Late Representations to Local Plan 2033 Reg 19
Gideon Corby  ID 53
Hackney Downs Labour Party Branch ID 133
Patrica Mitchell ID 132
Dr Penny Vera - Sanso ID 131
From: gideon corby
Sent: 07 January 2019 09:15
To: Mayor <Mayor@Hackney.gov.uk>
Cc: 
Subject: feedback on draft LP33

Dear Mayor Glanville,

Happy New Year and thank you for the opportunity to give feedback on the draft LP33. See screenshot of tweeted invite attached.

I have amended the draft LP33, with comments, in a Word document and also included a non-commented PDF. I brought back some phrasing that has been lost from previous Hackney plans. I have also inserted or just listed at the end of the document, relevant parts of Islington’s draft plan.

Islington have an up to date SPD (Biodiversity Action Plan) to supplement their local plan while Tower Hamlets have a biodiversity officer to help policy delivery.

I am extremely worried that without major changes to our biodiversity policy Hackney will lose an opportunity to benefit residents and wildlife. These changes will be cheap to fulfil but repay manifold. This LP is being drafted as we enter the Sixth Mass Extinction. As a member of the Hackney Swifts group I delivered a CPD talk to our planning officers. The Council’s engagement with Hackney Swifts has led to a breakthrough in Hackney’s policy on swifts. We need a similar breakthrough for wildlife in general and I am very happy to talk through the reasons for the amendments I’ve made with those drafting the LP33.

I look forward to hearing back.

Yours sincerely,

Gideon Corby
11. Hackney’s Green and Open Spaces

11.1 Hackney has almost 400 hectares of open space. Hackney’s parks and green spaces are of a high quality. They vary in size, ranging from large areas of Metropolitan Open Land at the Lee Valley Regional Park, which accounts for almost 40% of the borough's open space, to pockets of grass by the side of roads. The network of open spaces, waterways and the public realm is at the core of the borough’s green infrastructure with many being multi-functional assets which can have providing vital ecological and quality of life benefits for the community. Many of these spaces are also designated or non-designated heritage assets.

Key Facts

- 25 parks in Hackney have been awarded Green Flag status (as of 2018).
- Approximately three quarters of Hackney residents do not have access to a private garden.
- There are 395 hectares of open space in the borough.
- Hackney Marshes supports up to 82 football, rugby and cricket pitches.
  - Hackney has 160 food growing projects
  - Abney Park has rare species including…contact Russell Miller for details.

Chapter Objective:

- To protect and enhance existing open spaces and biodiversity and develop and improve green links between these spaces and support the creation of new open spaces and vertical gardens.
- This chapter expresses broad aims. The details of how these aims are to be achieved are found in the Hackney Biodiversity Action Plan (BAP) which has the equivalent status of a supplementary planning document.
- Developers will be required to reference the BAP as part of their planning application.
- Further information is available in:
  - Hackney Advice Note: Biodiversity Validation and Biodiversity Assessment
  - Hackney Advice Note: Biodiversity and the built Environment

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LP46 Protection and Enhancement of Green Infrastructure

A. All new development should enhance the network of green infrastructure and watercourses across the borough and seek to improve access to open space, particularly in areas of deficiency.

B. Development involving the loss of designated open space will not be permitted unless:
   i. there is compensatory contiguous replacement of better or equivalent quantity and quality of public open space and setting including facilities to enhance or diversify people’s experience of the open space; and
   ii. replacement is in a location with better or equivalent access by walking, cycling or public transport; and
   iii. the quality of the remaining and replacement open space is not eroded by the proposed development.

C. Development on other open space will only be permitted where:
   i. replacement and/or enhancement of open space of better or equivalent quality is provided either on site or a location within the vicinity of the site, especially in the identified areas of deficiency, and
   ii. wherever possible any replacement connects to the network of green infrastructure including the green chains and green corridors, or
   iii. it can be shown that the relationship between buildings and associated open space(s) can be improved in terms of use, security, setting and landscape quality.

D. Small scale ancillary developments which enhance the park and open space offer, such as refreshment facilities, public conveniences, drinking fountains, public art installations or outdoor play and fitness equipment will be permitted provided that they are:
   i. Of a high standard of design and quality, safe and accessible to all; and
   ii. Do not have a detrimental impact on nature conservation and biodiversity, and should seek to improve such; and
   iii. Do not result in the loss of functional open space where possible; and
   iv. Do not detract from the overall function, character and appearance of the park or open space.

