below.</p> <ul style="list-style-type: none"> <li>Tranche 1: 2006/07 to 2010/11: contains the known dwellings currently under construction, unexpired planning permissions that have yet to start (on past trends 90% of planning permissions result in on-site starts), development sites allocated in town centre growth areas, opportunity areas and sites outside the designated growth areas that are expected to come forward for housing development. Supply in Tranche 1 is expected to exceed the cumulative 5 year target by 2,495 dwellings.</li> <li>Tranche 2: 2011/12 to 2015/16: contains the bulk of the planned estate renewal programme, further phases of town centre growth, the estimated capacity of the identified opportunity areas and</li> </ul>

REF	LOCATION	ORIGINAL TEXT	REPLACEMENT TEXT
		<p>overshoot the 5 year target for this period by 746 dwellings.</p> <ul style="list-style-type: none"> <li>Tranche 3: 2016/17 to 2020/21: the estate renewal contribution is reducing, while supply from Dalston town centre and opportunity areas begin to come on stream. Supply is reducing and now undershoots the 5 year target by 2,069 units.</li> <li>Tranche 4: 2021/22 to 2025/26: estate renewal has completed apart from Woodberry Down, while town centre and opportunity sites are reaching their projected capacity. Supply is expected undershoot the assumed target at the end of this tranche by 1,827 units.</li> </ul>	<p>contributions from sites outside of the designated growth areas. Due to the anticipated phases of development supply is expected to overshoot the 5 year target for this period by 835 dwellings.</p> <ul style="list-style-type: none"> <li>Tranche 3: 2016/17 to 2020/21: the estate renewal contribution is reducing, while supply from Dalston town centre and opportunity areas continues. Supply is reducing and now undershoots the 5 year target by 655 units.</li> <li>Tranche 4: 2021/22 to 2025/26: estate renewal has completed apart from Woodberry Down, while town centre and opportunity sites are reaching their projected capacity. Supply is expected to undershoot the assumed target at the end of this tranche by 1,310 units.</li> </ul>
54	Policy 19	Hackney will seek to ensure that proposals for new residential development and residential conversions including changes of use, incorporate a mix of dwelling types and sizes that reflect and respond to Hackney's current and future housing needs, positively contributing to the creation of mixed, sustainable communities and neighbourhoods.	Hackney will seek to ensure that proposals for new residential development and residential conversions including changes of use, incorporate a mix of dwelling types and sizes that reflect and respond to Hackney's current and future housing needs, and taken together with residential extensions, positively contribute to the creation of mixed, sustainable communities and neighbourhoods.
56	Table 7.1 Figure 7.1		Delete Table 7.1 and Figure 7.1. Replace with versions attached at Appendices A.1 and A.2
57	Para 7.22		<p>After Para 7.22 insert a new paragraph as follows:</p> <p>In appropriate circumstances, residential extensions may allow the addition of bedroom space in existing dwellings and are recognised as a way of increasing the supply of larger dwellings in the borough in line with identified need for homes that are more suitable for larger families. The specific circumstances in which residential extensions may be permitted are set out in the Council's recent Residential Extensions and Alterations Supplementary Planning Document (2009).</p>
58	Para 7.25	A detailed breakdown of the Council's specific targets for size mix across all tenures will be included in a Housing Supplementary Planning Document.	A detailed breakdown of the Council's detailed size mix policy for all housing tenures will be included in the Development Management Development Plan Document.
59	Para 7.27	The Council has a number of mechanisms within the planning system to focus investment and delivery. The Core Strategy sets out the strategic spatial ambitions for the borough; more detail will be	The Council has a number of mechanisms within the planning system to focus investment and delivery. The Core Strategy sets out the strategic spatial ambitions for the

