Hackney Local Plan 2033

Integrated Impact Assessment

Containing the Sustainability Appraisal, Equality Impact Assessment, Habitats Regulation Assessment & Health Impact Assessment

October 2018
Contents

1. Non-technical summary ........................................................................................................... 1
2. Introduction ............................................................................................................................ 5
3. Sustainability Appraisal .......................................................................................................... 8
4. The Equalities Impact Assessment (EqIA) .............................................................................. 68
5. Habitats Screening Assessment ............................................................................................ 78
6. The Health Impact Assessment (HIA) .................................................................................... 90
Conclusions ............................................................................................................................... 100

Appendix 1: Sustainability implications of Policy changes between Regulation 18 draft LP33 and Regulation 19 Proposed Submission LP33

Appendix 2: EqIA Assessment Matrix

Appendix 3: HRA Screening tables

Appendix 4: HIA table assessing health implications of changes between Regulation 18 draft LP33 and Regulation 19 Proposed Submission LP33
1. **Non-technical summary**

**Introduction**

1.1 This Non-Technical Summary provides an overview of the Integrated Impact Assessment (IIA) of the Submission Version of Hackney’s Local Plan 2033 (LP33).

1.2 The IIA seeks to integrate sustainable development into the emerging Local Plan. This report presents the results of IIA. It updates the previous version of the IIA to reflect the changes that have been made to the policies following the Regulation 18 public consultation and re-appraises them accordingly.

1.3 This IIA consists of

- The Sustainability Appraisal (SA): considers the potential for economic, social and environmental effects on Hackney’s places and people resulting from the implementation of LP33.
- The Equalities Impact Assessment (EqIA): tests the policies to ensure those with protected characteristics are not disadvantaged.
- The Habitats Regulations Assessment (HRA): assesses whether the Local Plan will have significant effect on European sites either alone or in combination with other relevant plans and projects. This IIA includes a Habitats screening assessment.
- The Health Impact Assessment (HIA): assesses the health and wellbeing impacts of the Plan.

**Overview of the Hackney Local Plan 2033**

1.4 The London Borough of Hackney is preparing a new borough-wide Local Plan for the borough that will shape future growth and regeneration of Hackney over a 15 year period from 2018 to 2033.

1.5 Any new development in Hackney needs to be sustainable – this means it needs to meet the needs of the present people of Hackney without compromising the ability of future generations to meet their own needs. They also need to do this in an equitable way. In order to ensure this, the plans are subjected to an Integrated Impact assessment process, which aims to ensure that adopted planning policies maximise their benefit to Hackney’s places and people as effectively as possible.

1.6 LP33 consolidates and updates the Core Strategy (2010), the Development Management Local Plan (2015) and the Site Allocations Local Plan (2016). It will also replace the Area Action Plans for Dalston, Hackney Central and Manor House.

1.7 LP33 will contain the objectives and principal policies for planning within the borough. It will incorporate core strategic policies which set out the overall planning strategy, and detailed development management policies which guide development within the borough. The vision, delivery strategy and policies of the Local Plan will provide an
The Plan will be used to assess planning applications in the area and shape the built environment.

1.8 The Local Plan includes the following chapters and discussion throughout this IIA is generally split by these chapters:

- Places for People
- Protecting and Enhancing Heritage and Leading the Way in Good Urban Design
- Hackney’s People
- Meeting Hackney’s Housing Need
- A Strong and Competitive Economy Which Benefits All
- Planning for Vibrant Town Centres
- Improving Accessibility and Promoting Sustainable Transport
- Hackney’s Green and Open Spaces
- Climate Change

The approach to the LP33 IIA

1.9 This version of the IIA assesses the Submission Version of the Plan. It builds on:

- The Sustainability Appraisal Scoping Report which set out the key baseline information for the borough and identified the key sustainability issues in Hackney and a framework of objectives against which to assess the plan policies. The Scoping Report was published for consultation between 15th May 2017 and 19th June 2017 and was updated following feedback from the statutory consultees and internal consultees and re-published in July 2017; and
- The earlier version of this IIA which was produced to assess the draft Regulation 18 LP33 plan and its policies and demonstrate how the preferred approach maximises the benefits and minimises negative impacts on Hackney and its people. The previous IIA was published for consultation between 23 October and 4 December 2017 and this document is the updated version.

1.10 The IIA is split into four separate sections, summarised below.

1.11 The **Sustainability Appraisal** is based on the sustainability objectives identified in the Scoping Report (and set out in paragraph 3.19). There are a number of steps involved in the production of the SA, firstly identifying key issues within Hackney to be addressed within the Plan (informed by the scoping assessment), then considering options for addressing these issues, before undertaking full appraisal of the chosen approach for each issue against the sustainability objectives. The analysis also assesses the likelihood of these effects, the timeframe within which impacts will occur, and how these may change over time, and finally the permanence of any change.

1.12 The **Equalities Impact Assessment** assesses the impacts of the Plan on those with protected characteristics including age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation and marriage and civil partnership. The methodology uses is based on the Council’s own EqIA assessment form. The first step is to establish a baseline on the nature and type of groups with protected characteristics which exist within Hackney, then to assess the positive and
negative impacts of the local plan policies on these groups, before setting out recommendations for mitigation

1.13 This IIA includes a **Habitats Screening Assessment** which is the first stage of an HRA. It seeks to identify any effects of implementing the policies and proposals of the Local Plan 2033 on the habitats of designated European Sites or Natura 2000 sites; those relevant to Hackney being the Lee Valley SPA and Ramsar site and the Epping Forest SAC as these are within the recreational catchment of Hackney. The assessment seeks to identify any likely impacts on these areas based on known ‘pathways of impact’, predominantly recreational pressure and impacts of air and water quality, making sure to consider any ‘in combination’ effects alongside other plans and programmes.

1.14 The **Health Impact Assessment** has been produced in close collaboration with the Council’s Public Health Team. It is based on the NHS London Healthy Urban Development Unit (HUDU) Rapid Health Impact Assessment tool and assesses the health and wellbeing implication of the policies. The version of the HIA included within this IIA focuses on the changes that have been made between the Regulation 18 version and the Submission Version of the Plan. It follows the earlier HIA undertaken on the draft policies.

**Key findings of the IIA**

**Sustainability Appraisal**

1.15 The SA identifies that there is a high level of cohesion between the sustainability objectives and the objectives of LP33, which indicates a sustainable approach. Positive sustainability outcomes are identified within all chapters of the Plan with very few negative effects identified; where there are negative effects these are consistently mitigated by other policies within the Plan. Overall, the SA findings indicate that the plan represents the most sustainable approach possible within the scope of spatial planning.

**Equalities Impact Assessment**

1.16 The EqIA did not find that there were any significant negative impacts from the plan on those with Protected Characteristics due to the fact that many policies actively support delivery of greater equality.

**Habitats Regulation Assessment**

1.17 The HRA Screening Assessment acknowledges that the population growth and economic growth that is anticipated in Hackney may lead to increased air pollution through increased use of cars and freight vehicles, as well as more residents who will potentially be visiting the Lee Valley and Epping Forest for recreational purposes. The impacts will, however, be limited due to either an absence of impact pathways, policy controls within the plan that can be relied on to ensure significant effects are avoided, or external controls (such as the water resources planning process) that account for the growth aspects of the plan and with which the plan is consistent. Therefore, the Local Plan 2033 policies have been ‘screened out’ as being unlikely to lead to significant adverse effects (alone or in combination) on European sites and do not need to be taken forward for the next stage of Appropriate Assessment.
Health Impact Assessment

1.18 The HIA concludes that LP33 contains many positive elements for improving public health and reducing health inequalities and will not result in any negative outcomes for public health. These positive aspects include promoting active design, creating liveable neighborhoods, increasing walking and cycling and reducing private car use, promoting Health Impact Assessments, requiring provision of affordable housing, limiting concentrations of hot food takeaways, betting shops and payday loan shops, protecting, promoting and joining up green spaces, and preventing and mitigating the impact of climate change. The HIA demonstrates how spatial planning can promote health and wellbeing. Collaboration between Spatial Policy and Public Health will be ongoing.

1.19 The IIA recommends that the plan is taken forward to the final stage of consultation and then Examination.

Next steps

1.20 This IIA Report is available for comment alongside the submission version of LP33 as part of the Regulation 19 public consultation. The consultation runs from 19 November 2018 until 7 January 2019.

1.21 The findings of the IIA, together with consultation responses, will be used to help refine and finalise Local Plan before Examination and adoption.

1.22 Please comment as follows:

By email to: planmaking@hackney.gov.uk; or

By post to: Planning Policy Team
The Annexe
2 Hillman Street
Hackney
E8 1FB
2. **Introduction**

**Overview**

2.1 The London Borough of Hackney is preparing a new Local Plan for the borough that will shape future growth and regeneration of Hackney over a 15 year period from 2018 to 2033.

2.2 Following consultation on the key issues between 2 November and 24 December 2016, and consultation on draft policies from 23 October until 4 December 2017, the Council has now produced the Proposed Submission version of the Plan. This will be subject to a final round of public consultation between 19 November 2018 and 7 January 2019 and submitted to the Planning Inspectorate in January 2019.

2.3 Any new development in Hackney needs to be sustainable – this means it needs to meet the needs of the people of Hackney presently without compromising the ability of future generations to meet their own needs. This means balancing needs for affordable housing and employment growth with the protection of biodiversity and amenity of existing residents arising from open spaces, bustling town centres, high quality public transport. The council also seeks to promote diversity and equality in line with the Public Sector Equality duty, and to ensure that the plan helps to maximise health benefits for the people of Hackney.

2.4 In order to ensure this, the plan is subjected to a test of its impacts across these domains, whose results are then analysed to develop an Integrated Impact Assessment, which aims to guide the development of policies and ensure that adopted planning policies maximise their benefit to Hackney’s places and people as effectively as possible.

2.5 This report builds on the initial sustainability appraisal scoping report which was published for consultation between 15th May 2017 and 19th June 2017 which set out the key baseline information on the borough and identified the key issues around sustainability as well as a framework of objectives with which to assess the plan policies (Stage A of the Sustainability Appraisal process). An IIA produced to assess the draft LP33 policies which was published for consultation between 23 October and 4 December 2017 (Stages B & C of the sustainability appraisal process), where the proposed plan and its policies were thoroughly assessed, demonstrating how the preferred approach maximises the benefits and minimises negative impacts on Hackney and its people.

2.6 This report updates Stages B & C of the sustainability appraisal to reflect changes that have been made to the Plan in response to the Regulation 18 Public Consultation and the **Regulation 18 IIA**. Refer to appendix 1 for a summary of the changes that have been made to the Plan between Regulation 18 and Regulation 19 and a summary of the sustainability implications.
Hackney Local Plan 2033

2.7 The London Borough of Hackney is preparing a new borough-wide Local Plan for the borough that will shape future growth and regeneration of Hackney over a 15 year period from 2018 to 2033. This will be used to assess planning applications in the area and shape the built environment.

2.8 Any new development in Hackney needs to be sustainable – this means it needs to meet the needs of the present people of Hackney without compromising the ability of future generations to meet their own needs. They also need to do this in an equitable way.

2.9 In order to ensure this, the plans are subjected to an Integrated Impact Assessment process, which aims to ensure that adopted planning policies maximise their benefit to Hackney’s places and people as effectively as possible.

2.10 The new Local Plan will consolidate and update the Core Strategy (adopted in 2010) the Development Management Local Plan (adopted in 2015) and the Site Allocations Local Plan (adopted in 2016). It will also replace the Area Action Plans for Dalston, Hackney Central and Manor House.

2.11 The Local Plan 2033 (LP33) will contain the objectives and principal policies for planning within the borough. It will incorporate core strategic policies which set out the overall planning strategy, and detailed development management policies which guide development within the borough. The vision, delivery strategy and policies of the Local Plan will provide an integrated and coordinated approach to planning within the borough.

Consultation on the Integrated Impact Assessment

2.12 As with the other documents forming the basis for the Local Plan, the Council is seeking your views on whether you think the Integrated Impact Assessment provides a clear assessment of the plan, by providing details of the sustainability, equalities impacts, habitats impacts and finally health impacts, and justifies our approach to meeting the needs of the borough to 2033.

2.13 In addition, we must also consult three statutory government bodies: The Environment Agency, Historic England and Natural England on this report, as per the regulations.

2.14 We will be seeking your views on this report for seven weeks from 19 November 2018 until 7 January 2019.

You can respond in two ways;

Email us: planmaking@hackney.gov.uk

Write to us: Planning Policy Team
Hackney Service Centre
1 Hillman Street
E8 1DY

If you have any questions regarding the report, or wish to find out more, you can get in touch with the planning policy team at the above address, or call us on: 020 8356 8062.
The Integrated Impact Assessment

2.15 Integrated Impact Assessments aim to provide a more effective assessment of Local Plans by seeking to combine a portfolio of reports, some required and others optional, in order to discover cross-cutting issues. In doing so they provide a single, authoritative assessment of the benefits of the plan.

2.16 The reports included in the assessment are:
- The Sustainability Appraisal
- The Equalities Impact Assessment
- The Habitats Directive Assessment
- The Health Impact Assessment

2.17 The **Sustainability Appraisal** (SA) derives from E.U directive 2001/42/EC also known as the “Strategic Environmental Assessment”. The key aim is the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development. They are required to be prepared alongside new and revised Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs) under Section 39(2) of the Planning and Compulsory Purchase Act 2004.

2.18 The **Equalities Impact Assessment** (EqIA) aims to ensure that the council maximises its aim of making the borough a place for everyone, by eliminating unlawful discrimination, harassment and victimisation, advancing equality of opportunity, and to foster good relations between groups, in line with the public sector equality duty. It tests the policies within the proposed plan to ensure those with protected characteristics (see below) are not disadvantaged. This report is non-statutory, but a key part of ensuring the Local Plan is effective.

2.19 The **Habitats Directive Assessment** (HDA) derives from the Habitats Directive, otherwise known as Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora, and is designed to test whether the Local Plan will have significant effect on a European site, otherwise known as the Natura 2000 sites, either alone or in combination with other relevant plans and projects. The screening assessment is carried out in accordance with the DCLG Draft guidance note *Planning for the Protection of European Sites: Appropriate Assessment.*

2.20 The **Health Impact Assessment** (HIA) derives from the NHS London Healthy Urban Development Unit (‘HUDU’) Rapid Health Impact Assessment. This aims to provide a clear assessment of the plan, by assessing it against eleven topics, including Housing Quality, Access to Open Space, Healthy Food, Social Cohesion and Climate Change.

2.21 These reports will be contained as chapters within this document and provide their own self-contained conclusions.
3. **Sustainability Appraisal**

**Stage A: The Scoping Report**

3.1 Hackney began the sustainability appraisal process in concert with gathering evidence and developing options for a new Local Plan in mid to late 2016.

3.2 As part of this process, the borough developed and published a Sustainability Appraisal Scoping report, which set out the policy context at the international, national, regional and local scales, established the key sustainability challenges and set out an assessment framework for the Local Plan.

This is known as ‘Stage A’ of the SA process, which is set out below:

<table>
<thead>
<tr>
<th>Stage</th>
<th>Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>A1</td>
<td>Identifying other relevant policies, plans and programmes, and sustainability objectives.</td>
</tr>
<tr>
<td>A2</td>
<td>Collecting baseline information.</td>
</tr>
<tr>
<td>A3</td>
<td>Identifying sustainability issues and problems.</td>
</tr>
<tr>
<td>A4</td>
<td>Developing the SA framework.</td>
</tr>
<tr>
<td>A5</td>
<td>Consulting on the scope of the SA.</td>
</tr>
</tbody>
</table>

3.3 The Council consulted statutory bodies on this report between 15th May and 19th June 2017, and received comments. These were then used to update and amend the report’s evidence base and conclusions. This amended report was published alongside the Regulation 18 version of the IIA.

3.4 The Sustainability Appraisal scoping report delivered a set of Objectives, known as the Sustainability Objectives against which to assess planning policies. These are based on key sustainability issues identified in the evidence base.
Stages B - D: Sustainability Appraisal

3.5 The next stage is to test the Proposed Submission Version Local Plan against these objectives as per the SA process as set out below:

<table>
<thead>
<tr>
<th>Stage</th>
<th>Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>B1</td>
<td>Test the Local Plan Objectives against the Sustainability Appraisal Framework</td>
</tr>
<tr>
<td>B2</td>
<td>Develop the Local Plan Options including reasonable alternatives</td>
</tr>
<tr>
<td>B3</td>
<td>Evaluate the likely key effects of the Local Plan and Alternatives</td>
</tr>
<tr>
<td>B4</td>
<td>Consider ways of mitigating adverse effects and maximising beneficial effects</td>
</tr>
<tr>
<td>B5</td>
<td>Propose measures to monitor the significant effects of implementing the Local Plan</td>
</tr>
<tr>
<td>C</td>
<td>Prepare Sustainability Appraisal Report</td>
</tr>
<tr>
<td>D</td>
<td>Seek Representations on the sustainability appraisal report from consultation bodies and the public</td>
</tr>
</tbody>
</table>

3.6 As can be seen, the majority of work is effectively focused in Stage B, with the report fulfilling Stage C and consultation upon it alongside the draft plan stage D.

3.7 It should be noted that the sustainability process (as set out in the official guidance) sets out that Stage D should be completed alongside the submission of the final plan (otherwise known as Regulation 19) for consultation. However, the council believes it is useful to deliver a staged approach where the Sustainability Appraisal is published, as part of the IIA, at the draft plan consultation stage (known as Regulation 18), to allow for commentary to be received and suggestions included. This document is an updated version of the IIA reflecting changes made following consultation on both the draft Plan and the earlier version of the IIA.

3.8 This document is the final version of the IIA which will be submitted for examination. The approach taken allows for the highest possible level of assessment of policies including assessment of any significant developments in the period leading up to examination.

Methodology

3.9 The Local Plan is made up of a set of Objectives, a Vision & Spatial Strategy, nine Place Policies, 58 planning policies (organised into 8 chapters) and 33 Site Allocations. Taken together, these elements of the local plan guide the form and type of development in the borough.

The first step is to assess the local plan objectives, and spatial strategy against the sustainability appraisal framework to identify synergies and conflicts between the two. Assessment of the spatial strategy is critical because the Local Plan is a spatial plan, and therefore implicitly applies objectives differently in different locations. This will identify the potential for significant beneficial and adverse effects occurring in the latter stages of the process.

The second step is to assess alternative approaches to addressing key issues identified as part of the Local Plan development process. At the outset of the development of the local plan, a series of key issues were identified and assessed through 8 topic papers. These were published as a Direction of Travel Paper² in early 2016 by the council for consultation, and identified the following key issues:

- Housing
- A strong and competitive economy
- Town centres
- Hackney’s people
- Improving accessibility and promoting sustainable transport
- Hackney’s living spaces and places
- Protecting and enhancing heritage and good design
- Climate change

As identified in the SA Scoping report, Local Plans are limited in their scope to address issues in Hackney by the requirement to be in general conformity with policies set out in both the London Plan and the National Planning Policy Framework (‘NPPF’) and National Planning Policy Guidance (‘NPPG’). They are also necessarily limited to responding to wider sustainability issues by virtue of only having power to address the location, type and nature of development.

Policy options and alternatives can only be assessed where there is a clear choice between different spatial planning approaches to respond to a sustainability issue. In addition, there are issues where no alternative approaches are sufficiently distinguishable as to provide any additional value (for example when policies are whether to support a particular approach to a lesser or greater extent).

Therefore, the SA assesses alternatives for the following issues:

- Affordable Housing
- Housing Size and Type
- Density
- Conservation and Heritage
- Adverts
- Sunlight and Daylight
- Walking and Cycling
- Public Transport
- Employment Floorspace Affordability
- Employment Land
- Town Centres
- Open Space

---

² Direction of Travel Paper, 2016
• Biodiversity
• Air Quality
• Overheating
• Flooding

3.14 For each issue, the report summarises why this was a key issue, sets out the options considered along with their advantages and disadvantages, tests the policy options against the sustainability appraisal framework, and finally selects the preferred option, providing justification for why these options provide the best balance of mitigating adverse effects and maximising beneficial effects.

3.15 The third step assesses the preferred approach, as set out in the publication version of the Local Plan, providing a summary of the major positive and negative effects of the policies.
Stage B1: Testing the Local Plan Objectives

3.16 The Local Plan is guided by a set of objectives which outline the overall direction of the document. These objectives need to be tested to ensure they support and reflect the key sustainability issues identified in the scoping report, and that in dealing with these issues, they represent the most sustainable strategy.

3.17 Hackney Local Plan 2033 has nine objectives:

1. To deliver high quality urban neighbourhoods with distinctive architectural quality which respects Hackney’s historic character whilst producing unique and innovative contemporary design that reflects Hackney’s innovative and creative culture.

2. To tackle health inequalities, create a child friendly borough and an inclusive environment that promotes good health and wellbeing and enables skill development and lifelong learning for all.

3. To deliver up to 26,250 additional homes, increasing the supply of genuinely affordable homes, alongside community facilities to meet existing and future needs.

4. To support a diverse and mixed economy providing at least 23,000 new jobs by 2033 and maximise the supply of affordable workspace and low cost industrial space.

5. To support distinctive town centres and a vibrant town centre experience. Evidence indicates that there will a requirement of approximately 34,000sqm of new retail and leisure floorspace by 2033.

6. To create liveable and accessible neighbourhoods where people choose to walk, cycle and socialise, and support the development of a network for electric vehicles.

7. To support improvements to the public transport network and maximise the community and regeneration benefits and opportunities to come from Crossrail2.

8. To protect and enhance existing open spaces and biodiversity, develop and improve green links between these spaces and support the creation of new open spaces and vertical gardens.

9. To become a low carbon and carbon resilient borough realising significant improvements to air quality and reducing the urban heat island effect within the Borough.
3.18 The objectives aim to direct the plan to solving issues identified at the issues and options stage of consultation, and there is likely to be significant overlap with sustainability objectives.

3.19 The objectives are tested, individually, against the sustainability framework, with a commentary provided on this, which seeks to identify the impacts in the short, middle and long terms. The sustainability objectives are set out in the Scoping Report; they are:

1. To protect and enhance the biodiversity, flora and fauna of the borough.
2. To ensure efficient use of land.
3. To improve air quality by reducing emissions of pollutants.
4. To reduce noise and pollution
5. To minimize flood risk and encourage, Sustainable Urban Drainage Systems (SUDS) for new developments
6. To protect and enhance water resources and water quality
7. To improve connectivity, reduce the need to travel and encourage use of public transport including walking and cycling
8. To tackle climate change through reducing CO2 emissions, supporting energy production from renewable and low carbon sources
9. To protect and enhance the boroughs identified heritage assets, their setting and the wider historic environment and to preserve the archaeological aspects of the borough
10. To promote exemplar sustainable design which enhances the visual character in the borough
11. To reduce poverty and social exclusion and promote equalities and diversity
12. To protect, maintain and enhance Metropolitan Open Land and open spaces
13. To improve health in Hackney’s local community and promote healthy lifestyles
14. To improve educational attainment and the skill level of the population
15. To reduce crime and fear of the crime in the borough
16. To increase the number of decent and affordable homes
17. To improve access to an adequate range of social infrastructure
18. To minimize waste and maximize recycling in the borough
19. To maximise opportunities for sustainable economic growth
20. To generate employment opportunities for everyone
3.20 Table 1 sets out a matrix which summarises the interaction between the objectives and sustainability issues.

<table>
<thead>
<tr>
<th>Table 1</th>
<th>Local Plan Objectives Matrix</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Biodiversity</td>
<td>0 0 0 0 0 0 0 ++ + ++</td>
</tr>
<tr>
<td>2. Efficient Land</td>
<td>+ 0 0 0 0 + + + +</td>
</tr>
<tr>
<td>3. Air Quality</td>
<td>0 0 - - - 0 0 + ++ ++</td>
</tr>
<tr>
<td>4. Noise/Pollution</td>
<td>0 0 - - - + 0 + ++ ++</td>
</tr>
<tr>
<td>5. Flood Risk</td>
<td>0 0 0 0 0 0 0 + 0 +</td>
</tr>
<tr>
<td>6. Water Quality</td>
<td>0 0 0 0 0 0 + 0 +</td>
</tr>
<tr>
<td>7. Walking &amp; Cycling</td>
<td>0 ++ 0 0 0 ++ + 0 ++</td>
</tr>
<tr>
<td>8. Climate Changes</td>
<td>+ 0 0 0 0 + + + ++</td>
</tr>
<tr>
<td>9. Heritage Assets</td>
<td>++ 0 - - + 0 0 + 0 ++</td>
</tr>
<tr>
<td>10. Sustainable Design</td>
<td>+ 0 0 0 + + 0 ++ ++</td>
</tr>
<tr>
<td>11. Poverty &amp; Equality</td>
<td>0 + ++ 0 + + 0 0 ++</td>
</tr>
<tr>
<td>12. Open Space</td>
<td>0 0 - - 0 0 0 ++ 0 ++</td>
</tr>
<tr>
<td>13. Community &amp; Health</td>
<td>+ ++ + + + 0 ++ 0 ++</td>
</tr>
<tr>
<td>14. Education &amp; Skills</td>
<td>+ ++ 0 + + 0 0 ++ +</td>
</tr>
<tr>
<td>15. Crime</td>
<td>0 0 ++ 0 0 ++ 0 0 0 +</td>
</tr>
<tr>
<td>16. Affordable Homes</td>
<td>0 0 ++ - - 0 0 0 ++ +</td>
</tr>
<tr>
<td>17. Social Infrastructure</td>
<td>0 0 + 0 0 0 0 - - 0 ++</td>
</tr>
<tr>
<td>18. Waste</td>
<td>0 0 - - 0 0 0 0 ++ ++</td>
</tr>
<tr>
<td>19. Economic Growth</td>
<td>0 0 - ++ + 0 + - 0 ++</td>
</tr>
<tr>
<td>20. Employment</td>
<td>+ 0 - ++ + 0 + 0 ++</td>
</tr>
</tbody>
</table>

Key - Sustainability Impact

| ++ Major Positive | -- Major Negative | 0 Minimal Interaction |
| + Minor Positive | - Minor Negative |

3.21 The table provides a summary of the overall sustainability of the objectives, as assessed. Commentary on the results of the assessment are set out below, on an objective-by-objective basis:

**Objective 1** - To deliver high quality urban neighbourhoods with distinctive architectural quality which respects Hackney’s historic character whilst producing unique and innovative contemporary design that reflects Hackney’s innovative and creative culture.

3.22 Focusing the plan on delivering a high quality of design will result in a major positive impact Heritage Assets in the borough and other existing high-quality buildings, with commensurate, minor, benefits to sustainable design and climate change arising from reuse of existing buildings and therefore reduced carbon emissions. Promotion of a high quality environment may have minor positives for Community and Health, and Education and Skills arising from a high quality environment. Overall, this objective exhibits little
conflict with the sustainability objectives, being more about the method used to achieve other plan objectives than about a choice over land use. This objective has synergies with objectives 6 and 9 (Liveable Neighbourhoods and Climate Change) where high quality design can include both improving townscape and make use of innovative, low-carbon and renewable technologies.

Objective 2 – To tackle health inequalities, create a child friendly borough and an inclusive environment that promotes good health and wellbeing and enables skill development and lifelong learning for all.

3.23 The delivery of a healthy environment will have a major positive impact on multiple sustainability objectives including 7, 13 and 14 (Walking and Cycling, Community & Health) by promoting more health streets, environments and neighbourhoods. By encouraging the production of environments which foster health, for example though walking and cycling and other physical activity, the plan will support communities in meeting their needs. The additional focus on lifelong learning will result in a positive sustainability impact on reducing poverty and increasing equality. Over the longer term, this objective has synergies with other sustainability objectives, informing, for example, the creation of new developments to ensure they encourage healthy behaviour. Similar to objective 1, this objective has minimal conflicts with other areas as it seeks to deliver as part of new development, rather than dictating a land use.

Objective 3 - To deliver up to 26,250 additional homes, increasing the supply of genuinely affordable homes, alongside community facilities to meet existing and future needs.

3.24 The delivery of a large numbers of new houses and a focus on increasing the supply of affordable homes will have a major positive sustainability impact on the objective of delivering Affordable Housing. However, the provision of these homes requires, primarily, that land which could otherwise be used for other uses, most notably, employment floorspace, is used, with a potential negative sustainability impact on the aim of delivering a diverse economy and/or vibrant town centres. It is challenging to direct new housing to those most in need even when built, which means its effectiveness at alleviating poverty can only be considered a minor sustainability benefit. In addition, increased population will require the provision of new social infrastructure and transport infrastructure and lead to generally rising pollution, increasing pollution, and, unless there are rapid changes to technology, potentially leading to poor air quality. In addition, it will increase pressure on natural resources and biodiversity due to increased densities. This objective has synergies with liveable neighbourhoods and community and health, providing the basic medium in which these can be delivered, for example through the use of planning obligations and Community Infrastructure levy payments.

Objective 4- To support a diverse and mixed economy providing at least 23,000 new jobs by 2033 and maximise the supply of affordable workspace and low cost industrial space

3.25 Working to develop a more diverse and expanded economy will have major positive impacts on the sustainability of both employment and economic growth in the short and medium term, but this needs to be balanced against other needs to remain sustainable. Principle among these is the ability to provide housing and other services for those workers in the medium and longer terms, which, if not managed may lead to dysfunction in the local labour market, stunting the economy. Employment generating uses are likely to have strong synergies with the delivery of vibrant town centres, and to a lesser extent
on improving skills and education in the local area. However, similar to Housing, the increase in density and selection of land use this represents is likely to lead to increased pollution and reduced air quality, and increased pressure on open spaces and biodiversity.

**Objective 5 - To support distinctive town centres and a vibrant town centre experience.** Evidence indicates that there will a requirement of approximately 34,000sqm of new retail and leisure floorspace by 2033.

3.26 Supporting town centres will have a minor positive impact on sustainable use of land as it ensures new development is in the most sustainable locations, and builds on existing strengths. However, as with objectives 4 & 5, concentration of development in town centres, which are the most polluted areas in the borough will have a negative impact on air quality, noise and pollution. There is a tension between balancing the needs of town centre development against sustainable delivery of housing, employment space objectives, and the community and other uses which collectively make up a thriving town centre, while ensuring this is sustainable across all objectives.

**Objective 6 - To create liveable and accessible neighbourhoods where people choose to walk, cycle and socialise, and support the development of a network for electric vehicles.**

3.27 This objective has a major positive impact on walking and cycling by facilitating and encouraging these activities through urban planning interventions, with additional positive impacts on community and health through facilitating walking and socialising, in the medium and long terms. Development of new electric car charging points may be in conflict with encouraging cycling and walking, but overall, it is unlikely that vehicular transport will be eliminated and so charging points will facilitate reductions in pollution and carbon emissions, benefitting a sustainable approach to climate change.

**Objective 7 - To support improvements to the public transport network and maximise the community and regeneration benefits and opportunities to come from Crossrail 2.**

3.28 This objective has no significant, immediate sustainability impacts. Provision of additional public transport will benefit area in terms of providing access to employment to Hackney residents, but also widen the labour market in Hackney significantly, (especially in the medium and long term in respect of Crossrail 2) and allow commuting from distant areas. Overall this is likely to present opportunities to deliver more housing, including affordable housing, and support further economic growth. It will also have positive sustainability impacts for both climate change and pollution, if, and when, better technologies such as electrification of buses, and use of renewable power in the supply are implemented.

**Objective 8 - To protect and enhance existing open spaces and biodiversity, develop and improve green links between these spaces and support the creation of new open spaces and vertical gardens.**

3.29 Significant sustainability benefits arise from increasing open space and promoting green links, both for natural biodiversity in the borough and for local populations’ health and community. In addition, these are likely to provide commensurate increases in access to walking and cycling. Provision of vertical forests support sustainable design of buildings as well as reducing flood risk (in combination with green roofs) and improving water
quality. However, provision needs to be balanced against provision of other land uses, for example economic growth, and affordable housing to ensure sustainability of these objectives. It should also be noted that this objective is the only objective which ensures sustainability in terms of biodiversity and open space within the plan and should be accorded appropriate weight in policy development.

**Objective 9 - To become a low carbon and carbon resilient borough realising significant improvements to air quality and reducing the urban heat island effect within the Borough.**

3.30 Responding to climate change has significant positive impacts on Climate Change, Sustainable Design, Flooding, Pollution and Air quality objectives, by ensuring these are tackled as part of the development of the urban environment. In the medium to long term, it is well documented that Climate change is likely to effect the sustainability of almost all objectives, just as achieving many of those objectives must be done in an emissions reducing and resilient way, to ensure long term sustainability. However, achievement of this objective will have a negative effect on the ability of the borough to quickly achieve other objectives in the short-term by driving up their costs.

**Alignment between Plan Objectives and Sustainability Objectives**

3.31 Overall, there is a high level of cohesion between the two sets of objectives, with all sustainability objectives being met by at least one objective and the majority strongly. In particular, Community & Health, Walking & Cycling and Education & Skills are particularly strongly supported by the plan.

3.32 There were no areas where a strong divergence (which would indicate an unsustainable approach) was identified that did not have a corresponding objective which covered the sustainability issue. There are however tensions between plan objectives when delivering these. Two major themes emerge:

- The inherently limited supply of land available for development means that there is a significant tension between the selection of uses for this land as part of the plan. This is most strongly reflected between delivering affordable housing and economic growth, but also between these and open space/biodiversity, though it should be noted that the plan aims to protect these spaces as much as possible.

- Provision of increased density of development threatens the sustainability of Hackney’s amenities, particularly in terms of pollution, both air quality and broader concerns regarding waste and noise, but also in terms of biodiversity and heritage assets, which may be threatened if land is not used effectively, or there is insufficient weight given to ensuring other objectives shape form and details of development.
Stage B2: Appraising alternative options

3.33 In order to take the objectives forward, the Local Plan develops policies to address key issues, which will then be used to ensure that new development in the borough contributes to meeting these objectives.

3.34 These policies are principally aimed at delivering a response to issues raised and identified by the council and consultees so far, consultation responses highlighting key issues, set against the requirements for policies addressing certain issues set out by the NPPF and London Plan\(^3\).

3.35 The aim of this stage is to establish options for dealing with issues which have been raised, setting out in detail approaches considered to deal with issues where there is considered to be a range of alternative approaches to meeting the objectives, and identify the most sustainable to take forward in the preferred approach.

3.36 There are some issues where there is no reasonable alternative available except for that which is preferred. This situation most often occurs when national and regional policy require a policy response, and do so in a heavily prescribed way, therefore eliminating the development of any reasonable options, or, limit policy development in such a way as to make alternative policy options unreasonable. In addition, there are situations where it is unlikely that other policy options would realistically be pursued and therefore considered to exceed the test of reasonable alternatives.

3.37 Options have been identified for the following key issues:

- Air Quality
- Overheating
- Flooding
- Open Space
- Town Centres
- Car Free Development
- Conservation and Heritage
- Housing Size Mix
- Affordable Housing Threshold
- Type of Affordable Housing
- Affordable Housing Tenure Split
- Employment Land Provision
- Type of Employment Floorspace
- Employment Floorspace Affordability

Air Quality

3.38 Hackney suffers from high levels of pollution and therefore poor air quality, particularly with regard to emissions of Nitrous Oxide (NO\(_2\)) and Diesel Particulate Matter (Known as PM10 & PM2.5). Since 2005 Annual mean NO\(_2\) levels have exceeded limits in each monitoring year, ranging from 150-175% of target. Particulate Matter levels have fallen

---

\(^3\) Both of these documents have been subject to the relevant sustainability processes indicating their high-level objectives are sustainable.
but are still significant above safe levels. Hackney is designated as an air quality management area, denoting serious issues with air quality.

3.39 Air Quality is a key issue due to the potential damage to human health and the environment through the distribution of chemicals which are damaging to humans, animals and plants. Air Quality is identified as a key issue in national and regional policy as a significant threat to human health.

The following options were considered:

1) Strengthen existing policy by ensuring all development does not worsen air quality, either during the construction process or operational lifetime of the development. Ensure new development is not located in areas where users will be exposed to poor air quality. Reduce pollution sources by encouraging other forms of transport other than private vehicles.

2) Strengthen existing policy by ensuring all development does not exceed air quality neutral standards during construction and operation through an air quality assessment, where appropriate to scale of development. Development to consider existing and future air quality, and should not be located in areas of poor air quality, especially in they contain sensitive uses for which appropriate mitigation cannot be provided. Provision of planning obligations to deal with indirect air quality impacts.

3) Strengthen existing policy refusing the grant of planning permission in the most polluted areas until the applicant demonstrates they have not exceeded the Council’s air quality objectives, will not contribute to a worsening of air quality and this be minimised as far as practicably possible.

The first option broadly strengthens the currently adopted plan approach, and would result in a major positive impact on sustainability of the plan through a broad restriction on emissions being created by new developments, either as part of the construction process or the lifetime of the development, which would provide a strong medium and long term positive effect on air pollution, and a corresponding positive impact on health of residents. Furthermore, locating developments away from areas of worst air quality would provide a significant benefit, though this needs be balanced with ensuring that this does not cause other, growth related development to go ahead, which will often mean building in less-than-ideal conditions, especially near to public transport hubs and routes. The inclusion of electric vehicles which be additionally supportive in limiting new pollution sources.

However, overall sustainability is limited by need to balance positive impacts on air quality and health with other objectives, such as negative impact on sustainability of affordable housing and economic growth, and the significant challenge of both providing completely air quality neutral developments or locating these within areas of higher air quality when Hackney is designated in entirety as an air quality management area.

The second option would result in a major positive impact on sustainability objectives through tightened air quality requirements for development and required demonstration through an air quality assessment and longer term sustainability by requiring development to consider air quality over time in developing solutions, and have regard to locating sensitive uses and providing appropriate mitigation to ensure positive health impacts. Overall this would present a stronger package of mitigation than option A, by tightening controls, and ensuring that the most sensitive groups to air pollution are...
protected in the location a design of developments. The option shares a tension with option A of its impact on sustaining affordable housing and economic growth, but allows broader scope for type and size of developments in borough while providing an effective level of air quality control.

3.43 The third option would continue existing policy and corresponding impact on sustainability in terms of air quality and pollution by not permitting development in areas of poor air quality, ensuring that the most damaging sites are avoided unless there is a high level of mitigation. This option would, however, have a corresponding negative impact on the delivery of new developments, leading to increasingly negative impacts for housing affordability, economic growth and other factors over the long term. In addition, the policy has limited effect on smaller developments and does not consider developments outside of these areas which may contribute, cumulatively, to poor air quality, compared to the other options.

Air Quality - Conclusions

3.44 Approaches to dealing with air quality are relatively limited in basic terms, where the key element is restricting both sources of pollution and those vulnerable through spatial planning. However achieving a sustainable plan means balancing this with other needs, primarily, affordable housing and economic growth. Existing policy provides a good platform for this, seeking to ensure development only occurs where it can mitigate air pollution and focuses this strongly in areas with particularly poor air pollution. Option 2 is considered to be the strongest approach to take forward as it strengthens and expands this policy by ensuring that developments submit assessments of air quality impact, which will contain guidance on how this can be mitigated. This is stronger than Option 1, but also allows for development to still take place, unlike Option 3. It also focuses in on developments with potential vulnerable users to ensure these are more carefully scrutinised, rather than simply focusing on not allowing development in polluted areas, such as is the case with Option 1.

3.45 Option 2 was chosen as the preferred approach.

Overheating

3.46 Hackney is highly sensitive to increased surface temperatures due to its urban character, made up of a dense terrain of highly thermally absorbent buildings and infrastructure which act to collect and store increased heat; and the large amount of heat created by human activities (domestically, transportation and business).

3.47 This means that it exacerbates both the maximum temperatures and slows cooling, in what is known as the Urban Heat Island (UHI) effect. On a summer night it is approximately 4°C warmer in Central London than the surrounding countryside, which has significant impacts for the population, with risks to wellbeing, comfort and productivity stemming greater heat stress, on the population and natural environment, particularly due to the fact the heat island means significantly enhanced night-time temperatures.
Climate change will enhance this urban heat island, with the effect meaning a difference of around 6.5°C by 2050.