E. Living roofs and Vertical Forests
   i. Living roofs are required on major development schemes that include roof plates of over 100sqm.
   ii. Living roofs and vertical forests are encouraged on all development proposals, including minor schemes, renovations, extensions and conversions.

F. Allotments and Food Growing
   i. The Council will protect existing allotments and support the provision of new food growing spaces.
Green Infrastructure is the network of multi-functional green space across the borough, delivering a wide range of vital environmental, health and wellbeing, social and recreational benefits for Hackney’s communities as outlined in the Green Infrastructure Task Force’s objectives for green infrastructure in London:

1. Promoting Healthy Living: improving health outcomes by increasing physical activity, reducing stress and removing pollutants.
2. Strengthening Resilient Living: keeping the city cool, it’s air clean, and protecting it from flooding.
3. Encouraging Active Living: increasing levels of walking and cycling.
4. Creating Living Landscapes: enhancing natural processes for the benefit of people and wildlife and conserving the most special landscapes, habitats and species.
5. Enhancing Living Space: providing a range of outdoor space for cultural, civic, learning and community activity, including productive landscapes.

Development on designated open space (or playing pitches) is not permitted unless all criteria in section B of the policy are met. Loss of other open space, which tends to be located within housing estates, will also be carefully managed in line with criteria C of the policy as these spaces play a particularly important role for those without access to private gardens.

Population growth and development pressures in Hackney increases the importance of protecting all existing open spaces within the green infrastructure network, and this is especially important in areas of deficiency. Map 12 below shows areas of deficiency in access to publicly accessible open space. These areas should be prioritised for on-site provision of open space as outlined in Policy LP48.

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11.5 Where an existing open or green space is reasonably close to the community it serves, is demonstrably special to a local community and holds a particular local significance because of its beauty, historic significance, recreational value (including as playing field), tranquillity or richness of its wildlife and is local in character, then local communities can recommend them for Local Green Space designations in either the Local Plan or Neighbourhood Plan. Providing that the space satisfies the criteria of the NPPF paragraphs 76-78 then any designated Local Green Space will be afforded protection from new development other than in very special circumstances.

11.6 In some cases, identified areas of open space deficiency are not always a result of low quantities of open space, but a lack of or difficult access to open space. Enhancement of open space, particularly improved accessibility to existing parks and enhanced links between existing open spaces is encouraged across the borough in order to enhance the green infrastructure network (refer to Policy LP49 Green Chains and Green Corridors). The provision of ancillary facilities such as seating, play or fitness equipment, public toilets, refreshment facilities or picnic areas, drinking fountains and changing facilities of an appropriate size and scale within public parks and other publicly accessible open spaces, will be supported where it can be demonstrated that these will enhance the space without harming the biodiversity of the space or neighbouring spaces.

11.7 Living roofs and vertical forests are important features of urban greening, providing various benefits including improvements in the visual appearance of buildings,
11.8 There are nine dedicated allotment sites in Hackney managed by the Hackney Allotment Society as well as food growing spaces led by independent groups and social enterprises are also found in other open spaces. The council will protect exiting allotments and other community gardening projects. There is high demand for allotments in Hackney and the Council therefore seeks to protect all existing sites and actively supports the provision of new allotments and the expansion and improvement of existing allotments and community food growing schemes. Allotments and community gardens provide many benefits to the physical and mental wellbeing of residents including through the production of healthy, fresh food, greater exposure to natural environments and wildlife, physical activity and social connections. New food growing initiatives are encouraged on existing open spaces and temporarily derelict land where short or medium term development is not planned. Consideration must be given to facilities such as storage of equipment and composting, ensuring that there is no detrimental impact on the character, appearance, biodiversity and amenity of the surrounding area, and to equality of access and security.

11.9 Underutilised paved or tarmacked areas that could be transformed into greenspace should be turned into amenity grassland for children, allotments, low-maintenance biodiverse native vegetation or pocket woodland which local community groups or individuals should be encouraged to maintain. When local community groups locate suitable sites, necessary planning changes will be speedily made to encourage the transformation.

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There are 24 designated Sites of Importance for Nature Conservation (SINC) in Hackney. Hackney also falls within the Epping Forest Special Area of Conservation so regard must be given to the Management Plan for Epping Forest Special Area of Conservation. Springfield Park, in addition to being a SINC, is designated as a Regionally Important Geological/Geomorphological Site (RIG) based on its prominent spring line and Langley Silt and Hackney Gravel composition, and will therefore be protected. Planning permission will not be granted for any schemes that adversely affect SINCs of Metropolitan or Borough Grade 1 importance. SINCs of Borough Grade 2 and Local Importance, and any other site of significant biodiversity value, will also be strongly protected.