REF	LOCATION	ORIGINAL TEXT	REPLACEMENT TEXT
		<p>contained within the planning documents listed below.</p> <ul style="list-style-type: none"> <li>• A Site Allocations DPD will be produced in 2011. This will be the main mechanism for allocating and safeguarding sites for housing and other community facilities.</li> <li>• The Development Management Policies DPD will be produced in 2011. This will contain detailed criteria based policies following the broad spatial approach of the Core Strategy. The Area Action Plans for Dalston, Hackney Central and Manor House set out information on proposed redevelopment of these areas, including information on housing provision.</li> <li>• The Supplementary Planning Documents for Hackney Wick and Woodberry Down will both work alongside the Site Allocations DPD to safeguard appropriate sites for development and renewal.</li> </ul>	<p>borough; more detail will be contained within the planning documents listed below.</p> <ul style="list-style-type: none"> <li>• A Site Allocations DPD will be produced in 2011. This will be the main mechanism for allocating and safeguarding sites for housing and other community facilities.</li> <li>• The Development Management DPD will be produced in 2011. This will contain detailed criteria based policies following the broad spatial approach of the Core Strategy. The Area Action Plans for Dalston, Hackney Central, Manor House and Hackney Wick set out information on proposed redevelopment of these areas, including information on housing provision.</li> <li>• The Supplementary Planning Guidance for Woodberry Down will work alongside the Site Allocations DPD to safeguard appropriate sites for development and renewal.</li> </ul>
60	Para 7.43		<p>After Para 7.43 insert a new paragraph as follows:</p> <p>The Council has a number of mechanisms within the planning system to focus investment and delivery of Affordable Housing. The Core Strategy sets out the strategic spatial ambitions for the borough more detail will be contained within the planning documents listed below.</p> <ul style="list-style-type: none"> <li>• A Site Allocations DPD will be produced in 2011. This will be the main mechanism for allocating and safeguarding sites for affordable housing</li> <li>• The Development Management Policies DPD will be produced in 2011. This will contain detailed criteria based policies following the broad spatial approach of the Core Strategy. The Area Action Plans for Dalston, Hackney Central, Manor House and Hackney Wick set out information on proposed redevelopment of these areas, including information on affordable housing provision.</li> <li>• The Affordable Housing Supplementary Planning Document, which will be revised and updated over the lifetime of this LDF</li> <li>• The Supplementary Planning Guidance for Woodberry Down will work alongside the Site Allocations DPD to safeguard appropriate sites for development and renewal.</li> <li>• Borough Investment Plan (2010). This</li> </ul>

REF	LOCATION	ORIGINAL TEXT	REPLACEMENT TEXT
			will set out the Councils' Strategic approach to affordable housing delivery and capital funding investment priorities
62	Para 7.62	In Hackney it has been identified that gypsies, travellers and travelling show people wish to find and buy their own sites to develop and manage. Others require space to rent for pitching caravans, usually on sites owned and run by the local authority.	Delete this paragraph.
63	Para 7.63	The London Plan assessment identified  high population density of the borough.	The London Gypsy and Traveller Accommodation Needs Assessment (LGTANA), 2008 identified  high population density of the borough in order to meet this identified need.
64	Policy 23	New sites should be sympathetic to the existing local natural and built environment and other key planning considerations such as flood risk, and neighbourhood character.  Permission will only be granted if each of the above criteria are satisfied.	New sites should be in keeping with the existing local environment and other key planning considerations such as flood risk, and neighbourhood character.  Delete the last paragraph.
67	Para 8.8	In Hackney's town centres, growth areas and around transport nodes, buildings that are significantly taller than surrounding development may be appropriate (see the Glossary for the definition of tall buildings in the local context). Broad areas where there may be opportunities for relatively tall buildings are identified on Map 8.1 Tall Building Opportunity Areas. These are in certain parts of Shoreditch within the City Fringe where there are clusters of tall buildings that influence the urban scale. With high demand and limited development opportunities, tall or very tall buildings may be particularly appropriate in these areas. In the other identified broad areas, predominately lower 'mid rise' buildings are considered appropriate. Of these areas a few are suitable for 'tall' buildings.	In Hackney's town centres, growth areas and around transport nodes, buildings that are significantly taller than surrounding development may be appropriate (see the Glossary for the definition of tall buildings in the local context which, includes the sub categories of 'mid rise' 'tall' and 'very tall'). Broad areas where there may be opportunities for relatively tall buildings are identified on Map 8.1 Tall Building Opportunity Areas. These are in certain parts of Shoreditch within the City Fringe where there are clusters of tall buildings that influence the urban scale. With high demand and limited development opportunities, tall or very tall buildings may be particularly appropriate in these areas. In the other identified broad areas, predominately lower 'mid rise' buildings are considered appropriate. Of these areas a few locations are suitable for 'tall' buildings. Outside of the Tall Building Opportunity Areas, taller buildings are normally considered inappropriate.
68	Para 8.8	Proposals for taller buildings in all the identified Tall Buildings Opportunity Areas need to take into account the Hackney Tall Building Strategy (2005) especially the recommended detail area assessment and design considerations. The local context is particularly important for taller buildings, irrespective of their location. Detail analysis of site characteristics and the fabric of the surrounding environment is essential. This is especially the case where heritage issues, including impact on important heritage assets in neighbouring boroughs and important views are	Proposals for taller buildings in all the identified Tall Buildings Opportunity Areas including the whole of Shoreditch need to take into account local area sensitivities such as siting, visual impact, the historic environment and its setting. Consideration should also be given to the design rationale and detailed area assessment as set out in the Hackney Tall Building Strategy (2005). The local context is particularly important for taller buildings, irrespective of their location. Detailed analysis