Overheating of existing and future building stock and the built environment will have significant negative impacts on both the health and wellbeing, and economic productivity, of residents, as well as the natural environment and biodiversity of the borough.

The following options were considered:

1) Strengthen existing policy by requiring all developments to demonstrate clearly how the design, siting, materials and other elements reduce the risk of overheating. Require the use of overheating assessments to demonstrate that, over the lifetime of the development occupants will not see temperatures which damage their wellbeing. Require that buildings actively contribute to reducing the urban heat island effect. Require that all existing buildings bring developments up to a high standard in terms of reducing overheating.

2) Continue existing policy which requires new developments to take into account the need to adapt to higher temperatures, mitigate any overheating and meet any need for cooling. When dealing with existing building stock, opportunities to adapt buildings spaces and places to manage higher temperatures should be maximised.

3) Modify existing policy to focus on ensuring new development regulates internal and external temperatures through the design of the building and mitigate the urban heat island effect, with a focus on technologies and techniques which also maximise biodiversity benefits. Ensure that, where feasible, renovation of existing development follows the same approach. Strong focus on mitigating the urban heat island effect and use of the cooling hierarchy in the London Plan.

Option 1 would result in a positive impact on sustainability of the Plan by requiring new developments to have regard the risk of overheating in both the design of the building and materials, and direct linking to health and wellbeing of occupants. Support for reducing urban heat island effect will have a positive impact on biodiversity and mean other buildings not related to development will benefit. Support for improvements to existing building stock maximise the use of the plan to address this sustainability issue within the planning system.

The strong positive sustainability impacts of this approach need to be balanced with the sustainability of delivering economic growth in the short and medium term if they discourage development coming forward, despite the longer term benefits.

Option 2 would also result in a positive impact on sustainability by ensuring that account is taken to adapt to higher temperatures, and mitigate overheating. However this approach is limited by lack of requirement to account for the wider overheating effect of UHI and the health of occupants, which limit its ability to ensure sustainable development. Policy has a short-term benefit of reducing the costs of development, but has long term negative sustainability impacts due to the lack of adequate mitigation for future overheating.

Option 3 builds on the approach taken in the existing policy, which was judged to be the previously most sustainable approach. It expands this by requiring regard is had to external overheating, encouraging a broader approach to reducing the UHI effect with benefits to public health. In addition it has a positive impact on biodiversity not present.
in other options by ensuring that mitigation maximises benefits. Use of the cooling hierarchy ensures that building design makes use of passive cooling and only makes use of air conditioning (which has the effect of increasing ambient temperatures in the environment even while reducing them within buildings) as a last resort.

3.53 The application of strong policies on overheating, as discussed in option 1, could damage the short term sustainability of housing and economic growth, and so option 3 takes a balance between ensuring sustainability benefits and taking a less interventionist approach in how developments deal with overheating.

**Overheating – Conclusions**

3.54 Dealing with overheating is a key sustainability issue for health and wellbeing, but is also strongly related to climate change, which is likely to aggravate it. Option 3 is considered to be the most sustainable approach as it expands on Option 2 by ensuring that new development which comes forward is resilient to overheating through it design, and must demonstrate how they mitigate against the urban heat island effect, reflecting the distributed character of this issue. Option 1 is considered to be strongly sustainable, but also likely to limit development coming forward and therefore limit sustainability. In addition, this approach utilises biodiversity which will benefit the environmental sustainability of the borough.

3.55 Option 3 was chosen as the preferred approach.

**Flooding**

3.56 Climate change is likely to increase the risk of Flooding in Hackney, due an increase in amount of rainfall, and elevated risk of heavy, or ‘storm’ rainfall. This will affect Hackney both with increased chance of fluvial flooding, from the river Lea on the North-east edge of the borough, and pluvial, localised flooding, owing to the highly urbanised environment. The most recent assessments anticipate that by 2100 the depth of 1 in 1000 year fluvial flooding will increase in some areas by up to 50% (from 1m to 1.5m) and produce areas of extreme danger. The most recent surface water management plan identifies 9 separate critical drainage areas in the borough, where there is a high risk of localised flooding.

3.57 The impact of increased rainfall will have a subsequent effect on ability to sustain the majority of objectives identified – this will be in multiple, complex ways – increased flooding has the potential to erode social, economic and environmental sustainability, as well as incurring significant costs if it damages the underlying infrastructure of the borough.

The following options were considered:

1) New developments need to contribute to the provision of strategic infrastructure to alleviate flood risk when considered appropriate. Developments need to make use of Sustainable Drainage Systems (SDS) to reduce runoff and therefore control flooding, when there is an increase in the ‘impermeable area’ of the development, with development should halving the runoff using the systems. Amenity and Biodiversity should be maximised. In Critical Drainage Areas the design and provision of appropriate mitigation should be used to ensure a greenfield runoff rate is achieved (equivalent to if the site was open land). Developments within Flood Risk Zones should not increase flood risk. The council will defend cooperate with water network operators to ensure appropriate sewerage and wastewater infrastructure.
2) All development must consider how it will reduce vulnerability to flood risk over the lifetime of development, using design and on and off-site mitigation, aiming to achieve greenfield runoff rates. Major developments must submit appropriate flood risk assessments, as well as developments within critical drainage areas. Developments must make use of SuDS to ensure greenfield runoff rates and to make use of the drainage hierarchy. Basement developments to consider flood risk. All development should, in liaison with Thames Water, take account of the capacity of existing on and off-site water and sewerage infrastructure and the impact of development proposals on this infrastructure.

Option 1 will deliver major positive impact on sustainability of Hackney in terms of flood risk, biodiversity (through use of SDS), as well as indirect benefits for climate change resilience, economic growth and social infrastructure. However limited impact at the strategic level due to lack of need for developments and the plan to consider the broader strategic/cumulative need.

Option 2 would deliver major positive impacts on flood risk, climate change, sustainable design and broader benefits to economic growth and employment by protection against flood risks in the borough. Overall option extends coverage of policy to ensure that all developments are dealing with the cumulative impact of flood, as opposed to site specific impacts. Short term negative impacts may arise on sustainable delivery of affordable housing, economic growth and efficient use of land owing to the costs of such investments, but these (much like air quality) will drive long term resilience to flooding as climate change causes more frequent and intense flooding.

Flooding – Conclusion

Option 2 is considered to be the most appropriate approach as it strengthens the existing approach by ensuring that new developments demonstrate how they reduce flood risk, and strengthens requirements within areas at particular risk of flooding (critical drainage areas) from pluvial sources. Compared to Option 1, this presents a more proportionate approach which will allow for sustainability to be achieved across other objectives while ensuring flood risk is reduced across the borough.

Option 2 was chosen as the preferred approach.

Open Space

Open space is an important and valued asset within Hackney that provides a huge range of benefits for people and the environment. Access to open space is important for community health and wellbeing and also has benefits for climate change mitigation for example, improvements in air quality. The council’s existing approach to protecting open space will be retained, however the sustainability impacts of the amount of open space provision in new developments will be assessed here.

The following options were considered:

1) Increase provision of communal open space from 10sqm to 14sqm per person from large scale residential schemes.
2) Maintain existing new provision requirements for 10sqm per person from large scale residential schemes.
Option 1 looks to increase provision of open space. If the amount of communal open space provided is increased from 10sqm to 14sqm then this would allow the existing quantum of open space per resident to be retained as development takes place and the population grows in the future. This approach would have major positive impacts on community and health, encouraging walking and cycling, tackling climate change and improving biodiversity. However it might be necessary to balance the higher provision of communal open space against the undesirable risk of increasing density within housing developments in order to allow space for the higher open space provision; it is acknowledged that this is one of a number of factors that will need to be weighed up in planning decisions.

Option 2 is essentially the opposite of Option 1, and would retain the existing requirement for new developments to provide 10sqm per resident. If this is retained then the overall quantum of open space per resident will decrease as development takes place and the population grows in the future. This would result in longer term negative impacts on community and health, the desire and ability for residents to walk and cycle around the borough, would make it more difficult to address inequalities in access to open space, as well as climate change mitigation and biodiversity.

Conclusion – Open Space

Option 1 is considered to be the most appropriate approach as it will ensure that Hackney maintains an adequate level of Open Space as it grows both in terms of population and economy. It should be noted however, that provision of open space is directly in opposition to the same floorspace being developed to provide other land uses, and that while this approach may be sustainable in some developments, it should be carefully considered in situations where it would prevent the provision of new development which delivers strongly for other sustainability objectives.

Option 1 was chosen as the preferred approach

Town Centres

Hackney’s town centres are the focus for growth in the borough. Dalston is underperforming in its role as the borough’s major town centre, whilst Hackney Central is over-performing in its role as a district centre. There are some parts of the borough where Local Centres are either over-performing such as Stamford Hill, or not functioning effectively such as Shacklewell Lane, and there is potential in other areas of the borough for designation of new Local Centres to help support the local community.

Designated shopping centres help to direct growth in retail, leisure and to a lesser extent, commercial uses to these parts of the borough. Concentration of such uses within designated centres helps to improve access to a good range of shopping and other facilities, encourages community cohesion, reduces the need to travel, and promotes economic growth.

There are several sub-options within town centres, with broadly similar sustainability outcomes, but which need to be expanded to explore their lower level options. The following sub-options were considered:

1) Re-classification of Hackney Central from a District to a Major Centre along with minor changes to expand the boundary of Hackney Central
2) Re-classification of Stamford Hill from a Local Shopping Centre to a District Centre.
3) Designate four new Local Shopping Centre at Oldhill Street, Dunsmure Road, Green Lanes and Hackney Downs and either keep or de-designate Shacklewell Lane as a Local Shopping Centre.
4) Maintain existing approaches for the above options

**Hackney Central Town Centre**

3.70 The following options were considered

1) Re-classification of Hackney Central from a District to a Major Centre along with minor changes to expand the boundary of Hackney Central.
2) Re-classification of Hackney Central from a District to a Major Centre and no change to the boundary.
3) Retain Hackney Central as a District centre with no boundary changes.

3.71 Option 1 would re-classify Hackney Central from a district centre to a major centre. There would be an expectation that it will be a centre for growth and new development of a type and scale appropriate for a major centre, i.e. larger scale retail, leisure and commercial development, which is considered to have a major positive impact on the efficient use of land. The expansion of the boundaries of the centre would provide the increased opportunities for growth. This option would have major positive benefits on sustainable economic growth by supporting the vitality and viability of the centre, as well as major positive impacts on employment by providing jobs for local residents which may help to reduce poverty and social exclusion. It will also have a major positive impact on community cohesion and equality by providing shopping facilities for all residents. The concentration of shopping and other community facilities in one central location also has positive impacts in terms of improving connectivity and reducing the need to travel. The higher status of the town centre as a major centre rather than a district centre could help to attract greater investment to the public realm in Hackney Central, which could contribute towards the creation of Healthy Streets, encouraging walking a cycling and subsequently having a positive impact on residents’ health and wellbeing. However the increased concentration of uses, facilities and investment in a central location could potentially have major negative impacts on air quality, noise and pollution (although this may be partly offset by the anticipated increase in walking and cycling that may result from the increased concentration of uses) and could be considered to have a detrimental impact on the economic vitality of smaller centres in the borough.

3.72 Option 2 would follow Option 1, but then keep the town centre boundary to the same size it is now. This would have a major positive impact on the sustainability of the centre in terms of economic growth and employment, and would ensure that existing shops are protected and vitality maintained.

3.73 Option 3 would retain the existing designation as a district centre with no expansion in the boundaries then it will not be able to fulfil its potential as a centre for economic growth, as was identified in the Town Centre and Retail Study, and there may be negative impacts on the efficient use of land as larger scale town centre uses will be focused in the current major centre of Dalston. This in turn would have negative impacts on sustainable economic growth and employment opportunities in the locality.

**Stamford Hill Town Centre**

3.74 Hackney’s Local Centres provide community and shopping facilities to a local catchment. Stamford Hill is a very large local centre of 120 units, a turnover comparable to some of the district centres, two large anchor supermarkets, and it has developed an important
specialist functioning in providing goods and services to the Jewish community. It is therefore considered that Stamford Hill is over-performing as a local centre.

The following options were considered:

1) Re-classification of Stamford Hill from a Local Shopping Centre to a District Centre.
2) Retain Stamford Hill as a Local Shopping Centre.

3.75 Option 1 would re-classify Stamford Hill from a local shopping centre to a district centre there will be an expectation that it will be a centre for growth and new development of a type and scale appropriate for a district centre, i.e. larger scale retail, leisure and commercial development, which is considered to have a major positive impact on the efficient use of land and on sustainable economic growth by attracting investment to the area and improving the vitality and viability of the centre. Designating Stamford Hill as a higher order district centre may attract greater investment to the public realm, making the centre more attractive, safer and greener, with positive impacts on sustainable design. Re-classifying Stamford Hill as a district centre could also have major positive benefits on community cohesion and equality by providing a greater range of shopping, leisure and community facilities to cater for all sections of the community. The concentration of a greater range of shopping facilities in this northern part of the borough may have positive impacts on air quality and the environment in terms of reducing need to for residents travel to other parts of the borough and encouraging greater walking and cycling to access appropriate shops and facilities locally.

3.76 Option 2 would retain Stamford Hill as a Local Shopping Centre. This would restrict its growth with the potential for major negative impacts on sustainable economic growth as larger scale retail, leisure and commercial development will not be directed here. This would also have minor negative impacts on Hackney’s communities and healthy lifestyles.

Local Centres

3.77 If local shopping centres are not designated as such then they are less able to promote sustainable economic growth as they do not have the policy protection that ensures the retention and clustering of shops and other facilities. Concentration of local retail and community facilities in local shopping centres helps to encourage community cohesion and reduces the need to travel.

3.78 In the case of Shacklewell Lane, evidence suggests a failing local centre. The centre is disjointed into six separate areas separated by concentrations of residential use. Only 6 A1 units remain in the Centre and residential uses make up 20% of uses which is the highest of any use. The centre is not providing the facilities and services required by local communities, so protection as a local centre may be damaging to sustainable economic growth.

The following options were considered:

1) Designate four new Local Shopping Centre at Oldhill Street, Dunsmure Road, Green Lanes and Hackney Downs and de-designate Shacklewell Lane as a Local Shopping Centre.
2) Designate four new Local Shopping Centre at Oldhill Street, Dunsmure Road, Green Lanes and Hackney Downs and retain Shacklewell Lane as a Local Shopping Centre.
3) Do not designate any new Local Shopping Centres and retain Shacklewell Lane as a Local Shopping Centre.

3.79 Option 1 would designate four new Local Shopping Centres retail, leisure and other town centre uses of an appropriate scale will be directed towards these locations which will help to encourage sustainable economic growth in these areas and also have positive benefits on community cohesion and equality. The designated centres would have additional policy protection to enable them to provide services and facilities more effectively to local communities, for example through retention of a proportion of shops across the Centre, and would be subject to Article 4 Directions which remove PD rights for flexible changes of use (which currently apply to all existing centres and can be extended by the Council if necessary to cover the new centres).

3.80 If Shacklewell Lane is de-designated as a local centre then shops and other town centre uses will no longer be specifically directed towards this area (however de-designation would not preclude the opening of new small shops in the area). Existing shops in the area would still be protected because there is a requirement for marketing evidence for the loss of a shop both inside and outside of Local Shopping Centres to demonstrate that there is no demand for a shop use in the foreseeable future. However there would not be a requirement to retain a certain proportion of shops and the Article 4 Direction would no longer apply.

3.81 Option 2, which would continue to protect Shacklewell Lane as a Local Shopping Centre, would not represent efficient use of land and would potentially have a negative impact on sustainable economic development because the long term presence of vacant retail units could cause blight and discourage investment to the area and undermine the aim to protect Local Shopping Centres for retail and community uses.

3.82 Option 3 would not designate the four new Local Centres. There would be major negative impacts on sustainable economic growth and on Hackney’s communities and social infrastructure because shops and local community facilities would not be encouraged to locate and congregate in these locations. The sustainability impacts of retaining Shacklewell Lane as a Local Centre have been discussed above under options A and B.

**Conclusion – Town Centres**

3.83 The central issue considered in the approach to town centres is how to maximise their ability to accommodate growth while retaining their features as distinctive areas of the borough, and not, in the medium to long term, damaging their sustainability. This is clearly shown by the options which would raise Hackney Central to the level of a Major Town Centre, and Stamford Hill to a District Town Centre. In both cases, this would lead to a major positive impact on efficient use of land, sustainable economic growth and the vitality and viability of town centres. They would, however, focus development in the busiest areas of the borough, increasing risks of a major negative impact on users from pollution and reduced air quality. It could also draw in users from other, smaller, town centres, impacting on their viability.

3.84 As Hackney Central Option 2 indicates, there is also a concern that new growth in particular kinds of shops, in this case luxury outlet shopping, could cause changes to town centres which reduce amenity for the local population in favour of more transient populations, whose shops are likely to push up ground rents, and attract services (for example, coffee shops) aimed at this group. In addition, as noted, Hackney Walk is a
prospective development which may not succeed, and its inclusion in the town centre could, if it were to fail, lead to a high number of vacant units in the town centre.

3.85 For Hackney Central, Option 1 was chosen as the preferred approach.

3.86 For Stamford Hill, Option 1 was chosen as the preferred approach.

3.87 In terms of the Local Centres, the option to designate four new centres will bring similar benefits to the upgrading of the larger centres, with major positive impacts on community cohesion and equality arising from the protection of local amenity while encouraging sustainable economic growth. If the centres were not designated, as set out in Local Centres Option 3, there would be major negative impacts on sustainable economic growth, social infrastructure. While at first hand, the option to de-designate a local centre, Shacklewell Lane, may seem like a less sustainable approach, as set out, Shacklewell lane has suffered from a decline in facilities and floor space to the point where it would be at least as well protected by other policies proposed in the plan protecting isolated local shops.

3.88 For the Local Centres, Option 1 was chosen as the preferred approach.

**Car-Free Development**

3.89 Inner London suffers from significant issues with pollution and congestion created by population densities, which is aggravated by the use of cars by residents. The use of private vehicles also reduce walking and cycling. To this end, the borough is exploring approaches to dealing with this problem. A key source of car movements in the borough is new developments, which could be made to reduce and even eliminate car spaces for owners.

3.90 The options considered were:

1) Ensure car-free development across the whole of the borough for all development
2) Ensure car-free development for residential development

3.91 Option 1 provides major positive impacts in terms of air quality and the public realm which lead on to secondary effects such as a healthier population and use of more sustainable transport modes such walking and cycling. It is recognised that the absence of a car will cause difficulties for certain groups and in some locations, with potential major negative impacts for equalities, to this end the it would still support disabled parking, but groups traditionally reliant upon car use such as elderly people and those with young children are likely to be negatively affected by this option. In addition, restrictions in parking for businesses may affect their ability to provide services or to upgrade existing facilities if they face a loss of parking, for fleet uses, for example.

3.92 Option 2 would remove existing limits on provision of car parking spaces. This would have a short to medium term positive impact on provision of parking in the borough, with potential benefits to groups who require use of private transport, such as the elderly. However, it would also result in major negative impacts arising from increased car use, such as unsustainably high air pollution and commensurate damage to health, noise impacts, and reduce the attraction of walking and cycling. In the medium term it is likely to lead to congestion as car numbers rise, compounding the above impacts, especially in terms of health.

**Conclusion – Car Free Development**
Option 1 is considered to be the most sustainable option as the benefits arising from reduced car use, principally in terms of health, through reduced pollution, improved air quality, and increased walking and cycling, outweigh the potential negative impact on equalities and economic growth identified above.

Option 1 was chosen as the preferred approach.

Conservation and Heritage

Hackney has an exceptional historic fabric which is key to the character of the Borough, much of which is protected either by statutory listing, local listing or locally designated conservation areas, and there is a strong interest in the protection of these assets and awareness of how important they are to the high quality environment.

Options considered were:
1) Continue existing protections
2) Continue existing protections and develop targeted local policies for areas of the borough

Option 1 would have a major negative impact on heritage assets arising from the lack of nuanced protection offered for both buildings which fall outside existing restrictions, and for townscape character more broadly. It would also have a minor negative impact on sustainability owing to a reduced level of re-use of existing buildings and their embodied carbon. It would have a positive impact on economic growth and affordable housing due to increased ability to fully redevelop existing sites using modern methods.

Option 2 would result in the same outcome as option 1, but with additional major positive impacts for heritage assets and sustainable design owing to targeted new policy which aims to ensure that areas of local character are protected. By tailoring policy to individual areas, it will reduce the negative impacts on provision of growth, such as employment uses, but ensure where this is delivered it contributes to an attractive environment and protected heritage assets.

Conservation and Heritage – Conclusion

Option 2 is considered to be the most sustainable approach owing to it finding a balance between strongly protecting heritage assets across the borough, and instead taking into account local historic fabric. In doing so it ensures that the borough can accommodate growth, while maximising the efficient use of the land, by creating growing areas which draw on their history to deliver a high quality environment.

Option 2 was chosen as the preferred approach.

Housing Size Mix

Hackney has a high need for large homes for families and has prioritised these in the past. Data from the latest housing needs assessment suggests there is still a high need for family dwellings however there are concerns that large market housing in Hackney is only affordable to those on very high incomes, even those which are classed as
Providing the right dwelling size mix and tenure is important in ensuring the Borough’s housing needs are met.

The following options were considered:

1) Seek a mix of dwelling sizes reflective of housing needs in developments but offer flexibility to vary the mix. Put onus on developers to demonstrate family size dwellings in areas with high house prices will be affordable and allow flexibility for lower provision of family sized dwelling in these areas.

2) Allow the market to respond to demand for market homes of different sizes.

Option 1 would have a significant positive impact on community cohesion by helping to create mixed and balance communities. Flexibility built into the policy to allow variations to the preferred mix will also help scheme viability and help maximise affordable housing delivery.

Option 2 would lead to provision of unaffordable housing in the Borough which would increase social polarisation as these will only be affordable to a minority of people and beyond the reach of most of Hackney’s residents. Intermediate affordable family housing would be unaffordable in the south of the Borough where house prices are very high and therefore seeking significantly more family housing could have a negative impact on addressing poverty and equality as those in need of affordable family housing would be under-provided for and could be displaced.

**Conclusion – Housing Size Mix**

Hackney has a high need for large homes for families and has prioritised these in the past. Data from the latest housing needs assessment suggests there is still a high need for family dwellings however there are concerns that large market housing in Hackney is only affordable to those on very high incomes, even those which are classed as intermediate housing. The need for 1 and 2 bedroom dwellings has also increased however is still lower relative to the need for family housing.

Option 1 is considered to be the more sustainable option as it seeks a specific size mix reflective of Hackney’s identified housing needs, therefore helping to meet Hackney’s needs which will help reduce poverty/inequality and deliver affordable homes. Option 2 could potentially have a negative impact and increase inequality among Hackney residents if the market delivers only to cater to certain markets.

Option 1 was chosen as the preferred approach.

**Affordable Housing Threshold**

There is a significant need for affordable housing in Hackney and although affordable housing delivery in recent years has been good, current projections based on planning permissions show the Council is likely to significantly under-provide in the short-term. This combined with house prices putting market housing out of reach for many of Hackney’s residents, benefit reforms, an increased need for social housing identified by
the 2015 Hackney Strategic Housing Market Assessment and a general need for more homes means the Council needs to find a way to increase delivery.

3.110 High house prices and low average wages in the Borough as well as reduction in Revenue Support Grant received means there is a greater need for more genuinely affordable homes. There are currently issues of overcrowding and lack of enough disposable income for basic services for some. Access to affordable housing can help people gain access to homes, increase the amount of disposable income for low income households and therefore improve access to key services.

3.111 The following options were considered:

1) Seek provision of on-site affordable housing only on schemes that provide 11 or more residential units.

2) Seek provision of on-site affordable housing only on schemes that provide 10 or more residential units, however also seek monetary contributions towards affordable housing provision on schemes providing less than 11 residential units.

3.112 Option 1 would be maintaining the status quo. The policy options considered have a narrow focus in terms of the sustainability objectives they could impact upon however major positive impacts from delivering affordable housing are likely and subsequently major positive impacts on reducing poverty are also likely. The extent of the impact is however dependent on whether the affordable housing products delivered are genuinely affordable to Hackney residents (see SA “Affordable Housing – tenure split”). It is also limited by only seeking on-site or off-site contributions towards affordable housing on schemes of 10 units or more. 47% of homes delivered in recent years have been on sites below this threshold and so a large proportion of developments would not qualify for contributing towards affordable housing. Long-term positive impacts are identified provided that affordable homes remain affordable in perpetuity.

3.113 Option 2 would result in similar impacts to Option A, however there is potential for more developments to be affected as more developments would qualify for contributions towards affordable housing. This would result in a major positive impact on Affordable Housing, assuming monetary contributions from schemes below 11 units are spent; the financial amount sought from developers would be set an amount that would not deter development; and the contributions can be used to build more affordable homes. There is potential for an increased affordable housing requirement to impact against seeking higher environmental sustainability standards, etc. in new developments and the Local Plan as a whole will need to find an appropriate balance.

**Affordable Housing Threshold – Conclusion**

3.114 Both options would have significant positive sustainability impacts particularly with regards to delivering affordable homes and reducing poverty. Option 2 however has a larger scope of effect because it would derive affordable housing from more developments. Seeking genuinely affordable housing also ensures the affordable homes delivered are actually affordable.

3.115 Option 2 was chosen as the preferred approach.

**Type of Affordable Housing**
Due to house price growth outpacing wage growth, average house prices in the Borough are now more than 17 times the average household income. This has put owning/renting in the Borough out of the reach of many local people. Social and intermediate housing are intended to make homes affordable to people on low and middle incomes respectively however the current state of the housing market makes this difficult to achieve with some of the affordable housing products being provided. Affordable Rent housing for example lets properties at anything up to 80% market rent which in many parts of the Borough is still unaffordable. Shared-ownership is similarly unaffordable in a Borough where average house prices in parts of the Borough are over £800,000 unless a substantial deposit is raised.

If affordable housing is not genuinely affordable to most people in the Borough then its provision does little to address key sustainability objectives of reducing poverty and promoting equality.

The following options were considered:

1) Continue with current approach of only requiring affordable housing with a 60-40 social affordable-intermediate tenure split with no other requirements.

2) Specify that all affordable housing proposed must be demonstrated to be genuinely affordable.

Option 1 is likely to have a positive impact on addressing sustainability objectives of reducing poverty however it will be mostly dependent on the types of affordable homes proposed – not all proposed are likely to be genuinely affordable. This approach is however likely to result in the delivery of more affordable homes than Option B due to more flexibility for developers and therefore better overall scheme viability with this option.

Option 2 is likely to have significant positive impact on addressing sustainability objectives of reducing poverty because homes will be cheaper and more affordable for those in need. This will help increase disposable income which can be spent on essential services. This will also have a minor positive impact on health. Overall affordable housing provision is likely to be reduced however as homes offered at a higher discount will affect overall scheme viability.

Conclusion – Type of Affordable Housing

Option 2 is considered to be the more sustainable option in terms of reducing poverty/inequality and delivering affordable homes. Although Option 1 is likely to result in the delivery of a larger quantum of affordable homes, Option 2 will ensure the homes delivered are genuinely affordable, freeing up disposable income to be spent on essential services.

Option 2 was chosen as the preferred approach.

Affordable Housing Tenure Split

One of the main issues raised during the previous consultation was that most homes are not affordable to most people in Hackney. House prices currently are more than 17 times the average wage in Hackney and so even with the discount on the market rate provided with most types of affordable housing, other than social rent, homes remain unaffordable.
to most. The 2015 Hackney Strategic Housing Market Assessment also projects a need for significantly more social housing than any other type of housing. The GLA has recognised this London-wide issue and introduced new types of affordable housing products which are considered to be more genuinely affordable and responsive to London’s unique housing market. Forming an appropriate tenure mix requirement is key to maximising the delivery of genuinely affordable housing.

The following options were considered:

1) Seek to retain the current tenure split of 60-40 (social affordable/intermediate) for the affordable component of new developments. This is consistent with the London Plan.

2) All other things being equal to Option A, seek a tenure split more heavily weighted towards social-affordable rent with a 70-30 (social affordable/intermediate) split to reflect the Borough’s priority housing needs.

Option 1 would maintain the status quo and will result in significant positive impacts, particularly with regards to delivering affordable homes. The positive impacts of addressing poverty/equality, increasing disposable income (which will positively impact on access to services and health) and delivering genuinely affordable homes are largely dependent on the types of affordable housing delivered. A 60-40 split reflects the significantly higher need for social housing in the Borough but is also considered to help maintain scheme viability by not seeking too much and allowing more intermediate housing for which there is also a need in the Borough. This will also help ensure overall affordable housing provision is not reduced in the Borough.

There is a greater need for social affordable housing in the Borough than intermediate housing and so Option 2 would likely have a significant positive impact on addressing poverty and equality. If more social housing was delivered however, whilst this would be considered to be more effective in addressing poverty and would increase the supply of genuinely affordable homes, overall affordable housing provision would be reduced due to reduced scheme viability.

**Affordable Housing Tenure Split - Conclusion**

Both options have positive sustainability outcomes with regards to reducing poverty/inequality and delivering affordable homes. Option 2 however may result in far fewer affordable homes delivered due to the proportion of social rent housing required and its effect on scheme viability. Although there is a high need for social rent homes in the Borough there is also need for intermediate homes and Option 1 is considered preferable because it balances the need for homes of different parts of the community better.

Option 1 was chosen as the preferred approach.

**Employment Land Provision**
Hackney’s employment evidence suggests a strong need for B1a office (a minimum 117,000sqm) over the plan period and to retain vital industrial land within the Borough. Insufficient land and floorspace in the borough will impact on delivery of jobs.

The following options were considered:

1) Retain employment land and floorspace across the borough which are suitable for business use and resist their loss to other uses unless it is clear that they are not suitable.

2) Provide less protection for employment land and floorspace by allowing the market forces to determine the type of amount of floorspace to intervene with greater flexibility.

3) Protect employment land and floorspace by affording greater protecting to floorspace within designated employment areas and only allowing the loss of employment floorspace outside of designated areas where robust marketing evidence is provided and higher quality/density employment is provided.

Option 1 would have a positive impact on economic growth and employment as the objective of this approach is to maintain the supply of employment land/floorspace which are suitable for continued use (i.e. sustainable) which in turn provide employment opportunities. It would also moderate this by ensuring that developments are only allowed when there is sufficient market demand.

Option 2 could have positive impact on the supply of housing (including affordable housing) in the Borough as land for housing is more valuable than employment land in the borough. However, this option may have a negative impact on amenity particularly in designated employment areas that are predominately occupied by employment uses. Loss of employment floorspace is likely to have a negative impact on economic growth and employment within the borough.

Option 3 could have a positive impact on economic growth and employment as the objective of this approach is to maintain the supply of employment land/floorspace (and resultant job opportunities) in the most sustainable locations within the borough, by defining set areas of the borough where employment floorspace is most concentrated.

**Employment Land Provision – Conclusion**

Overall, option 3 provides the most sustainable approach by ensuring that key areas of the borough where employment is the dominant use, are protected from incursion by residential. This has a major positive outcome for both economic growth and the efficient use of land, as it ensures that employment floorspace supply is not restricted by the significantly higher land value of residential, therefore controlling prices and ensuring local businesses can both be created and expand.

Option 3 was chosen as the preferred approach.

**Type of Employment Floorspace**

Businesses need a range of types of floorspace to operate effectively, ranging from machine shops, to warehousing, to high class office floorspace, and increasingly transient ‘maker spaces’. This means that there is a need for policy to help to ensure that uses
which are needed are secured for the borough’s existing and potential future businesses to operate effectively or to expand.

3.137 Employment is good for health. Earnings from paid employment can provide access to a good standard of living and being in work is linked to a positive sense of wellbeing. People who are not working have a higher risk of poor physical and mental health, have fewer social connections and are less active on average. Long-term unemployment is particularly bad for health, with the effects lasting for many years. While there is clear evidence that employment can have positive health benefits, the quality of the work itself is also important.

3.138 The following options were considered:

1) Allow the market to influence the type of employment floorspace provided in designated employment areas (Priority Employment Areas).

2) Introduce new employment designations which promote and protect different types of employment uses within these designations (Priority Office Areas and Priority Industrial Areas).

3.139 Option 1 would have a major positive impact on delivery of office/workspace and thus economic growth, jobs within this particular sector given the increasing trend for the office delivery when sites are redeveloped. Negative impact on job creation / economic growth as industrial uses as these are often displaced when sites are redeveloped and office re-provided given it's a higher value use.

3.140 Option 2 would have a positive impact on delivery of both office / workspace (both POAs and PIAs) and greater protection of industrial uses (within PIAs) enabling economic growth and supporting a diverse, sustainable and balanced economy. The option would lead to job creation, have a positive impact in improving air quality by ensuring industrial uses which service Hackney and Central London are located in sustainable locations. This will also reduce the amount of service vehicles on the road network resulting in more sustainable travel.

**Conclusion – Type of Employment Floorspace**

3.141 Option 2 is considered to be the most sustainable approach as it will have a major positive impact on provision of employment and economic growth, but balance this with the need for housing and other floorspace uses. The policy will also ensure that the amenity impacts of this type of development are concentrated in smaller areas, therefore protecting other areas of the borough from impacts their amenity.

3.142 Option 2 was chosen as they preferred approach.

**Affordability of Employment Floorspace**

3.143 Evidence gathered from the Employment Land Study has indicated that rents and land values in the borough have been rising and businesses are being pushed further out. This means that many businesses (start-ups, small and medium size businesses) are struggling to access employment space or are being forced to relocate.

3.144 The following options were considered:

1) Borough-wide uniform requirement for affordable workspace – 10% at minimum 80% of market rent in perpetuity.
2) Encourage new affordable floorspace within new development but not be prescriptive about the amount and cost.

3) More refined spatial approach to securing Affordable Workspace and low cost employment floorspace in the borough in perpetuity – seeking a higher proportion in more sustainable / viable areas.

3.145 Option 1 would have a positive impact on employment and economic growth through the provision of affordable workspace in the borough however this impact is limited due to the level of affordability specified (80% of market) which given increases in land values / rents, remains unaffordable to a significant proportion of businesses, particularly start-ups, artists etc, creative industries.

3.146 Option 2 would have a minor positive impact on employment and economic growth however given the onus is on the developer/applicant to deliver the affordable workspace, the likelihood of the affordable workspace being provided is reduced.

3.147 Option 3 would have a major positive impact on securing employment opportunities and economic growth in the borough given that it will provide workspace at a rent level that is genuinely affordable for businesses in the Borough.

**Conclusion – Affordability of Employment Floorspace**

3.148 Option 3 is considered to be the most sustainable approach, as it takes a spatially differentiated and nuanced approach to requirement for affordable workspace. This will ensure that the requirement to provide affordable workspace does not limit the bringing forward of schemes, while also ensuring that those that do come forward contribute to ensuring that economic growth benefits the local population. In addition, it would ensure that this space is clustered in areas of the borough where they can maximise co-location benefits with larger, more established businesses.

3.149 Option 3 was chosen as the preferred approach.
Stage B3: Assessing the Preferred Approach

Introduction

3.150 The previous section of this report focused on the assessment of alternative options for various issues raised during the plan preparation, and set out which of these was considered at that stage to be the most sustainable options. These preferred options have fed into the development of the draft local plan.

3.151 The plan is structured into thematic chapters, which contain within them a set of policies aimed at delivering the objectives of the plan. The chapter are:

- Places for People
- Protecting and Enhancing Heritage and Leading the Way in Good Urban Design
- Hackney’s People
- Meeting Hackney’s Housing Need
- A Strong and Competitive Economy Which Benefits All
- Planning for Vibrant Town Centres
- Improving Accessibility and Promoting Sustainable Transport
- Hackney’s Green and Open Spaces
- Climate Change

3.152 A sustainability assessment is then carried out of the policies within each chapter, setting out any significant sustainability findings and providing a clear evaluation of the sustainability of the policy, in reference to the sustainability objectives.

3.153 The following key is used to assess sustainability impacts:

<table>
<thead>
<tr>
<th>++</th>
<th>Major positive</th>
<th>--</th>
<th>Major negative</th>
<th>0 Minimal interaction</th>
</tr>
</thead>
<tbody>
<tr>
<td>+</td>
<td>Minor positive</td>
<td>-</td>
<td>Minor negative</td>
<td></td>
</tr>
</tbody>
</table>

3.154 These impacts are categorised into major or minor, indicating their principal and supporting sustainability impact. These are often concurrent, for example improvements to air quality will benefit health, etc, and positive or negative. The analysis then goes on to assess the likelihood of these effects, the timeframe within which impacts will occur, and how these may change over time, and finally the permanence of any change.

3.155 Any significant negative impact need to be addressed as they represent parts of the strategy which are not sustainable. Where these are identified, mitigation considered appropriate to reduce the impact has been set out.

Growth Strategy

3.156 The first chapter of the local plan sets out a series of place policies for different areas of Hackney to set out the strategic guidance for the Council to develop the area based plans and allocate sites for development. The policies making up this chapter are:

- PP1 – Public Realm
- PP2 – Dalston
- PP3 – Hackney Central and Surrounds
- PP4 – Stamford Hill
- PP5 – Enhanced Corridors
PP6 – Hackney Wick
PP7 – Clapton and Lea Bridge Roundabout
PP8 – Shoreditch and Hoxton
PP9 – Manor House
PP10 – Homerton

**Sustainability Impacts**

3.157 The Public Realm policy PP1 seeks to ensure that all public spaces between and within buildings are considered in all development schemes. The policy applies to all developments in Hackney and has wide ranging positive sustainability impacts. The creation of well-defined streets and routes, the emphasis on wide, clear pavements and improved wayfinding will have high positive impacts on walking and cycling and subsequently on pollution. The provision of landscaping, seating, drinking fountains and other facilities will have high positive impacts on poverty and equality and community and health. The emphasis on encouraging community interaction and creating welcoming, multi-functional spaces for people to dwell will have high positive impacts on open space, crime and community and health. As well as enhancing quality of life and health and wellbeing, a high quality public realm is also known to play an important role in boosting the local economy, therefore having high sustainability impacts on economic growth. The positive effects of this policy will be seen in the short, medium and long term and the effects will have a high level of permanence provided maintenance arrangements are considered.

3.158 The Dalston place policy (PP2) specifically promotes Dalston’s public realm and green spaces and suggests opportunities for enhancing this, for example through the retention of the Curve Garden and the creation of new pedestrian links, so this policy will have positive sustainability impacts on open space and biodiversity and cycling and walking. As an identified area for growth in housing and commercial development, this policy will have positive sustainability impacts on affordable housing, economic growth and employment. There is emphasis within the policy on retaining and supporting cultural and community organisations within Dalston, which play an important role in the area, so the policy will have positive sustainability impacts on community and health, social infrastructure and education and skills. Growth and development in Dalston may have minor negative impacts on flood risk and air quality, however these impacts are balanced against the need for growth in the area and will be mitigated by other policies in the Plan. The impacts of this place policy are likely to be seen in the medium term.

3.159 The Hackney Central and Surrounds place policy (PP3) promotes Hackney Central as the borough’s civic and cultural hub and a strategically important employment area, putting forward a number of key development sites to enable this to come forward. This approach will have positive sustainability impacts on the efficient use of land, economic growth, employment and social infrastructure. There is also an identified capacity for 3,000 new homes in the area which will include the provision of genuinely affordable homes which will have a positive sustainability impact on affordable homes and equality and poverty. Promotion of an improved public realm and enhanced walking and cycling routes will have positive sustainability impacts on walking and cycling and open space. As a major growth area, there will be enhanced development activity within hackney Central and Surrounds, which could potentially have negative impacts on air quality, noise / pollution and flood risk, however these impacts are balanced against the need for
growth in the area and will be mitigated by other policies in the Plan. The impacts of this place policy are likely to be seen in the medium term.