The Council’s Biodiversity Action Plan (BAP) (March 2012) outlines the priorities for biodiversity in Hackney and a framework to improve biodiversity across the Borough. It sets out international, national and regional policy and legislation, thus, touching upon habitats and species which have statutory protection. Furthermore, the Plan looks at best practice around different types of habitats - Built Environment, Homes and Housing, Parks and Green Spaces, School Grounds, Wetlands and Waterways, Woodland. The guidance is relevant to designated and non-designated sites of nature conservation interest, irrespective of size and ownership. The BAP should be used as the first reference point regarding ways to incorporate nature conservation and biodiversity into schemes or the fabric of a building. In addition, for Hackney’s waterways the Environment Agency’s Thames River Basin Management Plan and the European Water Framework Directive provides guidance on the protection of watercourses and wetlands.
11.12 Hackney is seeking to achieve net gain in biodiversity; this means that development should leave biodiversity in a better state than before. Net Gain is demonstrated through a standardised metric such as the BREEAM methodology or as stated in the Hackney Biodiversity Action Plan (BAP). All development proposals should retain, enhance or create features and areas of nature conservation and/or geodiversity value and avoid harm to biodiversity. Wildlife corridors should be provided or enhanced where appropriate. All major development proposals are required to include a biodiversity survey of the site setting out actions that will be taken to protect and enhance the biodiversity value on the site and the methods of habitat management that will be implemented. Green infrastructure enhancements should be considered at an early stage in the design process rather than as an ‘add on’ at the end of the design process. Sites with a low existing green infrastructure value represent particular opportunities to increase green infrastructure functions.

11.13 All development schemes where the buildings have an eaves height or roof commencement height of 7.5 metres and above should provide nesting boxes for swifts, sparrows, starlings and/or bats as appropriate to help preserve endangered urban biodiversity in Hackney. Swift bricks should be set flush into the external wall to match adjacent brickwork wherever possible. Reference should be made to the Hackney Biodiversity Action Plan (BAP) for further details: https://www.hackney.gov.uk/biodiversity#hackney.

11.14 Where it is demonstrated that it is not possible to avoid adverse impact on habitats and/or species and there are exceptional circumstances such as overriding economic or social reasons for a development to occur within a SINC, and the benefits of the development outweigh the adverse impact on the biodiversity and geodiversity value of the site, mitigation measures, detailed by an independent ecologist and agreed by the Hackney Biodiversity Partnership or Hackney Biodiversity Officer, must be included to minimise this impact. This is subject to reasonable alternatives for location and design having been assessed, and high-quality re-provision either on-site or elsewhere in the borough, which shall at least re-provide the habitat area and value, and preferably increase and improve the value.

11.15 Gardens, including front gardens, are at particular risk in the borough and have been under increasing pressure from development over recent years. While development in one garden may have only a small impact, the cumulative effects of reduced garden space (at a local and regional level) is significant, for example by collectively reducing the amount of permeable surfaces to deal with increasing risks of surface water flooding, by reducing biodiversity and ecological connectivity, and by impacting on the overall open and green character of the borough.

11.16 The ‘Homes and Housing’ section of the BAP seeks to raise awareness of individual gardens and green spaces on housing estates as a biodiversity resource, and encourages investment and sensitive management of these areas for such purposes.
11.17 Alternatives to pesticide use will be actively sort. Enforcement of proper disposal of food waste will be encouraged to decrease the necessity for rodenticide.

11.18 Alternatives to herbicide use will be actively sort (see BAP). Community groups can opt out of herbicide spraying on their estates, streets and public spaces. Local community groups will be encouraged to use alternative methods of vegetation control. There are benefits to vegetation, which does not damage infrastructure while greening an otherwise inhospitable environment.

11.19 Measures and mitigation will be put in place to limit the adverse impact of domestic pets and invasive species on biodiversity in line with national policy.

### LP48 New Open Space

A. All development proposals for 10 or more residential units must provide:
   i. 14 sqm per person of communal open space; and
   ii. An Urban Greening Factor score of at least 0.4

B. All major mixed-use or commercial development proposals must provide:
   i. 4 sqm of communal open space per employee, and
   ii. An Urban Greening Factor score of at least 0.3.