REF	LOCATION	ORIGINAL TEXT	REPLACEMENT TEXT
		involved.	of site characteristics and the fabric of the surrounding environment is essential. This is especially the case where heritage issues, including impact on important heritage assets in neighbouring boroughs, such as the Tower of London World Heritage Site and important views are involved.
71	Policy 25	All development should make a positive contribution to the character of Hackney's historic and built environment. This includes identifying, preserving and enhancing the special character and appearance of the borough's identified heritage assets, their setting and where appropriate the wider historic environment.	All development should make a positive contribution to the character of Hackney's historic and built environment. This includes identifying, conserving and enhancing the historic significance of the borough's designated heritage assets, their setting and where appropriate the wider historic environment.
74	Para 8.34	<ul style="list-style-type: none"> <li>Lee Valley Regional Park Plan (2000) Part One: sets out the overall vision for a cohesive, sustainable and the valued regional green lung for leisure purposes, and also recognises its importance in terms of biodiversity and water assets. Part two of the Plan sets proposals for the future use and development of the Regional Park, which in the main is supported by Hackney Council. Although, the Park Authority is not a development management agency, and its Plan is not the local development plan, Local Planning Authority development plans are required to include proposals of the Park Plan which relate to their areas, providing that there are no inconsistencies between the plans.</li> </ul>	<ul style="list-style-type: none"> <li>The Lee Valley Regional Park Plan was adopted in 2000. It sets out proposals for future use and development of the regional park as a place for leisure, recreation, sport and nature. These proposals relate to large areas of open space within Hackney as indicated on the Proposals Map. The Regional Park Authority is in the process of reviewing its proposals and will replace the Park Plan with the Park Development Framework. The Park Authority is not a development management agency and its Plan is not a local development plan but local authorities are required to include those parts of the Park Plan or Development Framework affecting their area within own relevant development plan documents. However, such inclusion does not infer that the local planning authority will support them.</li> </ul>
75	Para 8.34	<ul style="list-style-type: none"> <li>The London Olympics Legacy planning application approved in 2007 shows a new linear park adjacent to the Old River Lea on the Hackney side. The details of this open space will be developed further in the forthcoming Hackney Wick Area Action Plan.</li> </ul>	<ul style="list-style-type: none"> <li>The London Olympics Legacy planning application approved in 2007 shows a new linear park adjacent to the Old River Lea on the Hackney side. The details of this open space will be developed further in the forthcoming Hackney Wick Area Action Plan. When the linear park and associated open spaces are developed, Hackney Council will, in consultation with the Mayor and adjoining authorities, define the boundaries of each Metropolitan Open Land area.</li> </ul>
79	Policy 30	Existing and proposed decentralised network routes will be safeguarded and protected to provide future connection opportunities from new and refurbished developments	Existing and proposed decentralised network routes will be safeguarded and protected to provide future connection opportunities from new and refurbished developments where these are demonstrated to be feasible.
83	Glossary (46)	<b>Employment generating uses:</b> For the purpose of this document, employment generating uses are: B1,	<b>Employment generating uses:</b> For the purpose of this document, employment

REF	LOCATION	ORIGINAL TEXT	REPLACEMENT TEXT
		B2, B8, C1 and D1. A1 can also be considered as a employment generating use but only when part of a development that also includes one or more of the uses mentioned previously (B1, B2, B8, C1, D1).	generating uses in line with the PPS 4 definition of economic development, including B1, B2, B8, C1 and D1. A1 can also be considered as a employment generating use but only when part of a development that also includes one or more of the uses mentioned previously (B1, B2, B8, C1, D1)
85	Glossary New entry		<b>Historic Significance:</b> The value of a heritage asset, because of its heritage interest, which may be archaeological, architectural, artistic or historic.
92	Proposals Map	Lesney's Toy Factory (see Appendix A.3)	Delete designation as Locally Significant Industrial Location