3.160 The Stamford Hill place policy (PP4) sets out that Stamford Hill will become a cohesive, liveable and well connected neighbourhood for all communities living in the area. The provision of additional school places to meet needs for children and adult learning will have high positive sustainability impacts on education and skills and community and health. The designation of Stamford Hill Broadway as a district centre will provide highly positive sustainability impacts on economic growth by attracting an improved range of shops, leisure and employment to this area, and the designation of two local centres in the area (Dunsmure Road and Oldhill Street) will consolidate this as these smaller centres will provide easy access to day-to-day goods for local residents, having high sustainability impacts on walking and cycling and poverty and equality. Furthermore, the emphasis in the policy on the creation of new and renovated urban neighbourhoods will have high positive sustainability impacts on heritage assets and sustainable design, and the linking of open space to the west (Woodberry Down) and the east (Lea Valley Regional Park) through the Stamford Hill area will have high positive sustainability impacts on open space, biodiversity and walking and cycling. Growth in the area may have minor negative sustainability impacts on objectives related to the environment, for example in terms of increasing pollution. The impacts will be seen in the medium term.

3.161 The Enhanced Corridors place policy (PP5) sets out the approach to enhancing the major historic corridors of Hackney, including though mixed-use developments, infill, public realm improvements and urban greening to combat air pollution along the corridors. This approach will have high positive impacts on various sustainability objectives including efficient use of land and sustainable design. A number of sites have been broadly identified within the place policy where there are opportunities for residential-led or commercial-led developments, or improvements to community facilities, green spaces or public realm. The approach taken enables flexibility on development opportunities within the corridors but will lead to high positive sustainability impacts on poverty and equality, community and health, affordable homes, social infrastructure economic growth and jobs. There will be minor negative sustainability impacts on air quality and noise and pollution because although the urban greening and public realm and landscaping improvements will encourage walking and cycling, these corridors remain the major north-south and east-west arterial roads in the borough and will most likely continue to be dominated by vehicular traffic throughout the plan period as much longer term behaviour change will be required for higher positive sustainability impacts. The Lea Valley Corridor is an important artery for walking, cycling, wildlife, river communities and recreation and leisure and this will be protected and enhanced through the place policy which will have high positive impacts on open space, biodiversity, air quality, water quality and walking and cycling. The implementation of this policy will be ongoing in to the much longer term, however smaller scale changes will be easier and quicker to implement, therefore the positive sustainability impacts arising from this place policy will be seen throughout the short, medium and long term.

3.162 The Hackney Wick place policy (PP6) seeks to establish Hackney Wick as a vibrant employment quarter with potential capacity for 10,000sqm of new employment floorspace over the plan period including supporting the cluster of hi-tech, cultural, creative and educational industries in the area; this will have high positive sustainability impacts on economic growth, employment and education and skills. As part of this there is emphasis
on ensuing provision of affordable and low-cost workspace which will have positive impacts on poverty and equality. There is also opportunity identified within the place policy for improving residential neighbourhoods within Hackney Wick and a potential provision of 1,550 new residential units throughout the plan period which will have high positive sustainability impacts on affordable homes. There is a focus also on improving access to the open spaces and sporting facilities of the Olympic Park which will have a high positive impact on open space, walking and cycling and community and health. It is worth noting that LLDC is currently the planning authority for Hackney Wick; this place policy aligns with the LLDC’s approach to planning for the area, however Hackney does not currently have control over planning decisions in this area, which means that the positive sustainability impacts identified above are not certain.

3.163 The Clapton and Lea Bridge Roundabout place policy (PP7) sets out the intentions to reinvent this area, which centres around the Clapton Roundabout, to create a place with its own civic heart and identity and new employment, retail and residential uses which would have positive sustainability impacts on efficient use of land, sustainable design, economic growth, employment and community and health. A key part of the place policy is the identified potential to reconfigure the roundabout which would reduce the vehicular capacity of the junction, thereby having positive impacts on air quality, noise and pollution, climate change and walking and cycling. It has also been identified that there is potential to renew the residential estates in the area which will have major positive impacts on affordable homes and poverty and equality. Finally, there is a focus on creating new green links in this area, particularly linking existing open spaces to Clapton Station, which would have major positive impacts on open space, walking cycling and climate change. This place policy will be a significant challenge to implement and, whilst it will have permanent and wide ranging positive sustainability impacts, these will not be realised until the long term.

3.164 The Shoreditch and Hoxton place policy (PP8) sets out a vision for Shoreditch to be a thriving and vibrant internationally recognised destination, home of Tech City, a cluster of creative, digital and tech industries and the creative heart of London. This focus on commercial growth will have major positive sustainability impacts for economic growth and employment. The economic benefits harnessed through this growth in the southern part of Shoreditch will be extended into the more residential neighbourhoods of Hoxton and Haggerston through improved access to high quality affordable homes and workspaces, which will have positive sustainability benefits in delivering affordable homes and addressing poverty and equality. In addition, there is an emphasis on supporting but diversifying the thriving night time economy that exists in Shoreditch. This will have high positive sustainability impacts on economic growth, crime and community and health. There is specific mention within the policy to improving natural surveillance of open spaces including Shoreditch Park, which will have positive impacts on crime and community safety. However Shoreditch in an area where high levels of growth and development is projected and only very limited new open space has been identified within the map, which suggest that the population of the area will grow, but that there will be less access to open space on a per person basis, which has potential negative sustainability impacts on the open space and community and health objectives as well as objectives around air quality. Shoreditch is a complex part of the borough with a high number of competing elements in operation, including a whole range of commercial uses from large corporate offices to much smaller scale makers and artists, as well as residential, and evening and night time economy uses, so some of the positive impacts
identified above, such as the benefits of economic growth sharing towards the residential areas, will take some time to materialise, most likely appearing in the medium to longer term.

3.165 The Manor House place policy (PP9) sets out the aspiration for Manor House to become a dynamic local centre providing retail, leisure, employment and community facilities for the local community. This will have positive sustainability impacts on social infrastructure, community and health, crime and economic growth. The Woodberry Down regeneration scheme is key to enhancing the area and includes provision of an additional 2,000 homes. This will have a major positive sustainability impact on affordable homes and poverty and equality objectives. There is also emphasis on improving the busy junction which dominates the area, which will have positive sustainability impacts on walking and cycling, air quality and pollution. Finally, improvements to the park edge (Finsbury Park in Haringey) and access to the enhanced Woodberry Wetlands and the distinctive but non-listed ‘Manor House’ will have positive sustainability impacts on open space and heritage assets. The enhanced Wetlands will have had a positive sustainability impact on biodiversity, however the increased number of visitors may have negative implications for biodiversity in this area, so the overall sustainability impact on biodiversity is considered to be neutral. These impacts will be seen in the medium to long term with a high degree of permanence.

3.166 The Homerton place policy (PP10) seeks to improve the public realm in the area, focused around enhancing historic landmarks such as St Barnabas’ Church and Sutton House and to create a child-friendly place with improved open space and play space and better cycle routes. This approach will have major positive sustainability impacts on heritage assets, open space, walking and cycling, community and health and poverty and equality. There is also a focus within the policy on reinforcing links between Homerton High Street, Homerton Station and Chatsworth Road, which will improve accessibility in the area, having positive sustainability impacts on walking and cycling and air quality. Improved links will provide increased opportunity to intensify commercial uses in this area which will have positive impacts on economic growth and employment. Finally, the ongoing regeneration of two estates in the area will have positive sustainability impacts on affordable homes and social infrastructure. The measures proposed in Homerton will not require major development or investment and therefore the positive impacts should be seen in the short to medium term.

3.167 The sustainability impacts of policies within this chapter are summarised in the table below:

<table>
<thead>
<tr>
<th>Policy</th>
<th>PP1</th>
<th>PP2</th>
<th>PP3</th>
<th>PP4</th>
<th>PP5</th>
<th>PP6</th>
<th>PP7</th>
<th>PP8</th>
<th>PP9</th>
<th>PP10</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>++</td>
<td>++</td>
<td>+</td>
<td>++</td>
<td>++</td>
<td>+</td>
<td>++</td>
<td>++</td>
<td>+</td>
<td>++</td>
</tr>
<tr>
<td>PP1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PP2</td>
<td>++</td>
<td>++</td>
<td>0</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>+</td>
<td>++</td>
<td>+</td>
<td>++</td>
</tr>
<tr>
<td>PP3</td>
<td>0</td>
<td>++</td>
<td>-</td>
<td>++</td>
<td>+</td>
<td>++</td>
<td>+</td>
<td>++</td>
<td>+</td>
<td>++</td>
</tr>
<tr>
<td>PP4</td>
<td>0</td>
<td>++</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>++</td>
<td>+</td>
<td>++</td>
<td>+</td>
<td>++</td>
</tr>
<tr>
<td>PP5</td>
<td>0</td>
<td>++</td>
<td>+</td>
<td>0</td>
<td>++</td>
<td>+</td>
<td>+</td>
<td>++</td>
<td>+</td>
<td>++</td>
</tr>
<tr>
<td>PP6</td>
<td>0</td>
<td>++</td>
<td>0</td>
<td>++</td>
<td>+</td>
<td>++</td>
<td>+</td>
<td>++</td>
<td>+</td>
<td>++</td>
</tr>
<tr>
<td>PP7</td>
<td>0</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
</tr>
<tr>
<td>PP8</td>
<td>0</td>
<td>++</td>
<td>++</td>
<td>0</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
</tr>
<tr>
<td>PP9</td>
<td>0</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
</tr>
<tr>
<td>PP10</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
<th>6</th>
<th>7</th>
<th>8</th>
<th>9</th>
<th>10</th>
</tr>
</thead>
<tbody>
<tr>
<td>PP1</td>
<td>+</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
</tr>
<tr>
<td>PP2</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>+</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
</tr>
<tr>
<td>PP3</td>
<td>0</td>
<td>++</td>
<td>++</td>
<td>+</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
</tr>
<tr>
<td>PP4</td>
<td>0</td>
<td>++</td>
<td>+</td>
<td>++</td>
<td>+</td>
<td>++</td>
<td>+</td>
<td>++</td>
<td>++</td>
<td>++</td>
</tr>
<tr>
<td>PP5</td>
<td>0</td>
<td>++</td>
<td>++</td>
<td>0</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
</tr>
<tr>
<td>PP6</td>
<td>0</td>
<td>++</td>
<td>++</td>
<td>0</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
</tr>
<tr>
<td>PP7</td>
<td>0</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
</tr>
<tr>
<td>PP8</td>
<td>0</td>
<td>++</td>
<td>++</td>
<td>0</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
</tr>
<tr>
<td>PP9</td>
<td>0</td>
<td>++</td>
<td>++</td>
<td>0</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
</tr>
<tr>
<td>PP10</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
<td>++</td>
</tr>
</tbody>
</table>
Protecting and Enhancing Heritage and Leading the Way in Good Urban Design

3.168 This chapter of the local plan focuses on the general aspects of the built environment and ensuring that the design of developments meets a high standard across a range of needs. The policies making up this chapter are:

- LP1 - Design Quality and Local Character
- LP2 - Development and Amenity
- LP3 - Designated Heritage Assets
- LP4 - Non Designated Heritage Assets
- LP5 - Strategic and Local Views
- LP6 - Archaeology
- LP7 - Advertisements

Sustainability Impacts

3.169 Policies LP1, LP3, LP4, LP5 and LP6 would have a major positive impact on all aspects of the sustainability of the borough’s heritage assets, primarily by protecting them from being altered or removed, and requiring any development of, or near to them, to respect the setting of the borough’s historic townscapes and landscapes, and maintain and improve their character. The policies will protect a range of historic buildings, including designated (LP3) and non-designated (LP4) heritage assets, as well ensuring that potential archaeological remains are investigated and protected.

3.170 Policy LP1 sets out requirements for the overall design and buildings, and has major positive impacts by requiring sustainable design and construction in all developments, strongly supporting the climate change and sustainable design sustainability objectives. This policy also seeks a range of key measures which support Hackney’s people and communities, as well as reducing crime by ensuring buildings are accessible, secure by design, and they also promote health through the requirement to use the active design principles. It also sets out that tall buildings, which represent some of the highest potential impact developments need to relate and respond to the boroughs historic townscape; not lead to overshadowing and to make a positive contribution to the public realm, having a major positive impact on heritage assets as well as sustainable design and efficient use of land. These impacts are likely to be felt in the short term given that this is a criteria based policy that development must adhere to.

3.171 Policy LP2 would have minor positive sustainability impacts across a range of factors related to amenity, most strongly in terms of ensuring developments are built in such a way as to limit overlooking and maximise sunlight and daylight for occupants, and to protect them from a range of pollution issues including noise and air pollution, which is also supported by the aims of LP58 (pollution). The effects of LP2 would be immediate and long term on new developments, but are limited in their effect on existing developments, except in ensuring the amenity of existing occupiers is considered and not negatively harmed by any new development proposed.

3.172 Policies LP5 and LP6 would have major positive impacts on heritage assets and minor positive impacts on efficient use of land and health by ensuring that developments do not impact on important views or adversely affect the historic significance of buildings, that they are sensitive to the character of the area, and do not cause visual intrusion and light
pollution into adjoining properties. The impacts of this policy are likely to occur in the short to medium term as the policy is applied to new applications.

3.173 Overall, the application of the strong design policies in this chapter will generate significant positive sustainability impacts around heritage assets, sustainable design, community and health, and minor impacts for poverty and equality, walking and cycling the climate change. There are no identified significant negative sustainability impacts of the policies, assuming that they are applied in balance with other planning policies. This is due to the fact these are principally delivered as part of the design of buildings after a land use has been selected, meaning they have little impact on efficient use of land or other land use related sustainability objectives.

3.174 The sustainability impacts of policies within this chapter are summarised in the table below:

<table>
<thead>
<tr>
<th>Sustainability Objective</th>
<th>Policy</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
<th>6</th>
<th>7</th>
<th>8</th>
<th>9</th>
<th>10</th>
<th>11</th>
<th>12</th>
<th>13</th>
<th>14</th>
<th>15</th>
<th>16</th>
<th>17</th>
<th>18</th>
<th>19</th>
<th>20</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>LP1</td>
<td>+</td>
<td>+</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>++</td>
<td>++</td>
<td>+</td>
<td>+</td>
<td>0</td>
<td>++</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td></td>
<td>LP2</td>
<td>0</td>
<td>0</td>
<td>++</td>
<td>0</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>++</td>
<td>+</td>
<td>+</td>
<td>++</td>
<td>0</td>
<td>+</td>
<td>+</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td></td>
<td>LP3</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>++</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td></td>
<td>LP4</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>++</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td></td>
<td>LP5</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>++</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td></td>
<td>LP6</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>++</td>
<td>+</td>
<td>0</td>
<td>0</td>
<td>+</td>
<td>+</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td></td>
<td>LP7</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>+</td>
<td>+</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td></td>
</tr>
</tbody>
</table>

Hackney's People

3.175 This chapter of the plan focuses on the delivery of facilities and amenity for the people of Hackney. The policies making up this chapter are:

- LP8 - Social and Community Infrastructure
- LP9 - Health and Wellbeing
- LP10 - Arts, culture and entertainment facilities
- LP11 - Utilities and Digital Connectivity Infrastructure

Key Sustainability Impacts

3.176 Policy LP8, as its title suggests, will have a major sustainability impact on both social infrastructure and community and health in the borough by supporting the provision of new social and community infrastructure, where there is an identified need, ensuring facilities are delivered in a balanced way which maximises the efficient use of land. This would include the retention of schools and educational facilities thereby having a positive sustainability impact on education and skills. In addition, it delivers major positive impacts on equalities by requiring these developments to provide access for all, and encouraging co-location with other social infrastructure. The policy also seeks to limit the loss of existing facilities unless they are replaced. The policy could be made more sustainable by requiring these developments, which attract a large number of users, often younger or elderly and/or more vulnerable, to be located in areas of the borough which have lower pollution and higher air quality, though it is noted that developments would be required to consider this under policy LP58. The impacts of the policy are highly likely and will occur over the medium to long term, as developments are proposed and then built out. The policy summarises in the supporting text what the identified need is for different types of social and community infrastructure (as per the Infrastructure Development Plan), but the
policy wording itself takes a flexible approach which ensures the long term ability of the Plan to respond to changes in the needs of the people of the borough.

3.177 There are also minor benefits arising from LP8 in terms of efficient use of land by aiming to co-locate new or replacement social facilities in new mixed-use developments. The provision of these facilities is likely to supporting reductions in poverty, crime and education and skills objectives in the medium to long term by supporting community cohesion.

3.178 Similar to the previous policy, Policy LP9 also will have a major positive impact on Community and Health, Walking and Cycling and Social Infrastructure objectives by supporting developments which contribute to a high quality environment and support health and active lifestyles. In addition they require all new development, regardless of use, to promote physical activity, to encourage residents to lead active lifestyles, and to provide facilities to support walking and cycling. The impact of the policy is highly likely to occur, within a medium to long timeframe, as new development comes forward. The effects of the policies are likely to be relatively permanent with regard to provision and protection of facilities, but changes to behaviour anticipated are less certain and / or permanent.

3.179 The provision of major arts, culture and entertainment facilities in the borough, through Policy LP10 will have a minor positive impact on both community and health, and on economic growth and employment objectives by attracting people to events and other peripheral supporting companies and services. The policies are unlikely to have any significant negative impacts on sustainability as long as they are applied in balance with the rest of the plan policies.

3.180 The provision of digital connectivity infrastructure through policy LP11 will ensure that all new homes and commercial developments are well connected, which will have major positive sustainability impacts for economic growth.

3.181 Overall, the policies contained in Hackney’s People will provide a major positive impact on communities and their health by ensuring access to an adequate range of social infrastructure by encouraging the provision of new and replacement of existing facilities, and doing this in the most efficient way possible by only allowing new developments where there is a clear need, and co-locating these developments with other uses. It also requires that developments are easily accessible by walking, cycling and public transport, further enhancing sustainability as these are facilities likely to be used by large numbers of people.

3.182 The sustainability impacts of policies within this chapter are summarised in the table below:

| Sustainability Objective | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | 17 | 18 | 19 | 20 |
|--------------------------|---|---|---|---|---|---|---|---|---|----|----|----|----|----|----|----|----|----|----|    |
| Policy                   |   |   |   |   |   |   |   |   |   |    |    |    |    |    |    |    |    |    |    |    |
| LP8                      | 0 | ++| + | 0 | 0 | ++| 0 | + | ++| ++| ++| ++| ++| ++| ++| ++| ++| ++| ++| ++|    |
| LP9                      | + | 0 | ++| ++| 0 | + | ++| 0 | + | ++| ++| ++| ++| ++| ++| ++| ++| ++| ++| ++| ++|    |
| LP10                     | 0 | 0 | 0 | 0 | 0 | + | 0 | + | ++| ++| ++| ++| ++| ++| ++| ++| ++| ++| ++| ++|    |
| LP11                     | 0 | + | 0 | 0 | + | + | 0 | 0 | 0 | 0 | + | 0 | 0 | + | 0 | 0 | + | ++| ++| ++| ++|    |
This chapter of the plan focuses on policies related to residential development and meeting Hackney’s identified housing need. The policies making up this chapter are:

- LP12 - Housing Supply
- LP13 - Affordable Housing
- LP14 - Dwelling Size Mix
- LP15 - Build to Rent
- LP16 - Self/Custom-Build Housing
- LP17 - Housing Design
- LP18 - Housing Older and Vulnerable People
- LP19 - Residential Conversions
- LP20 - Student Housing
- LP21 - Large Scale Purpose-Built Shared Housing
- LP22 - Houses in Multiple Occupation (HMO)
- LP23 - Gypsy and Traveller Accommodation
- LP24 - Preventing the Loss of Housing
- LP25 - Visitor Accommodation

Policy LP12 has a major positive impact on the efficient use of land as it sets out areas of the borough where housing can be delivered and how much housing is planned for each area. It also has major positive impact on affordable homes and community facilities by requiring market housing to be delivered alongside and in balance with these uses. The provision of housing is identified as a key sustainability issue, but there is potential that if housing is delivered in preference to other types of land use, such as business or key infrastructure facilities, that there could be long term significant impacts on the ability of the borough to support these objectives. This needs to be considered in balance with the fact that failure to deliver enough homes, including affordable homes, will have significant impacts on the ability to deliver employment, education & skills and community and health benefits which can arise only when safe, secure and affordable housing are available. Assuming that housing is delivered in accordance with policy LP12 alongside the application of other policies in the plan, the delivery of housing as part of well-designed, mixed use developments can support long term sustainability, but this needs to be carefully managed.

Policy LP13 has, as its title suggests a major positive impact on affordable housing by requiring all new development to maximise opportunities to deliver affordable housing. As an individual policy, as set out in the paragraph above there could be concerns about how this priority on housing delivery may impact on sustainability of other factors, but the policy requires maximisation have regard to site context and character, as well as economic viability, therefore protecting the historic fabric to an extent, as well as ensuring the most efficient use of land. The policy requires all developments of 10 units or more deliver at least half of development as affordable, with the split of this being 60% Socially rented vs 40% intermediate products. In doing so, the policy ensures that the majority of this housing is delivered at significantly below local market rates maximising the benefit, while ensuring this housing can be delivered, as lower rates will make the housing more challenging to sustainably deliver. Furthermore, the housing is to be delivered on-site, which provides a strong positive impact on community and health as well as poverty and equality by ensuring new development delivers housing for the local community. For schemes of 1-9 units, there is still a requirement to provide affordable housing though...
this is balanced against economic viability, which should provide an additional minor positive impact on small-scale developments. The effects of the policy are relatively certain as tenure will be clearly established in the planning permission, and the speed of the impact likely in the medium to long term, as developments come forward and are then built out.

3.186 Policy LP14 will have a major positive impact on the provision of decent homes by ensuring that new developments provide a range of dwelling sizes which provide for local needs. This dwelling mix will ensure that there are sufficiently large homes for those needing them, as identified in the 2015 Strategic Housing Market Assessment. The provision of these homes is likely to have a minor positive impact on poverty and equality and community and health objectives by ensuring local communities can secure access to better quality housing. Much as with policy LP12, this is balanced against local character and economic viability to ensure that the implementation of this policy does not result in a negative impact on heritage assets or ability deliver other land uses. In addition, policy LP19 requires that conversion of existing residential properties provide at least one family unit with three of more bedrooms, at ground level.

3.187 Policies LP15, LP16, LP18, LP20, LP21 and LP22 deal with special types of housing which may be proposed by developers, with the policies focused on ensuring these types of developments meet high standards. Policy LP15 deals with ‘build to rent’ housing where a major investor will ‘build and hold’ a development, gaining a constant return on investment over a longer time period through renting the properties out. This form of development could pose sustainability risks if the tenure of the units delivered changes (for example, to owned) where this could negatively impact on poverty and equality and reduce the supply of affordable homes for those who cannot or do not want, due to their circumstances, to buy a home. The policy protects against this by requiring the flats are held under covenant for at least 15 years, are under unified management, and offer longer term three year or longer tenancy agreements. In addition, schemes will need to comply with existing housing standards and be of an exceptional design standard, further supporting the sustainability of the built environment. Policy LP16 would have a similar, but less strong positive impact on provision of decent homes, by supporting the provision of self/custom houses which comply with the other policies set out in the plan. Self and custom build housing may, however, not represent the most efficient use of land as owners may develop low-density residential housing on the identified plots.

3.188 Policy LP18 will have a major positive impact on poverty and equality as the policy supports housing for older and vulnerable people, where a need can be demonstrated. In such cases, the policy ensures there are also minor positive benefits in terms of ensuring half of units are affordable, and schemes are accessible and near to services their users need. It is highly likely that these impacts would arise within the medium to long term, as the policy is applied to developments. The policy could be made more sustainable by ensuring this kind of housing is provided as part of other, mixed use developments, therefore providing a greater level of community interaction for these groups, although this needs to be balance against the specific and often challenging needs of vulnerable individuals.

3.189 Policy LP20 deals with another specialist form of housing, Student Accommodation, and is primarily aimed at responding to and controlling demand for this type of development. The policy will have a major positive impact on the affordability of this type of
accommodation by requiring a minimum of half the rooms to be affordable (in terms of student grants and loans), at no more than 55% of the maximum income a student could receive. The policy also seeks to limit the development of this type of accommodation where it would lead to an overconcentration and be of detriment to local amenity. The provision of this type of highly ‘specialist’ housing could have a detrimental impact on the sustainability of providing fully accessible affordable housing and the policy combats this by ensuring that new development of student accommodation is only permitted if the site is not suitable for conventional housing and the proposal meets identified needs for this type of housing.

3.190 Policy LP21 responds to the demand for new types of ‘shared’ accommodation in Hackney, such as co-living schemes where rooms are individually owned / rented but facilities are shared between individuals. As with student housing, this type of development is only permitted where the site is identified as not being suitable for conventional self-contained units. The impact of this policy is likely to reflect that set out in paragraph 5.25 with regards to student accommodation, that is, it will have a major positive impact on provision of affordable and decent homes, as it requires that new developments must be set at rents which are affordable to local (ward) level incomes, in accordance with policy LP13. In addition, the policy requires that developments provide a suitable level of communal space, having a minor positive impact on community and health, and that the developments meet space standards.

3.191 Policy LP22 supports HMOs in appropriate circumstances which will have high positive sustainability impacts on poverty and equality by providing relatively cheaper accommodation for those on lower incomes.

3.192 Policy LP17 on housing design will have a major positive impact on the delivery of sustainable design, as well as tackling climate change, by requiring new housing to meet GLA housing standards and accessibility standards, and tying developments to the council’s Sustainable Design and Construction SPD. Policy LP19 seeks to ensure that houses converted into a larger number of units retain a family sized unit of 3 bedrooms or more. This will have positive sustainability impacts on community and health by ensuring families have local access to housing options.

3.193 Policy LP25 deals with the provision of visitor accommodation such as hotels. The policy would have a major positive impact on economic growth and potentially on employment too, by ensuring that new hotel developments are directed to the Central Activities Zone and major town centres, therefore supporting the tourist economy and providing employment. However, there is potential that provision of hotels could have a major negative impact on affordable housing and other forms of economic growth by competing with these uses for sites within CAZ and major town centres and jeopardizing the efficient use of land to meet needs. To address this, the policy specifies that hotel development should not result in a loss of opportunity to provide conventional housing and limits the provision of new hotel accommodation unless it can be demonstrated that there is projected need within the borough, and will not harm the balance and mix of uses in the area, or lead to an over concentration, therefore ensuring their provision is balanced. In addition, the policy has a high potential of bringing minor benefits in terms of communities and health by requiring that new facilities are open to the public.

3.194 Policy LP24 limits the redevelopment or loss of residential floorspace, which will have a major positive impact on several sustainability factors. Primarily, it ensures that unless
the residential floorspace is no longer suitable, and it is inappropriate to re-provide it on site, this type of floorspace will be strongly protected, with a major positive impact on the provision of affordable housing. This is further enhanced by any redevelopment being an equivalent or higher density, or provision for specialist housing where there is a shortage. This will ensure that the type of size of housing can be altered by redevelopment. The policy could have potentially negative impacts on the provision of other land uses, for example, social and community uses, and employment. This is dealt with by allowing for developments to proceed for community uses where a need can be demonstrated. The policy is also inherently positive for Climate Change by avoiding the loss of the embodied carbon of existing buildings, though the policy could be made more sustainable if redevelopment would incorporate sustainable design features and energy-reducing technologies.

Policy LP23 will have a major positive impact on poverty and equality by setting out policy for provision of new specialist accommodation for Gypsies and Travellers and Travelling Show people to meet the needs of this protected group. The policies ensures that where a need can be demonstrated for the community the council will support provision. Further minor positive are provided by requirements that sites proposed are suitable for residential development, with good access to facilities which support community and integration. The policy also limits the loss of travellers sites unless an equivalent number of pitches are provided, though this could made more sustainable my ensuring these are within the borough, thereby ensuring the community is not displaced.

The sustainability impacts of policies within this chapter are summarised in the table below:

<table>
<thead>
<tr>
<th>Policy</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
<th>6</th>
<th>7</th>
<th>8</th>
<th>9</th>
<th>10</th>
<th>11</th>
<th>12</th>
<th>13</th>
<th>14</th>
<th>15</th>
<th>16</th>
<th>17</th>
<th>18</th>
<th>19</th>
<th>20</th>
</tr>
</thead>
<tbody>
<tr>
<td>LP12</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>+</td>
<td>+</td>
<td>-</td>
<td>-</td>
<td>+</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>LP13</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>+</td>
<td>+</td>
<td>-</td>
<td>-</td>
<td>+</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>LP14</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>++</td>
<td>++</td>
<td>0</td>
<td>0</td>
<td>++</td>
<td>0</td>
<td>0</td>
<td>++</td>
<td>0</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>LP15</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>++</td>
<td>++</td>
<td>0</td>
<td>0</td>
<td>++</td>
<td>0</td>
<td>0</td>
<td>++</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>LP16</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>++</td>
<td>++</td>
<td>0</td>
<td>0</td>
<td>++</td>
<td>0</td>
<td>0</td>
<td>++</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>LP17</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>++</td>
<td>++</td>
<td>0</td>
<td>0</td>
<td>++</td>
<td>0</td>
<td>0</td>
<td>++</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>LP18</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>++</td>
<td>++</td>
<td>0</td>
<td>0</td>
<td>++</td>
<td>0</td>
<td>0</td>
<td>++</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>LP19</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>++</td>
<td>++</td>
<td>0</td>
<td>0</td>
<td>++</td>
<td>0</td>
<td>0</td>
<td>++</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>LP20</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>++</td>
<td>++</td>
<td>0</td>
<td>0</td>
<td>++</td>
<td>0</td>
<td>0</td>
<td>++</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>LP21</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>++</td>
<td>++</td>
<td>0</td>
<td>0</td>
<td>++</td>
<td>0</td>
<td>0</td>
<td>++</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>LP22</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>++</td>
<td>++</td>
<td>0</td>
<td>0</td>
<td>++</td>
<td>0</td>
<td>0</td>
<td>++</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>LP23</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>++</td>
<td>++</td>
<td>0</td>
<td>0</td>
<td>++</td>
<td>0</td>
<td>0</td>
<td>++</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>LP24</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>++</td>
<td>++</td>
<td>0</td>
<td>0</td>
<td>++</td>
<td>0</td>
<td>0</td>
<td>++</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>LP25</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>++</td>
<td>++</td>
<td>0</td>
<td>0</td>
<td>++</td>
<td>0</td>
<td>0</td>
<td>++</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>
3.197 This chapter of the plan includes policies aimed at delivering economic growth and protecting designated areas of Hackney for employment uses. The policies making up this chapter are:

- LP26 - New Employment Floorspace
- LP27 - Protecting and Promoting Office floorspace in the Borough
- LP28 - Protecting and Promoting Industrial land and floorspace in the Borough
- LP29 - Affordable Workspace and Low Cost Employment Floorspace
- LP30 - Railway Arches
- LP31 - Local Jobs, Skills and Training

3.198 Policy LP26 would have a major positive impact on employment and economic growth by enabling the provision of new employment floorspace in the borough. The policy establishes and defines areas of the borough where employment floorspace is focused and directs new employment development into these areas, specifically Priority Office Areas, Priority Industrial Areas, the Central Activities Zone and designated town centres, therefore ensuring that the provision of this floorspace is maximised and delivered alongside other uses such as housing, and ensures there is not significant negative impacts to the related sustainability objectives. The designation of employment areas which promotes and safeguards employment uses and encourages co-location of employment and industrial uses provides a major positive for efficient use of land, economic growth and employment objectives as well as objectives around sustainable transport and reducing pollutants by ensuring businesses are located in the most sustainable areas/clusters within the borough whilst also delivering other uses such as residential / community.

3.199 Policies LP27 and LP28 are supplemental to Policy LP26, setting out the form of new office (LP27) and industrial (LP28) employment floorspace in Hackney. The policies would have a major positive impacts on employment and economic growth objectives, as they ensure that developments are well designed and incorporate a range of unit sizes and types, with emphasis on provision of spaces for small and independent commercial enterprises. The provision of this type of floorspace will also have a major positive impact on poverty and equality and employment by allowing the borough’s residents easier access to business space and jobs and increasing the size of the labour market.

3.200 Policy LP27 requires that new development within priority office areas (POAs) is employment led, with 50% of overall floorspace in B1 use, and this approach is spatially targeted, with the proportion rising to 60% per scheme in the Dalston POA and the majority of the Wenlock POA, and for 60% of all uses within the Shoreditch AAP area (incorporating the Shoreditch POA and part of the Wenlock POA) to be in B1 use. In doing so the policy ensures that a balance is struck between supporting economic growth whilst allowing provision of other uses, such as retail and affordable housing, therefore balancing the aims of the policy with other needs. The policy restricts the loss of any B1 floorspace within POAs, but takes a more balanced approach to developments outside these protected areas, allowing for a loss when marketing evidence show a lack of
demand, or, if the proposal is for replacement employment floorspace, this is of a higher quality, and that a marketing strategy is set out for the new space.

3.201 Policy LP28 requires a similar set of restrictions within Priority Industrial Areas (PIAs) where new development will only be permitted if there is re-provision of the same amount of industrial floorspace or the use is intensified, therefore ensuring that any new development maximises the efficient use of land. The retention of industrial land provides major positive sustainability benefits for economic growth and employment. The policy does not seek an uplift in industrial floorspace (rather its retention) and therefore should not lead to negative sustainability implications on climate change, air quality or noise and pollution, or if uses are intensified then these would be minor in nature. The policy allows for mixed-use redevelopment on PIA sites, including residential uses, provided there is no loss of industrial floorspace. If site design and layout is not adequate then mixed use schemes in PIAs could result in major negative sustainability impacts on community and health, and equalities. In order to mitigate this, the policy outlines that the design of mixed-use schemes in PIAs will need to be carefully considered to ensure environmental issues related to noise and pollution and general conflicts between uses do not impact negatively on amenity.

3.202 Policy LP29 supports the above policies by requiring that major new mixed use developments across the borough must provide a quantum of affordable workspace or re-provide a proportion of existing low cost employment floorspace. Low-cost employment floorspace tends to be cheaper, often industrial style floorspace, for use by creative industries such as artists. Affordable workspace tends to be new office space which is to be delivered at least 60% of market rate, falling to 40% in the Shoreditch POA, and must be provided on site. This type of floorspace ensures that small and medium sized enterprises do not find themselves forced out of these areas, therefore ensuring that the plan has a major positive impact economic growth and employment across a range of sectors, and reflects more closely the needs of the local population. The effect is likely to be permanent and long term due to the requirement for this floorspace to be provided in perpetuity, including re-provision if this space is subsequently redeveloped.

3.203 Policy LP30 has been developed to deal with a particular industrial typology, that is, railway arches. These have been increasingly sought for a range of uses outside of their historic warehousing and industrial uses. The policy will have a major positive impact on employment by ensuring these units are retained with the primary use being for employment, incorporate active frontages where they are located in town centres, and retain any existing low cost employment space.

3.204 Finally, policy LP31 seeks to secure a successful and inclusive economy in Hackney by ensuring that major development contribute towards skills and training programmes to equip residents with the skills required to gain employment in both the construction and operation of new developments. This policy will have major positive sustainability impacts for employment, economic growth, education and skills and poverty and equality. There are no identified negative impacts resulting from this policy. The positive impacts should be immediate and long lasting.

3.205 The sustainability impacts of policies within this chapter are summarised in the table below:
Planning for Vibrant Town Centres

3.206 Policies in this chapter deal with retail and other uses, and set out the planning for town centres. The policies making up this chapter are:

- LP32 - Town Centres
- LP33 - Hackney Central and Dalston
- LP34 - Stoke Newington, Stamford Hill and Finsbury Park
- LP35 - Local Shopping Centres
- LP36 - Shops outside of designated centres
- LP37 - Small and Independent shops
- LP38 - Evening and night time economy
- LP39 - Over-concentration of uses
- LP40 - Street markets

Policy LP32 will have a major positive impact on economic growth and efficient use of land by designating town centres and requiring that new retail and leisure development is directed into them. This approach also sets out a hierarchy where the two major town centres, Hackney and Dalston will be the focus of growth, while smaller centres will be expected to take reduced levels. This ensures that the level of development is proportionate to the size of the centre and ensures that growth does not displace existing facilities or other elements of town centres, such as sustainable provision of community facilities and employment floorspace. The policy does not designate Shoreditch as a town centre, but sets out that the Central Activities Zone (CAZ) is also a suitable location for new retail and leisure floorspace. Large new retail and leisure uses are limited in the CAZ and outside of town centres unless the applicant provides evidence they would not harm the vitality and viability of the centres, therefore ensuring that major new uses do not erode the value of the many smaller developments operating outside of town centres, delivering minor positive impacts for the vitality of town centres, as well as poverty and equality where these businesses are owned by the local population. Overall this policy acts as a foundation for the operation of other policies, so its effects are reliant on other facts for implementation. However if implemented the policy is likely to have medium and long term effects.

3.207 Policies LP33, LP34 and LP35 set out the approach to delivering growth in the different levels of town centre within the hierarchy, and will have a major positive impact on economic growth and poverty and equality by ensuring that the town centres remain the key retail and leisure destinations providing local and convenient access to facilities for local communities. This is balanced against other sustainability needs by taking a proportionate approach to restricting loss of retail within the centres. In the major centres of Dalston and Hackney Central, key parades and retail frontages are protected with a requirement that that there are no more than two adjoining street frontages not in retail use, reduced to three within the secondary shopping area, which forms the outer area within the town centre boundary. Within Stoke Newington, Stamford Hill and Finsbury...
Park district centres, this requirement is tightened slightly to two units, but the overall proportion is reduced, making the policy slightly more flexible. In local centres there is no requirement regarding the number of units, but the proportion of all units in retail should remain above 50%. Overall this ensures the protection of shops within centres, while accepting that other uses, such as business, housing or in some cases specific community uses may be more in demand, therefore providing minor positive sustainability impacts on affordable housing, community & health, social infrastructure and employment. In all centres, losses are acceptable in circumstances where evidence shows the unit does not have a realistic prospect of being used for retail, and any resulting changes must incorporate a shop front and have an active frontage, therefore providing a balanced approach which will maintain the vitality of centres but not creating vacant properties by restricting their direction more sustainable uses.

3.209 Policy LP36 deals with retail units outside of the town centres. The policy will have a major positive impact on both economic growth and poverty & equality by ensuring that smaller local shops outside of town centres, which typically serve local needs, are protected by resisting their loss unless there is an alternative shopping facility within 400m walking distance, its loss does not undermine a parade (if it is part of one) and it re-provides a shop front, therefore providing a balanced approach which would ensure that the aim of supporting economic growth is balanced with other factors.

3.210 Policy LP37 will have a minor positive impact on economic growth, and employment by supporting provision of small shop units within new schemes, and only permitting the amalgamation of smaller shopping units within the primary frontages of major town centres. These small units in particular benefit very small firms and local people looking to set up shops. The policy is graduated, requiring only major retail developments and major developments within town centres to incorporate small shopping units, equivalent to at least 10% of the new retail floorspace provided. In major developments, where there is no accessible provision of shops within 400m, small units must be incorporated to serve the local population. This approach supports new retail development and ensures it supports the local economy and provides for local needs, therefore having long term positive sustainability impacts on poverty & equality, community & health, economic growth and employment.

3.211 Policy LP38 responds to pressure, especially in the south of the borough, for new evening and late-night uses. These types of uses are typically structured around A4 and D2 uses, which can create particular disturbance. Enabling these uses can have a major positive impact on economic growth, but can simultaneously lead to major negative impacts for the amenity and health and wellbeing of residents if not managed. In order to balance this, the policy only allows new night time economy uses if these can be demonstrated to have no impact on adjoining properties. To ensure that the overall impact on the area is controlled, the policy also takes account of the cumulative impact of these uses and supports diversification of night time uses in areas where concentrations of specific evening and night time economy uses have developed and only allows limited expansion of licenced premises in Shoreditch and Dalston.