C. In the identified areas of deficiency, shown on Map 12, the emphasis is on on-site provision of open space. Planning permission for major developments will only be approved if the applicant can demonstrate that they will achieve the requirements set out in A and B above.

D. Outside of the areas of deficiency, shown on Map 12, where the targets set out in A and/or B cannot be achieved, developments must:
   i. Make physical improvements to the public realm to improve access to existing public open spaces, or
   ii. Make financial and/or physical contributions for the enhancement of existing public open space or other green infrastructure in the locality.

E. All new open space should meet the following criteria:
   i. Be provided on site, and
   ii. Be of high quality, and
   iii. Be incorporated into the design of the scheme from the outset, and
   iv. Maximise biodiversity benefits, and
   v. Be publicly accessible and useable where possible.
Hackney’s average existing open space provision and the overarching aim to retain the existing levels of provision per person as the population grows. New open space should meet the criteria set out in part E of the policy.

11.1311.21 In addition to providing communal open space, applicants are required to incorporate urban greening measures in the layout and design of a scheme to achieve an Urban Green Factor score of at least 0.4 for major residential schemes and at least 0.3 for major mixed-use or commercial schemes in line with the London Plan. This will help to increase green cover across each development and contribute towards the aims of.

**LP49 Green Chains and Green Corridors**

A. All new development adjacent to existing Green Chains and Green Corridors must be developed in a way that contributes towards the green infrastructure network. In the areas of potential new Green Chains identified on Map 13, financial contributions may be sought to develop new Green Chains in the future.

11.1511.22 In the areas that are deficient in access to open space, shown in Map 12 (i.e. predominantly around Dalston and Shoreditch), the emphasis is on on-site provision of open space. The option outlined in criteria D to exceptionally provide financial and / or physical contributions in lieu of on-site open space provision does not apply in areas of open space deficiency.

11.1611.23 Green Chains and Green Corridors are an integral part of Hackney’s green infrastructure network, contributing positively to the network of open spaces, recreation and biodiversity with positive impacts on climate change, drainage, air quality, active travel and health.

11.1711.24 Green Chains connect publicly accessible green spaces to each other within Hackney’s boundaries and beyond. Green Chains act as an extension of the green spaces that they connect, and should follow the ten Healthy Streets indicators.

11.1811.25 Green Corridors are relatively continuous areas of open space leading through the built environment, which may be linked and may not be publicly accessible. They may allow animals and plants to be found further into the built-up area than would otherwise be the case and provide an extension to the habitats of the sites they join.

11.1911.26 Map 13 below shows the existing Green Chains and Green Corridors and identified areas for the development of new Green Chains. Contributions towards new
and existing Green Chains and Green Corridors will be informed by details in the Council’s Transport Strategy 2015-2025 and the Council’s Green Infrastructure Strategy.

Map 13: Hackney’s Green Infrastructure
Children’s play space - both formal and informal space - is important for the development of physical, social and emotional skills in children and can improve health and reduce health inequalities. New play space should be provided on site in development schemes that are likely to generate a child yield of 10 or more. Child yield should be established using the play space calculator in the Mayor of London’s Play and Informal Recreation SPG and provision should be 10sqm per child. Play space must be inclusive and open to both existing communities and new residents. New play spaces and areas for informal recreation should be informed by the design principles outlined in the Mayor of London’s Play and Informal Recreation SPG.

If site constraints mean that play space cannot be provided in addition to communal open space in new developments as outlined in Policy LP48 then play space may be provided on-site within communal open space or on green roofs where these areas are safe, large enough, attractive and suitable for children to play. Exceptionally, where it is demonstrated that on-site play space is not feasible in any form, applicants may make financial and/or physical contributions for the enhancement of existing play space in the locality.

LP51 Tree Management and Landscaping

A. All development proposals must retain existing landscape features and trees of amenity value, especially veteran trees, hedgerows and natural features, and must incorporate high quality landscaping.