## Appendix A.1

Revised Table 7.1 to be inserted into the Core Strategy

Revised Table 7.1 Housing Growth Areas and the Housing Trajectory

		2006/11	2011/16	2016/21	2021/26	Total
	<b>Completed planning permissions borough</b>	4,260	0	0	0	4,260
	<b>Outstanding planning permissions all</b>	1,305	830	0	0	2,135
	<b>Existing development plan allocations</b>	0	50	0	0	50
	<b>Housing supply anticipated from sites to be allocated within the future DPD excluding Growth Areas</b>	0	310	530	500	1,340
	<b>Housing supply anticipated to come from sites not specifically identified as available through the local planning process (windfall sites)</b>	0	640	1,555	1,765	3,960
<b>A</b>	<b>Sub Total</b>	<b>5,565</b>	<b>1,830</b>	<b>2,085</b>	<b>2,265</b>	<b>11,745</b>
<b>B</b>	<b>Identified Estate Renewal Areas</b>					
	Woodberry Down	0	1,325	910	430	2,665
	Colville	0	505	170	0	675
	Ottaway Court (six estates) *	0	-30	0	0	-30
	Rendlesham House (six estates)	0	15	0	0	15
	Tower Court (six estates)	0	45	0	0	45
	Alexandra National House (six estates)	0	30	0	0	30
	Kings Crescent	0	565	0	0	565
<b>B</b>	<b>Identified Estate Renewal Areas Sub Total</b>	<b>0</b>	<b>2,455</b>	<b>1,080</b>	<b>430</b>	<b>3,965</b>
<b>C</b>	<b>Identified Town Centre Regeneration</b>					
	Dalston	435	520	600	215	1,770
	Hackney Central	155	525	210	310	1,200
<b>C</b>	<b>Identified Town Centre Regeneration Sub Total</b>	<b>590</b>	<b>1,045</b>	<b>810</b>	<b>525</b>	<b>2,970</b>
<b>D</b>	<b>Identified Opportunity Areas</b>					
	Hackney Wick **	135	85	200	200	620
	South Shoreditch ***	210	20	100	200	530
	Manor House	65	65	50	50	230
	Improved Railway Corridors****	195	355	40	40	630
<b>D</b>	<b>Identified Opportunity Areas Sub Total</b>	<b>605</b>	<b>525</b>	<b>390</b>	<b>490</b>	<b>2,010</b>
<b>E</b>	<b>Non-conventional self-contained and returns from vacant Sub Total</b>	<b>795</b>	<b>780</b>	<b>780</b>	<b>780</b>	<b>3,135</b>
<b>F</b>	<b>Grand Total (A+B+C+D+E)</b>	<b>7,555</b>	<b>6,635</b>	<b>5,145</b>	<b>4,490</b>	<b>23,825</b>
<b>G</b>	<b>GLA Draft Replacement London Plan Housing Target</b>	<b>5,060</b>	<b>5,800</b>	<b>5,800</b>	<b>5,800</b>	<b>22,460</b>

Please note: above figures are rounded to the nearest 5 and all figures are net additional

**NOTES:**

\* The minus figure arises through demolitions and a smaller number of larger units

\*\* Figures do not take account of more recent but unverified substantial housing proposals from the Olympic Legacy Company

\*\*\* Area as identified by the South Shoreditch Supplementary Planning Document

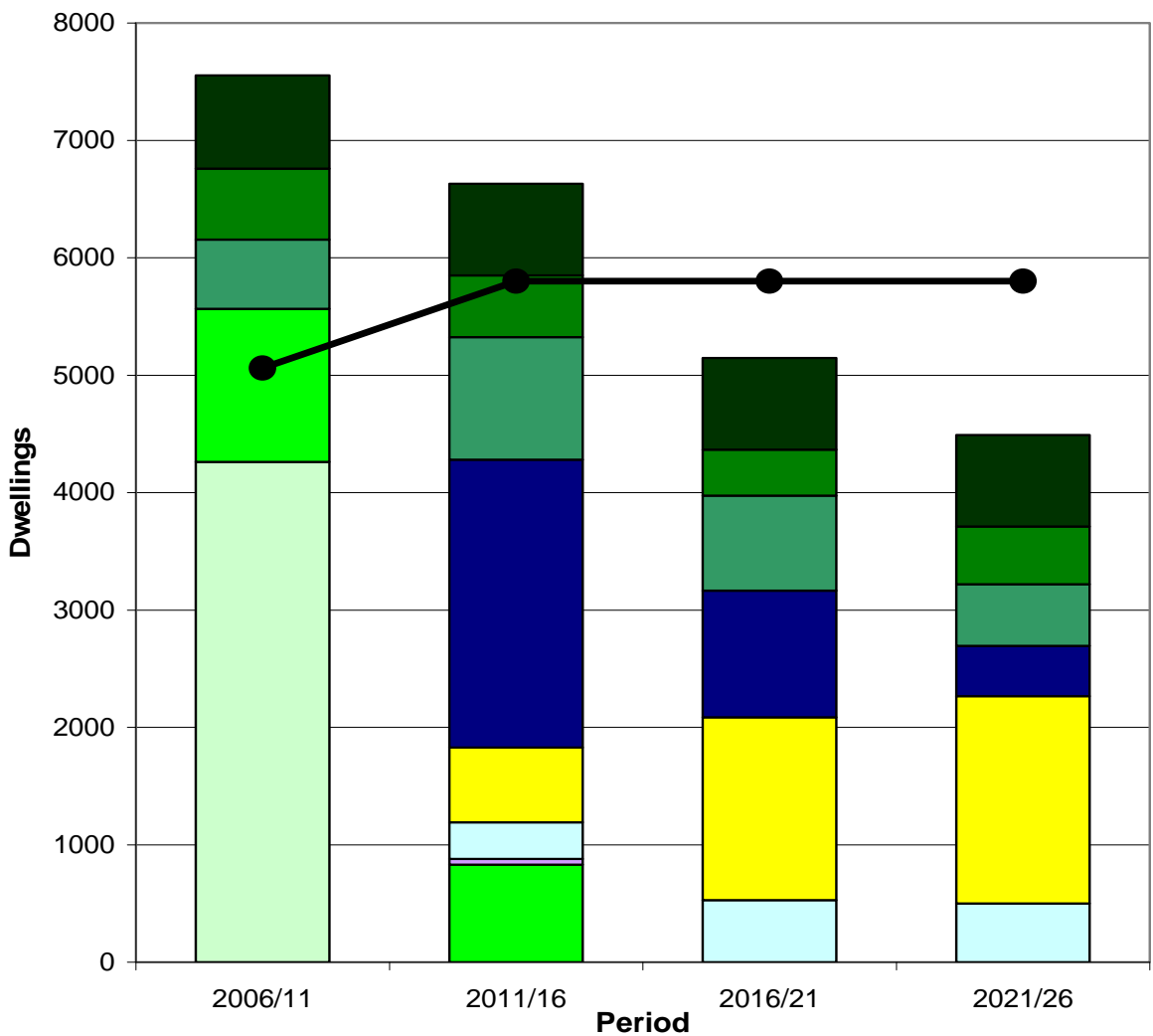
\*\*\*\* Figures include Haggerston West and Kingsland, Holly Street, Marian Court and Bridge House estate renewal areas (total 349 units)