3.212 Policy LP39 responds to the demand for A5 (hot food takeaway) uses and betting shops in the borough. The policy would have a major positive impact on poverty and equality and community and health as it strictly controls the provision of these uses. Primarily this is done by restricting the proportion of A5 uses and betting shops to 5% of a town (or
local) centre’s units and requires that where either of these uses can be provided, there is at least 3 units of non-A5 / non-betting shop uses between them. This policy has a particularly strong positive impact for the health of young people by preventing the creation of new A5 units within 400m of the boundary of primary or secondary schools and requiring takeaways to operate in compliance with the Council’s Healthy Catering Commitment.

3.213 Policy LP40 deals with the markets in the borough, by refusing permission for development which would result in the loss of market or pitches unless there is a comparable replacement provision. It also directs growth in markets to town centres. This will have a major positive impact on economic growth, as well as equality and diversity. An increase or expansion of markets could have impact for amenity and transport in the borough, but this is dealt with by restricting the provision of new stalls or pitches when they will have a cumulative impact.

3.214 The sustainability impacts of policies within this chapter are summarised in the table below:

<table>
<thead>
<tr>
<th>Sustainability Objective</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
<th>6</th>
<th>7</th>
<th>8</th>
<th>9</th>
<th>10</th>
<th>11</th>
<th>12</th>
<th>13</th>
<th>14</th>
<th>15</th>
<th>16</th>
<th>17</th>
<th>18</th>
<th>19</th>
<th>20</th>
</tr>
</thead>
<tbody>
<tr>
<td>LP32</td>
<td>0</td>
<td>++</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>0</td>
</tr>
<tr>
<td>LP33</td>
<td>0</td>
<td>++</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>0</td>
</tr>
<tr>
<td>LP34</td>
<td>0</td>
<td>++</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>0</td>
</tr>
<tr>
<td>LP35</td>
<td>0</td>
<td>++</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>0</td>
</tr>
<tr>
<td>LP36</td>
<td>0</td>
<td>++</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>0</td>
</tr>
<tr>
<td>LP37</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>0</td>
</tr>
<tr>
<td>LP38</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>0</td>
</tr>
<tr>
<td>LP39</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>LP40</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

Improving Accessibility and Promoting Sustainable Transport

3.215 Policies in this chapter aim to deliver a more accessible and connected borough, and contains the following policies:

- LP41 - Liveable Neighbourhoods
- LP42 - Walking and Cycling
- LP43 - Transport and Development
- LP44 - Public Transport and Infrastructure
- LP45 - Parking and Car Free Development

3.216 Policy LP41 will have a major positive impact on multiple sustainability factors by requiring that new developments contribute to the concept of living neighbourhoods, which builds on the Healthy Street concept set out by TFL\(^4\) to bring forward changes which will contribute to increasing walking and cycling rates in the city. The strong positive impact is on Walking and Cycling, as the policy requires new development to create environments which encourage these uses, while reducing private motor vehicles, improving the public realm through safer road crossing and wayfinding, and reallocation of road space for walking and cycling. This will also support major positive impacts on community and health by increasing the amount of exercise undertaken by residents, and on air quality & noise and pollution by reducing the number of vehicles on the roads. It is notable the policy specifically requires developments to tackle poor air quality with a

\(^4\) http://content.tfl.gov.uk/healthy-streets-for-london.pdf
particular focus on children and the elderly. Finally the policy will have a major positive impact on biodiversity and climate change by requiring new developments contribute to greening of neighbourhoods through tree planting and other green space. The policy is likely to have a strong overall positive impact in the short to medium terms if implemented, with the impact felt across all forms of land use. As the policy aims to shape the form of development if applied in a balanced way it is unlikely to limit new development coming forward.

3.217 Policy LP42 will have similar major positive impacts as policy LP41, as it restricts development unless this can demonstrate that it will improve the pedestrian environment and provide a high quality environment by promoting walking and cycling, including setting the cycle parking standards and expansion of cycle hire facilities. In addition, the policy requires that developments are permeable and easy and safe to walk through having a minor positive impact on reducing crime. Overall, the policy sets out details supporting policy LP41, and so the timing and likelihood of its effects are similar.

3.218 Policy LP43 deals with the overall impact of new developments on transport. The policy will have a major positive impact on walking and cycling, as well as people’s health by requiring that developments reduce the need to travel by encouraging high density development, minimising private vehicle trips and that they submit a travel plan setting out how this will be achieved. In addition, the policy will have a major positive impact on air quality by requiring that impacts at the time of construction of the development are minimised through construction and logistics plans and other mechanisms aims at reducing the impact on air quality and public safety. Finally, the policy will have a minor positive impact on air quality in the medium to long term by requiring that an assessment is made of ongoing freight movements and ensuring the use of low emission vehicles in consolidated deliveries.

3.219 Policy LP44 will have similar sustainability impacts to policies LP41 and LP43 as it sets out requirements for how new development should support public transport infrastructure. This will have a minor positive impact on air quality, noise and pollution and community and equality by requiring that new development protects existing public transport infrastructure, requires the provision of financial contributions to support improvements to respond to the impact of development, and support improving rail infrastructure. The policy supports car clubs which may reduce the overall quantum of cars on the road but is still providing support to vehicular travel which could have a minor negative sustainability impact on air pollution, however considering their infrequent use this is considered to not affect the overall sustainability of the policy. The impact of the policy is likely to be felt in the medium to long term owing to the slow nature of upgrades to public transport networks.

3.220 Policy LP45, as the name suggests, implements requirements for developments to be ‘car free’ that is, not providing any new parking spaces or allowing residents to apply for parking permits within controlled parking zones. This would have a major positive impact on air quality, noise and pollution and community and health. The policy also supports reducing poverty and equality by only allowing new parking spaces to be created when these are wheelchair accessible, and essential for operational and servicing needs, when a clear justification of this need is made through a transport assessment. This ensures that reducing the number of spaces does not have an undue impact on the ability of offices and other employment uses by limiting their ability to function, and ensuring new
residential developments are open and accessible to all, especially those with reduced mobility. The policy also supports changes to land use to support reductions in the number of cars by encouraging the redevelopment of car parks, refusing permission to create new car parks, and resisting the loss of boundary treatments and gardens to provide vehicular access. In addition, the policy will have a minor positive impact on climate change by requiring that at least 20% of new parking spaces are equipped with an electric vehicle charging point, and developments contribute to expansion of car clubs in their areas. Overall the policy will have impacts in the short and medium terms by immediately reducing the availability of spaces for private vehicles, with a high degree of certainty about these impacts coming forward.

3.221

The sustainability impacts of policies within this chapter are summarised in the table below:

<table>
<thead>
<tr>
<th>Sustainability Objective</th>
<th>Policy</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1</td>
</tr>
<tr>
<td></td>
<td>++</td>
</tr>
<tr>
<td></td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>0</td>
</tr>
</tbody>
</table>

Hackney's Green and Open Spaces

3.222

Policies in this chapter set out the borough’s approach to creating and maintaining open space for amenity and biodiversity. The policies making up this chapter are:

- LP46 - Protection and enhancement of Green Infrastructure
- LP47 - Biodiversity and Sites of Importance of Nature Conservation
- LP48 - New Open Space
- LP49 - Green chains and green corridors
- LP50 - Play Space
- LP51 - Tree management and landscaping
- LP52 - Waterways, canals and residential moorings

3.223

Policy LP46 will have a major positive impact on biodiversity, communities and health and walking and cycling, as the policy protects areas of open space and promotes pathways linking them to and from new development. Development involving any loss of designated open space is only allowed where the development delivers a compensatory contiguous replacement of better or equivalent open space as well facilities, and is more easily accessed by cycling and walking. This is further supported by allowing small scale developments which are ancillary to the open space, as long as these do not impact on the biodiversity or overall function of the open space. The policy does not allow the need for housing or economic growth to trump the need for open space, forsaking benefits in the short term for significant sustainability benefits in the long term regarding increased resilience to climate change and maintaining biodiversity in the borough. The policy also any protects other 'non designated' open space in the borough as well as allotments with a similar major positive impact on biodiversity and communities and health, by requiring replacement space and ensuring that any replacement links to green chains between designated open spaces. In addition the policy requires that new developments maximise urban greening through provision of living roofs on major schemes which have roof plates of over 100sqm which cannot be used to support amenity space. Overall, the policy will have significant positive sustainability impacts, as outline above, in the short, medium
and long terms, with the benefits increasing over time as open spaces become more critical to dealing with the impacts of population growth and climate change.

Policies LP47 and LP4 will have a major positive impact on biodiversity by protecting Sites of Importance for Nature Conservation (SINCs) and requiring that developments next to these sites or near to protected sites to the north east of the borough in Walthamstow, do not have a detrimental impact on these sites, and maximise opportunities to improve them. It also requires the same developments link into the wider green infrastructure of the borough, such as green links, and that smaller developments, when within the designated green link corridors, are developed in a way which contributes to green infrastructure, which works alongside policy LP49. In addition, policy LP47 requires that development schemes with an eaves height of 7m and above provide nesting boxes for swifts and other endangered biodiversity which will have major positive impacts on biodiversity which will be short, medium and long term as swifts are known to return to the same boxes year after year.

Policy LP48 builds on policies LP46 and LP47 by requiring that all major development in the borough provide new open space, at a rate of 14sqm per person in residential schemes and 4sqm per employee in non-residential as well as urban greening measures on site to achieve an Urban Greening Factor score of 0.4 and 0.3 respectively. This will have a major positive impact on community and health and poverty and equality by ensuring new developments contribute to the overall proportion of open space in the borough. The policy also sets out areas of the borough which are deficient in open space and tightens the requirements in these area regarding provision. To ensure development continues to come forward if these requirements cannot be met, the policy allows for provision of other green infrastructure measures which will have a major positive impact for biodiversity, such as green roofs or walls. The provision of open space in this way will ensure that the major positive impact on biodiversity and community and health can be delivered with a high degree of certainty and permanence, in the medium and long terms while also ensuring that economic growth and affordable housing can continue to be delivered as needed.

Policy LP50 deals with alternative uses for open space, namely play space. The policy protects existing play spaces and supports provision of new ones as well as supporting informal play facilities, having a major positive impact on community and health and sustainable design. The policy requires major mixed use schemes, which will generate a child yield of 10 or more to provide 10sqm of dedicated play space per child. It also sets out that these spaces should be well located to take advantage of accessible routes for walking and cycling, and be sustainable and easy to maintain, providing minor positive sustainability benefits for walking and cycling and sustainable design.

Policy LP51 deals with the management of trees and existing landscaping. The policy will have a major positive impact on biodiversity and climate change, by strongly protecting existing trees and other natural features from development. In the case of trees protected by Tree Protection Orders (TPOs), this extends to the development having an impact on the tree. The policy balances these restrictions by allowing for the loss of non-designated trees when these can be compensated by new trees or other adequate planting, or removal if this is in the interest of good arboriculture practice. The policy could be improved by the addition of requirements on the type and species of new trees and other cover to be delivered, to ensure these maximise biodiversity benefits for native species,
however overall provides strong benefits in the short term by protecting existing assets, and in the medium and long term by establishing good practice and encouraging the provision of a larger number of trees.

3.228 Policy LP52 provides protection and regulation of water-based assets in the borough. The policy would have a major positive sustainability impact on water quality, biodiversity and community and health by requiring that new development is restricted along waterways and riparian areas unless it ensures public access along any waterfronts, does not damage nature conservation, and enhances the waterfront, therefore ensuring any new development delivers a clear improvement to these environments. The impact of these policies is highly likely in the short to medium term, although in the longer term the policy map need to take account of increased risk of flooding and higher water levels on any improvements which are proposed.

3.229 Policy LP52 also sets out policies around the use of the waterways for permanent residential mooring of canal boats. The policy would have a positive impact on the provision of affordable housing in the borough by supporting moorings when they do not reduce the navigability of the canal, or have a negative impact on biodiversity or public access, therefore balancing them against other needs in a similar form to major built developments with equivalent sustainability benefits.

3.230 The sustainability impacts of policies within this chapter are summarised in the table below:

<table>
<thead>
<tr>
<th>Sustainability Objective</th>
<th>Policy 1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
<th>6</th>
<th>7</th>
<th>8</th>
<th>9</th>
<th>10</th>
<th>11</th>
<th>12</th>
<th>13</th>
<th>14</th>
<th>15</th>
<th>16</th>
<th>17</th>
<th>18</th>
<th>19</th>
<th>20</th>
</tr>
</thead>
<tbody>
<tr>
<td>Climate Change</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

3.231 The final chapter of the plan responds to the issue of climate change, setting out how the borough will deal with the impact it will have on the borough. It contains the following policies:

- LP53 - Water and Flooding
- LP54 - Overheating
- LP55 - Mitigating Climate Change
- LP56 - Decentralised Energy Networks (DEN)
- LP57 - Waste
- LP58 - Improving the Environment - Pollution

3.232 Policy LP53 would have major positive impacts on flood risk, water quality and sustainable design as it requires that all development have regard to reducing flood risk both to and from developments over the expected lifetime of the development. This ensures that developments will have regard to the increased risks from flooding which will result from climate change, as well as contributing to controlling them to the same level as if there was no development through SUDs. In cases where developments cannot do this, it requires provision of planning obligations ensure reduced overall flood
risk from the development, ensuring a sustainable approach. The policy will also have minor benefits for flood risk by ensuring that any development takes account of existing flood defences and how they can be accessed. The policy may have a minor negative impact on economic growth and the provision of affordable housing due to increased costs associated with requirements to reduce flooding, but this will be limited to areas already at higher risk of flooding, and while this may have a negative impact in the short term, the increased risks from flooding in the medium to long terms will make developments more sustainable by their higher resilience to flooding.

Policy LP54 would have major positive sustainability impacts for climate change, community and health and sustainable design by requiring new developments to take account of internal and external temperatures and cooling in the design, and to regulate these through the form, materials and technologies. This will benefit future occupants of buildings and residents across the borough by ensuring that all buildings seek these improvements, as well as ensuring that there is a measure of resilience in terms of combatting the Urban Heat Island (UHI) effect. Finally, the policy will have a minor positive impact (in combination with policy LP47) by supporting methods which increase biodiversity.

Policy LP55 is aimed at mitigating climate change through changes to the built environment, both in proposed new developments and alterations to existing developments. The policy would have a major positive impact on climate change, sustainable design and biodiversity. In terms of climate change, the policies require that new residential development is zero-carbon by the use of low carbon materials and construction methods, or by paying a carbon off-setting payment to Hackney which is then used by the borough to support sustainable technologies which reduce carbon by an equivalent amount, therefore slowing climate change. In the case of existing developments, the policy requires that developments provide the maximum feasible reductions in carbon emissions, but balance this against protecting heritage and character of buildings in order to ensure the sustainability of heritage assets in the borough. In terms of sustainable design and biodiversity, the policy requires that developments make use of technologies and designs which minimise exposure to the effects of climate change, and they make use of the council’s existing sustainable design and construction SPD which supports the use of green roofs, solar panels and other technologies. Again, to balance against potential damage to character and heritage assets, this is applied to a less rigorous degree to existing developments. Overall, the policies ensure that in the medium to long term carbon emissions are reduced, as well as development being designed to be resilient to climate change with the effects high certain.

Policy LP56 would have minor positive impacts on climate change and on efficient use of land by requiring developments to incorporate decentralised energy systems adequate to power the development into the design of the building, or, where available to connect to existing networks within adjacent developments, with the policy strongly supporting this approach where viable. These systems would have a minor negative impact on air pollution due the fact that they move power emissions into the urban environment, and this could have significant sustainability impacts unless dealt with through the policy.

Policy LP57 would have a major positive impact on waste by requiring that developments minimise waste, both in the short term at the construction phase of development, and for
future occupants by requiring that developments clearly set out waste storage and collection facilities in plans. The policy also requires developments to adhere to the objectives of the North London Waste Plan, which is in development, and protects existing waste sites, unless compensatory capacity can be found within North London. The effects are highly likely in the short, medium and long terms.

3.237 Policy LP58 on pollution would have a major positive impact on water quality, the efficient use of land, air quality, and noise and pollution by setting out the ways developments are expected to limit pollution. In terms of water quality, the policy requires that new developments do not pose an unacceptable risk to water sources in the borough, with this being assessed on a case by case basis with input from the Environment Agency, and requiring those considered to mitigate risk. In terms of efficient use of land, the policy requires that developments ensure that they identify and deal with contaminated land and, in cases where activities in a proposed use may create potentially polluting activities, they incorporate mitigation and monitor for any impacts on the ground. This is of significant benefit as remediation of contaminated land has long term benefits for humans and the natural environment, and its clean-up can be extremely costly and can delay the use of land for other needs, such as housing.

3.238 In terms of air quality, the policy requires that all developments do not exceed air quality neutral standards or contribute to a worsening of air quality. The extension of this requirement to all developments will have significant positive impacts by ensuring that even smaller developments are helping to combat poor air quality. The policy also requires that developments have regard to the air quality in their area and do not locate sensitive uses, such as residential and community facilities, or those use by the young and elderly in area where they would be at risk (this would have major benefits for community and health as well), and that the design of these buildings further reduces exposure to air pollution. The policy, while beneficial, is likely to have a major impact on provision of housing and economic growth due to the fact that Hackney is a highly polluted borough, therefore reducing its overall sustainability. The policy could be made more sustainable by allowing for development with appropriate mitigation to proceed in these areas, similar to the operation of the zero carbon policy.

3.239 In terms of noise and vibration, the policy only allows development when noise created by the development would be mitigated to prevent adverse impacts on other dwellings and occupants, therefore having a major positive impact on existing properties. The policy also ensures that residential developments, by their design do not create adverse noise impacts, limiting noise from internal circulation spaces and other noise creating elements, such as lifts and ventilation. Overall the policy would have an immediate positive impact which would continue into the long term by nature of existing for the lifetime of the development.

3.240 The sustainability impacts of policies within this chapter are summarised in the table below:

| Sustainability Objective | Policy 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | 17 | 18 | 19 | 20 |
| LP53                     | 0       | + | 0 | 0 | ++ | ++ | 0 | ++ | 0 | ++ | 0 | + | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| LP54                     | +       | 0 | ++ | ++ | 0 | ++ | 0 | ++ | 0 | ++ | 0 | + | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| LP55                     | +       | + | ++ | ++ | 0 | ++ | 0 | ++ | 0 | + | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| LP56                     | 0       | + | ++ | ++ | 0 | 0 | 0 | ++ | 0 | ++ | 0 | + | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| LP57                     | 0       | + | 0 | 0 | 0 | 0 | 0 | ++ | 0 | 0 | 0 | + | + | 0 | 0 | 0 | 0 | ++ | 0 | 0 |
| LP58                     | ++      | + | ++ | ++ | + | 0 | ++ | 0 | ++ | + | + | ++ | + | 0 | 0 | 0 | + | 0 | 0 | 0 |
Note

3.241 It should be reiterated that the assessment above reflects the changes that have been made to the policies following the Regulation 18 public consultation and the previous Regulation 18 Sustainability Appraisal. Refer to appendix 2 for a summary of the changes to the plan between the Regulation 18 and Regulation 19 versions and a discussion around the sustainability impacts of these changes. This version of the SA will be submitted to the Planning Inspectorate alongside the final draft Plan.
Stage B4: Key Effects of the Plan

3.242 This section brings together key findings from the analysis and provides recommendations for dealing with any significant negative sustainability impacts, and maximising any positive impacts.

3.243 Step B4 begins by considering significant negative sustainability outcomes and proposing measures which seek mitigate these impacts and ensure that the plan is sustainable.

3.244 Following this, key findings are set out related to maximising each sustainability objective in terms of key positive and negative impacts from related policies, which aims to set out how different policies interact, with reference to the key tensions identified at the end of Stage B1.

3.245 Finally, this step will set out any recommendations for changes to policies which help to strengthen positive impact of these policies and therefore improve overall sustainability.

Significant Negative Impacts of the Preferred Approach

3.246 The assessment found there were no significant negative sustainability impacts arising from the plan, based on the assumption that policies would be given equal weight in determining the type, scale and form of development in Hackney. Many potential negative impacts of individual policies, such as a singular focus on delivery of certain types of development in favour of others, are not proposed, and policies for land use (primarily Housing, Employment and Open space) typically allocate appropriate locations/areas in the borough for their uses, ensuring that the significant tension over the use of the highly limited amount of land is carefully managed.

3.247 It is also important to reinforce the fact that the Local Plan is highly limited in its ability to diverge significantly from existing National and Regional Policy. As these plans have undergone sustainability appraisal themselves, it means that it the Local Plan is unlikely to deliver significant negative impacts, but is equally limited in how it can maximise positives.

Maximising Sustainability Effects

Biodiversity

3.248 Biodiversity is strongly supported by the plan, primarily through the strong enhancement and protection offered by policies LP46 (Protection and enhancement of green infrastructure) and LP47 (Biodiversity and SINCs) which seek to protect and enhance the boroughs open spaces and waterways which form the key reserve for biodiversity, and through the strategy of linking these areas through Policy LP49 (Green Chains and Corridors). There are synergies between the protection and enhancement of biodiversity and responding to climate change, especially policy LP54 (Overheating), and to amenity of new and existing residents as part of the open space policies and policy LP41 (Liveable Neighbourhoods)

3.249 There are significant tensions between the redevelopment of sites for buildings and protection of these sites for biodiversity, with the former having a potential negative impact, but throughout the plan, policies aim to mitigate this by requiring the use of ‘urban
greening’ most notably through policies PP1 (Public Realm), LP1 (Design Quality and Local Character), LP48 (New Open Space) and policies LP54 and LP55 (Overheating and Mitigating Climate Change) by requiring the use of green roofs, green walls and other public realm planting. Over the long term, regard needs to be had to the potential impact of climate change as a stressor of biodiversity, especially with regards to flooding and waterways.

**Efficient Use of Land**

3.250 Efficient use of land is the single most challenging sustainability objective to deliver on, due to the fact that it deals with the primary challenge in Hackney, which has a finite supply of developable land. This means that decisions on whether to use land to deliver on other key sustainability objectives and major sections of the plan, such as economic growth, which is supported by employment policies (LP26-LP31) and housing (LP12-LP25) have an inherent cost. In order to combat this, employment policies designate areas of the borough for employment land uses, aim to curb losses and to focus employment floorspace as sustainably as possible, and housing policies aim to ensure that housing delivered across the rest of the borough maximises the type and tenure to create the homes that are needed. By holding these in balance the plan ensures an optimal positive impact is achieved.

3.251 The plan also contains policies which strongly support efficient use of land through policies LP32-LP40 which focus on designating Town Centres as the key areas for growth in retail and leisure as well as housing and employment, and to protect existing amenities in these areas. In doing so, they ensure that, along with the protection of open spaces (secured by policies LP46-LP52), development makes the most efficient use of land with the optimal synergy with other objectives.

**Air Quality**

3.252 Air Quality presents another balanced picture, with strongly positive impact deriving from policies in the plan which seek to protect the health of individuals, most notably policy LP58 (pollution) and Policy LP2 (Development and Amenity), but this must be balanced against the general increase in air pollution which is likely to stem from growth, driving higher vehicular traffic. It is notable that policy LP45 (Parking and car free development) provides mitigation by strongly limiting the ability to use private cars in the borough and encouraging the use of electric vehicles, therefore controlling these emissions, but the strong support throughout the plan for individuals making use of streets for walking and cycling and through the liveable neighbourhoods strategy means that individuals are likely to be exposed to higher levels of pollutants, in the short to medium terms. Over the long term, the use of low emissions vehicles and erosion of private car ownership supported by the policies will help to mitigate this.

**Noise and Pollution**

3.253 Reducing Noise and Pollution is strongly supported by the plan in policies LP58 (Pollution) and LP2 (development and amenity). The impact of noise and pollution arising from the growth proposed in the plan is strongly mitigated by these policies, leading to a positive overall impact.

**Flood risk**
Reducing Flood Risk is strongly supported by the plan through policy LP53 (Water Flooding) which requires developments to take account of flood risk, and through open space policies (LP46-LP52). It should be noted that flood risk reduction is required through national planning policy which has a strong bearing on restricting where development can be located. The policy extends this and increases sustainability by ensuring that developments take account of potential increase long term threats due to climate change.

Water Quality

The plan has a strong positive impact on protecting water quality through policy LP58 (pollution) which ensures these resources are safeguarded, and that, through restrictions and remediation of contaminated land, new pollution sources do not enter water bodies.

Walking and Cycling

A number of policies deal specifically with promotion of walking and cycling, specifically policy LP42, and the creation of liveable neighbourhoods under policy LP41. Multiple policies related to design and amenity also require that developments have regard to accessibility by walking and cycling. As discussed above there are potential negative impacts on the achievement of this objective deriving from a high level of traffic on roads. In addition, the plan cannot directly force behavioural change to these modes by individuals, instead only altering the availability of different modes (to reduce car use and increase opportunities to cycle and/or walk) through location of development, therefore limiting the impact.

Climate Change

Responding to climate change is strongly supported by the plan, principally through policy LP55 (Mitigating Climate change), which require residential developments to be zero-carbon in terms of offsetting emissions from construction and incorporate a range of technologies to reduce emissions over the lifetime of the building. In addition, the overall policy body promoting walking and cycling (see above) will have a positive impact on climate change. The provision of decentralised energy will help to increase overall energy efficiency by combining heating and power and removing power lost in transmission, but it should be noted that this may have significant air quality impacts.

Heritage Assets

The sustainability of Heritage assets is strongly supported both through the direct protection of these assets through policies LP3, LP54 and LP6 (Designated and Non Designated Heritage Assets, and Archaeology) and through design policy LP1 aimed at ensuring that new development maintains and improves existing character. There is a potential for heritage assets to be negatively affected by the provision of new housing and employment floorspace if this is not adequately controlled, and there may be instances where these are considered to be more important to overall sustainability than protection of assets, but overall the rarity of these decisions mitigates any significant effect.

Sustainable Design
The plan will have a strong positive impact on sustainable design due primarily to the policy aimed at mitigating climate change (LP55) which ensure that sustainable design forms part of the way developments come forward. As the policy is primarily related to the form of new developments it has limited overall impact on sustainability.

### Poverty and Equality

The plan strongly supports poverty and equality through a range of policies, principally related to provision of much needed employment and housing, including the provision of affordable housing (LP13) and affordable workspace (LP29) as well as ensuring that the design of developments is accessible to all (Policy LP17) and caters to the full range of needs of various populations (LP18-LP23). As long as these policies are implemented effectively, there is likely to be a major positive impact on poverty and equality as a result of the plan.

Poverty and equality is also assessed through the Equalities Impact Assessment which forms another element of the Integrated Impact Assessment.

### Open Space

Open space is strongly supported by the plan via the very strong protections provided by the open space policies (LP46-LP52). This includes protecting open spaces, as well as allowing enhancements through development which improves amenity. The policies ensure that new developments provide an equivalent amount of open space, including on non residential schemes, therefore ensuring that this remains highly sustainable.

### Community and Health, Social Infrastructure and Crime, Education and Skills

Community and Health, social infrastructure and (reductions in) crime and improving education is strongly supported throughout the plan and maximises benefits from new development to support communities, primarily through the policies encouraging walking and cycling, as well as policy LP8 (social and community infrastructure) which prevents the loss of community facilities, and should ensure that and potential negative impact on the sustainability of these objectives is limited. The overall strategy of pursuing liveable neighbourhoods (PP1 and LP41) should create conditions which benefit communities and reduce crime through better wayfinding and security through natural surveillance. Health in young people is strongly maximised through policy LP39 (Over concentration of uses) which prevents the location of takeaways within 400m of schools. It is notable the improvements in air quality supported by the plan will also support this objective.

The Health Impact assessment element of this IIA will assess health impacts in greater detail.

### Affordable Homes, Economic Growth and Employment

The plan devotes a significant amount of policy to developing a clear strategy for provision of employment floorspace and delivery of affordable housing, and these can be considered to form the principal sustainability challenge of the entire plan. The tension
has corresponding impacts on multiple other sustainability objectives, including, but not limited to economic growth, communities and health, equalities and employment.

3.266 Affordable housing is principally supported by policy LP13 which sets out the approach to delivering affordable housing, and ensures that all new developments that come forward in the borough, as well as conversions of existing properties contribute to provision of affordable housing. The wider housing policies (LP12-LP25) also look to enhance the type and size of accommodation, as well as encouraging specialist uses where there is demand, which ensures that any new housing created, regardless of tenure, is appropriate to the local market, including limiting the provision of new hotel units instead of new housing, and ensuring that new types of housing such as build to rent are protected into the medium and long term from loss or change.

3.267 Economic development and Employment policies are, except for Open space, the principal ‘zoning’ policies of the plan, with creation of new employment floorspace directed to certain areas for certain uses, primarily industrial (PIAs) and office space (POAs) and LSIS and the town centre. The policy also ensures that these spaces balance need by allowing development of housing as long as schemes are employment led (majority employment) mixed-use schemes. This implicitly assumes that all areas (outside open space) are suitable for housing in combination with other uses, therefore developing an approach which balances these two key issues, and ensuring that economic growth is contained in areas of the borough which have the greatest support elsewhere in policy to deal with this sustainably.

3.268 Assuming the policies in the plan are implemented in a balanced way, the overall sustainability impact will have minimal negative impact on sustainable delivery of both types of development, in combination with the other elements of the plan, and therefore this is judged to be the most sustainable, possible, approach.

Waste

3.269 Dealing with waste is strongly supported through policy LP57 of the plan, which requires that at both the construction and occupation stages, developments ensure that waste is dealt with. The plan is inherently limited in affecting individual behaviour, but policies maximise the impact in terms of ability to drive forward other council plans and programmes for waste and recycling.

Recommendations

3.270 Overall, the SA findings indicate that the plan represents the most sustainable approach possible within the scope of spatial planning. Therefore the SA recommends that the plan is taken forward to the final stage of consultation and then Examination.

3.271 Some minor improvements to policy were identified in the IIA undertaken at Regulation 18 Stage. These are set out below:

- Policy 7 (now LP8) Social and Community Infrastructure could be made more sustainable by adding reference to ensuring that new developments of this type have regard to locating themselves in areas of higher air quality, and/or ensure that they protect users from the impact of noise and pollution.
• Policy 17 (now LP19) regarding conversion of existing housing could be improved by ensuring that the policy makes reference to ensuring these new dwellings are adaptable for the disabled and elderly, therefore ensuring greater sustainability in terms of poverty and equality.

• Policy 19 (now LP21) regarding shared housing can be made more sustainable in the medium and long term by ensuring these types of developments have long tenancies and protection of their overall tenure through restrictions similar to those for policy 13 (now LP15) Build to Rent.

• Policy 49 (now LP52), regarding the borough’s waterways could be made significantly more sustainable by including reference to ensuring any new development or improvements take account of the potential for increased chance of flooding or other impacts of climate change to ensure they benefit the population in the long term.

3.272 In response to these recommendations some minor policy changes have been implemented in the proposed submission version of the Local Plan.

• Policy LP58 on air pollution states that new development, especially those catering for vulnerable people and users such as elderly and children should be sited and designed to minimise exposure to air pollution. More detail has been added to this policy stating that all new build developments in areas of sub-standard air quality must provide an air quality assessment; this will be valuable for new social and community infrastructure facilities and will lead to improved siting of such facilities to protect users from the impacts of noise and pollution.

• With regards to ensuring that converted housing is adaptable for the disabled and elderly, this is not specifically referenced in policy LP19 because it is covered in the Building Regulations.

• Some changes were made to policy LP21 to state that all units must be for rent with minimum tenancy lengths of no less than three months and a detailed management plan must be provided setting out details of proposed tenancy lengths.

• Policy LP52 has been amended to state that any development alongside the waterways or canals must not have any negative impact on flood risk management which implies that the potential increased risk of flooding is considered.
Stage B5: Monitoring the likely significant effects

The Council produces an Authority Monitoring Report (AMR) which monitors the social, environmental and economic effects of planning policy documents to determine the extent to which objectives, targets and programmes are being met. The latest AMR covers the period 1 April 2016 to 31 March 2017, and the 2017-2018 AMR is currently being produced.
4. The Equalities Impact Assessment (EqIA)

Introduction

4.1 The Equalities Impact Assessment assesses the impacts of the Local Plan on particular groups within Hackney. The Council is committed to improving equality and making the borough ‘a place for everyone’. In practice, this means ensuring all actions taken by the Council contribute to equality. In order to achieve this aim, this report provides an assessment of the impact as set out in the Equality Act 2010 in what is known as an Equality Impact Assessment ("EqIA").

The Equality Act 2010 updates and combines all previous discrimination legislation with the aim of reducing socio-economic inequalities by ensuring that certain groups with Protected Characteristics are supported and protected. Protected Characteristics are:

- Age
- Disability
- Gender reassignment
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation
- Marriage and civil partnership (applicable only to the need to eliminate unlawful discrimination)

4.2 These have been grouped into the following categories to aid analysis:

- Race
- Disability
- Gender
- Age
- Faith
- Sexual orientation

4.3 The Equality Act also establishes the PSED which the Council, as a public body, is required to follow. The PSED requires that in the exercising of its functions, the Council has due regard for the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act;
- Advance equality of opportunity between people who share a Protected Characteristic and those who do not; and
- Foster good relations between people who share a Protected Characteristic and those who do not.

4.4 These are then codified into the following actions:

- Remove or minimise disadvantages suffered by persons who share a relevant Protected Characteristic that are connected to that characteristic;
- Take steps to meet the needs of people who share a relevant protected characteristic that are different from the needs of people who do not share it; and
• Encourage persons who share a Protected Characteristic to participate in public
life or in any other activity in which their participation by such persons is
disproportionately low.

4.5 LP33 sets out the borough-wide planning policies that the Council will use to inform
decisions on development proposals and to assess planning applications which come
forward. The policies are informed by national and regional policy and the Council’s
Community Strategy.

The Plan contains a total of 58 policies plus 10 overarching place policies covering a
range of issues identified at previous stages and through the requirements of the
London Plan, and are grouped into the following chapters:

• Places for People
• Protecting and enhancing heritage and leading the way in good urban design
• Hackney’s People
• Meeting Hackney’s Housing Need
• A Strong and Competitive Economy which Benefits All
• Planning for Vibrant Town Centres
• Improving Accessibility and Promoting Sustainable Transport
• Hackney’s Green and Open Spaces
• Climate Change

4.6 The plan has been prepared ready for the Regulation 19 consultation due to take place
between 19 November 2018 and 7 January 2019. The EqIA will assess the likely impact
of the policies on the equality groups and, where required, suggest mitigation to avoid
negative impacts.

Methodology

4.7 This section sets out the methodology and approach for this EqIA. As explained above,
the approach to the assessment builds on the core methodology set out in the Council’s
EqIA assessment form.

4.8 The following steps are undertaken:

• Step 1) Establish a baseline on the nature and type of groups with protected
characteristics which exist within Hackney.
• Step 2) Assess the positive and negative impacts of the local plan policies on
these groups
• Step 3) Identify whether and to what extent there are any significant negative
impacts on these groups arising from the plan and its policies, and set out
recommendations for mitigation.
Step 1: Baseline Information on groups with Protected Characteristics in Hackney

4.9

The SA Scoping report sets out a comprehensive assessment of the baseline information. Some key points relevant to equalities impacts are:

Age

- Hackney’s population is expected to grow by 24.5% over the plan period to 335,000. This will require increased provision of accommodation and services and will place more pressure on existing resources.
- Hackney has a predominantly working age population. Young people make up approximately 24.4% of the population, and there are relatively fewer older people compared to the London average (7.3% vs. 11.5%) although the percentage of older people is likely to increase over the period to 2033, rising to 10.3% of the population.
- Hackney has a significant number of older people in one person households (7.3%) and a higher than average proportion of Lone-parent families (14.9%) compared to London (12.7%).
- Hackney is the eleventh most deprived local authority overall in England in the 2015 Index of Multiple Deprivation.
- With regards to child poverty in Hackney, 30.2% of under 16 year olds are living in relative poverty, which is the fifth highest rate in London overall. In addition 21% of children live in families where adults are out of work.
- Birth rate varies by age and ethnicity. Asian and Black resident have higher birth rates, with the highest rates at age 25-34. The Stamford Hill Orthodox Jewish community have much higher birth rates at 180 and 190 births per 1,000 women age 15-49, peaking at 280-300 per 1,000 women aged 20-29.
- In Hackney, 12.5% of reception year (age 4-5) children are obese. 27.0% of year 6 (age 10-11) children are obese (National Child Measurement Programme, 2015/16). Around 90,000 adults in Hackney are overweight, of whom at least 36,000 are obese.

Sex

- Females make up 50.4% of Hackney’s population, and 50.6% of young people are female.
- In older populations there is a higher proportion of females (53.7%)

Sexual Orientation

- There is little data available on sexual orientation within the local or Hackney area. However, some inferences can be taken from the Hackney Profile. The Hackney Profile deduces some estimates for London, and states that 2.6% of the population identify themselves as lesbian, gay or bisexual, 0.3% describe themselves as ‘other’, a further 6.9% do not know or decline to say, and 2.0% provided no response.
- Nearly 90% of Londoners describe themselves as straight or heterosexual.
- The 2015 GP Patient Survey indicated that in Hackney there were comparatively high numbers of people who identify as gay or lesbian (5.0%), bisexual (2.0%), or other (2.0%), and a further 11.0% preferred not to say. The Patient Survey includes the explanation that the figures collected may under-represent the size of the LGBT population.

Race
• Hackney has a diverse population with 47% of the population being from ethnic minorities, which is comparatively high compared to London (40%). The largest single minority group are Turkish, who make up 3.6% of the population. The second and third largest are Nigerian (2.7%) and Jamaican (1.8%). At the point of the census, 37.9% of residents had been born abroad, comparable to the London average of 36.6%.

Faith

• Hackney is equally diverse in terms of religious practice. As of 2015, just over 37% of the population is Christian, 10% is Jewish, 12% is Muslim (vs 15% across London), 2% are Hindu (vs 5% across London).

Disability

• 14.3% of residents in the Hackney have a long term health problem or disability, much higher than the London average (13.8%).
• 61% of older people have a high level of disability.

Other Characteristics of Protected Groups

• Hackney has an employment rate below the London average at 69% of the population, compared to 72.9% across the city.
• Hackney has a higher than average level of individuals on out-of-work benefits (10.7% v a London average of 7.7%). Commensurate with this, it has a higher youth unemployment rate (6.3%) than the London average at 5.7%.
• 8.2% of the population have no qualification, while 54.9% have a degree level or above qualification, indicating a high level of inequality in educational levels.
• Across London, the average crime rate was 7.97 offences per 1000 population between 2012-2013 compared to 10.49 per 1000 in Hackney (Metropolitan Police, 2013).
• Life expectancy in Hackney is lower than the London average with males expected to live to the age of 78 (3rd worst in London) and females to 83. Life expectancy is 5.6 years lower for men in the most deprived areas of Hackney than in the least deprived areas and for women its 3.6 years lower.
• It is estimated that roughly 53,000 Hackney residents age 19-64 have at least one common mental health disorder, of whom around half have depression and/or anxiety. It is estimated that approximately 1,200 Hackney residents age 65+ have dementia.
• Physical inactivity is an issue in Hackney. On one estimate, almost 55,000 adults in Hackney and the City are doing less than 30 minutes of moderate exercise a week.

Step 2: Assessment of the positive and negative equalities impacts of the plan

4.10 The following section sets out a summary of the positive and negative equalities impacts, of the plan. This is structured around each chapter of the plan.

4.11 Full analyses of the policies was conducted and this can be found at appendix 2 of this document.

Protecting and enhancing heritage and leading the way in good urban design

4.12 The chapter contains the following policies:
  LP1 - Design Quality and Local Character
4.13 These policies promote good architectural and urban design principles such as the Healthy Streets approach which encourages improved public spaces, open spaces, walking and cycling routes. This will help to reduce congestion and air pollution and make the streets greener and healthier which will be beneficial for all in Hackney but particularly so for the young and elderly who are particularly susceptible to negative health impacts resulting from air pollution. Improvements to the public realm which improve accessibility and movement around public spaces may be particularly beneficial for those who are less mobile, such as the elderly or disabled.