B. Proposals resulting in the removal of protected trees (trees under a TPO and those within conservation areas) or a detrimental impact on the health and amenity of such trees will be refused except in exceptional circumstances and/or where over-riding planning benefits are demonstrated. In such cases, compensatory measures will be required for suitable replacements and/or additional planting, or contributions to planting offsite. The removal of non-protected trees as part of development schemes will not be supported unless adequate replacement planting is proposed, or the removal is in the interests of good arboricultural practice.
11.21 Trees are a valuable feature of the urban and natural landscape and a key part of the green infrastructure network. Trees offer substantial benefits to people and the environment in improving air quality, reducing noise pollution, contributing to climate change adaptation, reducing the urban heat island effect, providing habitats for wildlife, contributing towards biodiversity and providing landscape structure and character. Street trees in particular contribute to the visual quality and amenity of the public realm and help people relate to the urban environment.

11.22 Trees and landscaping should be an integral part of the design process. All development proposals must retain and protect existing trees, particularly those of amenity value, i.e. those that have interest biologically, aesthetically or culturally. In addition, Landscaping Plans must be submitted with all major development proposals demonstrating that landscape design and materials are of a high quality and compatible with the character of the area, proposed planting is environmentally appropriate for the specific location, proposed sustainable irrigation plans are appropriate, and that planting design will not impact negatively on the structure of nearby buildings or hinder accessibility. Opportunities for food growing should also be considered as part of landscaping schemes. The emphasis is to soften the impact of the development in its setting, provide visual interest in the street scene and contribute to nature conservation and the borough’s green infrastructure.

11.23 Larger, older trees provide proportionally greater environmental services. Native trees provide greater biodiversity benefits, having evolved alongside other native species. Existing large or long-lived trees wherever possible. New tree planting must consider longevity and size at maturity to ensure net gain in tree canopy, environmental services and biodiversity. Planting should follow the Right Tree Right Place principle and recognise that 1:1 removal and replanting is not replacement even when large trees are planted. It takes decades for trees to grow and impossible to “replace” mature trees. If done well, replanting may mitigate loss but retention should be preferred. All new tree planting must be maintained in accordance with best arboricultural practice.

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LP52 Waterways, Canals and Residential Moorings

A. The natural habitat and setting of the waterways and their riparian areas must be protected and enhanced.

B. The River Lea and Regent’s Canal are green corridors which, if enhanced, will encourage wildlife from the Lea Valley deep into Hackney.

Development Alongside Waterways and Canals

B-C. Development alongside the waterways and their riparian areas will only be permitted where all of the following criteria are met:

i. Public access in the form of a continuous green chain along the waterfront or towpath is maintained, created or enhanced. This should include, where appropriate, the incorporation of an undeveloped buffer strip alongside the watercourse; and

ii. There is no conflict with nature conservation, biodiversity interest, heritage value or flood risk management. Mitigation or compensatory measures may be necessary; and

iii. The development enhances the leisure, recreation or educational value of the waterway; and

iv. The development does not have an adverse impact on the structural integrity of the waterway; and

v. The development does not cause additional overshadowing of the canal. A daylight and sunlight assessment must be submitted with all applications and mitigation or compensatory measures may be necessary; and

vi. The design makes a positive contribution to the character and appearance of the waterfront area and setting.

vii. Detrimentally affect leisure provision, amenity and the character and appearance of the waterway and surrounding area.

Residential Moorings

C-D. Proposals for residential moorings will be supported provided supporting uses and facilities are or will be in place, and, where appropriate they have regard to the Park Plan and Area Proposals of the Lee Valley Park Authority.

D-E. Proposals for residential moorings and associated facilities must not:

i. Hinder navigation along the waterway; or

ii. Have a detrimental impact on nature conservation and biodiversity; or

iii. Impede public access; or

iv. Detrimentally affect leisure provision, amenity and the character and appearance of the waterway and surrounding area.
The most significant waterways in Hackney, all of which are designated under the Water Framework Directive, are:

- The Old River Lea and Lee Navigation (Hackney Cut)
- Regents Canal (including Wenlock and Kingsland basins)
- The New River, West and East Reservoirs (Stoke Newington)

These waterways form part of the strategic Blue Ribbon Network and are recognised as a valuable habitat for plants and nature conservation and provide for a range of leisure interests. Development along the waterways is permitted provided all criteria in part B of the policy are met. Development alongside waterways and canals can impact on biodiversity as a result of reduced light and cooler temperatures and can potentially also create a ‘canyoning’ effect around the canal, reducing its amenity value. All canalside developments must therefore be accompanied by a daylight and sunlight assessment that identifies the waterspace as a sensitive receptor and sets out the mitigation measures that will be implemented if a development is likely to cause additional overshadowing of the canal. The undeveloped buffer strip alongside the watercourse should be publicly accessible. Any proposals must take account of the statutory and discretionary requirements of Environment Agency, the Canal and River Trust and Natural England and must support the aims of the European Union Water Framework Directive which seeks to achieve Good Ecological Status or Potential across Hackney’s waterways. Development alongside the waterways should also consider using waterborne freight.