**Appendix A.2**

Revised Figure 7.1 to be inserted into the Core Strategy

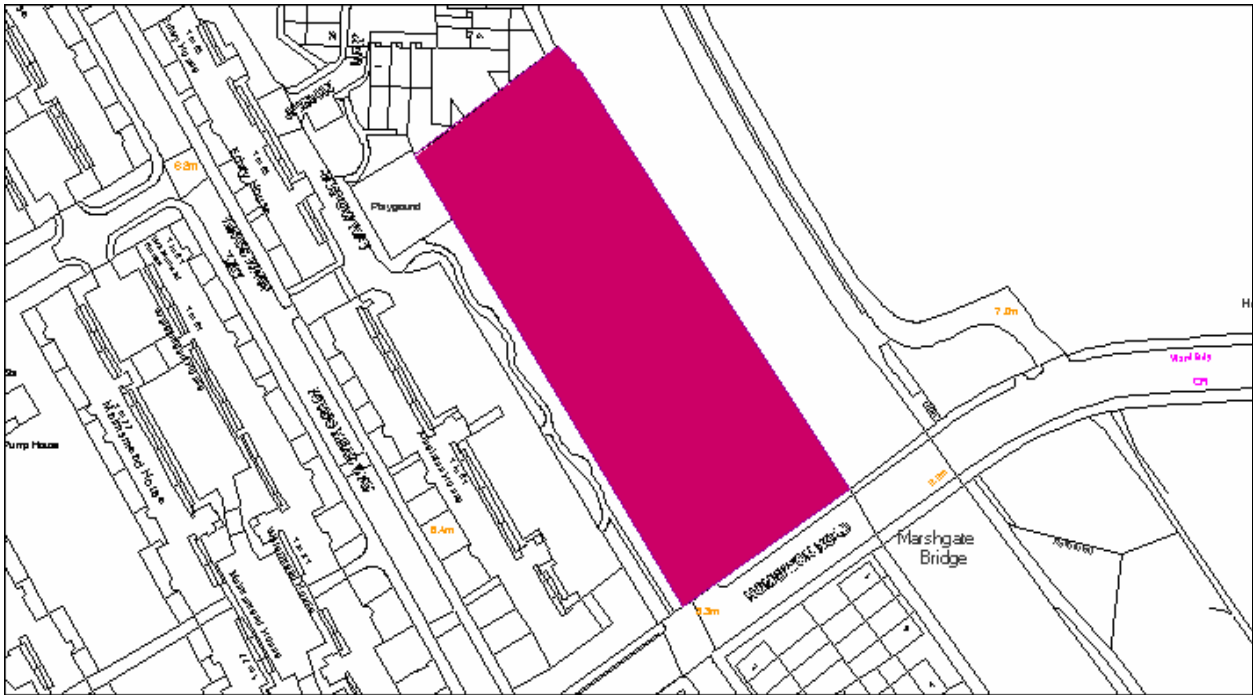
**Figure 7.1 Housing Trajectory and Delivery**

- Non-conventional Self contained and returns from vacant
- Identified Opportunity Areas Total
- Identified Town Centre Regeneration Total
- Identified Estate Renewal areas Total
- Housing supply anticipated to come from windfall sites
- Housing supply anticipated from sites to be allocated in the future DPDs exc. Growth Areas
- Existing development plan allocations
- Outstanding planning permissions all
- Completed planning permissions borough
- GLA Draft Replacement London Plan Housing target



### Appendix A.3

#### Area to be deleted from Locally Significant Industrial Location designation



**Appendix B**  
**Recommended Minor Changes Proposed by the Council**

[Reference numbers are consistent with those in the Council's final schedule of changes].