4.14 One policy in this section which has been identified as having potential minor negative impacts on equalities groups is Policy LP3 (Designated Heritage Assets) which seeks to protect listed buildings and historic buildings. Some listed buildings may have special architectural qualities or features which must be preserved and could prohibit the implementation of improved accessibility standards such as ramps or lifts. This policy could therefore be considered to have minor negative impacts on less mobile members of the community, such as the elderly or disabled which may find it difficult to access such buildings.

**Hackney’s people**

4.15 The chapter contains the following policies:
- LP8 - Social and Community Infrastructure
- LP9 - Health and Wellbeing
- LP10 - Arts, culture and entertainment facilities
- LP11 - Utilities and Digital Connectivity Infrastructure

4.16 These policies seek to protect and ensure provision of community facilities such as education and health services and community centres and cultural facilities, as well as promoting healthy and active lifestyles amongst all member of the community. These policies in general are considered to have a positive impact on all groups in terms of encouraging community cohesion and physical and mental health and wellbeing. Certain elements of these policies, such as the promotion of the Secured by Design principles, are considered particularly beneficial in helping all equalities groups, who may at times or in certain situations feel vulnerable, to feel safer in the local environment.

**Meeting Hackney’s Housing Need**

4.17 The chapter contains the following policies:
- LP12 - Housing Supply
- LP13 - Affordable Housing
- LP14 - Dwelling Size Mix
- LP15 - Build to Rent
- LP16 - Self/Custom-Build Housing
- LP17 - Housing Design
- LP18 - Housing Older and Vulnerable People
- LP19 - Residential Conversions
LP20 - Student Housing
LP21 - Large Scale Purpose-Built Shared Housing
LP22 - Houses in Multiple Occupation (HMO)
LP23 - Gypsy and Traveller Accommodation
LP24 - Preventing the Loss of Housing
LP25 - Visitor Accommodation

4.18 These policies seek to ensure provision of a range of different types, tenures and sizes of housing in order to meet housing need. Generally the housing policies have been identified as having a neutral or positive impact on the equalities groups. There are certain policies which are considered to be particularly positive.

4.19 For example, policy LP13 Affordable Housing seeks to maximise provision of affordable housing which will be beneficial for those who may be on lower incomes such as the young, elderly, faith groups, BME communities and those with disabilities. Similarly policy LP14 on dwelling size mix seeks to ensure adequate provision of family sized units and specifically seeks a higher proportion of larger units in Stamford Hill where family sizes amongst the Jewish population tend to be proportionally larger than average. This policy is therefore considered to be highly positive for families with children and particularly for faith groups in Stamford Hill.

4.20 Various policies within the housing section have been identified as having positive impacts on different age groups. Policy LP15 seeks to provide homes for rent, policy LP20 seeks to provide student accommodation, and policy LP21 seeks to provide shared housing such as co-living schemes, all of which are considered to have positive impacts for younger members of the community who may be unable to buy in the area but who are seeking rental accommodation. Similarly, policy LP18 which supports the provision of housing for older and vulnerable people will have a positive impact on older age groups and the disabled.

A Strong and Competitive Economy which Benefits All

4.21 The chapter contains the following policies:
   LP26 - New Employment Floorspace
   LP27 - Protecting and Promoting Office floorspace in the Borough
   LP28 - Protecting and Promoting Industrial land and floorspace in the Borough
   LP29 - Affordable Workspace and Low Cost Employment Floorspace
   LP30 - Railway Arches
   LP31 - Local Jobs, Skills and Training

4.22 These policies protect and promote all types of employment floorspace within the borough, including both office space and industrial space, and designates specific employment areas in the borough. These are generally considered to have a neutral impact on the equalities groups. Policy LP29 encourages affordable and low cost employment space which may provide benefits to start-up businesses, which may be characterised by those from younger age groups, or charitable organisations. Policy LP31 encourages training and skills programmes for local residents to ensure that local residents feel the benefits of economic growth in Hackney, helping to achieve and inclusive and equitable economy.

Planning for Vibrant Town Centres
The chapter contains the following policies:

- LP32 - Town Centres
- LP33 - Hackney Central and Dalston
- LP34 - Stoke Newington, Stamford Hill and Finsbury Park
- LP35 - Local Shopping Centres
- LP36 - Shops outside of designated centres
- LP37 - Small and Independent shops
- LP38 - Evening and night time economy
- LP39 - Over-concentration of uses
- LP40 - Street markets

These policies direct town centre uses, such as retail, leisure and commercial development to Hackney’s town centres, designate primary and secondary shopping areas and set out the criteria to be met before any change of use away from retail. The overall aim is to protect and promote shops and other town centre uses within these areas; the concentration of such uses within a central location will have positive impacts on less mobile members of the community, such as the elderly, disabled, or parents with buggies by reducing the need to travel long distances to access shopping facilities and other services. Similarly, Policies LP36 and LP37 protect shops within small local shopping centres and those isolated shops or parades outside of designated centres. These policies are considered to have positive impacts on less mobile members of the community by ensuring access to convenience shops within short distances.

One element of policy LP38 Evening and Night Time Economy is encouraging the diversification of the types of evening and night time economy uses with the aim of reducing the emphasis on bars and drinking and encouraging more cultural uses, restaurants and cafes. It is considered that this could have a positive impact on those looking for alternative types of evening entertainment, perhaps older members of the community or religious groups.

One element of policy LP39 is to avoid the over-concentration of hot food takeaway within Hackney’s town centres and in close proximity to schools, which is considered to be beneficial for all who suffer from obesity, and particularly school age children.

Policy LP40 seeks to protect markets in the borough. Older traditional markets such as Ridley Road often provide goods and services as well as employment for Afro-Caribbean, Asian and other BME communities. Shopping in markets often provides cheaper food for poorer members of the community, and can be popular amongst the older population. The protection of markets is therefore considered to have positive impacts on older residents and BME communities.

One potential improvement to policy could be to require that new developments of independent shops are encouraged when they meet a minority demand, for example, provision of supermarkets to meet a specific need. This could provide a strong positive equalities outcome.

**Improving Accessibility and Promoting Sustainable Transport**

The chapter contains the following policies:

- LP41 - Liveable Neighbourhoods
- LP42 - Walking and Cycling
LP43 - Transport and Development
LP44 - Public Transport and Infrastructure
LP45 - Parking and Car Free Development

4.30 These policies encourage liveable neighbourhoods and promote sustainable transport such as cycling infrastructure, improvements to the pedestrian environment and walking routes and the provision of more green spaces. It is considered these policies will have positive impacts in improving the health of all residents and improving local air quality, but is considered to be particularly beneficial for those who may be more susceptible to obesity or cardiovascular illness such as the young and the elderly respectively. Related to this, policies also encourage high density development to be located in the most accessible areas and around transport nodes which is considered to have a positive impact on less mobile members of the community such as the disabled, elderly and parents with young children.

4.31 Policy LP45 Parking and Car Free Development encourages car free development. Wheelchair accessible parking will be provided in accordance with London Plan standards, however the remainder will generally be car free. Whilst this is beneficial in many aspects for example for improving the health of residents who suffer from respiratory diseases, the policy has been identified as potentially having minor negative impacts on families with young children or the elderly who may need access to parking facilities close to dwellings.

Hackney’s Green and Public Spaces

4.32 The chapter contains the following policies:
- LP46 - Protection and enhancement of Green Infrastructure
- LP47 - Biodiversity and Sites of Importance of Nature Conservation
- LP48 - New Open Space
- LP49 - Green chains and green corridors
- LP50 - Play Space
- LP51 - Tree management and landscaping
- LP52 - Waterways, canals and residential moorings

4.33 These policies protect and enhance green infrastructure and biodiversity, trees and allotments across the borough, promote the creation of green links, and set out open space and play space standards required in new development. They are generally considered to have a neutral impact on the equalities groups, apart from policy LP50 Play Space which is considered to have a positive impact on children.

Climate Change

4.34 The chapter contains the following policies:
- LP53 - Water and Flooding
- LP54 - Overheating
- LP55 - Mitigating Climate Change
- LP56 - Decentralised Energy Networks (DEN)
- LP57 - Waste
- LP58 - Improving the Environment - Pollution

4.35 These policies seek to protect the borough from the impacts of climate change, including flood risk and overheating, as well as setting out energy and standards for new development. All are considered to have a neutral impact on the equalities groups, apart
from policy LP58 Improving the Environment – Pollution which sets out the approach to minimising all types of pollution, including air pollution which is considered to have a positive impact on residents with respiratory conditions and young children in the borough who are disproportionately affected by high air pollution levels.
Step 3: Identify whether and to what extent there are any significant negative impacts on these groups arising from the plan and its policies

4.36 This section of the EqIA identifies and summarises any significant impacts of the Local Plan which on those with Protected Characteristics, provides an analysis of whether these impacts are positive or negative, and establishes if these impacts are significant enough to require further mitigation.

4.37 The analysis did not find that there were any significant negative impacts from the plan on those with Protected Characteristics, due to the fact that many policies actively support delivery of greater equality, and those which have potential to reduce it do not do so to a level judged to be significant.
5. Habitats Screening Assessment

5.1 Hackney is developing a new Local Plan (LP33) and is undertaking Habitats Regulations Assessment in line with the requirements set by the Conservation (Natural Habitats &c) (Amendment) Regulations 2007.

5.2 This document is the HRA Screening assessment. It is the first stage of a Habitats Regulations Assessment (HRA) and identifies any likely significant effects of implementing the policies and proposals of the Local Plan 2033 on designated European Sites or Natura 2000 sites. These sites include Special Areas of Conservation (SACs), Special Protection Areas (SPAs), and as outlined by national policy, Ramsar Sites. The assessment will also advise on appropriate policy mechanisms for delivering mitigation measures where any effects are identified.

Requirement for HRA

5.3 The European Directive (92/43/EEC) on the Conservation of Natural Habitats and Wild Flora and Fauna (the Habitats Directive) protects habitats and species of European nature conservation importance. The Habitats Directive establishes a network of internationally important sites designated for their ecological status. These are referred to as Natura 2000 (N2K) sites or European Sites, and comprise Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) [which are classified under the Council Directive 79/409/EEC on the conservation of wild birds, the ‘Birds Directive’]. The main aim of the Habitats Directive is to promote the maintenance of biodiversity by requiring Member States to take measures to maintain or restore natural habitats and wild species listed on the Annexes of the Directive⁵.

5.4 Articles 6 (3) and 6 (4) of the Habitats Directive require Appropriate Assessment to be undertaken on proposed plans or projects which are not necessary for the management of the site but which are likely to have a significant effect on one or more European sites either individually, or in combination with other plans and projects. These are cited below:

**Article 6(3)**

Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site’s conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provision of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.

**Article 6(4)**

If, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative

---

⁵ JNCC http://jncc.defra.gov.uk/page-1374
reasons of overriding public interest, including those of a social or economic nature, the Member State shall take all compensatory measures necessary to ensure that the overall coherence of Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted.

5.5 The need for Habitat Regulations Assessment set out in Article 6 of the Habitats Directive is interpreted into UK law and implemented through Regulation 48 of The Conservation (Natural Habitats & c) Regulations 1994 (as amended in 2007). These regulations require the application of HRA to all land use plans.

Regulation 48:

A competent authority, before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which is likely to have a significant effect on a European site in Great Britain (either alone or in combination with other plans or projects, and is not directly connected with or necessary to the management of the site, shall make appropriate assessment of the implications for the site in view of that site’s conservation objectives.

Natura 2000 and Ramsar Sites

5.6 Natura 2000 sites are nature protection areas established under the 1992 Habitats Directive. The aim of the network is to assure the long-term survival of Europe’s most valuable and threatened species and habitats. It is comprised of Special Areas of Conservation (SAC) designated by Member States under the Habitats Directive, and also incorporates Special Protection Areas (SPAs) designated under the Conservation of Wild Birds Directive (79/409/EEC). Ramsar sites are those designated under the International Convention on Wetlands of International Importance, and are not under EU legislation. The National Planning Policy Framework (NPPF) (2018), however, states that Ramsar sites (wetlands of international importance) should receive the same protection as designated Natura 2000 sites. This being the case, appropriate assessment is required for both European and Ramsar sites.

5.7 The role of the Natura 2000 sites (SACs, SPAs, Ramsar) is to provide statutory protection for terrestrial and coastal sites that are of European and global importance as a result of habitats or species contained within them. A Habitat Regulations Assessment of the potential effects of the Local Plan on the Natura 2000 network has been undertaken despite the absence of any European sites actually within the Borough itself, due to an acknowledgement that development within a borough can lead to adverse effects on European sites within neighbouring boroughs and to the fact that the Lee Valley SPA and Ramsar site abuts the north east boundary of the Borough.

Methodology

5.8 HRA screening (this document) comprises the following key tasks:

| Task 1 | Identification of European sites both within the plan/proposal boundaries and in an appropriate area of search around the plan/proposal area. This includes considering hydrological... |

Identification of Natura 2000 sites & characterisation

- Information was obtained for each European site, based on publicly available information. This included information relating to the sites’ qualifying features; conservation objectives; vulnerabilities/ sensitivities, current conditions, trends & geographical boundaries.

<table>
<thead>
<tr>
<th>Task 2</th>
<th>Plan review and identification of likely impacts</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>• Screening of the plan/proposal and the identification of likely impacts (including a review of the plan/proposal’s aims, objectives, strategic policies, including spatial implications where identified to determine likely impacts).</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Task 3</th>
<th>Consideration of other plans and programmes</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>• Consideration, where appropriate of other plans and programmes that may have in-combination effects with the plan/proposal.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Task 4</th>
<th>Screening Assessment</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>• Assessment of the potential of identified impacts to affect the designated interest features of European sites</td>
</tr>
<tr>
<td></td>
<td>• Summary of screening outcomes and recommendations.</td>
</tr>
</tbody>
</table>

5.9 The essential question whether the Plan, either alone or in combination with other relevant projects and plans, is likely to result in a significant effect upon European sites. The objective is to ‘screen out’ those plans and projects that can, without any detailed appraisal, be said to be unlikely to result in significant adverse effects upon European sites, usually because there is no mechanism for an adverse interaction with European sites.

Pathways of Impact

5.10 This section summarises the various impact pathways that could connect development within Hackney with impacts on European sites.

Urbanisation and recreational pressure

5.11 Increased urbanisation in proximity to sensitive areas can lead to impacts on the sensitive areas including increased fly tipping and cat predation. The principle adverse ecological effect of fly tipping is the introduction of invasive alien species with garden waste. In terms of cat predation, a survey performed in 1997 indicated that nine million British cats brought home 92 million prey items over a five-month period. A large proportion of domestic cats are found in urban situations, and increasing urbanisation is likely to lead to increased cat predation.

5.12 Recreational pressure refers to the effects of increased visitors to sensitive sites. There is evidence that damage to vegetation in woodlands and other habitats can be caused by vehicles, walkers, horses and cyclists trampling on the sites which in turn causes soil compaction and erosion. Walkers with dogs contribute to pressure on sites through nutrient enrichment via dog fouling and also have potential to cause greater disturbance to fauna as dogs are less likely to keep to marked footpaths. Motorcycle scrambling and
off-road vehicle use can cause more serious erosion, as well as disturbance to sensitive species.

5.13 Many wetland sites, and particularly the Lee Valley, are extensively used for recreational activity by people from a wide-ranging catchment that includes the whole of Hertfordshire and also draw visitors from further afield. Activities of walkers (particularly dog walkers) and water-borne recreation can, if carried out in winter, have a significant disturbing effect upon wintering waterfowl thus increasing energetic expenditure (as birds have to take flight more frequently) and competition on the less disturbed parts of the wetland.

Air quality

5.14 There are various known pollutants that can affect air quality and impact on habitats, the main ones of concern for European sites being oxides of nitrogen (NOx), ammonia (NH3) and sulphur dioxide (SO2). NOx can have a directly toxic effect upon vegetation, and greater NOx or ammonia concentrations within the atmosphere will lead to greater rates of nitrogen deposition to soils. An increase in the deposition of nitrogen from the atmosphere to soils is generally regarded to lead to an increase in soil fertility, which can have a serious deleterious effect on the quality of semi-natural, nitrogen-limited terrestrial habitats.

5.15 The main pollutant related to increases in development activity is NOx emissions caused by the output of vehicle exhausts (more than half of all emissions) resulting from an increase in associated road traffic.

5.16 With regards to local air pollution, both the Lee Valley SPA/Ramsar and Epping Forest SAC lie in close proximity to major roads. These roads may be used by journeys arising from Hackney and therefore air quality should be considered within the scope of this screening assessment.

5.17 In addition to the contribution to local air quality issues, development can also contribute cumulatively to an overall deterioration in background air quality across an entire region. Diffuse pan-authority air quality impacts are the responsibility of the London Plan, both since they relate to the overall quantum of development within a region (over which individual boroughs have little control), and since this issue is best addressed at the highest pan-authority level.

Water Resources and Quality

5.18 There is a risk that increased abstraction to meet the needs of the increased population of Hackney will (when considered ‘in combination’ with the increased population throughout East London and parts of Hertfordshire over the plan period) lower water levels within the River Lee that are designated as or which feed the European site, thereby reducing freshwater inputs. This could potentially lead to increased sedimentation of the river channel due to reduced flows and a reduction in the freshwater available to SPA birds for drinking, feeding, roosting, loafing and bathing.
Task 1: Identification of sites

There are no European sites within Hackney however Hackney falls within the recreational catchment of the sites identified below and the Plan could therefore potentially impact upon them.

- Lee Valley SPA and Ramsar site (located in LB Waltham Forest, Epping Forest District and the Borough of Broxbourne) – including:
  - The Walthamstow Reservoirs SSSI.
  - Amwell Quarry SSSI and Rye Meads SSSI (within East Herts District)
  - Turnford and Cheshunt Pits SSSI (within the Lee Valley Country Park)

- Epping Forest SAC (located in LB Waltham Forest, LB Redbridge and Epping Forest District)

These sites are described in greater detail below.

Lee Valley SPA and Ramsar site

The Lee Valley is a series of wetlands and reservoirs located in the north east of London within the Lee Valley Regional Park. The site occupies approximately 24 km of the valley and comprises embanked water supply reservoirs, sewage treatment lagoons and former gravel pits that support a range of man-made, semi-natural and valley bottom habitats that support wintering wildfowl.

Lee Valley qualifies as an SPA for its Annex I species:

- Bittern Botaurus stellaris
- Gadwall Anas strepera
- Shoveler Anas clypeata

Lee Valley qualifies as a Ramsar site under the following criteria:

- Criterion 2: The site supports the nationally scarce plant species whorled water-milfoil Myriophyllum verticillatum and the rare or vulnerable invertebrate Micronecta minutissima (a water-boatman); and,
- Criterion 6: species/populations occurring at levels of international importance.

Qualifying Species/populations (as identified at designation):

- Species with peak counts in spring/autumn: Northern shoveler Anas clypeata
- Species with peak counts in spring/autumn: Gadwall Anas strepera

The Natural England Site Improvement Plan for the Lee Valley identifies that some of the pressures / threats that will affect the Lee Valley are:

- Water pollution
- Hydrological changes
- Recreational disturbance including angling
- Atmospheric pollution

Epping Forest SAC

Epping Forest SAC is a 1,600 hectare site of which 70% consists of broadleaved deciduous woodland. It is one of only a few remaining large-scale examples of ancient
wood-pasture in lowland Britain and supports a nationally outstanding assemblage of invertebrates, a major amphibian interest and an exceptional breeding bird community.

5.26 Epping Forest qualifies as a SAC for both habitats and species. The site contains Annex I habitats of:
- Beech forests on acid soils with Ilex and sometime Taxus in the shrublayer.
- Wet heathland with cross-leaved heath; and
- Dry heath

The site contains Annex II species:
- Stag beetle Lucanus cervus.

5.27 The Natural England Site Improvement Plan for Epping Forest identifies that some of the pressures / threats that will affect Epping Forest include:
- Air pollution
- Public disturbance
- Inappropriate water levels
- Water pollution

**Task 2: Plan review and identification of likely impacts**

5.28 The aim of this screening is to identify at a broad level those policies that will not have an effect on European Sites and those that have the potential to have a significant effect at the sites identified at Task 1. Refer to Appendix 3 for the screening assessment of each policy in LP33 and the identification of likely key impacts.

The approach taken is in accordance with guidance by David Tyldesley Associate, for English Nature, 2006). Local Plan policies were screened on the basis of the following criteria:

**Reasons why a policy will not have an effect on a European Site:**

1. The policy itself will not lead to development.
2. The location of the development is unknown, and will be selected following consideration of options in lower plans.
3. The policy will have no effect because development is dependent on implementation of lower tier policies.
4. The policy concentrates development in existing urban areas, steering development away from European sites and sensitive areas.
5. The policy will steer development away from European sites and associated sensitive areas.
6. The policy is intended to protect the natural environment, including biodiversity.
7. The policy is intended to conserve or enhance the natural, built or historic environment, and such enhancements are unlikely to affect a European site.

---

7 The Assessment of Regional Spatial Strategies and Sub-regional strategies under the Provisions of the Habitats Regulations: Draft (David Tyldesley Associate, for English Nature, 2006)
Reasons why a policy could have an effect on a European Site:

8. The plan/policy steers a quantum or type of development towards or encourages development in, an area that includes a European site or an area where development may indirectly affect a European site.

Reasons why a policy/plan would be likely to have a significant effect:

9. The policy makes provision for a quantum of kind of development that in the location(s) proposed would be likely to have a significant effect on a European site. Appropriate Assessment required.

5.29 There were no individual policies within LP33 that when screened against the criteria were considered likely to lead to significant effects on site integrity. However further discussion is required with regards to ‘in combination’ effects.

Task 3: Consideration of other plans and programmes

5.30 It is a requirement of Article 6(3) of the Habitats Directive that HRA examines the potential for plans and projects to have a significant effect either individually or ‘in combination’ with other plans, programmes & projects.

5.31 Undertaking an assessment of other plans and programmes relevant to LP33 requires a pragmatic approach given the extensive range of plans underway in the surrounding region. When considering other plans, attention was focused on those aimed at delivering planned spatial growth with the most significant being those that seek to provide, housing, employment and infrastructure. The review considered the most relevant plans including:

- Hackney Housing Strategy 2017-2022
- Hackney Transport Strategy 2015-2025
- Hackney Air Quality Action Plan 2015-2019
- Draft North London Waste Plan (2012)
- The London Housing Strategy (2018)
- Environment Agency’s Thames Catchment Abstraction Management Strategy (2014)

5.32 The potential for these Plans to lead to ‘in combination’ effects with LP33 on the European Sites is considered throughout this screening assessment. The main ‘in combination’ effects are likely to be related to increased development and increased traffic leading to impacts on air pollution and water quality, and increased populations leading to increased recreational pressure on the designated sites.
Task 4: Screening Assessment

5.33 Whilst the screening assessment of the individual policies shown in Appendix 3 effectively ‘screens out’ the individual policies, these need to be considered in the context of the overarching LP33 Growth Strategy for the borough. The Growth Strategy sets out how the Plan will promote sustainable growth across the borough over the 15 year period between 2018 and 2033. It seeks to deliver 26,250 new homes, 34,000sqm of new retail and leisure floorspace and 117,000sqm of new employment floorspace. Community and cultural facilities are also promoted within mixed use developments. The majority of the growth is directed towards the existing town centres and the main existing transport corridors. Open spaces in Hackney will be protected and enhanced and there will be improved green links between these spaces.

5.34 When the individual policies are considered in combination with the overarching Growth Strategy and the growth planned in neighbouring boroughs and across London, there may be ‘in combination’ effects on the European sites which require further consideration. These effects will relate primarily to increased recreational pressure as well as air and water pollution which are the main impact pathways likely to affect the designated European sites.

5.35 Lee Valley SPA and Ramsar Site

5.35.1 Recreational activity in the Lee Valley

5.36 The Lee Valley Regional Park is already extensively used for recreational activity and over the past 5 to 10 years there has been emphasis on facilitating and promoting greater public access to the Lee Valley SPA for recreation to increase visitor numbers. As part of this the Walthamstow Wetlands Project, which opened the Wetlands to public access in October 2017, has substantially increase public access to and use of Walthamstow Reservoirs.

5.37 The place policy for Stamford Hill (PP4) in particular seeks to increase east west links through the area between Woodberry Down and the Lea Valley Regional Park, and LP33 policy LP12 sets out the Council’s aspiration to deliver an additional 3,000 homes in the Stamford Hill / Woodberry Down area. Growth in this area will lead to increased recreational activity in the Lee Valley and Walthamstow Wetlands, both of which are local open spaces for Hackney residents and particularly those in the north of the borough.

5.38 Similarly, the Enhanced Corridors place policy (PP5) seeks to enhance the major corridors within Hackney, one of which is the Lee Valley edge. The River Lee corridor is an important artery for walking, cycling, wildlife, river communities and for leisure and recreation and is recognised as an area that balances the urban intensity of the borough with open space and leisure. The place policy seeks to improve access to and across the Lee Valley and improve connections with Waltham Forest.

5.39 The aspiration set out in policy LP12 to deliver 1,330 homes per year to 2033 will add to recreational pressures on the Lee Valley. This also needs to be considered in the context of almost 650,000 homes to be delivered across London over the next ten years (based
There are various policies identified above which are likely to increase recreational activity within the Lee Valley SPA and Ramsar site and the Walthamstow Wetlands SSSI. While the Park has detailed management plans to control recreation, it is inevitable that these plans will be placed under greater pressure (and potentially require greater funds to implement) if the number of recreational users increases considerably. That being said, most of the Regional Park lies outside the boundaries of the SPA. The HRA Screening Statement for the Lee Valley Park Development Framework concludes that there would be no likely significant effect of the numerous measures and policies intended to increase public accessibility to the Regional Park (including those areas of international importance) due to the Regional Park Authority’s overriding commitment to managing the Regional Park, their past experience of delivering increased access while avoiding disturbance and their ongoing commitment to visitor access management in the more sensitive parts of the Park.

**Air quality**

Growth in Hackney as projected in LP33 could reasonably be expected to indirectly cause an increase in air pollution, particularly NOx as a result of greater vehicle use. However strong mitigation measures are embedded within the Plan through various policies which promote walking and cycling and discourage use of cars. In addition, policy LP58 specifically seeks to ensure that new development does not exceed air quality neutral standards or contribute to worsening air quality at the construction of operation stage over the lifetime of the development. The Hackney Transport Strategy and the Mayor’s Transport Strategy will also play a positive contribution towards reducing air pollution impacts.

The London Plan HRA states that the Air Pollution Information System (APIS) does not identify any critical loads for the Lee Valley SPA / Ramsar and Walthamstow Wetlands habitat which could affect the bird species which form the reason for the international designation. The waterbody is phosphate limited, rather than nitrogen limited, meaning that it is it is phosphate availability that controls the growth of macrophytes and algae. The London Plan will not affect phosphate availability within Walthamstow Wetlands. The same applies to LP33.

**Water quality**

The River Lee and its associated reservoirs form a major component of the water resource for northeast London. Growth in Hackney associated with LP33 could potentially be considered to lead to increased abstraction from sensitive surface water sources, however since Thames Water are currently implementing a major water supply project in London which will involve abstraction and desalination of water from the tidal River Thames (the Thames Gateway Water Treatment Plant) which means that damaging levels of abstraction from the River Lee to supply Waltham Forest (or other parts of London) should be avoidable.

Furthermore, water levels of the Walthamstow Reservoirs SSSI are directly controllable by the site manager (Thames Water). Hackney’s policies will not result in levels of water
usage that would require Thames Water to establish inappropriate water levels in Walthamstow Reservoirs or general water quality within the River Lee.

**Amwell Quarry SSSI, Rye Meads SSSI and Turnford and Cheshunt Pits SSSI**

5.45 In addition to the areas of the Lee Valley SPA and Ramsar site in London, there are two parts of the SPA / Ramsar site within East Herts District: Amwell Quarry (Amwell Nature Reserve) and Rye Meads Nature Reserve. These are managed by Hertfordshire and Middlesex Wildlife Trust and the RSPB. Both reserves are laid out in considerable detail with a network of hides (ten at Rye Meads, three at Amwell) and clearly marked footpaths/boardwalks with screening vegetation that are specifically laid out and designed to route people away from the sensitive areas and minimise disturbance while at the same time accommodating high numbers of visitors. Moreover, no dogs are allowed (except registered assistance dogs) and the wet and marshy/open water nature of the habitats on site inherently limits off-track recreational activity, rendering it difficult to accomplish and unappealing. For these reasons it is considered that the vulnerability of Amwell Nature Reserve and Rye Meads Nature Reserve to the potential adverse effects of recreational activity that can affect other less well-managed sites is very low. Within Turnford and Cheshunt Pits, which lie outside East Herts but within the Lee Valley Country Park, recreational activity is similarly regulated through zoning of water bodies. The majority of the site is already managed in accordance with agreed management plans in which nature conservation is a high or sole priority.

**Epping Forest SAC**

**Recreational activity in Epping Forest**

5.46 It is estimated that Epping Forest SAC receives over 4 million visits per year. A 2011 visitor survey report identified that those living within 2km of the edge of the Forest comprise at least 95% of all visitors and previous advice stated that the ‘core catchment’ for recreational pressure on Epping Forest should be considered to be 4km. Wanstead flats is the closest SAC component of Epping Forest to Hackney (approximately 5km away).

5.47 A more recent visitor survey undertaken by Footprint Ecology (2017) identified that 75% of visitors travelled up to 6.2km to the Epping Forest SAC with some visitors travelling from as far as Peterborough, Maidenhead, Maidstone, Surbiton and Braintree. Natural England provided interim advice in September 2018 on a new strategic approach to the Zone of Influence for recreational impacts on the SAC, stating that a recreational zone of influence of 6.2km could be used to assess whether residential applications will have a recreational impact on Epping Forest SAC. This is an interim approach until the Epping Forest Mitigation Strategy is finalised. Part of Hackney falls within the 6.2km buffer zone, as shown on the map below (the outer red line shows the 6.2km buffer). However, in reality very few people travel from Hackney to the Epping Forest SAC: the visitor survey (2017) found that of 415 people surveyed only 9 (2 percent) came from Hackney.
A number of Hackney’s place policies fall within the 6.2km Zone of Influence including Hackney Central and Surrounds (PP3), Stamford Hill (PP4), Enhanced Corridors (PP5), Hackney Wick (PP6), Clapton and Lea Bridge Roundabout (PP7) and Homerton (PP10). When taken as a whole, a significant amount of growth is anticipated across these areas and this is may lead to a very minor increase in recreational pressure on Epping Forest as demand for recreational greenspace grows. It is known that over 50% of visitors to Epping Forest originate from Waltham Forest, Redbridge or the southern part of Epping Forest District (predominantly Leyton, Theydon Bois and Buckhurst Hill). Therefore, growth within Hackney will have a relatively minor impact on recreational pressures in Epping Forest.

Epping Forest District Council is already aware of the contribution to visitor activity within the SAC that is likely to be made by new residents within Waltham Forest, Redbridge and Epping Forest authorities and the authorities are working together to produce a mitigation strategy for addressing recreational pressure on the SAC. The recreation mitigation strategy could involve a tariff to be applied to net new dwellings within a chosen zone around the SAC. The funds obtained by those tariffs will be directed towards a combination of access management, increased ranger capacity and potentially additional greenspace provision to ensure that population growth is sustainably managed.

Air quality

Epping Forest SAC is known to be adversely affected by relatively poor local air quality alongside the roads that traverse the SAC and this has been demonstrated to have
negatively affected the epiphytic lichen communities of the woodland as well as other features. Journey to work census data from 2011 indicate that the London boroughs most likely to contribute to NOx concentrations and nitrogen deposition within Epping Forest SAC, arising from road traffic, are the London Boroughs of Redbridge, Waltham Forest and possibly Enfield, and there are no significant journey to work flows between Hackney and Epping Forest and air pollution within Hackney will not impact negatively on Epping Forest SAC as it will be dispersed and absorbed locally. Furthermore, Hackney has a number of policies in place in LP33 to reduce vehicle usage and promote walking and cycling. The Hackney Transport Strategy and the Mayor’s Transport Strategy will also play a positive contribution towards reducing air pollution impacts.

Summary and Conclusion

5.51 It is acknowledged that the population growth and economic growth that is anticipated in Hackney may lead to increased air pollution through increased use of cars and freight vehicles, as well as more residents who will potentially be visiting the Lee Valley and Epping Forest sites. However the whole premise of the Local Plan 2033 is to direct development to the most sustainable locations and there are various policies in the plan to positively manage and promote biodiversity, green infrastructure, air quality and sustainable methods of travel. Furthermore, the impact of increased visitors to the European sites are dealt with by the sites themselves.

5.52 Therefore, the Local Plan 2033 policies have been ‘screened out’ as being unlikely to lead to significant adverse effects on European sites and do not need to be taken forward for the next stage of Appropriate Assessment.
6. The Health Impact Assessment (HIA)

Introduction

6.1 This analysis was prepared by the London Borough of Hackney (LBH) Public Health team at the request of the LBH Planning Policy team to contribute to the Integrated Impact Assessment for Hackney’s Local Plan 2033, Hackney A Place for Everyone. The review covers the Draft Local Plan submitted for Public Consultation (Reg18) in October 2017. The assessment builds on feedback provided by Public Health to the Planning Policy team on earlier iterations of the Draft Local Plan, and reflects changes to policies to address Public Health inputs.

6.2 This document is structured as follows:

1. Introduction
2. Policy context
3. Local context
4. Health Impact Assessment findings by Draft Local Plan policy chapter
5. Conclusion and recommendations

Background

6.3 The National Planning Policy Framework states that Local planning authorities should ensure that health and wellbeing, and health infrastructure are considered in local plans and in planning decision making.

6.4 As noted in the Planning Practice Guidance, a range of issues can be considered through the plan-making and decision-making processes, with regard to health and healthcare infrastructure, including how:

- development proposals can support strong, vibrant and healthy communities and help create healthy living environments which should, where possible, include making physical activity easy to do and create places and spaces to meet to support community engagement and social capital;
- the local plan promotes health, social and cultural wellbeing and supports the reduction of health inequalities;
- the local plan considers the local health and wellbeing strategy and other relevant health improvement strategies in the area;
- the healthcare infrastructure implications of any relevant proposed local development have been considered;
- opportunities for healthy lifestyles have been considered (e.g. planning for an environment that supports people of all ages in making healthy choices, helps to promote active travel and physical activity, and promotes access to healthier food, high quality open spaces, green infrastructure and opportunities for play, sport and recreation);
- potential pollution and other environmental hazards, which might lead to an adverse impact on human health, are accounted for in the consideration of new development proposals; and
- access to the whole community by all sections of the community, whether able-bodied or disabled, has been promoted.
Although the spatial planning system cannot impact on individual characteristics that can affect health, such as age, gender, hereditary factors; the planning system can influence the wider determinants of health which shape individual behaviours and influence health outcomes. These include social and community influences, living and working conditions, and socioeconomic, cultural and environmental influences. A healthy community is one where all residents enjoy high standards of both mental and physical wellbeing. Good health means not merely the absence of disease, but also being physically active, healthy and happy. There are a range of opportunities for urban design to contribute to mental as well as physical health, including through working to create a green place, an active place, a social place and a safe place. The Barton and Grant model below depicts how the areas people live in affect health and wellbeing.

---

8 Design Council (2017). Designing good mental health into cities: the next frontier for urban design
Policy Context

6.6 Ensuring health and wellbeing issues are considered at the earliest stage in the development of planning policy formulation can enable planning to strengthen its contribution to the health of people in Hackney and therefore it is essential that the Local Plan takes every opportunity to lay the framework for ‘building in’ health to all planning proposals. This approach is supported by the following policy documents at national and regional level:

- **The National Planning Policy Framework** directs local planning authorities to work with public health leads to understand and take account of the health status and needs of the local population to ensure that Local and Neighborhood Plans are health promoting;

- **The National Planning Policy Framework** states that Planning should take account of and support local strategies to improve health, social and cultural wellbeing for all. Consequently, the priorities set out in Hackney’s Joint Health and Wellbeing Strategy and other strategies such as the Healthy Weight Strategy are relevant to the Local Plan formulation

- **The London Plan** notes that the planning system can play a key role in promoting health and reducing health inequalities. The London Plan states that in preparing Local Development Plans, boroughs should work with key partners to identify and address significant health issues facing their area and monitor policies and interventions for their impact on reducing health inequalities; and integrate planning, transport, housing, environmental and health policies to promote the health and wellbeing of communities.

- **The London Plan** states that new developments should be designed, constructed and managed in ways that improve health and promote healthy lifestyles to help to reduce health inequalities. The impacts of major development proposals on the health and wellbeing of communities should be considered, for example through the use of Health Impact Assessments (HIA)

- **The Mayor of London Social Infrastructure Supplementary Planning Guidance** states that Health Impact Assessment (HIA) is a useful tool to inform the development of local policies and plans. HIA identifies opportunities for maximising potential health gains and minimizing harm, and addressing inequalities, taking account of the wider determinants of health. To have a material impact, an HIA should be undertaken as early as possible in the plan making process.

6.7 The draft new Local Plan for Hackney will include the following objective:

*To tackle health inequalities, create an environment that promotes health and wellbeing, and enable skill development and lifelong learning.*

6.8 Public Health comments on draft planning policies aim to support Planning in how to use the planning system to achieve this objective.
Local Context

6.9 The Hackney Joint Health and Wellbeing Strategy 2015-18 has four priorities:

1. Improving the health of children and young people, in particular tackling childhood obesity and working with pregnant mothers and children under five years old
2. Controlling the use of tobacco, with a renewed emphasis on stopping people from starting smoking as well as helping them to quit
3. Promoting mental health, focusing on relieving depression and anxiety for working age adults
4. Caring for people with dementia, ensuring our services are meeting the needs of the older population.

6.10 The Hackney Healthy Weight Strategy includes the following directional statements relevant to the areas of influence of the Planning system:

1. Parks, outdoor spaces and the built environment in Hackney and the City will be attractive, safe and well-used by all members of the community
2. Everyone in Hackney and the City will be more active as part of their daily lives and the places where they live, work and learn will help them
3. Everyone in Hackney and the City will find it easier to buy, prepare and eat affordable, healthy food

6.11 An average of 1,125 people die every year in Hackney and the City. 35% of these deaths are preventable. The greatest numbers of deaths are caused by cardiovascular disease (349 per year) and cancer (313 per year), followed by respiratory disease (136 deaths per year) (Public Health Outcomes Framework 2016).

6.12 Individual behaviour plays an important role in determining how healthy or unhealthy people are. Whether someone smokes, how much exercise they do, the quality of their diet and their drinking habits, all contribute to their risk of disease, disability and premature death. Exposure to multiple behavioural risk factors is linked to higher risk of poor health outcomes, and more commonly affects people living in disadvantaged circumstances (Joint Strategic Needs Assessment, Lifestyle and Behaviour, 2016).

6.13 Most of these behaviours are strongly linked to the environment in which people live their lives, rather than being a free lifestyle choice. Improving the environment (including the built environment) to facilitate healthier behaviours is vital for promoting public health (Joint Strategic Needs Assessment, Society and Environment, 2016). Promoting health and wellbeing and reducing health inequalities is a key Council objective, and is reflected through Hackney’s Sustainable Community Strategy.

6.14 Obesity has a wide range of negative health, social and economic impacts; shortening lives, increasing ill health and worsening quality of life, as well as increasing NHS and
social care costs.\textsuperscript{9} In Hackney, almost 90,000 adults are overweight or obese.\textsuperscript{10} Obesity is higher among more deprived groups. Over 40\% of children in year 6 are overweight or obese.\textsuperscript{11} Hackney has one of the highest child obesity rates in London and England. \textit{Fast food outlets} tend to sell food that is high in fat and salt, and drinks that are high in sugar. Higher concentration of fast food outlets, which is associated with area deprivation, has been linked to higher prevalence of obesity. Hackney has almost 300 fast food outlets, based on 2014 data (Joint Strategic Needs Assessment, Society and Environment, 2016). Planning is one of the levers to address obesity by creating a ‘healthy weight environment’. This is an environment that supports people to avoid becoming overweight or obese through how the place is designed and what it provides (for example, access to healthier food and drink and opportunities to be physically active as part of daily life).\textsuperscript{12} Planning can influence the built environment to improve health and reduce obesity and excess weight in local communities. Local planning authorities can have a role in enabling a healthier environment by supporting opportunities for communities to access a wide range of healthier food production and consumption choices.