There is demand in Hackney for both permanent private moorings and moorings that are open to all licensed craft (for up to 2 weeks, unless otherwise specified by local restrictions). In line with the London Plan, Hackney supports residential moorings along the navigation systems provided all the criteria of Part C of the policy are met and there is no detrimental impact on the waterways. Permanent moorings in particular should be located if possible off-line from the main navigation routes, i.e. in basins and docks, lay-bys, or on the non-towing path side of the waterway. If planning permission for mooring is granted, applicants would also be required to obtain permission from the Canal & River Trust for permission to moor on the waterspace.

In addition, Hackney has public and private ponds of high amenity and biodiversity value including Clissold, Haggerston and Springfield Parks as well as Clapton and Clapton Common. Species needing protection include rapidly declining amphibians. Conservation and enhancement measures are detailed in the BAP.
Islington’s Sites of Importance for Nature Conservation (SINCs) are areas designated for their importance for wildlife, biodiversity and access to nature. SINC boundaries are shown on the Policies Map. Planning permission will not be granted for any schemes which adversely affect designated SINCs of Metropolitan or Borough Grade 1 Importance. SINCs of Borough Grade 2 and Local Importance, and any other site of significant biodiversity value, will also be strongly protected.

Policy G4: Biodiversity, landscape design and trees

Development proposals involving the creation of new buildings, redevelopment of existing buildings or large extensions must submit a Landscape Design Strategy which maximises green infrastructure, biodiversity and sustainable drainage. The Landscape Design Strategy should consider landscape design holistically from the outset of the design process and demonstrate the following:

- An integrated approach to hard and soft landscaping design. Priority should be given to soft landscaping and urban greening, including areas of unconstrained planting;

- Consideration of existing and proposed trees, hedges, shrubs and other vegetation of landscape or environmental significance, and their impact on biodiversity, sustainable drainage, air quality and urban cooling;

- Functional, attractive and inclusive design;

- Biodiversity benefits and ecological connectivity have been maximised, including through the protection and enhancement of existing biodiversity, and the incorporation of new areas of biodiversity and opportunities for wildlife, including through green roofs and vertical greening;

- Incorporation of Sustainable Urban Drainage Systems (SUDS) into the landscape design as part of an integrated approach which maximises biodiversity and water use efficiency alongside other benefits including, where appropriate and practical, amenity and recreation;

- Incorporation of suitable wildlife habitats, including micro-habitats;

- A robust planting design that can sustain itself without intensive maintenance and/or intervention; (viii) Appropriate maintenance arrangements that will be put in place from the outset of the development; and (ix) Integration of food growing opportunities, where feasible and practical.
Biodiversity benefits and ecological connectivity must be maximised through planting design, ecological landscaping, and the incorporation of areas of biodiversity that complement surrounding habitats and support the council’s Biodiversity Action Plan. Species chosen for planting must maximise biodiversity benefit, be beneficial to wildlife and complement the existing habitat. Habitat features should be incorporated on-site to support existing species of wildlife and provide opportunities for new wildlife.

5.26 Proposals on sites of significant biodiversity value will only be considered in wholly exceptional circumstances where high quality re-provision will be required, including at least equal habitat area and value and where other relevant Local Plan policies on Green Infrastructure and design of open space are met. Preservation of existing biodiversity, including wildlife habitats, is strongly preferred over re-provision as any redevelopment of an existing space will necessitate its total loss and replacement with a space that has to be established with plants and wildlife and carries the risks that the replacement space will be less successful than that which it replaces. Re-provision is only likely to be acceptable where measures are secured to ensure that the quality of re-provision at least reaches the quality of the previous space.

5.27 Islington’s wildlife depends not only on green spaces, but also on the artificial fabric of the city. Buildings can provide roosting sites for bats and nesting opportunities for birds such as swifts, house sparrow, peregrine falcon and black redstart, species that have seen large population declines, and which are dependent on built areas for their survival. Walls can provide habitats for many species of plant, including ferns and mosses, and also provide spaces for invertebrates. Developments involving refurbishment and/or extension of existing buildings may impact species using the existing buildings, therefore measures to ensure retention and enhancement of such species will be required. Developments involving new and existing buildings should also utilise opportunities to attract new species to a site through such measures. All wildlife habitats must be designed in accordance with the council’s Biodiversity Action Plan, and in many cases, will include micro habitat creation. Artificial nest boxes/bricks should be incorporated within developments (refurbishments, extensions and/or new build) to provide nesting and roosting opportunities for birds, including species under threat such as swifts, house martins, swallows and house sparrows, and where appropriate, bats.