REF	LOCATION	ORIGINAL TEXT	REPLACEMENT TEXT
1	Para 1.11		<p>After this paragraph insert new text as follows:</p> <p>In June 2009, the Council published the Core Strategy Proposed Submission document and accompanying Sustainability Appraisal report. These set out the Council's proposed spatial policies. The Planning Service received 80 representations about this document and following consideration of them it was decided to propose a series of further changes to improve the document. These changes formed the content of the Core Strategy Submission Document Proposed Pre-examination Changes document which in December 2009 was sent to all individuals and organisation that responded to the June 2009 consultation. There were 18 responses to this further consultation exercise.</p> <p>To support the Examination in Public the Core Strategy Submission Document (Consolidated with Schedule of Proposed Changes, which was subject to proportionate consultation in December 2009 – January 2010) was produced. This document included the changes proposed in December 2009.</p>
2	Para 1.23	<p>DPDs:</p> <ul style="list-style-type: none"> <li>• Development Control Policies (DCP)</li> </ul>	<p>DPDs:</p> <ul style="list-style-type: none"> <li>• Development Management Development Plan Document (DMPD)</li> </ul>
3	Para 2.14	<p>Shoreditch</p> <p>Shoreditch bordering the City of London grew around the junction of the A10 with Old Street-Hackney Road. Shoreditch has a history of creativity and was home to England's first playhouse in 1576. Today, Shoreditch is home to Europe's highest concentration of creative industries. 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. The expansion of the City's financial district has created major opportunities around Shoreditch for offices, residential and potentially retail development.</p>	<p>South Shoreditch</p> <p>South Shoreditch bordering the City of London grew around the junction of the A10 with Old Street-Hackney Road. South Shoreditch has a history of creativity and was home to England's first playhouse in 1576. Today, South Shoreditch is home to Europe's highest concentration of creative industries. The distinctive combination of arts, creative industries and the thriving night-time economy in South Shoreditch Triangle, has seen the area become a model for inner city development. The expansion of the City's financial district has created major opportunities around Shoreditch for offices, residential and potentially retail development.</p>
4	Para 3.8	Shoreditch	South Shoreditch
8	Policy 1	The aim is to rejuvenate Dalston town centre by adding new uses, employment and activities in mixed use, commercial and residential projects, taking the opportunity of the new Dalston Junction Station to	The aim is to rejuvenate Dalston town centre by adding new uses, employment and activities in mixed use, commercial and residential projects and enhancing Dalston's

REF	LOCATION	ORIGINAL TEXT	REPLACEMENT TEXT
		increase the density of employment within the area and to attract new businesses and investment.	historic environment, taking the opportunity of the new Dalston Junction Station to increase the density of employment within the area and to attract new businesses and investment.
10	Para 4.11	Dalston is the largest Town Centre in Hackney.	Dalston is the largest Town Centre in Hackney and has some areas of distinctive historic value.
11	Para 4.13	Hackney Central is the civic and cultural heart of the borough. It contains the Town Hall and civic office complex, central library, museum, Hackney Empire Theatre and shops. There is a historic quarter around St John's Church, its church-yard and Sutton House with associated open space and Georgian streets.	Hackney Central is the civic and cultural heart of the borough. It contains the Town Hall and civic office complex, central library, museum, Hackney Empire Theatre and shops. Its Victorian and public buildings, along with a historic quarter around St John's Church, its church-yard and Sutton House with associated open space and Georgian streets give Hackney Central its historic merit.
14	Para 4.19	<b>Shoreditch</b>  4.19 With a fine grain townscape and diverse social culture, Shoreditch contrasts with the City financial district to the south.	<b>South Shoreditch</b>  4.19 South Shoreditch, as defined by the Unitary Development Plan (UDP) 1995, has a fine grain townscape and diverse social culture that contrasts with the City financial district to the south.
15	Para 4.20	Shoreditch	South Shoreditch
17	Para 4.22	Shoreditch	South Shoreditch
19	Para 4.24	Shoreditch	South Shoreditch
25	Policy 6	The Council will encourage patterns and forms of development that reduce the need to travel, particularly by car, and will ensure that development results in the highest standard of environment and facilities for pedestrians and cyclists.	The Council will encourage patterns and forms of development that reduce the need to travel, particularly by car, and will ensure that development results in the highest standard of design quality, environment and facilities for pedestrians and cyclists.
26	Para 5.48 2 <sup>nd</sup> bullet	<ul style="list-style-type: none"> <li>The Development Management Policies Development Plan Document</li> </ul>	<ul style="list-style-type: none"> <li>The Development Management Development Plan Document</li> </ul>
28	Policy 3	<ul style="list-style-type: none"> <li>The City Fringe / Shoreditch</li> </ul>	<ul style="list-style-type: none"> <li>South Shoreditch</li> </ul>
30	Para 6.1	Historically, Hackney's retail and commercial uses formed around town centres while industry developed in Shoreditch, Hackney Wick, and alongside main roads, railways and waterways. This resulted in a land use pattern of retail and employment areas side by side in the central and southern parts of the borough with regionally significant employment areas in Shoreditch and Hackney Wick, very much linked to warehousing and industrial uses.	Historically, Hackney's retail and commercial uses formed around town centres while industry developed in South Shoreditch, Hackney Wick, and alongside main roads, railways and waterways. This resulted in a land use pattern of retail and employment areas side by side in the central and southern parts of the borough with regionally significant employment areas in South Shoreditch and Hackney Wick, very much linked to warehousing and industrial uses.
31	Para 6.6	Certain centres in the borough have specialised in	Certain centres in the borough have