6.15 Taking measures to address obesity is firmly in line with Planning Practice Guidance (PPG). The PPG (006 Reference ID: 53-006-20170728) states that local planning authorities can consider bringing forward, where supported by an evidence base, local plan policies and supplementary planning documents, which limit the proliferation of certain use classes in identified areas, where planning permission is required. In doing so, evidence and guidance produced by local public health colleagues and Health and Wellbeing Boards may be relevant.

6.16 Local planning authorities and planning applicants could have particular regard to the following issues:

- proximity to locations where children and young people congregate such as schools, community centres and playgrounds
- evidence indicating high levels of obesity, deprivation and general poor health in specific locations
- over-concentration and clustering of certain use classes within a specified area
- odours and noise impact
- traffic impact
- refuse and litter

6.17 \textit{Physical inactivity} is one of the main drivers of ill-health in England. Increasing physical activity can reduce new cases of major diseases by 20-50\%, including diabetes, several cancers, heart disease, and depression; as well as its contribution to reducing obesity.\textsuperscript{13} Physical inactivity rates are higher among more deprived groups, older adults and people with disabilities. A quarter of adults in Hackney are classed as physically inactive. Most children and young people in Hackney and the City are failing to exercise at levels recommended by government guidelines. More than three quarters report being sedentary for more than seven hours a day (Joint Strategic Needs Assessment, Lifestyle and Behaviour, 2016). Planning has a major impact on opportunities to be physically

\textsuperscript{10} Based on analysis of patient BMI measurements in Hackney GP records in April 2015
\textsuperscript{11} National Child Measurement Programme, 2016/17
\textsuperscript{12} TCPA (2014) Planning Healthy Weight Environments (see especially box 1 on page 11)
\textsuperscript{13} Chief Medical Officers (2015) Infographic on Physical Activity
active for children and adults. The extent to which the design of buildings, places and spaces promotes physical activity, for play, leisure and active travel will be vital for reducing physical inactivity in Hackney.

6.18 It is estimated that roughly 53,000 Hackney residents age 19-64 have at least one common mental health disorder, of whom around half have depression and/or anxiety. It is estimated that approximately 1,200 Hackney residents age 65+ have dementia (Joint Strategic Needs Assessment, Mental Health and Substance Use, 2016). Physical activity can reduce the risk of developing common mental health disorders and dementia. Mental health and dementia are priorities in the Hackney Joint Health and Wellbeing Strategy 2015-18. The Centre for Urban Design and Mental Health sets out a series of urban design opportunities to improve mental health, notably:

- Accessibility to green places in the course of people's daily routines
- Integration of physical activity into people's daily routines
- Creating pro-social spaces (places that facilitate strong social connections)
- Enhancing safety and security

6.19 There is strong evidence that greater opportunities for gambling (i.e. availability and accessibility of venues) increases the number of regular and problem gamblers in an area. Gambling may be harmful for some people, by exacerbating financial vulnerability and worsening mental health problems through addictive behaviour. Problem gambling is linked to poor health and a co-dependence on alcohol. The number of betting shops per head of population in Hackney is broadly in line with similar London boroughs, but higher than the national average. Payday loan shops provide high interest, short-term loans for people needing money to tide them over for short periods. Links have been established between severe debt and poor mental health, between debt and suicide, and debt and substance misuse. One conservative estimate suggests that Hackney has the eighth highest rate of loan shops per head of population in London (Joint Strategic Needs Assessment, Society and Environment, 2016).

6.20 Smoking is a leading cause of preventable disease and death and one of the most significant factors contributing to health inequalities. Over 47,000 adults (age 16+) in Hackney are recorded as current smokers in local GP records. This equates to a prevalence rate of 23% of all GP registered patients. Annual costs to society resulting from smoking in Hackney and the City are estimated at £68 million. These costs are spread across health services, businesses, local government and the fire service. People in more deprived areas are more likely to smoke and are less likely to quit. Men and women from the most deprived groups have more than double the death rate from lung cancer compared with those from the least deprived (Joint Strategic Needs Assessment, Lifestyle and Behaviour, 2016). People who work in manual jobs are more likely to smoke, and this contributes to them having worse health and dying younger than other groups. Linking staff working on building sites to help to quit smoking could contribute to building companies’ efforts to meet the Considerate Constructors scheme, help them improve

---

14 Design Council (2017) Designing good mental health into cities: the next frontier for urban design
their public image (appearance), and help them protect the health of their employees (valuing the workforce).

6.21 Access to appropriate, affordable housing is one of the most important factors in promoting positive health and wellbeing. Housing circumstances have a major impact on people’s physical, mental and social wellbeing. For example, damp and cold homes are linked to respiratory and cardiovascular disease, noise and overcrowding can affect child development and family relationships, and problems meeting housing costs are the source of significant stress and anxiety. Many housing-related health harms are particularly damaging for the youngest and oldest age groups. Many properties in the private rented sector are in poor condition and contain some of the most vulnerable residents (Joint Strategic Needs Assessment, Society and Environment, 2016).

6.22 Employment is good for health. Earnings from paid employment can provide access to a good standard of living and being in work is linked to a positive sense of wellbeing. People who are not working have a higher risk of poor physical and mental health, have fewer social connections and are less active on average. Long-term unemployment is particularly bad for health, with the effects lasting for many years. While there is clear evidence that employment can have positive health benefits, the quality of the work itself is also important. Being in ‘good work’ - which is safe, rewarding and provides a sense of self-worth - is what really matters for positive health outcomes. The workplace is, therefore, an important setting for promoting health and wellbeing and can help to reverse the harmful effects of long-term unemployment and prolonged periods of ill health (Joint Strategic Needs Assessment, Work and Worklessness).

6.23 There are strong links between education, health and quality of life. Research has shown that positive wellbeing in pupils can lead to improved academic progression and engagement in school. In turn, a good education significantly improves a child’s later life chances. Higher educational achievement provides access to better employment prospects and higher wages, and is associated with healthier lifestyles and better health outcomes (both in terms of physical and mental wellbeing). While the causal relationships between education and health are complex to untangle, it is likely that by improving education for all, social inequalities in health will reduce. Promoting the health and wellbeing of pupils and students within schools and colleges has the potential to improve their educational outcomes and their health and wellbeing outcomes (Joint Strategic Needs Assessment, Education and Training).

6.24 Areas with more accessible green space are associated with better mental and physical health. Health inequalities are smaller in greener areas. In greener areas, mortality rates are only 43% higher for deprived groups, compared to 93% higher for deprived groups in less green areas. Groups with lower rates of visits to green spaces include some ethnic minority groups, people on lower incomes, people aged over 65 and people with disabilities (all groups which tend to experience worse health). Consequently, efforts are needed to ensure accessibility (not only availability) of green space (UCL, Natural solutions for tackling health inequalities, 2014).

6.25 There is growing evidence that high levels of air pollution can cause damage to the airways and lungs, trigger asthma attacks, cause heart attacks, and lead to premature death for people who are already ill. Recent research by Kings College suggests that child exposure to air pollution reduces lung capacity permanently by up to ten percent. Long term exposure to air pollution (over many years) can also increase the risk of
cancer. The most vulnerable suffer the most harm from air pollution, especially those who live in deprived areas, live work or learn near busy roads, are more vulnerable because of their age or existing medical conditions. In Hackney, 82 deaths a year can be attributed to air pollution (fine particulate matter, PM 2.5), comprising 8.1 per cent of the causes of premature deaths in the borough.

Climate change is a major public health issue, with the World Health Organisation noting:\(^{15}\)

- An increase in heat-related illness and death
- More flood-related illness and displacement – as well as injury and infection, the effect of flooding on mental health will be considerable.
- An increase in food, water and vector-borne disease – higher temperatures will mean more drought, more flooding and changes in patterns of disease with an increase in tropical diseases.
- Increased levels of air pollution – prevalence of ozone, fine particles (PM10 and PM2.5) and even extended pollen seasons, all of which could increase levels of respiratory and cardiovascular disease.
- Skin cancer and sunburn – malignant melanoma has increased by 78% among men and 48% among women from 2003 to 2012. It is now the fifth most common cancer in England and is expected to continue rising as people spend more time outdoors due to warmer weather.
- Pressure on healthcare providers to keep services running in extreme weather – flooding, storms and wildfires are all set to become more common under future climate forecasts and they will all impact critical infrastructure (e.g. water supply, electricity, hospital services).
- An increase in health inequalities – increased fuel and food prices and a reduction in access to heating, cooling, insurance and green spaces will all impact those who may already be disadvantaged.

There are many policy actions that can contribute to preventing or mitigating climate change, be it improvements to energy efficiencies in housing, changing diets so they are more ‘climate friendly’ and changing the ways we look at, and use, various forms of transport, including boosting rates of walking and cycling. Taking these steps will not only tackle some of the drivers of climate change, such as emissions of greenhouse gases, but also improve other public health outcomes such as physical activity levels.

An initial assessment of primary care site utilisation in Hackney and the City suggested that about 50% of GP practices are fully or over utilised. Whilst there is capacity within the remaining estate, some localities are likely to struggle to increase services and match the capacity of a growing population. The assessment of the functional suitability of existing practices suggests that about 58% of City and Hackney’s GP practices, with minor investment, are functionally acceptable. The remaining require either significant

---

\(^{15}\) https://publichealthmatters.blog.gov.uk/2016/08/12/climate-change-and-the-significant-seven/
investment or relocation. This implies therefore that over 40% require substantial investment or new sites (GP Confed Primary Care Workforce and Estate, 2015).

6.29 The key issues in relation to health and wellbeing in Hackney include obesity, smoking, physical inactivity, depression and anxiety, and dementia. Health and wellbeing is shaped by the places and environments in which people live their lives. The food environment and the physical activity environment can facilitate healthier eating and more active living, both of which dramatically reduce risks of developing ill health. The development of social infrastructure to meet the current and future needs of the population will be integral to supporting Hackney’s development. Consequently, the development and implementation of planning policies has the potential to contribute substantially to improving the health of people in Hackney, and reducing the health inequalities between the most and least deprived groups.

Findings

6.30 This HIA is based on the NHS London Healthy Urban Development Unit (HUDU) Rapid Health Impact Assessment tool (2017) which provides structured questions and evidence to facilitate review of policies/plans against the following themes:

- Housing quality and design
- Access to healthcare services and other social infrastructure
- Access to open space and nature
- Air quality, noise and neighborhood amenity
- Accessibility and active travel
- Crime reduction and community safety
- Access to healthy food
- Access to work and training
- Social cohesion and lifetime neighborhoods
- Minimising the use of resources
- Climate change

6.31 Refer to the table in Appendix 4 which contains the recommendations that were made in the Health Impact Assessment prepared in response to the previous draft of the Local Plan; the response from the Planning team on how the Local Plan Proposed Submission has been adapted to take into account these recommendations; and why each of these recommendations and changes matter. All of the changes to the previous draft of the Local Plan were examined and it is those changes that were assessed as potentially having an impact on public health that are included in the table. A summary is provided below.

Spatial Objectives

6.32 The LP33 spatial objectives will have positive impacts on health and wellbeing. There is one objective which aims to tackle health inequalities and create an environment that promotes good health and wellbeing. This objective addresses input from Public Health on the original draft spatial objective (to promote healthy lifestyles). The new spatial
objective reflects how the environment (not just individual choices) impacts on health, and the role of planning in reducing inequalities in health between groups.

6.33 Spatial objectives also commit to the development of genuinely affordable housing; community facilities; new jobs; liveable neighbourhoods where people choose to walk, cycle and socialise; protection, enhancement and linking of green spaces; and improvement of air quality. The objectives of the Draft Local Plan are strongly consistent with a holistic approach to improving the wider determinants of health and wellbeing.

Protecting and Enhancing Heritage and Leading the way in Good Urban Design

6.34 Policies in this section will have positive impacts on health and wellbeing. Policies have been amended to include more information about active design in buildings and spaces, and to promote the Healthy Streets approach which aims to create streets where people choose to walk, cycle and spend time. These changes will contribute positively to increasing physical activity and socialising, with major positive impacts on physical and mental health.

Hackney’s People

6.35 Policies in this section will have positive impacts on health and wellbeing. Policies have been amended to specify that new development must have regard to the capacity of existing social infrastructure and provide / contribute to costs entailed in meeting any increased social infrastructure needs. A number of clarifications have also been made to the Health and Wellbeing Policy to refer to the wider determinants of health and reducing health inequalities, which do not only include direct factors such as physical activity, but also broader determinants such as housing, education, employment, transport, communities and the environment which are all areas that Planning policy can influence.

Meeting Hackney’s Housing Needs

6.36 Policies in this section will have positive health impacts in terms of provision of genuinely affordable housing and the requirement for new homes to be designed to be adaptable to meet the needs of those with disabilities and the elderly as well as assisting independent living at home. Various policy changes have been made to this section of the Plan but the specific health and wellbeing implications are minimal.

A Strong and Competitive Economic with Benefits All

6.37 Policies in this section will have positive impacts on health and wellbeing as employment is an important contributor to good health. A new policy has been included on local skills and jobs which seeks to ensure that there are a broad range of employment opportunities across a variety of sectors available to local residents, including in both the construction and operation of new developments, which will have a positive impact on health.

Planning for Vibrant Town Centres

6.38 Policies in this section will have positive impacts on health and wellbeing. Changes have been made to the Overconcentration of Uses policy to broaden the restriction on the development of new hot foot takeaways within 400m of a school to include primary schools (as well as secondary school and community colleges) and to remove the. These
are important changes given the Local Plan’s strategic objective to reduce health inequalities, the local priority to reduce child obesity in the borough.

**Improving Accessibility and Promoting Sustainable Transport**

6.39 Policies in this section will have positive impacts on health and wellbeing including the policy on Walking and Cycling which requires new development to prioritise walking and cycling and policy promotes design of footpaths to be suitable for older people and people with disabilities, which contributes positively to physical activity for all. Policies have been strengthened to include reference to achieving Vision Zero which is an initiative of the Mayor of London to reduce road danger and create safer streets. The Liveable Neighbourhoods policy also now refers to provision of drinking fountains which will help to improve the pedestrian environment, thus facilitating the choice to walk or cycle as part of daily life which promotes health and wellbeing. Any measures that contribute to reducing private car use are considered positive for public health, through increasing physical activity by sustainable transport modes and reducing air pollution.

**Hackney’s Green and Public Spaces**

6.40 Policies in this section will have positive impacts on physical and mental health and wellbeing through seeking to protect and enhance green spaces and create a network of green space across the borough. Policies have been enhanced, for example, through including a requirement to achieve an Urban Greening Factor rating within major development schemes. In addition, reference has been made to ‘informal play’, rather than just formal play facilities, which will have positive health benefits for children. Open space can contribute to positive mental health, through physical activity, access to nature and the development of strong social connections.

**Climate Change**

6.41 Policies in this chapter set out measures to mitigate and adapt to climate change which will have positive impacts on health and wellbeing. With regards to air quality, detail has been added to the Policy setting out measures for improving air quality, but the Plan does not go as far as to state that all large scale development must achieve Air Quality Positive Standards (the aim is currently to achieve air quality neutral) in all developments. This is in line with the London Plan which states that all development should be at least air quality neutral and the development of large scale redevelopment areas such as Opportunity Areas should achieve an Air Quality Positive approach.

**Conclusions**

6.42 Officers from Public Health have fed into the development of the policies in this submission version of the Local Plan. A number of refinements and improvements have been made to LP33 since the draft version as a result of these discussions. These are summarised above and shown in greater detail in the table in Appendix 4. The table
provides sets out how the Plan has responded to the recommendations made by Public Health in the HIA completed at Regulation 18 stage of the Plan.

6.43 It can be concluded that LP33 contains many positive elements for improving public health and reducing health inequalities and will not result in any negative outcomes for public health. These positive aspects include promoting active design, creating liveable neighborhoods, increasing walking and cycling and reducing private car use, promoting Health Impact Assessments, requiring provision of affordable housing, limiting concentrations of hot food takeaways, betting shops and payday loan shops, protecting, promoting and joining up green spaces, and preventing and mitigating the impact of climate change. This HIA demonstrates how spatial planning can promote health and wellbeing. Collaboration between Spatial Policy and Public Health will be ongoing.
Appendix 1

Policy changes between Regulation 18 draft Local Plan 2033 and Regulation 19 Proposed Submission
Local Plan 2033
The following tables assess the sustainability impacts of the policies changes to LP33 between the Regulation 18 and Regulation 19 versions of the Plan.

<table>
<thead>
<tr>
<th>Protecting and Enhancing Heritage and Leading the way in Good Urban Design</th>
<th>Reg 18 policies</th>
<th>Reg 19 policies</th>
<th>Key changes</th>
<th>Sustainability implications (discussion)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Design Quality and Local Character</td>
<td>LP1 Design Quality and Local Character</td>
<td>The criteria for good design have been re-ordered with minor text updates. The ‘Building Heights’ title has been amended to ‘Taller Buildings’. Additional text defines what constitutes a tall building in Hackney, i.e. buildings taller than the existing context.</td>
<td>The changes to the tall buildings policy seek to set out that all buildings taller than the existing context are considered as taller buildings and outlines that tall buildings must be considered in relation to its immediate and wider context. This change will have positive sustainability implications for SA Objectives 9 Heritage Assets and 10 Sustainable Design.</td>
<td></td>
</tr>
<tr>
<td>2. Development and Amenity</td>
<td>LP2 Development and Amenity</td>
<td>Clarification that amenity considerations also apply to waterways and canals.</td>
<td>This change will have positive sustainability implications for SA Objectives 12 Open Space and 13 Community &amp; Health.</td>
<td></td>
</tr>
<tr>
<td>3. Designated Heritage Assets</td>
<td>LP3 Heritage</td>
<td>A new title and some re-ordering of the policy. Two new sections have been included on ‘Registered Parks and Gardens and protected London Squares’ and ‘Setting of World Heritage Sites’</td>
<td>The new elements of the policy seek to ensure development does not impact on Registered Parks and Gardens or the setting of World Heritage Sites. This will have positive sustainability impacts on SA Objectives 9 Heritage Assets, 10 Sustainable Design and 12 Open Space.</td>
<td></td>
</tr>
<tr>
<td>4. Non Designated Heritage Assets</td>
<td>LP4 Non Designated Heritage Assets</td>
<td>More detail has been added to this policy to describe what is a categorised as a non-designated heritage asset. Detail has been added to explain that proposals that result in less than substantial harm to non-designated heritage assets will only be permitted if efforts to restore the asset have been explored or the public benefits of redevelopment outweigh the</td>
<td>The addition to the policy regarding the circumstances in which less than substantial harm to a non-designated heritage asset will be permitted aligns with the explanation in the NPPF. The changes provide clarity to the approach and will therefore have positive sustainability impacts on SA Objectives 9 Heritage Assets and 10 Sustainable Design.</td>
<td></td>
</tr>
<tr>
<td>LP5 Strategic and Local Views</td>
<td>New policy to resist development within the strategic view corridors - Westminster Pier to St Paul’s Cathedral, and King Henry’s Mound to St Paul’s Cathedral.</td>
<td>This new policy will have positive sustainability implications in relation to SA objectives 9 Heritage Assets, 10 Sustainable design and 12 Open Space. The policy could potentially reduce land availability for development, and this may be amplified by the fact that the identified strategic view area falls within Shoreditch which is a key location for growth. This could therefore have negative sustainability impacts on SA objectives 16 Affordable Housing and 19 Economic Growth. That being said, it is a statutory requirement to protect strategic views and they cover a very small area in the south of the borough, so impacts will be negligible.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>---</td>
<td>---</td>
<td>---</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5. Archaeology</td>
<td>LP6 Archaeology</td>
<td>Two new sections have been added to the policy to cover Scheduled Monuments and Undesignated Heritage Assets</td>
<td>These new sections provide clarity on the national consent regime for works to scheduled monuments and undesignated heritage assets. These additional sections are governed by a national regime so sustainability impacts related to LP33 will be negligible.</td>
<td></td>
</tr>
<tr>
<td>6. Advertisements</td>
<td>LP7 Advertisements</td>
<td>No change</td>
<td>N/A</td>
<td></td>
</tr>
</tbody>
</table>

### Hackney’s People

<table>
<thead>
<tr>
<th>Reg 18 policies</th>
<th>Reg 19 policies</th>
<th>Key changes</th>
<th>Sustainability implications (discussion)</th>
</tr>
</thead>
<tbody>
<tr>
<td>7. Social and Community Infrastructure</td>
<td>LP8 Social and Community Infrastructure</td>
<td>Additional provision within the policy ensuring that new development contributes towards the provision of social infrastructure where it will place additional pressure on existing facilities. Removal of requirement for social infrastructure to be located in town centres</td>
<td>This change will have positive impacts on SA Objective 17 Social Infrastructure. Allowing social infrastructure facilities to be located outside of town centres means that they can be located in areas of need, for example, within estates. This will have major positive impacts on SA Objective 17 Social Infrastructure.</td>
</tr>
</tbody>
</table>
8. Health and Wellbeing

LP9 Health and Wellbeing

New provision within the policy requiring schemes of 50+ housing units or 10,000sqm+ non-residential floorspace and all schemes for takeaways betting shops and payday loan shops to submit a Health Impact Assessment.

Added requirement for access to free drinking water and public toilets.

This change will ensure that major schemes are developed in a way that considers the wider health and wellbeing impacts of the development and ensure that mitigation measures are put in place to address any negative impacts identified. In addition, the requirement to carry out a HIA for the development of uses such as takeaways and betting shops which are known to have a detrimental impact on health will ensure that negative impacts on health and wellbeing are identified and mitigated. This policy change will therefore have positive impacts on SA Objectives 13 Community & Health and 11 Poverty & Equality.

The requirement to provide drinking water and public toilets within major commercial developments in town centres will have positive sustainability impacts on SA Objectives 11 Poverty & Equality, 13 Community & Health and 17 Social Infrastructure.

9. Arts, culture and entertainment facilities

LP10 Arts, culture and entertainment facilities

No policy changes

N/A

10. Housing supply

LP11 Utilities and Digital Connectivity Infrastructure

New policy.

This new policy seeks to ensure that utilities are provided as part of new development schemes and that they are integrated within the development and completed prior to occupation. It must also be demonstrated that sufficient ducting space is provided for future digital connectivity infrastructure. This new policy will have positive sustainability implications for SA Objective 17 Social Infrastructure.

Meeting Hackney’s Housing Need

<table>
<thead>
<tr>
<th>Reg 18 policies</th>
<th>Reg 19 policies</th>
<th>Key changes</th>
<th>Sustainability implications (discussion)</th>
</tr>
</thead>
<tbody>
<tr>
<td>10. Housing supply</td>
<td>LP12 Housing supply</td>
<td>Policy amended to reflect new London Plan target of 1,330 homes per year and the Council’s aspiration to meet housing need of 1,750 homes per year by 2033. Housing growth figures for each area have been amended, e.g. Shoreditch reduced from 12K to 7-8K, Woodberry Down reduced from 7K to 3K, Dalston from 5K to</td>
<td>The changes regarding housing targets and numbers add detail and clarification to existing policy rather than creating any new policy. These changes therefore have no sustainability implications.</td>
</tr>
</tbody>
</table>
| 2K, Hackney Central from 4K to 3K.  
Policy amended to reference the importance of small sites in meeting housing need.  
Policy amended to state that self-contained residential units are the priority use above other forms of residential accommodation such as student housing, visitor accommodation and other alternative forms of accommodation. | The emphasis on delivering housing on small sites may increase job opportunities available for small and medium sized developers, provide a greater diversity of different types of homes in accessible locations, offer opportunity for innovative / sustainable design options and help support the local economy. This could therefore have positive implications for SA Objectives 2 Efficient Use of Land, 7 Walking and Cycling, 10 Sustainable Design, and 19 Economic Growth.
Conversely development on small sites could result in higher levels of developed land overall, which could have minor negative impacts on levels of open space, biodiversity and pollution – SA Objectives 1 Biodiversity, 3 Air Quality, 4 Noise / Pollution, and 12 Open Space.

The prioritisation of conventional residential accommodation over other types of accommodation will be positive in terms of meeting local housing need, therefore having positive impacts on SA Objectives 13 Community & Health and 16 Affordable Homes. |
| --- | --- |
| 11. Affordable Housing | LP13 Affordable housing  
Clarification that affordable housing requirements apply to conventional housing, student housing, shared housing and specialist older person housing.  
Greater details about off-site provision for schemes of 10 or more units. | Changes to this policy are generally clarifications or the provision of greater detail rather than substantive policy changes. Generally they will have positive implications for SA Objective 16 Affordable Homes. |
| 12. Dwelling Size Mix | LP14 Dwelling size mix  
Greater detail has been added to the dwelling size mix table to provide requirements for intermediate and market housing, in addition to the mix requirements for social / London Living Rent homes which was already provided. | This change will have positive implications in terms of providing homes of sizes that meet the needs of the local population, particularly ensuring that there is a proportion of larger 3+ bed homes provided within new developments. This will have positive implications on SA Objective 13 Community & Health. |
| 13. Build to Rent | LP15 Build to rent  
Clarification that Build to Rent schemes are subject to affordable housing requirements; 50% of the | This change will have positive implications for SA Objective 16 Affordable Homes. |
| 14. Self/Custom-Build Housing | LP16 Self/Custom-Build Housing | New provision within the policy to support self / custom-build housing on infill development sites. | Self-build housing will generally be low density development which may not be considered an efficient use of land, however supporting such development on infill sites is likely to have positive sustainability impacts because small infill sites may often be inappropriate for larger or higher density residential developments, therefore supporting self and custom build housing on infill sites is considered to have positive implications for SA Objectives 2 Efficient use of land and 13 Community and Health. |
| 15. Housing Design | LP17 Housing Design | Removal of the requirement to provide higher levels of open space in new housing developments in areas of deficiency in access to public open space. | This requirement of ‘higher levels of open space’ was previously not defined in the policy or supporting text and would have presented challenges in implementing Therefore the removal of this provision is unlikely to have negative impacts on the provision of open space (SA Objective 12 Open Space) as residential developments are still required to meet the open space objectives set out in the GLA Housing SPG. |
| 16. Housing Older and Vulnerable People | LP18 Housing Older and Vulnerable People | No changes | N/A |
| 17. Residential Conversions | LP19 Residential Conversions | Remove size threshold requirement for house conversions. Added a requirement to retain a minimum of one 4+ bed unit as part of conversion schemes in Stamford Hill. | Previously policy stated that a dwelling must be over 120sqm floorspace for conversion to flats to be permitted. Removal of this requirement is considered to have a neutral impact on the sustainability objectives because the requirement to retain a family sized dwelling, adequate access and ensure that each dwelling is self-contained is covered elsewhere in the policy. The requirement to retain a larger 4+ bed unit in Stamford Hill is positive in terms of meeting local housing needs in this area, therefore having positive implications for SA Objective 13 Community and Health. |
| 18. Student Housing | LP20 Student housing | Clarification that student housing is only permitted if the site is not suitable for conventional housing. | The prioritisation of conventional self-contained housing throughout this chapter will have positive implications for meeting the needs of the local population, having positive implications on SA Objective |
### 13 Community & Health

A reduction in the amount of student accommodation permitted will also help to lessen any negative impacts in terms of amenity, noise, evening and night time economy, thereby having minor positive impacts on SA Objectives 13 Community and Health and 15 Crime. There may be a resulting reduction in the quantity of student housing delivered which could have minor negative implications for SA Objective 19 Economic Growth given that fewer students will reside in the area and contribute to the local economy.

| 19. Shared Housing | LP21 Large Scale Purpose-Built Shared Housing LP22 Houses in Multiple Occupation (HMO) | Separated large scale shared housing and HMO policy into two policies. The Large-Scale Purpose Built Shared Housing policy clarifies the requirements for these types of co-living developments including a provision that 50% of the units must be provided at rental levels which do not exceed one third of ward level incomes. The HMO policy outlines the criteria to be met for HMOs to be supported, including a requirement that they do not result in a loss of family housing as well as locational ad design requirements and management arrangements. The Shared Housing policy has been split into 2 separate policies. It is made clear within the new Large Scale Purpose-Built Shared Housing policy that conventional self-contained units are the priority, which will have positive implications for SA Objective 13 Community and Health. The requirement within the policy for 50% of the units to be provided at levels which do not exceed one third of ward level incomes offers a way of meeting needs for affordable housing for a specific section of the community through the private rented sector; this will have positive implications for SA Objective 16 Affordable Homes and 11 Poverty and Equality. Further points within the policy requiring the scheme to be provided under single management, for relatively longer tenancy agreements for renters, and for such schemes to be provided in areas of high public transport accessibility provide positive implications for SA Objectives 7 Walking & Cycling and 13 Community and Health. In addition, co-living schemes are generally aimed towards young professionals, so development of such schemes may have positive implications for SA Objective 19 Economic Growth. Support for HMOs is subject to a number of criteria, including a requirement that it must not result in the loss of existing housing suitable for family occupation. Whilst this will be positive in terms of retaining family sized accommodation in the borough and meeting local housing needs, thereby supporting SA Objective 13 community and Health, it effectively means that existing homes cannot be converted into HMOs in the future, which could potentially have negative impacts on those who rely on cheap accommodation, causing negative impacts on SA Objective 11 Poverty and Equality. The other provisions of the policy protect the amenity of neighbouring occupiers and seek to ensure that any... |
HMOs delivered are of a high quality which may have positive sustainability impacts.

<table>
<thead>
<tr>
<th>20. Gypsy and Traveller Accommodation</th>
<th>LP23 Gypsy and Traveller Accommodation</th>
<th>No changes to the policy. Clarification that Hackney’s need is for 78 additional pitches to 2030.</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>21. Preventing the Loss of Housing</td>
<td>LP24 Preventing the Loss of Housing</td>
<td>Removal of the provision that permitted loss of housing within employment land designations provided the change was to a B use class.</td>
<td>This amendment will help to protect existing homes but may result in a slight reduction in the development of new B-Class floorspace, thereby having positive sustainability implications for SA Objective 13 Community and Health and minor negative implications for SA Objective 20 Employment.</td>
</tr>
<tr>
<td>22. Visitor Accommodation</td>
<td>LP25 Visitor Accommodation</td>
<td>More restrictive policies on hotels: other policy compliant land uses are prioritised and any proposal must demonstrate that it will not result in the loss of conventional C3 housing nor impact on opportunities to provide conventional housing or employment uses.</td>
<td>The prioritisation of conventional housing and employment uses will have positive implications for SA Objectives 13 Community and health, 16 Affordable Homes and 20 Employment. Given the needs for conventional homes and office floorspace is considered more pressing the revised approach towards visitor accommodation is justified and is will ultimately have positive sustainability implications on Economic growth (SA Objective 19) as it will help to avoid an over-supply of hotel room whilst enabling sufficient supply to come forward to meet the needs of visitors to Hackney.</td>
</tr>
</tbody>
</table>

A Strong and Competitive Economy which benefits all

<table>
<thead>
<tr>
<th>Reg 18 policies</th>
<th>Reg 19 policies</th>
<th>Key changes</th>
<th>Sustainability implications (discussion)</th>
</tr>
</thead>
<tbody>
<tr>
<td>23. New Employment Floorspace</td>
<td>LP26 New Employment Floorspace</td>
<td>Change in designation of Prout Road and Tilia Road from LSIS to PIA. New provision encouraging a mix of uses within employment schemes, whilst still requiring provision of maximum employment floorspace.</td>
<td>The change in designation from LSIS to PIA means that a mix of uses will be permitted as part of any redevelopment schemes in Prout Road and Tilia Road (rather than solely industrial uses as outlined in the LSIS policy). This will have positive sustainability implications, for example by providing retail, community or residential uses in proximity to employment uses, therefore having positive impacts on various SA objectives including 2 Efficient use of land, 7 walking and cycling, 11, poverty and equality, 13 Community and health, 16 Affordable Homes and 17 Social Infrastructure. The change could however mean that less industrial floorspace is provided overall (although there will still be no loss of industrial floorspace), thereby potentially supporting fewer jobs in the industrial sector, which could have potential implications for SA Objective 20 Employment.</td>
</tr>
</tbody>
</table>
The new criteria promoting a mix of uses as part of employment schemes will support the creation of sustainable neighbourhoods by encouraging the development of retail, community or residential uses in proximity to employment uses. This will have positive impacts on various SA objectives including 2 Efficient use of land, 7 walking and cycling, 11 poverty and equality, 13 Community and health, 16 Affordable Homes and 17 Social Infrastructure.

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th>This change will support a mix of different types of employment uses within POAs through the retention of industrial and light industrial uses. This will have positive sustainability implications for SA Objectives 19 Economic Growth, 20 Employment and 11 Poverty and Inequality. The presence of industrial uses within predominantly office areas could however impact negatively in terms of SA Objectives 3 Air Quality and 4 Noise/Pollution although policy provisions address these considerations.</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th></th>
<th></th>
<th>New provision stating that existing industrial uses and low cost employment floorspace in POAs must be re-provided in line with the Affordable and Low Cost Workspace policy. Related to this, the supporting text has been amended to state that redevelopment of existing non-B1a use class in POAs can contribute to employment floorspace targets.</th>
<th>This change will support a mix of different types of employment uses within POAs through the retention of industrial and light industrial uses. This will have positive sustainability implications for SA Objectives 19 Economic Growth, 20 Employment and 11 Poverty and Inequality. The presence of industrial uses within predominantly office areas could however impact negatively in terms of SA Objectives 3 Air Quality and 4 Noise/Pollution although policy provisions address these considerations.</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th></th>
<th></th>
<th>Addition to the supporting text to state that where a particular site within a PIA does not include any existing industrial uses, new development should be mixed use providing the maximum economically feasible amount of B Class employment floorspace.</th>
<th>This will help to protect the integrity and employment function of the PIAs which will have positive sustainability impacts on SA Objectives 19 Economic Growth, 20 Employment and 11 Poverty and Inequality.</th>
</tr>
</thead>
</table>

|   |   | Changes have been made to this policy to prioritise re-provision of existing low cost (including industrial) floorspace before providing new affordable workspace. It is also clarified in policy that in circumstances where it is viable, low cost employment floorspace should be provided in perpetuity, at equivalent rents and service charges, suitable for the existing or equivalent uses. This would have positive sustainability implications overall, particularly in terms of providing a variety of types of jobs within different sectors for various members of the local population, including supporting start-ups, SMEs, cultural and creative enterprises, charities and social enterprises. This will have positive sustainability implications on SA Objectives 19 Economic Growth, 20 Employment and 11 Poverty and Equality. | Low cost employment floorspace should be provided in perpetuity, at equivalent rents and service charges, suitable for the existing or equivalent uses. This would have positive sustainability implications overall, particularly in terms of providing a variety of types of jobs within different sectors for various members of the local population, including supporting start-ups, SMEs, cultural and creative enterprises, charities and social enterprises. This will have positive sustainability implications on SA Objectives 19 Economic Growth, 20 Employment and 11 Poverty and Equality. |
both low cost employment floorspace and new affordable workspace should be provided

<table>
<thead>
<tr>
<th>27. Railway Arches</th>
<th>LP30 Railway Arches</th>
<th>No policy changes</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>LP31 Local jobs, skills and training</td>
<td>New policy</td>
<td>This new policy seeks to provide skills and training opportunities for local residents to enable them to participate in both the construction and operation of new development and ensure that everyone benefits from economic growth in Hackney. The policy will have major positive sustainability impacts on SA objectives 11 Poverty and Equality, 13 Community and Health, 15 Education and Skills, 19 Economic Growth and 2 Employment.</td>
</tr>
</tbody>
</table>

Planning for Vibrant Town Centres

<table>
<thead>
<tr>
<th>Reg 18 policies</th>
<th>Reg 19 policies</th>
<th>Key changes</th>
<th>Sustainability implications (discussion)</th>
</tr>
</thead>
<tbody>
<tr>
<td>28. Town Centres</td>
<td>LP32 Town Centres</td>
<td>No changes to proposed Town Centres and boundaries.</td>
<td>N/A</td>
</tr>
<tr>
<td>29. Hackney Central and Dalston</td>
<td>LP33 Hackney Central and Dalston</td>
<td>No changes</td>
<td>N/A</td>
</tr>
<tr>
<td>30. Stoke Newington, Stamford Hill and Finsbury Park</td>
<td>LP34 Stoke Newington, Stamford Hill and Finsbury Park</td>
<td>No changes</td>
<td>N/A</td>
</tr>
<tr>
<td>31. Local Shopping Centres</td>
<td>LP35 Local Shopping Centres</td>
<td>No changes</td>
<td>N/A</td>
</tr>
<tr>
<td>32. Shops outside of designated centres</td>
<td>LP36 Shops outside of designated centres</td>
<td>Reference added to centres outside the borough boundary when considering access to local shops within 400m</td>
<td>This minor change makes the policy more realistic (as residents are not constrained by borough boundaries) and will have limited sustainability implications.</td>
</tr>
<tr>
<td>33. Small and Independent shops</td>
<td>LP37 Small and Independent shops</td>
<td>Policy change to remove blanket ban on amalgamation of shopping units and instead allow amalgamation of units in primary shopping frontages, reflecting demand noted in the retail study. Policy change to ensure that subdivision of a retail unit (for example for a partial conversion to residential) does not negatively impact on the continued operation of the shop, i.e. avoiding 'token' retail units.</td>
<td>This change could potentially reduce the amount of small retail units within primary shopping frontages of Dalston and Hackney Central. Whilst this may have positive sustainability implications for the economy (as larger shop floorplates attract larger retailers), it could have negative sustainability implications on small or start-up businesses seeking small / relatively cheaper retail units. There will be positive implications for SA objective 19 Economic Growth, but potentially negative implications for SA objectives 11 Poverty and Equality and 20 Employment. This change will protect small retail units, therefore having positive implications for SA Objectives 13 Community &amp; Health and 19 Economic Growth.</td>
</tr>
<tr>
<td>34. Evening and night time economy</td>
<td>LP38 Evening and night time economy</td>
<td>No changes</td>
<td>N/A</td>
</tr>
<tr>
<td>35. Over-concentration of uses</td>
<td>LP39 Over-concentration of uses</td>
<td>The restriction on developing hot food takeaways within 400m of a school no longer excludes town centres and now states that uses across the borough boundary must also be considered.</td>
<td>This change will have positive impacts on the health of residents, particularly school age children, and is unlikely to harm the vitality and viability of town centres. There will be positive implications for SA objective 13 Community and Health.</td>
</tr>
<tr>
<td>36. Street markets</td>
<td>LP40 Street markets</td>
<td>No changes</td>
<td>N/A</td>
</tr>
</tbody>
</table>

**Improving Accessibility and Promoting Sustainable Transport**

<table>
<thead>
<tr>
<th>Reg 18 policies</th>
<th>Reg 19 policies</th>
<th>Key changes</th>
<th>Sustainability implications (discussion)</th>
</tr>
</thead>
<tbody>
<tr>
<td>37. Liveable Neighbourhoods</td>
<td>LP41 Liveable Neighbourhoods</td>
<td>Minor wording changes to policy only.</td>
<td>N/A</td>
</tr>
</tbody>
</table>
Hackney’s Green and Public Spaces