Policy G5 Green roofs and vertical greening

B iv) Green Roofs should be designed to: have a varied substrate depth of average 80-150mm, unless it can be demonstrated that this is not reasonably possible.

C Developments proposing the installation of roof level solar panels are required to incorporate the panels over a green roof area to form a ‘bio-solar roof’, where the overarching biodiversity and drainage functions of the green roof will not be adversely affected.
All green roof installations should be extensive green roofs. The installation of intensive or semi-intensive green roofs to provide amenity space will only be acceptable where it is clearly demonstrated that this is required to meet other policy requirements, and where the primary biodiversity, sustainable drainage and cooling functions of the green roof will not be adversely affected. Dedicated areas of biodiversity-based planting must be maximised and the amenity space must not cover the majority of roof space.

New-build developments, and all major applications (including those involving refurbishments) should maximise the greening of vertical surfaces as far as reasonably possible. Vertical greening should be designed to:

- maximise benefits for biodiversity, sustainable drainage and cooling;
- avoid excessive water demand and employ a watering system that does not rely on mains water supply, including utilising rainfall runoff;
- promote ecological diversity through planting a range of appropriate species and incorporating micro habitats to support Islington’s Biodiversity Action Plan, including nesting boxes for birds or bats where possible;
- provide growing conditions suitable for the selected species, and require minimal maintenance;
- incorporate planting from both ground level and roof level planters where practical.

The design of green walls must include consideration of building structure and character, including architectural and historic features, in order to ensure such features are preserved and damage is avoided.

Urban greening - through green roofs and vertical greening - is particularly important on constrained sites where there is limited space for other forms of green space. Green roofs and green walls provide an opportunity for enhancing biodiversity and creating different types of new habitats in the built environment, supporting a wide range of species. These features form an important part of green infrastructure and play a useful role in connecting existing areas of habitat and supporting rare and protected species, as well as providing a broad range of other sustainability benefits. Designers are encouraged to consult a suitably qualified ecologist for advice on the planting and growing conditions of green roofs and green walls. This will also assist developments in achieving credits related to ecology in the relevant BREEAM schemes, where applicable.

Green roofs are vegetated layers that sit on top of the conventional roof surfaces of a building. Green roofs cannot be considered as a direct replacement for green space lost to development as they will tend to have more limited biodiversity potential due to their raised location and limited depth of growing medium, however they do have multiple benefits. They improve biodiversity by supporting a wide range of plant life and providing alternative ecological habitats for insects, bats and birds. Green roofs also contribute to minimising flood risk by reducing surface water runoff, improve air quality, improve thermal efficiency and cooling of buildings through the insulation they provide, and provide urban cooling to mitigate the ‘heat island effect’.
5.42 ‘Extensive’ green roofs are able to establish a self-sustaining plant community, and are suitable for installation on the majority of building types because they have low management requirements and do not usually require artificial irrigation. Extensive green roofs designed for biodiversity should include a varied substrate depth and be planted and seeded with a wide range of wildflowers. These features will provide good habitat for wildlife including native invertebrate species, nesting and foraging for a number of bird species, and pollinators such as bees. Extensive green roofs must not be publicly accessible, except for necessary maintenance, in order to ensure the biodiversity of the roof can thrive. Development proposals should prioritise biodiversity based extensive green roofs in favour of intensive and semi-intensive green roofs, unless it can be demonstrated that an intensive or semi-intensive green roof is necessary to meet policy requirements relating to the provision of private open space. Clear and convincing evidence must be provided to demonstrate that provision of alternative on-site amenity space is not possible in order to justify why an extensive roof cannot be installed.

5.43 ‘Intensive’ and ‘semi-intensive’ green roofs provide different degrees of accessible amenity space such as rooftop gardens and food growing areas and require higher levels of design and maintenance. These types of roofs must be installed upon a stronger structure in order to support the additional weight requirements of deeper soils or substrate and features such as paths. As a result, they can also support a greater diversity of planting and richer ecology including shrubs and tree planting, in addition to wildflowers found on extensive green roofs. Intensive green roofs can provide very effective sustainable drainage as they can support the weight requirements of blue roof storage, which can also be used to irrigate the planting and trees.