REF	LOCATION	ORIGINAL TEXT	REPLACEMENT TEXT
		providing for the local communities and other centres, such as Shoreditch and Dalston	specialised in providing for the local communities and other centres, such as South Shoreditch and Dalston
32	Para 6.7	At present, Hackney is well known for its creative industry clusters in Hoxton and Shoreditch as well as the evening	At present, Hackney is well known for its creative industry clusters in Hoxton and South Shoreditch as well as the evening
33	Para 6.8	Policies for retail development and employment fit into the context of national policy in particular Planning Policy Guidance Note 4: Industrial, commercial development and small firms (PPG4, 1992), draft Planning Policy Statement 4: Planning for Prosperous Economies (PPS4, 2009), Planning Policy Guidance Note 13: Transport (PPG13) and Planning Policy Statement 6: Planning for town centres (PPS6, 2005), regional and local corporate policy. The London Plan provides strategic context - Dalston is a major town centre, Hackney Wick is Strategic Industrial location and Shoreditch is part of the Central Activities Zone (CAZ).	Policies for retail development and employment fit into the context of national policy in particular Planning Policy Statement 4: Planning for Sustainable Economic Growth (PPS4, 2009), Planning Policy Guidance Note 13: Transport (PPG13) and regional and local corporate policy. The London Plan provides strategic context - Dalston is a major town centre, Hackney Wick is Strategic Industrial location and South Shoreditch is part of the Central Activities Zone (CAZ).
34	Para 6.26	The Council has designated a Special Policy Area in Shoreditch.	The Council has designated a Special Policy Area in South Shoreditch. Add an endnote as follows: South Shoreditch Supplementary Planning Document, LBH, February 2006, and Statement of Licensing Policy 2005, LBH, 2005.
39	Para 6.33	At present, Hackney is well known for its creative industry clusters in Hoxton/Shoreditch,	At present, Hackney is well known for its creative industry clusters in Hoxton/South Shoreditch,
41	Para 6.41	South Shoreditch is identified in the London Plan as part of London's Central Activities Zone (CAZ).	South Shoreditch is identified in the London Plan as part of London's Central Activities Zone (CAZ). The CAZ's extent is shown on the Proposals Map.
44	Para 6.47	80% of the identified employment floorspace will be delivered in Shoreditch and Hackney Wick,	80% of the identified employment floorspace will be delivered in South Shoreditch and Hackney Wick,
45	Para 6.48	These businesses are essential to Hackney's economic vitality and are often catalysts for the regeneration of dilapidated areas.	Add an endnote as follows:  Study of Small Business Workspace Provision in Hackney, 2006
47	Para 6.48	The proposed agglomerations will benefit businesses, provide employment opportunities, diversify Hackney's economy and tackle climate change,	The proposed agglomerations will benefit businesses, provide employment opportunities and diversify Hackney's economy,
50	Para 6.50 4 <sup>th</sup> bullet	Development Control Development Plan Document	Development Management Development Plan Document
55	Para 7.11	The City Fringe and Shoreditch	South Shoreditch
61	Para 7.50 2 <sup>nd</sup> bullet	Development Management Policies DPD	Development Management Development Plan Document