<table>
<thead>
<tr>
<th>Reg 18 policies</th>
<th>Reg 19 policies</th>
<th>Key changes</th>
<th>Sustainability implications (discussion)</th>
</tr>
</thead>
<tbody>
<tr>
<td>42. Protection and Enhancement of Green Infrastructure</td>
<td>LP46 Protection and Enhancement of Green Infrastructure</td>
<td>Removal of exceptional circumstances which allowed loss of designated open space where community benefit was considered to outweigh harm.</td>
<td>The removal of this exceptional circumstance will support the Council in protecting designated open space, therefore having positive sustainability implications for SA Objectives 1 Biodiversity, 12 Open Space, 8 Climate Change and 13 Community and Health.</td>
</tr>
<tr>
<td>Policy Area</td>
<td>LP/Code</td>
<td>Changes</td>
<td>Implications</td>
</tr>
<tr>
<td>-----------------------------------------------</td>
<td>---------</td>
<td>-------------------------------------------------------------------------</td>
<td>-------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Biodiversity and Sites of Importance of Nature</td>
<td>LP47</td>
<td>Explicit reference to access to free drinking water facilities.</td>
<td>The reference to supporting drinking fountains within parks and open space will have positive implications for SA Objective 13 Community and Health.</td>
</tr>
<tr>
<td>Conservation</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Reference to achieving a net gain in biodiversity has been added.</td>
<td>Both of these changes will have a high positive impact on SA Objective 1 Biodiversity.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>New provision requiring nesting boxes for swifts, sparrows, starlings and/or bats</td>
<td></td>
</tr>
<tr>
<td>New Open Space</td>
<td>LP48</td>
<td>New criterion requiring residential and commercial schemes to meet the GLA’s Urban Greening Factor.</td>
<td>This will have a high positive impact on SA Objective 12 Open Space and 1 Biodiversity, particularly in areas of deficiency in access to open space where it is a requirement to provide both a quantum of communal open space per person and to achieve the UGF.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Green Chains and Green Corridors</td>
<td>LP49</td>
<td>No changes</td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Play Space</td>
<td>LP50</td>
<td>Minor changes to remove from the policy the statement that play space may be incorporated within communal amenity space if it is not feasible to provide both; this statement remains in the supporting text. Also, a clarification to the supporting text to confirm that if it is not feasible to provide on-site play space then contributions may be made towards enhancing existing nearby play space.</td>
<td>The changes made to this policy are minor in order to allow flexibility. The policy still prioritises on-site provision of children’s play space within new major developments. There will therefore be neutral sustainability implications on relevant SA Objectives including 12 Open Space, 13 Community and Health and 17 Social Infrastructure.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Allotments and food growing</td>
<td></td>
<td>No policy changes have been made but the policy and supporting text has been incorporated into the Protection and Enhancement of Green Infrastructure policy.</td>
<td>N/A</td>
</tr>
<tr>
<td>48. Tree Management and Landscaping</td>
<td>LP51 Tree Management and Landscaping</td>
<td>No changes</td>
<td>N/A</td>
</tr>
<tr>
<td>-----------------------------------</td>
<td>--------------------------------------</td>
<td>------------</td>
<td>----</td>
</tr>
</tbody>
</table>

| 49. Waterways, Canals and Residential Moorings | LP52 Waterways, Canals and Residential Moorings | Changes made to policy to ensure development alongside the waterways does not impact upon the structural integrity of the waterway or cause additional overshadowing of the waterway. | These changes, particularly with regards to avoiding overshadowing, will help to protect biodiversity within the waterways, therefore having positive sustainability implications for SA Objectives 1 Biodiversity and 12 Open Space. |

<table>
<thead>
<tr>
<th>Climate change</th>
<th>Reg 18 policies</th>
<th>Reg 19 policies</th>
<th>Key changes</th>
<th>Sustainability implications (discussion)</th>
</tr>
</thead>
<tbody>
<tr>
<td>50. Building Resilience to Climate Change – Flooding</td>
<td>LP53 Water and Flooding</td>
<td>Greater clarity is provided on the circumstances in which a flood risk assessment and a sustainable drainage strategy are required. New policy provision stating that BREEAM water efficiency standards for residential development must not exceed a maximum water use of 105 litres per head per day. New policy provision encouraging water efficiency measures within new developments.</td>
<td>These policy changes will have positive sustainability impacts for SA Objectives 5 Flood Risk and 8 Climate Change. Water efficiency standards / measures will not add any substantial costs to development so there will be no negative sustainability implications.</td>
<td></td>
</tr>
<tr>
<td>51. Building Resilience to Climate Change – Overheating</td>
<td>LP54 Overheating</td>
<td>Additional text added to the supporting text to reference the London Plan cooling hierarchy and emphasise the preference for passive cooling measures.</td>
<td>This additional information has positive sustainability implications for SA Objectives 3 Air Quality, 4 Noise/Pollution and 8 Climate Change.</td>
<td></td>
</tr>
<tr>
<td>52. Mitigating Climate Change – Proposed Developments</td>
<td>LP55 Mitigating Climate Change</td>
<td>Two policies have been combined into one. Clarification that the BREEAM carbon-emissions targets apply to</td>
<td>Changes are minor clarifications rather than substantive updates to the policy; there will be no sustainability implications.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>---</td>
<td>---</td>
<td>---</td>
<td></td>
<td></td>
</tr>
<tr>
<td>53. Mitigating Climate Change – Existing Developments</td>
<td>all non-residential developments (not just majors) and an update of the CO2 emissions targets.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>54. Mitigating Climate Change - Decentralised Energy Networks (DEN)</td>
<td>No change</td>
<td>N/A</td>
<td></td>
<td></td>
</tr>
<tr>
<td>55. Improvement the Environment - Waste</td>
<td>No change</td>
<td>N/A</td>
<td></td>
<td></td>
</tr>
<tr>
<td>56. Improving the Environment - Pollution</td>
<td>Additional details have been added to this policy including: - The types of development requiring air quality assessments - Proposals which could harm air quality or expose users to poor air quality will be resisted unless mitigation measures will reduce the impact to acceptable levels. - Air quality improvements measures should be implemented on site. - A new criteria has been added to state that Source Protection Zones should be considered with regards to water pollution. - A new criteria has been added to state that development proposed on contaminated land must</td>
<td>All of these changes will have positive sustainability implications, particularly for SA Objectives 3 Air Quality, 4 Noise/Pollution, 8 Climate Change and 10 Sustainable Design. The additional criteria are all considered to be relatively straightforward to consider or incorporate into a new development and therefore will not add substantial costs to development so there will be no negative sustainability implications.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
undertake a desk study and site investigation and remediation proposals agreed.

- A new criteria has been added to state that noise-sensitive development should be located in areas that are not in proximity to noise-generating uses.
Appendix 2

Equalities Impact Assessment Matrix
## Chapter 1: Places for People

<table>
<thead>
<tr>
<th>Policy</th>
<th>Race</th>
<th>Disability</th>
<th>Gender</th>
<th>Age</th>
<th>Faith</th>
<th>Sexual orientation</th>
<th>Analysis</th>
</tr>
</thead>
<tbody>
<tr>
<td>PP1 Public Realm</td>
<td>+</td>
<td>+</td>
<td>+</td>
<td>+</td>
<td>+</td>
<td>+</td>
<td>This policy sets out that public realm improvements should be considered as part of all development schemes. The specific types of interventions mentioned include improving routes and wayfinding, wide clear pavements, seating, greening, drinking fountains, safe building entrances and shared space for informal play and recreation will have positive impacts on all equalities groups as they encourage community interaction and support ease of movement which may particularly benefit the elderly or disabled.</td>
</tr>
<tr>
<td>PP2 Dalston</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>+</td>
<td>O</td>
<td>O</td>
<td>This policy sets out the vision for Dalston to sustain the unique creative, cultural and social organisations that characterise the area. There will also be opportunities to maximise positive benefits of the arrival of Crossrail 2 which will support growth in the area. This could have positive equalities impacts for those seeking jobs or homes in the area.</td>
</tr>
<tr>
<td>PP3 Hackney Central and Surounds</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>+</td>
<td>O</td>
<td>O</td>
<td>This policy sets out the vision for Hackney Central to be the borough’s civic and cultural hub and a strategically important employment area. This could have positive equalities impacts for those seeking jobs or homes in the area. The potential bus station relocation could improve permeability and walking opportunities which will have equally positive impacts on all equalities groups.</td>
</tr>
<tr>
<td>PP4 Stamford Hill</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>+</td>
<td>+</td>
<td>O</td>
<td>This policy sets out that Stamford Hill will become a cohesive, liveable and well connected neighbourhood for all communities living in the area which will have positive equalities impacts for all faith groups. The provision of additional school places to meet needs for children and adult learning will have positive equalities impacts for young people and adult learners. There will be no disproportionate impacts on other equalities groups.</td>
</tr>
<tr>
<td>PP5 Enhanced Corridors</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>This policy sets out the intention to enhance the major historic corridors of Hackney both through development and greening to combat air pollution and enhance the public realm. The approach is not considered to have a disproportionate impact on any of the equalities groups.</td>
</tr>
<tr>
<td>PP6 Hackney Wick</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>+</td>
<td>O</td>
<td>O</td>
<td>This policy seeks to establish Hackney Wick as a vibrant employment quarter supporting the cluster of hi-tech, cultural, creative and educational industries in the area, which will be beneficial for young jobseekers. There is a focus also on improving access to the open spaces and sporting facilities of the Olympic Park which will be beneficial to all, with no disproportionate impacts on the equalities groups.</td>
</tr>
<tr>
<td>PP7 Clapton and Lea Bridge Roundabout</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>This policy seeks to reinvent Clapton and the Lea Bridge Roundabout as a place with its own civic heart and new commercial and residential uses, including reconfiguration of the roundabout and new green links. There will be substantial benefits for all residents with no specifically identified impacts on the equalities groups.</td>
</tr>
</tbody>
</table>
PP8 Shoreditch and Hoxton

This policy sets out the vision for establishing Shoreditch as the creative heart of London with a focus on commercial growth within Tech City and supporting but diversifying the thriving night time economy. There is also specific mention within the policy to improving natural surveillance of open spaces and emphasis on ensuring that the benefits of growth in Shoreditch are extended to the residential neighbourhoods within the area, all of which is considered to have positive impacts on the equalities groups.

PP9 Manor House

This policy sets out the aspiration for Manor House to become a dynamic local centre providing retail, leisure, employment and community facilities for the local community, including the provision of affordable homes as part of the Woodberry Down regeneration scheme which is considered to provide high positive impacts for those who may be on lower incomes or have larger families such as faith groups, BME communities, the young, elderly and those with disabilities.

PP10 Homerton

This policy seeks to improve the public realm in Homerton and to create a child-friendly place with improved open space and play space and better cycle routes, which will have particularly positive equalities impacts for young people.

Chapter 2: Protecting and Enhancing Heritage and Leading the way in Good Urban Design

<table>
<thead>
<tr>
<th>Policy</th>
<th>Race</th>
<th>Disability</th>
<th>Gender</th>
<th>Age</th>
<th>Faith</th>
<th>Sexual orientation</th>
<th>Analysis</th>
</tr>
</thead>
<tbody>
<tr>
<td>LP1 Design Quality and Local Character</td>
<td>O</td>
<td>-</td>
<td>+</td>
<td>+</td>
<td>O</td>
<td>O</td>
<td>This policy encourages good architectural and urban design principles which will benefit all equalities groups. Principles such as the Healthy Streets approach encourages walking and cycling through improved routes and enhanced public spaces where people can interact. This approach will be particularly beneficial for less mobile members of the community such as disabled and older residents and parents with young children.</td>
</tr>
<tr>
<td>LP2 Development and Amenity</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>This policy seeks to ensure there are no adverse amenity impacts resulting from development, which will impact positively on all, with no specific impacts on the equalities groups.</td>
</tr>
<tr>
<td>LP3 Designated Heritage Assets</td>
<td>O</td>
<td>-</td>
<td>O</td>
<td>-</td>
<td>O</td>
<td>O</td>
<td>This policy seeks to protect listed buildings and historic buildings. Some listed buildings may have special architectural facilities which could prohibit the implementation of improved accessibility standards such as ramps or lifts, so this policy could be considered to have minor negative impacts on less mobile members of the community, such as the elderly or disabled.</td>
</tr>
<tr>
<td>LP4 Non Designated</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>This policy seeks to protect and preserve non-designated heritage assets</td>
</tr>
<tr>
<td>Policy</td>
<td>Race</td>
<td>Disability</td>
<td>Gender</td>
<td>Age</td>
<td>Faith</td>
<td>Sexual orientation</td>
<td>Analysis</td>
</tr>
<tr>
<td>--------------------------------</td>
<td>------</td>
<td>------------</td>
<td>--------</td>
<td>-----</td>
<td>-------</td>
<td>-------------------</td>
<td>-----------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Heritage Assets</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>and is not considered to have any disproportionate impacts on any of the equalities groups.</td>
</tr>
<tr>
<td>LP5 Strategic and Local Views</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>This policy seeks to protect the strategic views and the identified Important Local Views within Hackney and is not considered to have any disproportionate impacts on the equalities groups.</td>
</tr>
<tr>
<td>LP6 Archaeology</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>This policy seeks to protect the borough’s archaeological heritage and is not considered to have any disproportionate impacts on any of the equalities groups.</td>
</tr>
<tr>
<td>LP7 Advertisements</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>This policy seeks to ensure advertisements are high quality and appropriate to their location and is not considered to have any disproportionate impacts on any of the equalities groups.</td>
</tr>
</tbody>
</table>

**Chapter 3: Hackney’s People**

<table>
<thead>
<tr>
<th>Policy</th>
<th>Race</th>
<th>Disability</th>
<th>Gender</th>
<th>Age</th>
<th>Faith</th>
<th>Sexual orientation</th>
<th>Analysis</th>
</tr>
</thead>
<tbody>
<tr>
<td>LP8 Social and Community Infrastructure</td>
<td>+</td>
<td>+</td>
<td>+</td>
<td>+</td>
<td>+</td>
<td>+</td>
<td>This policy protects and seeks to provide social and community infrastructure across the borough and resists the loss of existing social and community infrastructure. It will have a positive impact on all equalities groups in terms of community cohesion.</td>
</tr>
<tr>
<td>LP9 Health and Wellbeing</td>
<td>+</td>
<td>+</td>
<td>+</td>
<td>+</td>
<td>+</td>
<td>+</td>
<td>This policy helps to promote healthy and active lifestyles amongst all Hackney residents. It will have a high positive impact on all equalities groups. Specific initiatives such as Secure by Design will assist all equalities groups, who may at time or in certain situations feel unsafe, to feel safer.</td>
</tr>
<tr>
<td>LP10 Arts, culture and entertainment facilities</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>This policy supports arts, cultural and entertainment facilities in appropriate locations. Access to these facilities is known to be beneficial for health and wellbeing and these impacts are considered to be equally positive for all residents with no disproportionate impact on the equalities groups.</td>
</tr>
<tr>
<td>LP11 Utilities and Digital Connectivity Utilities</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>This policy seeks to ensure businesses and homes have good digital connectivity. This will have positive impacts on all residents and no disproportionate impact on the equalities groups.</td>
</tr>
</tbody>
</table>
## Chapter 4: Meeting Hackney’s Housing Need

<table>
<thead>
<tr>
<th>Policy</th>
<th>Race</th>
<th>Disability</th>
<th>Gender</th>
<th>Age</th>
<th>Faith</th>
<th>Sexual orientation</th>
<th>Analysis</th>
</tr>
</thead>
<tbody>
<tr>
<td>LP12 Housing Supply</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>This policy promotes housing growth and will have positive impacts on all residents with no disproportionate impact on equalities groups.</td>
</tr>
<tr>
<td>LP13 Affordable Housing</td>
<td>+</td>
<td>+</td>
<td>O</td>
<td>+</td>
<td>+</td>
<td>O</td>
<td>This policy seeks to maximise the provision of genuinely affordable housing, seeking 50% affordable housing products on large scale residential schemes and equivalent contributions on smaller schemes. Affordable homes are considered to provide high positive impacts for those who may be on lower incomes or have larger families such as faith groups, BME communities, the young, elderly and those with disabilities.</td>
</tr>
<tr>
<td>LP14 Dwelling Size Mix</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>+</td>
<td>++</td>
<td>O</td>
<td>This policy seeks to ensure an appropriate mix of dwelling sizes are provided across different housing tenures. The provision of one third family sized dwellings within the social and market tenures will have a positive impact on families with children who are seeking larger units. The policy also seeks a higher proportion of larger units in Stamford Hill where family sizes amongst the Jewish population tend to be proportionally larger than average, which will be beneficial for this group. The policy is considered to have a neutral impact on other equalities groups.</td>
</tr>
<tr>
<td>LP15 Build to Rent</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>+</td>
<td>O</td>
<td>O</td>
<td>This policy supports build to rent developments subject to certain criteria. These types of homes will be particularly attractive and beneficial to younger members of the community who may not be able to afford to buy homes in the borough. The requirement to provide long tenancies would be beneficial to families. The requirement for affordable housing to be at Living Rent or London Affordable Rent levels will be beneficial to those on lower incomes.</td>
</tr>
<tr>
<td>LP16 Self/Custom-Build Housing</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>This policy supports self-build housing where appropriate. It is not considered to have any disproportionate impact on the equalities groups.</td>
</tr>
<tr>
<td>LP17 Housing Design</td>
<td>+</td>
<td>+</td>
<td>O</td>
<td>+</td>
<td>+</td>
<td>O</td>
<td>This policy seeks to ensure homes meet space and accessibility standards, which will be beneficial for the disabled, the elderly and families and have a neutral impact on other equalities groups.</td>
</tr>
<tr>
<td>LP18 Housing Older and Vulnerable People</td>
<td>O</td>
<td>++</td>
<td>O</td>
<td>++</td>
<td>O</td>
<td>O</td>
<td>This policy supports the development of housing for older and vulnerable people and resists its loss. This will have positive impacts on elderly and disabled people and neutral impacts on the other equalities groups.</td>
</tr>
<tr>
<td>LP19 Residential Conversions</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>This policy sets out the criteria that must be met for conversion from a house to flats. The loss of large housing units in the borough could potentially have a negative impact on provision of homes for larger families, although this may be partly offset by criteria B of the policy which seeks to provide at least one family sized unit on the ground floor. The policy is therefore considered to have a neutral impact on all equalities groups.</td>
</tr>
<tr>
<td>LP20 Student</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>O</td>
<td>This policy sets out the criteria that must be met for the provision of student</td>
</tr>
<tr>
<td>Policy</td>
<td>Race</td>
<td>Disability</td>
<td>Gender</td>
<td>Age</td>
<td>Faith</td>
<td>Sexual orientation</td>
<td>Analysis</td>
</tr>
<tr>
<td>--------------------------------------------</td>
<td>------</td>
<td>------------</td>
<td>--------</td>
<td>-----</td>
<td>-------</td>
<td>-------------------</td>
<td>---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Housing</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>+</td>
<td>O</td>
<td>O</td>
<td>housing. Provision of such housing would be beneficial to younger members of the community, specifically students. The policy also requires the provision of affordable rooms which would be particularly beneficial students from poorer backgrounds. The policy would have a neutral impact on other equalities groups.</td>
</tr>
<tr>
<td>LP21 Large Scale Purpose-Built Shared Housing</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>+</td>
<td>O</td>
<td>O</td>
<td>This policy supports the provision of large scale shared housing such co-living schemes subject to certain criteria. This type of housing can be more affordable than conventional housing and is typically orientated towards younger members of the community and therefore is considered to have positive impacts on the age category. It is considered to have a neutral impact on other equalities groups.</td>
</tr>
<tr>
<td>LP22 Houses in Multiple Occupation (HMO)</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>This policy supports the provision of HMOs and resists their loss unless it is demonstrated that they are no longer required. HMOs provide accommodation for low-income occupiers and the policy may therefore have positive impacts on various equalities groups.</td>
</tr>
<tr>
<td>LP23 Gypsy and Traveller Accommodation</td>
<td>+</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>This policy supports the provision of homes for gypsies and travelers subject to the criteria outlined, and resist their loss. This policy will therefore have positive impacts on gypsies and travellers (race) and neutral impacts on the other equalities groups.</td>
</tr>
<tr>
<td>LP24 Preventing the Loss of Housing</td>
<td>+</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>+</td>
<td>O</td>
<td>This policy resists the loss of housing. Criteria iv specifically seeks to combine small dwellings in the Stamford Hill area to create larger family units. Some faith groups proportionately tend to have larger family sizes; as a result this policy is considered to have a positive impact on these communities. It is not considered to have any disproportionate impact on the other equalities groups.</td>
</tr>
<tr>
<td>LP25 Visitor Accommodation</td>
<td>O</td>
<td>+</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>This policy seeks to ensure that hotels are located in the most accessible locations such as town centres and the CAZ and sets criteria for the new quality of new visitor accommodation, including the provision of at least 10% wheelchair accessible rooms, which is considered to have a positive impact on the disabled. The policy is considered to have a neutral impact on the other equalities groups.</td>
</tr>
</tbody>
</table>

Chapter 5: A Strong and Competitive Economy which Benefits All

<table>
<thead>
<tr>
<th>Policy</th>
<th>Race</th>
<th>Disability</th>
<th>Gender</th>
<th>Age</th>
<th>Faith</th>
<th>Sexual orientation</th>
<th>Analysis</th>
</tr>
</thead>
<tbody>
<tr>
<td>LP26 New Employment Floorspace</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>This policy seeks to encourage new employment opportunities in sustainable parts of the borough to sustain and enhance the local economy. It is not considered that this policy would have disproportionate impacts on the equalities groups.</td>
</tr>
</tbody>
</table>
Chapter 6: Planning for Vibrant Town Centres

<table>
<thead>
<tr>
<th>Policy</th>
<th>Race</th>
<th>Disability</th>
<th>Gender</th>
<th>Age</th>
<th>Faith</th>
<th>Sexual orientation</th>
<th>Analysis</th>
</tr>
</thead>
<tbody>
<tr>
<td>LP27 Protecting and Promoting Office floorspace in the Borough</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>This policy seeks to encourage new office floorspace in sustainable parts of the borough and to protect existing office floorspace. It is not considered that this policy would have disproportionate impacts on the equalities groups.</td>
</tr>
<tr>
<td>LP28 Protecting and Promoting Industrial land and floorspace in the Borough</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>This policy seeks to protect industrial floorspace. It is not considered that this policy would have disproportionate impacts on the equalities groups.</td>
</tr>
<tr>
<td>LP29 Affordable Workspace and Low Cost Employment Floorspace</td>
<td>+</td>
<td>+</td>
<td>+</td>
<td>+</td>
<td>+</td>
<td>+</td>
<td>This policy seeks to encourage affordable and low cost employment space in the borough. The types of businesses who may occupy these affordable workspaces may include start-ups, who may be from younger age groups, or charitable organisations and the voluntary sector who may seek to redress issues of social inequality faced by socially excluded communities within the borough.</td>
</tr>
<tr>
<td>LP30 Railway Arches</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>This policy seeks to promote the use of Railway Arches in the borough for industrial and office development and ancillary uses. It is not considered that this policy would have disproportionate impacts on the equalities groups.</td>
</tr>
<tr>
<td>LP31 Local Jobs, Skills and Training</td>
<td>+</td>
<td>+</td>
<td>+</td>
<td>+</td>
<td>+</td>
<td>+</td>
<td>This policy seeks to secure contributions towards employment skills and training programmes for local residents. This will have positive impacts for all equalities groups.</td>
</tr>
</tbody>
</table>

This policy directs town centre uses, such as retail, leisure and commercial development to Hackney’s town centres. The concentration of such uses within a central location will have positive impacts on less mobile members of the community, such as the elderly, disabled, or parents with buggies by reducing the need to travel long distances to access shopping facilities and other services.

This policy sets out the primary and secondary shopping areas and frontages within the major town centres of Hackney Central and Dalston, with an overall aim of protecting and promoting shops and other complementary town centre uses within these areas, to ensure a good mix of uses within these centres. The protection of shops is considered to have a neutral impact on the equalities groups.

This policy sets out the criteria to be met before any change of use away from retail is permitted in the district centres. The protection of shops is
<table>
<thead>
<tr>
<th>Policy</th>
<th>Race</th>
<th>Disability</th>
<th>Gender</th>
<th>Age</th>
<th>Faith</th>
<th>Sexual orientation</th>
<th>Analysis</th>
</tr>
</thead>
<tbody>
<tr>
<td>LP35 Local Shopping Centres</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>considered to have a neutral impact on the equalities groups.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>This policy sets out the criteria to be met before any change of use away from retail is permitted in the local centres. The protection of shops in local shopping areas is important in providing easy local access to essential facilities, and is particularly beneficial for less mobile members of the community such as the elderly, disabled, or parents with buggies by reducing the need to travel long distances to access shopping facilities and other services.</td>
</tr>
<tr>
<td>LP36 Shops outside of designated centres</td>
<td>O</td>
<td>+</td>
<td>+</td>
<td>+</td>
<td>O</td>
<td>O</td>
<td>This policy protects shops outside of designated shopping centres and is considered to be particularly beneficial for less mobile members of the community such as the elderly, disabled, or parents with buggies by ensuring access to convenience shops within short distances.</td>
</tr>
<tr>
<td>LP37 Small and independent shops</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>This policy supports small and independent shops. These may be more affordable for business owners or those that wish to start up small businesses, but the policy is not considered to have any impact on the equalities groups.</td>
</tr>
<tr>
<td>LP38 Evening and night time economy</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>+</td>
<td>+</td>
<td>O</td>
<td>This policy encourages limited expansion of the evening and night time economy in the boroughs designated centres, provided certain criteria are met. This element of the policy will have no impact on the equalities groups. The policy also encourages diversification of the types of evening and night time economy uses with the aim of reducing the emphasis on bars and drinking and encouraging more cultural uses, restaurants and cafes as part of the evening economy. This could have a positive impact on those looking for alternative types of evening entertainment, perhaps older members of the community or religious groups.</td>
</tr>
<tr>
<td>LP39 Over-concentration of uses</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>+</td>
<td>O</td>
<td>O</td>
<td>This policy seeks to avoid the over-concentration of hot food takeaways, betting shops and payday loan shops within Hackney's town centres. Childhood obesity is an issue within Hackney with 12.5% of reception year children and 27.0% of year 6 children being obese. This policy restricts the development of new hot food takeaways within 400m of a school, which will be beneficial to school age children. The policy is considered to have a neutral impact on the other equalities groups.</td>
</tr>
<tr>
<td>LP40 Street markets</td>
<td>+</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>This policy seeks to protect markets in the borough. Older traditional markets such as Ridley Road often provide goods and services as well as employment for Afro-Caribbean, Asian and other BME communities. Shopping in markets often provides cheaper food for poorer members of the community, and can be popular amongst the older population. The protection of markets is therefore considered to have positive impacts on older residents and BME communities. The policy will have a neutral impact on the other equalities groups.</td>
</tr>
</tbody>
</table>
Chapter 7: Improving Accessibility and Promoting Sustainable Transport

<table>
<thead>
<tr>
<th>Policy</th>
<th>Race</th>
<th>Disability</th>
<th>Gender</th>
<th>Age</th>
<th>Faith</th>
<th>Sexual orientation</th>
<th>Analysis</th>
</tr>
</thead>
<tbody>
<tr>
<td>LP41 Liveable Neighbourhoods</td>
<td>+</td>
<td>+</td>
<td>+</td>
<td>+</td>
<td>+</td>
<td>+</td>
<td>The policy seeks to enhance neighbourhoods by promoting sustainable, livable transport options to benefit all. The Council recognises that a flexible and balanced approach is needed to prevent excessive car usage within the borough. Promoting an accessible, low cost and reliable public transport network as well as a pedestrian friendly environment would be an advantage to all.</td>
</tr>
<tr>
<td>LP42 Walking and Cycling</td>
<td>+</td>
<td>+</td>
<td>+</td>
<td>+</td>
<td>+</td>
<td>+</td>
<td>This policy seeks to encourage development that will improve the local environment for walking and cycling within the borough, which will have positive impacts for all equalities groups.</td>
</tr>
<tr>
<td>LP43 Transport and Development</td>
<td>O</td>
<td>+</td>
<td>+</td>
<td>+</td>
<td>O</td>
<td>O</td>
<td>This policy seeks to ensure that the transport needs of development are met and encourages high-density development to be located around transport nodes and highly accessible areas. This will have a positive impact on less mobile members of the community such as the disabled, elderly and parents with young children.</td>
</tr>
<tr>
<td>LP44 Public Transport and Infrastructure</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>This policy seeks to protect public transport infrastructure. It is considered to have a neutral impact on the equalities groups.</td>
</tr>
<tr>
<td>LP45 Parking and Car Free Development</td>
<td>O</td>
<td>+</td>
<td>O</td>
<td>-</td>
<td>O</td>
<td>O</td>
<td>The policy promotes car free development. Whilst this is beneficial in many aspects for example for improving the health of residents who suffer from respiratory diseases, it may have negative impacts on families with young children or the elderly who may need access to parking facilities close to dwellings.</td>
</tr>
</tbody>
</table>

Chapter 8: Hackney's Green and Open Spaces

<table>
<thead>
<tr>
<th>Policy</th>
<th>Race</th>
<th>Disability</th>
<th>Gender</th>
<th>Age</th>
<th>Faith</th>
<th>Sexual orientation</th>
<th>Analysis</th>
</tr>
</thead>
<tbody>
<tr>
<td>LP46 Protection and enhancement of Green Infrastructure</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>This policy seeks to protect and enhance Green Infrastructure within the borough. An estimated 75.6% of households live in flats in Hackney, which is above the national average and the London average, and these residents are unlikely to have access to their own open space, which means that access to parks and open space is of vital importance in Hackney. This policy also seeks to protect existing allotments and support the provision of new food growing locations within the borough. Research suggests that the use of allotments has a positive impact on the wellbeing of users along with the light exercise it provides and is a source of affordable food for local people. The policy is considered to beneficial for all in Hackney with no disproportionate impacts on the equalities groups.</td>
</tr>
<tr>
<td>LP47 Biodiversity and</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>This policy seeks to protect the borough’s biodiversity and is not</td>
</tr>
<tr>
<td>Policy</td>
<td>Race</td>
<td>Disability</td>
<td>Gender</td>
<td>Age</td>
<td>Faith</td>
<td>Sexual orientation</td>
<td>Analysis</td>
</tr>
<tr>
<td>--------------------------------------------</td>
<td>------</td>
<td>------------</td>
<td>--------</td>
<td>-----</td>
<td>-------</td>
<td>-------------------</td>
<td>------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Sites of Importance of Nature Conservation</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>considered to have any disproportionate impacts on the equalities groups.</td>
</tr>
<tr>
<td>LP48 New Open Space</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>This policy sets out open space standards required for new development and prioritises on site provision in areas of deficiency. It is not considered to have any disproportionate impacts on the equalities groups.</td>
</tr>
<tr>
<td>LP49 Green chains and green corridors</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>This policy seeks to protect and enhance Green Chains and Green Corridors in the borough and is not considered to have any disproportionate impacts on the equalities groups.</td>
</tr>
<tr>
<td>LP50 Play Space</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>+</td>
<td>O</td>
<td>This policy protects play space and promotes the development of new play space within major developments. Children’s play space is important for the development of physical, social and emotional skills in children and can improve health and reduce health inequalities. The proportion of reception age children overweight or obese in Hackney is 28.0%, reaching 40.9% in Year 6 (2010-11 figures). This policy is considered to have positive impacts on young children and a neutral impact on other equality groups.</td>
</tr>
<tr>
<td>LP51 Tree management and landscaping</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>This policy seeks to protect and retain existing landscape features and trees of amenity value within the borough and is not considered to have any disproportionate impacts on any of the equalities groups.</td>
</tr>
<tr>
<td>LP52 Waterways, canals and residential moorings</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>This policy seeks to protect and retain existing Waterways, canals and residential moorings within the borough and is not considered to have a disproportionate impacts on the equalities groups.</td>
</tr>
</tbody>
</table>

**Chapter 9: Climate Change**

<table>
<thead>
<tr>
<th>Policy</th>
<th>Race</th>
<th>Disability</th>
<th>Gender</th>
<th>Age</th>
<th>Faith</th>
<th>Sexual orientation</th>
<th>Analysis</th>
</tr>
</thead>
<tbody>
<tr>
<td>LP53 Water and Flooding</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>This policy seeks to protect the borough from flood risk and its associated impacts and is not considered to have a disproportionate impact on any of the equalities groups.</td>
</tr>
<tr>
<td>LP54 Overheating</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>This policy seeks to encourage design that prevents overheating of new developments this will be beneficial for those households affected by fuel poverty especially low income households. This policy is not considered to have a negative impacts on any of the equalities groups.</td>
</tr>
<tr>
<td>LP55 Mitigating Climate Change</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>This policy seeks to reduce carbon dioxide emissions through sustainable design and construction and is not considered to have a disproportionate impacts on any of the equalities groups.</td>
</tr>
<tr>
<td>LP56 Decentralised Energy Networks (DEN)</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>This policy encourages the use of Decentralised Energy Networks. DENs provide cheap alternative energy through the lifetime of their operation which could offset the energy cost faced by poorer communities within the borough. However these benefits will be more long term in nature and</td>
</tr>
<tr>
<td>Policy</td>
<td>Race</td>
<td>Disability</td>
<td>Gender</td>
<td>Age</td>
<td>Faith</td>
<td>Sexual orientation</td>
<td>Analysis</td>
</tr>
<tr>
<td>------------------------------------</td>
<td>------</td>
<td>------------</td>
<td>--------</td>
<td>-----</td>
<td>-------</td>
<td>-------------------</td>
<td>------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>LP57 Waste</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>This policy seeks to minimise waste during both construction and operation of development within the borough and is not considered to have a negative impact on any of the equalities groups.</td>
</tr>
<tr>
<td>LP58 Improving the Environment -</td>
<td>O</td>
<td>+</td>
<td>O</td>
<td>+</td>
<td>O</td>
<td>O</td>
<td>This policy seeks to protect the borough from the impacts of pollution as a result of new development within the borough. Hackney residents with respiratory conditions and young children in the borough are disproportionately affected by high air pollution levels. The reduction of air pollutants would have a positive impact on these groups. Other aspects of the policy are not considered to have a disproportionate impacts on any of the equalities groups.</td>
</tr>
</tbody>
</table>
Appendix 3

HRA Screening Tables
The following tables comprise the initial HRA screening process. The aim of this screening is to identify at a broad level those policies that will not have an effect on European Sites and those that have the potential to have a significant effect at the sites identified (Epping Forest and Lee Valley). This approach is in accordance with guidance by David Tyldesley Associate, for English Nature, 2006). Local Plan policies were screened on the basis of the following criteria:

**Reasons why a policy will not have an effect on a European Site:**

1. The policy itself will not lead to development.
2. The location of the development is unknown, and will be selected following consideration of options in lower plans.
3. The policy will have no effect because development is dependent on implementation of lower tier policies.
4. The policy concentrates development in existing urban areas, steering development away from European sites and sensitive areas.
5. The policy will steer development away from European sites and associated sensitive areas.
6. The policy is intended to protect the natural environment, including biodiversity.
7. The policy is intended to conserve or enhance the natural, built or historic environment, and such enhancements are unlikely to affect a European site.

**Reasons why a policy could have an effect on a European Site:**

8. The plan/policy steers a quantum or type of development towards or encourages development in, an area that includes a European site or an area where development may indirectly affect a European site.

**Reasons why a policy/plan would be likely to have a significant effect:**

9. The policy makes provision for a quantum of kind of development that in the location(s) proposed would be likely to have a significant effect on a European site. Appropriate Assessment required.

---

<table>
<thead>
<tr>
<th>Policy</th>
<th>Brief summary</th>
<th>Screening outcome</th>
</tr>
</thead>
<tbody>
<tr>
<td>PP1 Public Realm</td>
<td>This policy sets out the public realm improvements that must be considered as part of all development schemes.</td>
<td>Screened out: The policy itself will not lead to development.</td>
</tr>
<tr>
<td>PP2 Dalston</td>
<td>This policy sets out the vision and development opportunities for Dalston.</td>
<td>Screened out: The policy concentrates development in existing urban areas, steering development away from European sites and sensitive areas.</td>
</tr>
<tr>
<td>PP3 Hackney Central and Surrounds</td>
<td>This policy sets out the vision and development opportunities for Hackney Central.</td>
<td>Within the 6.2km Zone of Influence of Epping Forest SAC. Impacts to be explored.</td>
</tr>
<tr>
<td>PP4 Stamford Hill</td>
<td>This policy sets out the vision and development opportunities for Stamford Hill.</td>
<td>In proximity to the Lee Valley SPA and Ramsar site and within the 6.2km Zone of Influence of Epping Forest SAC. Impacts to be explored.</td>
</tr>
<tr>
<td>PP5 Enhanced Corridors</td>
<td>This policy sets out the vision and development opportunities for the main arterial corridors in Hackney.</td>
<td>In proximity to the Lee Valley SPA and Ramsar site and within the 6.2km Zone of Influence of Epping Forest SAC. Impacts to be explored.</td>
</tr>
<tr>
<td>PP6 Hackney Wick</td>
<td>This policy sets out the vision and development opportunities for Hackney Wick.</td>
<td>Within the 6.2km Zone of Influence of Epping Forest SAC. Impacts to be explored.</td>
</tr>
<tr>
<td>PP7 Clapton and Lea Bridge Roundabout</td>
<td>This policy sets out the vision and development opportunities for Clapton and the Lea Bridge roundabout.</td>
<td>Within the 6.2km Zone of Influence of Epping Forest SAC. Impacts to be explored.</td>
</tr>
<tr>
<td>PP8 Shoreditch and Hoxton</td>
<td>This policy sets out the vision and development opportunities for Shoreditch and Hoxton.</td>
<td>Screened out: The policy concentrates development in existing urban areas, steering development away from European sites and sensitive areas.</td>
</tr>
<tr>
<td>PP9 Manor House</td>
<td>This policy sets out the vision and development opportunities for Manor House.</td>
<td>Screened out: The policy concentrates development in existing urban areas, steering development away from European sites and sensitive areas.</td>
</tr>
<tr>
<td>Policy</td>
<td>Brief summary</td>
<td>Screening outcome</td>
</tr>
<tr>
<td>--------</td>
<td>--------------</td>
<td>------------------</td>
</tr>
<tr>
<td>PP10 Homerton</td>
<td>This policy sets out the vision and development opportunities for Homerton.</td>
<td>Within the 6.2km Zone of Influence of Epping Forest SAC. Impacts to be explored.</td>
</tr>
</tbody>
</table>

### Protecting and Enhancing Heritage and Leading the way in Good Urban Design

<table>
<thead>
<tr>
<th>Policy</th>
<th>Brief summary</th>
<th>Screening outcome</th>
</tr>
</thead>
<tbody>
<tr>
<td>LP1 Design Quality and Local Character</td>
<td>This policy promotes high quality design in all developments.</td>
<td>Screened out: The policy is intended to conserve or enhance the natural, built or historic environment, and such enhancements are unlikely to affect a European site.</td>
</tr>
<tr>
<td>LP2 Development and Amenity</td>
<td>This policy seeks to prevent the adverse impacts of development proposals on the amenity of occupiers and neighbours.</td>
<td>Screened out: The policy itself will not lead to development.</td>
</tr>
<tr>
<td>LP3 Designated Heritage Assets</td>
<td>This policy protects heritage assets and their settings.</td>
<td>Screened out: The policy is intended to conserve or enhance the natural, built or historic environment, and such enhancements are unlikely to affect a European site.</td>
</tr>
<tr>
<td>LP4 Non Designated Heritage Assets</td>
<td>This policy protects heritage assets and their settings.</td>
<td>Screened out: The policy is intended to conserve or enhance the natural, built or historic environment, and such enhancements are unlikely to affect a European site.</td>
</tr>
<tr>
<td>LP5 Strategic and Local Views</td>
<td>This policy protects strategic and local views in Hackney.</td>
<td>Screened out: The policy is intended to conserve or enhance the natural, built or historic environment, and such enhancements are unlikely to affect a European site.</td>
</tr>
<tr>
<td>LP6 Archaeology</td>
<td>This policy protects and promotes archaeological heritage.</td>
<td>Screened out: The policy is intended to conserve or enhance the natural, built or historic environment, and such enhancements are unlikely to affect a European site.</td>
</tr>
<tr>
<td>LP7 Advertisements</td>
<td>This policy seeks to ensure advertisements are of a high quality and do not impact on the historic significance of buildings.</td>
<td>Screened out: The policy is intended to conserve or enhance the natural, built or historic environment, and such enhancements are unlikely to affect a European site.</td>
</tr>
<tr>
<td>Hackney's People</td>
<td>Brief summary</td>
<td>Screening outcome</td>
</tr>
<tr>
<td>----------------------------------</td>
<td>-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>LP8 Social and Community Infrastructure</td>
<td>This policy supports and protects social and community infrastructure and seeks to direct new facilities to accessible locations.</td>
<td>Screened out: The policy concentrates development in existing urban areas, steering development away from European sites and sensitive areas.</td>
</tr>
<tr>
<td>LP9 Health and Wellbeing</td>
<td>This policy seeks to ensure that new development contributes to healthy lifestyles and reduces health inequalities.</td>
<td>Screened out: The policy itself will not lead to development.</td>
</tr>
<tr>
<td>LP10 Arts, culture and entertainment facilities</td>
<td>This policy directs arts, culture and entertainment facilities to major and district centres.</td>
<td>Screened out: The policy concentrates development in existing urban areas, steering development away from European sites and sensitive areas.</td>
</tr>
<tr>
<td>LP11 Utilities and Digital Connectivity Infrastructure</td>
<td>This policy seeks to ensure that adequate utility infrastructure and digital connectivity is provided in new development has</td>
<td>Screened out: The policy itself will not lead to development.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Meeting Hackney’s Housing Need</th>
<th>Brief summary</th>
<th>Screening outcome</th>
</tr>
</thead>
<tbody>
<tr>
<td>LP12 Housing supply</td>
<td>This policy sets out the Council’s aspiration to deliver 1,330 homes per year up to 2033, predominantly within existing centres and the growth corridors. It is a key part of the growth strategy. When considered alone it can be screened out, however when considered in the context of the overarching growth strategy and alongside other key LP33 policies including LP26 New Employment Floorspace and LP32 Town Centres and the growth planned in neighbouring boroughs there may be ‘in combination’ effects on the European sites which require further consideration.</td>
<td>Screened out: The policy concentrates development in existing urban areas, steering development away from European sites and sensitive areas. ‘In combination’ effects to be explored.</td>
</tr>
<tr>
<td>LP13 Affordable housing</td>
<td>This policy stipulates levels and types of affordable housing to be provided in new residential schemes.</td>
<td>Screened out: The policy itself will not lead to development.</td>
</tr>
<tr>
<td>-------------------------</td>
<td>-------------------------------------------------------------------------------------------------</td>
<td>-------------------------------------------------</td>
</tr>
<tr>
<td>LP14 Dwelling size mix</td>
<td>This policy stipulates the housing size mix to be provided in new residential schemes.</td>
<td>Screened out: The policy itself will not lead to development.</td>
</tr>
<tr>
<td>LP15 Build to rent</td>
<td>This policy supports build to rent developments subject to certain criteria.</td>
<td>Screened out: The policy concentrates development in existing urban areas, steering development away from European sites and sensitive areas.</td>
</tr>
<tr>
<td>LP16 Self/Custom-Build Housing</td>
<td>This policy supports self and custom build housing where there is demand.</td>
<td>Screened out: The policy concentrates development in existing urban areas, steering development away from European sites and sensitive areas.</td>
</tr>
<tr>
<td>LP17 Housing Design</td>
<td>This policy sets out the design standards required in new residential schemes.</td>
<td>Screened out: The policy itself will not lead to development.</td>
</tr>
<tr>
<td>LP18 Housing Older and Vulnerable People</td>
<td>This policy supports provision of housing to meet the needs of older and vulnerable people.</td>
<td>Screened out: The policy concentrates development in existing urban areas, steering development away from European sites and sensitive areas.</td>
</tr>
<tr>
<td>LP19 Residential Conversions</td>
<td>This policy supports conversion from houses to flats subject to certain criteria.</td>
<td>Screened out: The policy itself will not lead to development.</td>
</tr>
<tr>
<td>LP20 Student housing</td>
<td>This policy directs student accommodation to suitable locations subject to various criteria.</td>
<td>Screened out: The policy concentrates development in existing urban areas, steering development away from European sites and sensitive areas.</td>
</tr>
<tr>
<td>LP21 Large Scale Purpose-Built Shared Housing</td>
<td>This policy supports shared housing subject to various criteria.</td>
<td>Screened out: The policy concentrates development in existing urban areas, steering development away from European sites and sensitive areas.</td>
</tr>
<tr>
<td>LP22 Houses in Multiple Occupation (HMO)</td>
<td>This policy supports HMOs subject to various criteria.</td>
<td>Screened out: The policy concentrates development in existing urban areas, steering development away from European sites and sensitive areas.</td>
</tr>
<tr>
<td>Policy Description</td>
<td>Policy</td>
<td>Brief summary</td>
</tr>
<tr>
<td>--------------------</td>
<td>--------</td>
<td>---------------</td>
</tr>
<tr>
<td>LP23 Gypsy and Traveller Accommodation</td>
<td>This policy supports the provision of pitches to meet the needs of gypsies, travellers and travelling showpersons subject to various criteria.</td>
<td>Screened out: The policy concentrates development in existing urban areas, steering development away from European sites and sensitive areas.</td>
</tr>
<tr>
<td>LP24 Preventing the Loss of Housing</td>
<td>This policy seeks to prevent the loss of residential floorspace.</td>
<td>Screened out: The policy itself will not lead to development.</td>
</tr>
<tr>
<td>LP25 Visitor Accommodation</td>
<td>This policy directs hotels to major town centres and the CAZ and sets criteria that must be met for the provision on new hotels.</td>
<td>Screened out: The policy concentrates development in existing urban areas, steering development away from European sites and sensitive areas.</td>
</tr>
</tbody>
</table>

**A Strong and Competitive Economy which benefits all**

<table>
<thead>
<tr>
<th>Policy Description</th>
<th>Policy</th>
<th>Brief summary</th>
<th>Screening outcome</th>
</tr>
</thead>
<tbody>
<tr>
<td>LP26 New Employment Floorspace</td>
<td>This policy directs new employment floorspace to the designated employment areas and town centres. It is a key part of the growth strategy. When considered alone it can be screened out, however when considered in the context of the overarching growth strategy which seeks to deliver 117,000sqm of new employment floorspace by 2033, as well as alongside other key LP33 policies including LP12 Housing Supply and LP32 Town Centres and the growth planned in neighbouring boroughs, there may be ‘in combination’ effects on the European sites which require further consideration.</td>
<td>Screened out: The policy concentrates development in existing urban areas, steering development away from European sites and sensitive areas. ‘In combination’ effects to be explored.</td>
<td></td>
</tr>
<tr>
<td>LP27 Protecting and Promoting Office floorspace in the Borough</td>
<td>This policy directs office floorspace to POAs and sets thresholds for the proportions to be provided in mixed use schemes, as well as criteria to resist the loss of office floorspace.</td>
<td>Screened out: The policy concentrates development in existing urban areas, steering development away from European sites and sensitive areas.</td>
<td></td>
</tr>
<tr>
<td>Policy</td>
<td>Brief summary</td>
<td>Screening outcome</td>
<td></td>
</tr>
<tr>
<td>--------------------------------------------</td>
<td>-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td></td>
</tr>
<tr>
<td>LP28 Protecting and Promoting Industrial land and floorspace in the Borough</td>
<td>This policy directs industrial floorspace to PIAs and LSIS and sets criteria to resist the loss of industrial floorspace.</td>
<td>Screened out: The policy concentrates development in existing urban areas, steering development away from European sites and sensitive areas.</td>
<td></td>
</tr>
<tr>
<td>LP29 Affordable Workspace and Low Cost Employment Floorpace</td>
<td>This policy sets the criteria for the provision of affordable and low cost employment space within major employment and mixed use development schemes.</td>
<td>Screened out: The policy itself will not lead to development.</td>
<td></td>
</tr>
<tr>
<td>LP30 Railway Arches</td>
<td>This policy protects the railway arches for employment uses.</td>
<td>Screened out: The policy concentrates development in existing urban areas, steering development away from European sites and sensitive areas.</td>
<td></td>
</tr>
<tr>
<td>LP31 Local jobs, skills and training</td>
<td>This policy seeks to ensure the benefits of economic growth in Hackney are harnessed for local residents in terms of provision of jobs and training.</td>
<td>Screened out: The policy itself will not lead to development.</td>
<td></td>
</tr>
<tr>
<td>Planning for Vibrant Town Centres</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Policy</td>
<td>Brief summary</td>
<td>Screening outcome</td>
<td></td>
</tr>
<tr>
<td>LP32 Town Centres</td>
<td>This policy seeks to deliver 34,000sqm of new retail and leisure floorspace in Hackney by 2033. This is directed towards the existing town centres and therefore, when considered alone it can be screened out as the new development will be concentrated in the existing centres. However when considered in the context of the overarching growth strategy and alongside other key LP33 policies including LP12 Housing Supply and LP26 New Employment Floorpace, as well as the growth planned in neighbouring boroughs, there may be ‘in combination’ effects</td>
<td>Screened out: The policy concentrates development in existing urban areas, steering development away from European sites and sensitive areas. ‘In combination’ effects to be explored.</td>
<td></td>
</tr>
<tr>
<td>Policy</td>
<td>Description</td>
<td>Screened out:</td>
<td></td>
</tr>
<tr>
<td>--------</td>
<td>-------------</td>
<td>---------------</td>
<td></td>
</tr>
<tr>
<td>LP33 Hackney Central and Dalston</td>
<td>This policy directs large scale retail, commercial and cultural development to Hackney Central and Dalston and sets thresholds for retention of A1 units.</td>
<td>The policy concentrates development in existing urban areas, steering development away from European sites and sensitive areas.</td>
<td></td>
</tr>
<tr>
<td>LP34 Stoke Newington, Stamford Hill and Finsbury Park</td>
<td>This policy directs retail, commercial and cultural development of an appropriate scale to the district centres and sets thresholds for retention of A1 units.</td>
<td>The policy concentrates development in existing urban areas, steering development away from European sites and sensitive areas.</td>
<td></td>
</tr>
<tr>
<td>LP35 Local Shopping Centres</td>
<td>This policy supports a range of retailing and community services in the Local Centres and sets thresholds for retention of A1 units.</td>
<td>The policy concentrates development in existing urban areas, steering development away from European sites and sensitive areas.</td>
<td></td>
</tr>
<tr>
<td>LP36 Shops outside of designated centres</td>
<td>This policy sets out the approach to protection of individual shops outside of centres.</td>
<td>The policy itself will not lead to development.</td>
<td></td>
</tr>
<tr>
<td>LP37 Small and Independent shops</td>
<td>This policy supports the provision of small shop units within major new retail schemes and sets criteria for sub-division or amalgamation of individual shop units.</td>
<td>The policy itself will not lead to development.</td>
<td></td>
</tr>
<tr>
<td>LP38 Evening and night time economy</td>
<td>This policy directs new evening and night time economy uses to the designated centres and supports diversification of the night time economy.</td>
<td>The policy concentrates development in existing urban areas, steering development away from European sites and sensitive areas.</td>
<td></td>
</tr>
<tr>
<td>LP39 Over-concentration of uses</td>
<td>This policy seeks to avoid over concentration of hot food takeaways and bettering shops and payday loan shops within town centres.</td>
<td>The policy concentrates development in existing urban areas, steering development away from European sites and sensitive areas.</td>
<td></td>
</tr>
<tr>
<td>LP40 Street markets</td>
<td>This policy protects and promotes existing markets and directs any new markets to the designated centres.</td>
<td>The policy concentrates development in existing urban areas, steering development away from European sites and sensitive areas.</td>
<td></td>
</tr>
</tbody>
</table>
### Improving Accessibility and Promoting Sustainable Transport

| Policy                        | Brief summary                                                                                                                                                                                                                                                                                                                                 | Screening outcome                                                                                                                                                                                                                       |
|-------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| LP41 Liveable Neighbourhoods  | This policy sets out a series of criteria that all new development should meet to ensure Hackney’s places and streets are attractive and liveable.                                                                                                                                                                                                 | Screened out: The policy itself will not lead to development.                                                                                                                                                                             |
| LP42 Walking and Cycling      | This policy requires walking and cycling to be prioritised in all new development.                                                                                                                                                                                                                                                                                                                            | Screened out: The policy itself will not lead to development.                                                                                                                                                                             |
| LP43 Transport and Development| This policy seeks to ensure that the transport needs of new developments are provided for, and encourages high density development to be located around transport nodes and highly accessible areas.                                                                                                                                                                                         | Screened out: The policy concentrates development in existing urban areas, steering development away from European sites and sensitive areas.                                                                                                       |
| LP44 Public Transport and Infrastructure | This policy seeks to ensure that all development protects existing public transport infrastructure and makes financial contributions towards its improvement.                                                                                                                                                                                                 | Screened out: The policy itself will not lead to development.                                                                                                                                                                             |
| LP45 Parking and Car Free Development | This policy requires that all new development in the borough is car-free.                                                                                                                                                                                                                                                                                                                                 | Screened out: The policy itself will not lead to development.                                                                                                                                                                             |

### Hackney's Green and Public Spaces

<table>
<thead>
<tr>
<th>Policy</th>
<th>Brief summary</th>
<th>Screening outcome</th>
</tr>
</thead>
<tbody>
<tr>
<td>LP46 Protection and Enhancement of Green Infrastructure</td>
<td>This policy sets out that the network of green infrastructure across the borough must be protected, access improved and there should be no net loss of open space.</td>
<td>Screened out: The policy is intended to protect the natural environment, including biodiversity.</td>
</tr>
<tr>
<td>LP47 Biodiversity and Sites of Importance of</td>
<td>This policy protects and seeks to enhance biodiversity across the borough.</td>
<td>Screened out: The policy is intended to protect the natural environment, including biodiversity.</td>
</tr>
<tr>
<td>Nature Conservation</td>
<td>Brief summary</td>
<td>Screening outcome</td>
</tr>
<tr>
<td>---------------------</td>
<td>---------------</td>
<td>-------------------</td>
</tr>
<tr>
<td>LP48 New Open Space</td>
<td>This policy seeks to ensure new open space is provided in new developments, with emphasis on provision in the areas of deficiency.</td>
<td>Screened out: The policy is intended to protect the natural environment, including biodiversity.</td>
</tr>
<tr>
<td>LP49 Green Chains and Green Corridors</td>
<td>This policy seeks to develop the network of green chain and green corridors across the borough.</td>
<td>Screened out: The policy is intended to protect the natural environment, including biodiversity.</td>
</tr>
<tr>
<td>LP50 Play Space</td>
<td>This policy seeks new play facilities in schemes that are likely to generate a child yield of 10 of more.</td>
<td>Screened out: The policy itself will not lead to development.</td>
</tr>
<tr>
<td>LP51 Tree Management and Landscaping</td>
<td>This policy seeks to protect trees and landscape features.</td>
<td>Screened out: The policy is intended to protect the natural environment, including biodiversity.</td>
</tr>
<tr>
<td>LP52 Waterways, Canals and Residential Moorings</td>
<td>This policy seeks to protect and enhance the waterways and their riparian areas and sets criteria for residential moorings.</td>
<td>Screened out: The policy is intended to protect the natural environment, including biodiversity.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Climate change</th>
<th>Brief summary</th>
<th>Screening outcome</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy</td>
<td>Brief summary</td>
<td>Screening outcome</td>
</tr>
<tr>
<td>LP53 Water and Flooding</td>
<td>This policy ensures that development is not located in flood risk areas, that appropriate flood mitigation measures are in place, that greenfield runoff rates are achieved, and that water efficiency measures are incorporated.</td>
<td>Screened out: The policy is intended to protect the natural environment, including biodiversity.</td>
</tr>
<tr>
<td>LP54 Overheating</td>
<td>This policy sets out that development must regulate internal and external temperatures.</td>
<td>Screened out: The policy is intended to protect the natural environment, including biodiversity.</td>
</tr>
<tr>
<td>LP55 Mitigating Climate Change</td>
<td>This policy sets out that all development in Hackney must actively seek to mitigate the impact of climate change by reducing carbon</td>
<td>Screened out: The policy is intended to protect the natural environment, including biodiversity.</td>
</tr>
<tr>
<td>LP56 Decentralised Energy Networks (DEN)</td>
<td>This policy supports decentralised energy networks in new major developments.</td>
<td>Screened out: The policy is intended to protect the natural environment, including biodiversity.</td>
</tr>
<tr>
<td>----------------------------------------</td>
<td>--------------------------------------------------------------------------</td>
<td>--------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>LP57 Waste</td>
<td>This policy sets out that development should seek to minimise waste during both construction and operation of the development.</td>
<td>Screened out: The policy is intended to protect the natural environment, including biodiversity.</td>
</tr>
<tr>
<td>LP58 Improving the Environment - Pollution</td>
<td>This policy sets out that development must not exceed air quality neutral standards and must not pose risk to water quality.</td>
<td>Screened out: The policy is intended to protect the natural environment, including biodiversity.</td>
</tr>
</tbody>
</table>
Appendix 4

HIA table assessing health implications of changes between Regulation 18 draft LP33 and Regulation 19 Proposed Submission LP33
<table>
<thead>
<tr>
<th>Chapter and Policy</th>
<th>Recommendations made in the Health Impact Assessment (HIA) that was prepared in response to the previous draft of the Local Plan, and recommendations in the Briefing on the Public Health Team’s Assessment of the Draft London Plan</th>
<th>Response from the Planning team: how the Local Plan Proposed Submission has been changed to address the HIA that was prepared in response to the previous Local Plan draft, and the Planning team’s reasoning for making / not making changes</th>
<th>Why these recommendations / changes matter</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Design and Heritage: Policy 1 - Design Quality and Local Character</strong></td>
<td>The reference to active design would be clearer with the addition of reference to active design in buildings and spaces, and that the Healthy Streets approach aims to create streets where people choose to walk, cycle and spend time.</td>
<td>Definition of active design has been included in the glossary. There is explicit reference to active design and the healthy street approach in the policy, with cross reference to both Sport England’s and the Centre for Active Design guidelines.</td>
<td>Requiring development to promote good health through the use of active design principles (along with making development accessible and inclusive) can contribute to increasing physical activity and socialising, with major positive impacts on physical and mental health.</td>
</tr>
<tr>
<td><strong>Design and Heritage: Policy 1 - Design Quality and Local Character</strong></td>
<td>It would be useful to cite an illustrative example of applying active design principles in the policy. This could be ensuring staircases are designed and positioned to encourage people to use them, including clear signposting, and ensuring staircases are attractive by making them well-lit and well decorated. This would be in line with the National Institute for Clinical Excellence guidance on physical activity and the environment.</td>
<td>Definition of active design has been included in the glossary. Example of active design will be too detailed for the Local Plan, and may be more appropriate in a supporting paper or SPD. There are cross references to active design guidance in the Plan.</td>
<td>Citing an illustrative example would help to operationalise Policy 1, to ensure planning permissions for new developments always prioritise the need for people (including those with limited mobility) to be physically active as a routine part of daily life.</td>
</tr>
<tr>
<td><strong>Design and Heritage: Policy 1 - Design Quality and Local Character</strong></td>
<td>Policy 1 should add specific guidance around design of schools to ensure healthy lifestyles and a positive learning environment, including by referring to ensuring active design in planning of schools and nurseries. The guidance should include ensuring sufficient, well-designed outdoor and indoor space for active recreation/play.</td>
<td>The London Plan and GLA’s Social Infrastructure SPG go into detail about the provision of different types of social infrastructure. It is not necessary to repeat policy already contained in the London Plan, however the supporting paper acknowledges that there are differences in approaches with different types of infrastructure. Reference will also be made to the requirements of the London Plan and any additional guidance which is relevant in planning terms.</td>
<td>Carrying out these recommendations would bring the Local Plan in line with Policy S3 of the Draft London Plan (Education and Childcare Facilities), which mentions the importance of the design of schools in creating decent learning environments, and the importance of outdoor space for schools. Good quality outdoor space is vital given the high levels of child obesity and physical inactivity in Hackney.</td>
</tr>
<tr>
<td><strong>Design and Heritage: Policy 1 - Design Quality and Local Character</strong></td>
<td>(See also assessment to Policy 8)</td>
<td>The following extract from Public Health England's Preventing Suicides in Public Places: a Practice Resource discusses the responsibility of Local Authority Planning teams in preventing suicides: “Around a third of all suicides take place outside the home, in a public location of some kind. [...] A number of effective steps can be taken to prevent public places being used for suicide and to increase the chances of last-minute intervention. [...] Now that responsibility for suicide prevention lies with local authorities, there is an opportunity for public health teams and local planning departments to work together to incorporate suicide prevention measures in designs for all new public buildings, multistorey car parks, bridges and other infrastructure projects, and to make this a condition of planning consent. This is much easier and more cost-efficient than trying to bolt them on later, once a problem has developed. This practice resource (<a href="https://www.gov.uk/government/publications/suicide-prevention-suicides-in-public-places">https://www.gov.uk/government/publications/suicide-prevention-suicides-in-public-places</a>) should therefore be shared with local authority planning departments and used to inform planning decisions”</td>
<td></td>
</tr>
<tr>
<td>---</td>
<td>---</td>
<td>---</td>
<td></td>
</tr>
<tr>
<td>For the Policy 1 section on building heights, it would be advisable to include a reference to incorporating measures to reduce risk of suicide attempts, where appropriate, with signposting to the Public Health England resource on suicide prevention in public places, which provides guidance on measures to consider in tall building design (such as physical barriers and markings).</td>
<td>Yes this will be incorporated into the forthcoming design SPD. Meanwhile, there should be reference to Public Health England’s guidance in the Local Plan.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Public Health recommends that the Planning team stipulate that measures such as different entrances or play facilities for different tenures will not be permitted.</td>
<td>Contained in London Plan and Housing SPD. The London Plan is a material consideration, and it would not be necessary to duplicate its policies in Hackney's Local Plan. Furthermore, Policy LP17 'Housing Design' does cross reference the accessibility standards set out in the London Plan.</td>
<td>Policy D3 of the Draft London Plan (Inclusive Design) emphasises the importance of &quot;independent access without additional undue effort, separation or special treatment&quot; and, in the supporting text, &quot;inclusive communities&quot;. The Hackney Local Plan does state that development must be &quot;inclusive and accessible for all&quot; but could go further to ensure that social and physical inclusion are ensured, in line with the London Plan Policy D3. Promoting social inclusion is an aspect of good design.</td>
<td></td>
</tr>
<tr>
<td>The Policy text should require new development to have regard to the capacity of social infrastructure and</td>
<td>Agree with this approach and a new requirement will be added to the Policy.</td>
<td>Including this specification will support Planning to deliver the Infrastructure Delivery Plan and to fulfil its aim (referred to in the supporting text for Policy 7) to work with</td>
<td></td>
</tr>
<tr>
<td>Community Infrastructure</td>
<td>provide/contribute to costs entailed in meeting any increased social infrastructure needs.</td>
<td>stakeholders such as the Clinical Commissioning Group to ensure the provision and enhancement of services and facilities meet changing local needs.</td>
<td></td>
</tr>
<tr>
<td>--------------------------</td>
<td>---------------------------------------------------------------------------------------------------------------------------------</td>
<td>-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td></td>
</tr>
<tr>
<td><strong>Hackney's People:</strong> Policy 8 - Social and Community Infrastructure</td>
<td>Public Health recommends that the Planning team expand Local Plan Policy 7 to cover specific considerations for health and social care, educational and childcare facilities, and sport and recreation facilities. These types of uses require unique approaches (for example the design of schools and healthcare facilities are important to a range of health and social outcomes but design considerations relating to these uses are not outlined in Hackney’s Draft Local Plan). It would also be beneficial for the Local Plan policies to refer to maintenance of social infrastructure.</td>
<td>The London Plan and GLA’s Social Infrastructure SPG go into detail about the provision of different types of social infrastructure. It is not necessary to repeat policy already contained in the London Plan; however, the supporting paper acknowledges that there are differences in approaches with different types of infrastructure. Reference will also be made to the requirements of the London Plan and any additional guidance which is relevant in planning terms. (See also Policy 1 above)</td>
<td></td>
</tr>
<tr>
<td><strong>Hackney's People:</strong> Policy 9 - Health and Wellbeing</td>
<td>The inclusion of a policy on Health and Wellbeing (Policy 8) is positive, as it complements the ‘mainstreaming’ of health and wellbeing considerations into a wide range of other policies. This holistic approach should be reflected in the text of the policy, as the current draft policy appears to suggest that health is mainly about physical activity.</td>
<td>Reference to mental wellbeing has been added alongside physical wellbeing, as has reference to reducing health inequalities, and reducing environmental factors which can contribute to poor health.</td>
<td></td>
</tr>
<tr>
<td><strong>Hackney's People:</strong> Policy 9 - Health and Wellbeing</td>
<td>Health is not only about physical activity. As stated in the background section of this document, “The planning system can influence the wider determinants of health which shape individual behaviours and influence health outcomes. These include social and community influences, living and working conditions, and socioeconomic, cultural and environmental influences. A healthy community is one where all residents enjoy high standards of both mental and physical wellbeing. Good health means not merely the absence of disease, but also being physically active, healthy and happy. There are a range of opportunities for urban design to contribute to mental as well as physical health, including through working to create a green place, an active place, a social place and a safe place.”</td>
<td>Health and wellbeing including reducing health inequalities is a key objective of the whole Plan. This is re-emphasised at the start of the section, Referring to the social determinants of health emphasises that health is not only determined by direct factors such as physical activity, but also broader determinants such as housing, education, employment, transport, communities</td>
<td></td>
</tr>
<tr>
<td><strong>Hackney's People:</strong> Policy 9 - Health and Wellbeing</td>
<td>Policy 8 A should be changed to, “New development that contributes to positively influencing the social determinants of health, enabling healthy lifestyles and</td>
<td>As the draft London Plan states, “Social infrastructure plays an important role in developing strong and inclusive communities. It can provide opportunities to bring different groups of people together, contributing to social integration and the desirability of a place”. Carrying out these recommendations would bring Hackney’s Local Plan in line with the draft London Plan which, unlike the Local Plan, has separate policies for healthcare (Policy S2 Health and Social Care Facilities), education (Policy S3 Education and Childcare Facilities) and sports infrastructure (Policy S5 Sports and Recreation Facilities); and assigns responsibility for maintenance of social and community infrastructure. The draft London Plan also contains examples of shared use of social infrastructure such as “schools opening their facilities out of hours for use by the community”; the Local Plan promotes co-location of social infrastructure uses and maximising use of buildings in evenings and at weekends but it does not specifically mention community use of school sports facilities.</td>
<td></td>
</tr>
</tbody>
</table>
Reducing health inequalities will be supported and is with health inequalities explicit in the policy. The need to balance and apply relevant policies to proposals is crucial in planning; health consideration will be key factor. and the environment (as shown in the Barton and Grant model in the background section of this document), which are all areas that Planning policy can influence. Referring to reducing health inequalities is recommended as this is one of the Local Plan's strategic objectives.

<p>| Hackney's People: Policy 9 - Health and Wellbeing | Policy 8 B. i. should be changed to “Ensure development is designed to <strong>contribute to creating healthy environments, including promoting physical activity, promoting good mental and physical wellbeing and reducing environmental factors which can contribute to poor health</strong> through appropriate arrangement and design of buildings and uses, access, open space and landscaping, the provision of facilities to support walking and cycling, and ensuring schemes meet ‘Secured by Design’ principles”. [Note: bold shows the additional suggested wording] | The Policy now includes: “to promote mental and physical activity and wellbeing, and reducing environmental factors which can contribute to poor health”; the phrase “Secured by Design” was also added. Policies complement other policies in the Plan. The primary policy regarding design is Policy LP1. Other policies in the plan such as the open spaces, transportation, social and community infrastructure and climate change all implicitly and explicitly reference health and wellbeing factors. It is important to not only focus on physical activity but also the other contributions to physical and mental wellbeing (see above). |
| Supporting text statement 3.6 should be changed to &quot;Healthy urban planning aims to promote healthy, successful places for people to live and work in. This can be achieved by providing the homes, jobs and services that people need, reducing environmental risks and delivering well designed buildings and urban spaces which will create the conditions for healthy, active lifestyles. In addition to access to healthcare services, a number of other factors are known to influence a person’s health status and lifestyle, including economic, environmental and social conditions. These factors are referred to as the wider or social determinants of health. The built environment can help influence changes in lifestyle and help achieve positive health outcomes. The Council will seek to secure a local environment which promotes health and wellbeing through new development.” The text has been adapted so instead of stating that “The Council will seek to secure a local environment which promotes physical activity through new development”, it states that “The Council will seek to secure a local environment which promotes physical activity and mental wellbeing through new development, and seeking to improve people’s economic, social and environment conditions.” The Plan should be read as a whole; other policies cover these matters. Health and wellbeing is explicitly and implicitly implied throughout the Plan. Including the additional wording can help to ensure clarity on how the Local Plan will promote health and wellbeing. |</p>
<table>
<thead>
<tr>
<th><strong>Hackney’s People:</strong> Policy 9 - Health and Wellbeing</th>
<th>Supporting text statement 3.7 relating to requirements for Health Impact Assessments (HIA) are positive and responsive to Public Health input on previous drafts. However, these requirements should be included in the Policy (instead of the supporting text).</th>
<th>Reference to HIA has been included in the Policy.</th>
<th>Including these requirements in the Policy ensures HIA expectations have weight in influencing planning practice.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Meeting Hackney’s Housing Need:</strong> Policy 13 - Affordable Housing</td>
<td>The previous HIA supported the inclusion of the Policy on affordable housing to maximise the supply of genuinely affordable housing with definitions of what is expected to support implementation of the Policy.</td>
<td>The updated draft continues the commitment to maximise the supply of genuinely affordable housing, including added details about off-site provision, and specification that affordable housing requirements also apply to accommodation outside of the C3 categorisation, such as student housing, shared housing, and older person housing.</td>
<td>This is positive, given the health and wellbeing impacts of housing, and the local conditions of high rents and house prices. Specifying that affordable housing requirements will be applied to student housing, shared housing and older person housing is in line with the draft London Plan.</td>
</tr>
<tr>
<td><strong>Meeting Hackney’s Housing Need:</strong> Policy 15 - Build to rent</td>
<td>n/a</td>
<td>The new draft has added a specification that at least 50% of units in build to rent schemes should be affordable. The draft has also changed its statement that affordable housing delivered as part of the development will be required to be either Living Rent or London Affordable Rent, to instead a requirement for it to be Living Rent, which is in line with the draft London Plan.</td>
<td>It is positive that the specification was added that 50% of units will need to be affordable, for the reasons explained above for Policy 11. However, given that London Affordable Rent is targeted towards low-income households (compared with Living Rent which is targeted to middle-income households), the removal of the reference to London Affordable Rent in the requirement means that rent levels may be higher which could reduce the affordability for low-income households.</td>
</tr>
<tr>
<td><strong>Meeting Hackney’s Housing Need:</strong> Policy 17: Housing Design</td>
<td>Public Health recommends that the Planning team adds a line on ensuring homes are protective for health, including by sufficient insulation and ventilation to avoid excessive damp, heat or cold.</td>
<td>The London Plan forms part of Hackney’s Local Plan. Policy does cross reference the London Plan. Supporting text for LP17 states “ensuring that new buildings are well-insulated and sufficiently ventilated to avoid the health problems associated with damp, heat and cold, will help provide healthier living environments for Hackney residents”</td>
<td>Adding this specification into the Local Plan brings it in line with the draft London Plan which states in Policy GG3 (Creating a Healthy City): “Ensure that new buildings are well-insulated and sufficiently ventilated to avoid the health problems associated with damp, heat and cold”.</td>
</tr>
<tr>
<td>Meeting Hackney’s Housing Need: Policy 18 - Housing Older and Vulnerable People</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>---</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Policy 16</strong> supporting text (4.18) notes the range of vulnerable people likely to have particular housing needs, such as people with mental health problems, learning disabilities or alcohol misuse, and states that the Council will support proposals to accommodate needs. It could be useful to signpost to sources of guidance for design considerations in meeting the housing needs of members of these different groups.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Policy 18</strong> supports text notes that there are a plethora of guidance about recommendations relating to specific issues. The supporting text does reference Hackney’s Older Person’s Housing Strategy which should provide further guidance relating to this specifically.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Signposting to sources of guidance would help the Planning team and developers to more easily access evidence-based information to most effectively address the needs of vulnerable people.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>A Strong and Competitive Economy which Benefits All: Policy 29 - Affordable and Low Cost Workspace</th>
</tr>
</thead>
<tbody>
<tr>
<td>The previous HIA supported the previous draft's stipulation of the provision of affordable or low cost workspace.</td>
</tr>
<tr>
<td>The Policy was reworded to clarify that existing low cost workspace should be re-provided where it exists or if no low cost workspace exists on the site, new affordable workspace should be provided.</td>
</tr>
<tr>
<td>Requiring low cost / affordable workspace can be positive for increasing employment opportunities for people on lower incomes, who tend to have worse health.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>A Strong and Competitive Economy which Benefits All</th>
</tr>
</thead>
<tbody>
<tr>
<td>The chapter policies make no reference to increasing employment opportunities for local residents, in the construction / development process or in jobs created in employment sites. The policies in this chapter do not explicitly aim to contribute to increasing employment possibilities for residents of the borough.</td>
</tr>
<tr>
<td>A new policy relating to Local Jobs, Skills and Training has been included in the Proposed Submission Local Plan.</td>
</tr>
<tr>
<td>Employment is an important contributor to good health.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Planning for Vibrant Town Centres: Policy 39 - Over- concentration of uses</th>
</tr>
</thead>
<tbody>
<tr>
<td>The text of Policy 39 A iv. should be reworded to state, “a commitment is made to operate in compliance with the Healthier Catering Commitment”. Similarly, supporting text statement 6.25 should state that “All new takeaways are required to operate in compliance with the Healthier Catering Commitment”.</td>
</tr>
<tr>
<td>Policy amended to address the recommendation.</td>
</tr>
<tr>
<td>Making these changes improves the accuracy of the statements.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Planning for Vibrant Town Centres: Policy 39 - Over- concentration of uses</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Policy 39 restriction on new hot food takeaways within 400 metres of the boundary of a secondary school should also apply to town centre locations. It is strongly recommended that the Local Plan removes the exclusion of town centres from this.</td>
</tr>
<tr>
<td>The Policy has been amended and restriction of A5 units within 400m of a school no longer excludes town centre locations. Also, the following was added: “When assessing takeaways within the 400m buffer, applicants must...”</td>
</tr>
<tr>
<td>These are important changes given the Local Plan's strategic objective to reduce health inequalities, the local priority to reduce child obesity (Health and Wellbeing Strategy priority) and the high child obesity levels in the borough.</td>
</tr>
<tr>
<td>Planning for Vibrant Town Centres: Policy 39 - Over-concentration of uses</td>
</tr>
<tr>
<td>---</td>
</tr>
<tr>
<td>In addition to the changes in the above recommendation, Public Health recommends that the Planning team change the wording of Policy 39 to incorporate exclusion within 400m of &quot;existing and proposed&quot; schools, and add primary schools to the wording. The Policy has been amended to include primary schools, secondary schools and community colleges, existing and approved.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Improving Accessibility and Promoting Sustainable Transport: Policy 41 - Liveable neighbourhoods</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy 41 would be strengthened by adding to the safe road environment point (iv) that this aims to progressively reduce traffic accident casualties in line with 'Vision Zero' objectives (to bring the plan Policy in line with the new Mayor’s Transport Strategy). In the same way, the point about reallocation of road space (ix) should state that this will include seeking to reallocate space by the side of roads away from car parking use towards uses that create more liveable neighbourhoods and promote more sustainable means of travel. Addressed. The following text has been added to the safe road environment point (iv) in line with the recommendation: &quot;where traffic accident casualties are steadily reduced supporting Vision Zero objectives&quot;. The phrase &quot;and use of public transport&quot; has been added to the reallocation of road space point (ix), so that is now reads: &quot;Support permeability and the reallocation of road space to promote walking, cycling and use of public transport&quot;. Road space is not subject to planning control therefore cannot included in the Local Plan. Definitions of all transport terms are now included in the glossary. As is stated in the Mayor's Transport Strategy, &quot;Adopting Vision Zero will be central to the overall success of the Healthy Streets Approach, working towards the elimination of road traffic deaths and serious injuries by reducing the dominance of motor vehicles on London’s streets. [...] Minimising road danger is fundamental to the creation of streets where everyone feels safe walking, cycling and using public transport.&quot; The promotion of sustainable transport such as walking, cycling and public transport encourages active travel and thus increasing physical activity and socialising, with major positive impacts on physical and mental health; promoting sustainable transport also helps to reduce air pollution levels with associated health benefits.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Improving Accessibility and Promoting Sustainable Transport: Policy 41 - Liveable neighbourhoods</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Draft London Plan contains requirements that free drinking water is available in new or redeveloped public realm schemes (Policy D7 Public Realm) and that free and accessible public toilets should be provided in large-scale commercial developments and public realm (Policy S6 Public Toilets). Public Health recommends that the Planning team include these considerations in an appropriate place in Hackney's Draft Local Plan. Addressed. Policy 46 - Protection and Enhancement of Green Infrastructure includes reference to the provision of water fountains as one of the improvements to make to the pedestrian environment. This has also been added to Policy 9 (Health &amp; Wellbeing): &quot;D. Large-scale commercial developments in major town centres and highly accessible locations should incorporate local social infrastructure such as free This is a positive addition as providing water fountains and public toilets improves the pedestrian environment, thus facilitating the choice to walk or cycle as part of daily life. This promotes health and wellbeing through increasing physical activity through active travel, reducing exposure to air pollution, improving health through access to green space, and facilitating strong social connections, which support mental health.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Planning for Vibrant Town Centres: Policy 35</th>
</tr>
</thead>
<tbody>
<tr>
<td>Restriction, and A. iii. in Policy 35 is reworded to state &quot;It is not located within 400 metres of the boundary of a secondary school or community college.&quot; also take into account uses within neighbouring boroughs.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Improving Accessibility and Promoting Sustainable Transport: Policy 41 - Liveable neighbourhoods</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Draft London Plan contains requirements that free drinking water is available in new or redeveloped public realm schemes (Policy D7 Public Realm) and that free and accessible public toilets should be provided in large-scale commercial developments and public realm (Policy S6 Public Toilets). Public Health recommends that the Planning team include these considerations in an appropriate place in Hackney's Draft Local Plan. Addressed. Policy 46 - Protection and Enhancement of Green Infrastructure includes reference to the provision of water fountains as one of the improvements to make to the pedestrian environment. This has also been added to Policy 9 (Health &amp; Wellbeing): &quot;D. Large-scale commercial developments in major town centres and highly accessible locations should incorporate local social infrastructure such as free This is a positive addition as providing water fountains and public toilets improves the pedestrian environment, thus facilitating the choice to walk or cycle as part of daily life. This promotes health and wellbeing through increasing physical activity through active travel, reducing exposure to air pollution, improving health through access to green space, and facilitating strong social connections, which support mental health.</td>
</tr>
<tr>
<td>Hackney's Green and Public Spaces: Policy 46 - Protection and enhancement of green infrastructure</td>
</tr>
<tr>
<td>Hackney's Green and Public Spaces: Policy 47 - Biodiversity and sites of importance of nature conservation</td>
</tr>
<tr>
<td>Hackney's Green and Public Spaces: Policy 48 - New open space</td>
</tr>
<tr>
<td>Hackney's Green and Public Spaces: Policy 50 - Play space</td>
</tr>
<tr>
<td>Hackney's Green and Public Spaces: Policy 51 - Tree management and landscaping</td>
</tr>
<tr>
<td>Hackney's Green and Public Spaces</td>
</tr>
<tr>
<td>Climate change</td>
</tr>
<tr>
<td>Climate change: Policy 58 - Improving the environment - pollution</td>
</tr>
</tbody>
</table>