REF	LOCATION	ORIGINAL TEXT	REPLACEMENT TEXT
65	Chapter 8 Overarching Principles	<b>High Quality Design</b> The Council will require development to contribute positively to a sense of place and Hackney's local distinctiveness, their setting and the wider historic environment. High quality design should relate to and complement their surroundings, and be fit for purpose. The strategic importance placed on delivering high quality sustainable development.	<b>High Quality Design</b> The Council will require development to contribute positively to a sense of place and Hackney's local distinctiveness, their setting and the wider historic environment. High quality design should relate to and complement their surroundings, and be fit for purpose. The strategic importance placed on delivering high quality sustainable development accords with national guidance.
66	Chapter 8 Overarching Principles	<b>Historic Environment</b> The Council and is committed to preserving and /or enhancing the character and appearance of its historic assets their setting and the wider historic environment. Hackney's historic heritage must be considered a positive asset for the borough's future	<b>Historic Environment</b> The Council is committed to conserving the historic significance of the borough's heritage assets, their setting and the wider historic environment. Hackney's historic heritage must be considered a positive contributor for the borough's future.
69	Para 8.19	Hackney's conservation area review process emphasises the importance of the distinctive features of a place, its spatial qualities, the significance of its historic buildings and assets, Historic / Heritage assets as defined by Draft PPS15 (2009), see also Glossary and the contribution they make to the townscape as well as intangible aspects such as historical associations and former uses	Hackney's conservation area review process emphasises the importance of the distinctive features of a place, its spatial qualities, the significance of its historic buildings and assets. Historic / Heritage assets as defined by PPS5 Planning for the Historic Environment (2010) and its supporting Planning Practice Guide, see also Glossary, and the contribution they make to the townscape as well as intangible aspects such as historical associations and former uses.
70	Para 8.20	Furthermore, the Council is committed to protecting buildings and structures of particular local interest or cherished landmark, which are not statutorily listed.	Furthermore, the Council is committed to protecting buildings, structures and townscape features of particular local interest, value or cherished landmarks, which are not statutorily designated.
72	Para 8.24	Currently there are 27 designated conservation areas with three more ongoing through the designation process. The list of locally listed buildings is also part of this programme. English Heritage's 'Heritage at Risk' Register contains 34 statutorily listed buildings in Hackney, the Council may be able to take action or work with owners to secure the preservation of buildings on the Register or prevent others being added.	As at July 2010 there are 29 designated conservation areas in Hackney. The list of locally listed buildings is also part of this programme. English Heritage's 'Heritage at Risk' Register (2010) contains 34 entries including 1 registered park and 1 conservation area in Hackney. The Council may be able to take action or work with owners to secure the preservation of buildings and heritage assets on the Register or prevent others being added.
73	Table 8.1	None	In cell beneath "Public Open Space (designated)", insert text as follows:  Other Open Space (designated)
76	Para 8.38	Walthamstow Reservoirs and Marshes in the neighbouring borough of Waltham Forest is a Special Protection Area, and is protected under the Ramsar Convention which protects wetlands worldwide.	Walthamstow Reservoirs in the neighbouring borough of Waltham Forest is a Special Protection Area, and is designated under the Ramsar Convention which protects wetlands worldwide. The adjoining Walthamstow Marshes is a Site of Special Scientific Interest.

REF	LOCATION	ORIGINAL TEXT	REPLACEMENT TEXT
77	Policy 28	Where appropriate, public access, continuous green links and towpaths along the waterfront should be maintained,	Where appropriate, public access, continuous green links towpaths and heritage value along the waterfront should be maintained,
78	Para 9.18	In the main growth areas identified by Core Strategy Policy 1,	In the main growth areas identified by Core Strategy Policies 1 - 5,
80	Para 9.25 1 <sup>st</sup> bullet	Development Management Policies document	Development Management Development Plan Document
81	Para 9.39	Development Management Policies document	Development Management Development Plan Document
82	Appendix 2 Para 2.1	The importance of open spaces are demonstrated by their many values.	The importance of open spaces, including water and waterways, are demonstrated by their many values.
84	Glossary (146)	<b>Sites of Nature Conservation:</b> Locally important sites of nature conservation adopted by the Council that include Metropolitan; Borough Grade I; Borough Grade II; and Local.	<b>Sites of Importance for Nature Conservation:</b> sites of nature conservation value within the borough that include Metropolitan, Borough Grade I, Borough Grade II, and Local importance.
86	Proposals Map		Changes to legend:  Delete Olympic Games; insert Olympic Park  Delete Estate Regeneration; insert Estate Renewal  Delete Strategic View; insert Strategic View Background Area  Delete Strategic Industrial Land; insert Strategic Industrial Location  Delete Locally Significant Industrial Location; insert Locally Significant Industrial Site  Delete Other Industrial Site; insert Other Industrial Area
87	Proposals Map		Central Activities Zone (policy 17) Add clearer designation (see Appendix B.1)
89	Proposals Map		Strategic View Background Area (policy 24) Amended designation (see Appendix B.2)
91	Proposals Map		Chelsea-Hackney Safeguarding (policy 6) Amended designation (see Appendix B.3)
92	Appendix 1		Under 'Environmental Quality' add new row: column 1: 'EQ46 Recycling Facilities' column 2: 'Policy 32 Waste'
93	Appendix 1		Under 'Employment' add 'Policy 18 Promoting Employment Land' to row 1, column 2
94	Appendix 1		Under 'Employment' add 'E7 Industrial and Commercial Improvement Areas' to row 2, column 1
95	Appendix 1		Under 'Community Services' add 'CS1 Site for New Development' and 'CS7 Sites and

REF	LOCATION	ORIGINAL TEXT	REPLACEMENT TEXT
			Premises for Community and Voluntary Projects' to row 2, column 1
96	Appendix 1		Add new heading 'Transport' with a single row as follows: column 1: 'TR17 Development at Stratford TR18 Channel Tunnel Development TR19 Planning Standards' column 2: 'A combination of the following policies: Policy 6 Transport and Land Use Policy 33 Promoting Sustainable Transport'

**Appendix B.1**  
Clearer Central Activities Zone designation



**Appendix B.2**  
Amended Strategic View Background Area designation



**Appendix B.3**  
Amended Chelsea-Hackney Safeguarding designation