5.44 The incorporation of biodiversity-based extensive green roofs on all available roof space should be provided as part of all new-build developments, major refurbishments, and extensions larger than 100sqm. All other developments should investigate the potential for incorporating a green roof. Where it is demonstrated that the incorporation of a green roof is not feasible or practical, it must be demonstrated that other forms of greening have been investigated and maximised as part of the development, in order to maximise soft landscaping and biodiversity in line with green infrastructure strategic policy. All development proposals are encouraged to incorporate ‘green roof’ elements and planting on terraces and balconies, subject to other planning considerations.

5.45 Due to the densely developed nature of the borough, there may be competing demands on the proposed use of roof spaces, including the provision of biodiverse urban greening, rainwater attenuation, renewable energy generation through solar panels, and amenity space. High quality design should aim to resolve any potential conflicts between creating green roofs, providing renewable energy and supplying amenity space on roofs. Dual uses on roofs will be encouraged where they will not have a negative impact on the primary functions of the green roof to provide biodiversity, sustainable drainage and cooling benefits.

5.52 The incorporation of green walls should include plants that are planted in the ground and climb directly up wall surfaces and trellis to provide vegetation cover, such as Ivy. Green walls should also include planting at roof level which hangs down the building, where practical, and can be incorporated as part of a green roof. Alternatively, green walls can be
part of a vertical system incorporating vegetation, growing medium, irrigation and drainage into a single system in which multiple plantings root to a structural support attached to the wall and receive water and nutrients from within the vertical support.

5.53 Impacts on building structure and associated maintenance requirements are relevant considerations when determining the scope of a green wall. Green wall design must include consideration of maintenance requirements in order to ensure that plants receive sufficient water and nutrients from the ground or from within the vertical support, depending on the type of green wall proposed. In order to be a sustainable greening feature, the watering system for the green wall must not rely on mains water supply.
Subject: Re: Local Plan 2033 (LP33)

Dear Phil Glanville

Following your reassurance below that late contributions to the LP33 consultation would be accepted, and now that Hackney Downs LP branch has had the opportunity to discuss the plan, and also following the recent - and very welcome - news on the future of the Nightingale Primary School site, I'm attaching our submission below.

As the consultation is officially closed, I'm hoping one of you will make sure our submission arrives on the right computer screen and that it's incorporated into the consultation document as soon as possible. If someone could confirm this to the branch, we'd be very grateful.

With many thanks,
Leonie Rushforth
Vice Chair HDLP

HACKNEY DOWNS LABOUR PARTY BRANCH SUBMISSION TO LP33

We note that the future of Adult Education provision in Hackney does not feature at all in LP33; it is mentioned once but that’s in an individual consultation comment, which likewise notes the absence of AE from the Council’s plans and proposes that Stoke Newington Library be protected as an AE hub and that its facilities and scope be extended.
We further note that Adult Education provision in the borough generally has been drastically cut and that very little is currently offered.

In this connection, we welcome the Council’s undertaking to keep the vacated Nightingale Primary School site in our branch area in council hands, that is in public ownership, and to maintaining its use as an education site/centre.

We propose that the Council makes an explicit commitment in LP33 to using the Nightingale site as a council-run AE centre in order to extend the very depleted AE resources in the borough, and that this commitment is expressed both in the Community Resources/Education section of the plan and in the Site Allocation section. In addition, we propose that local schools, education groups and organisations of all kinds should be involved with the Learning Trust in exploring imaginative ways in which this broad commitment could be developed in practice.
Part A
Title: Miss
First name: Patricia; Last name: Mitchell
Organisation: n/a
Email: ; Telephone
Address:

I wish to participate in an oral part of the examination

I wish to be notified of when the Hackney Local Plan is submitted to the Planning Inspectorate; when the Hackney LP examination will occur; when the Inspector's report is published; and when the Hackney LP is adopted.
Signature:  P. Mitchell  Date:  25 January 2019
Chapter 12
4/5. I believe the Hackney Local Plan 2033 Proposed Submission is not sound because it is not justified.

6. Reasons:
The most serious risk we are all facing is from climate change. This ought to be a priority consideration for Hackney Council. Yet only Chapter 12 at the end of the Plan deals with it directly, in just 8 pages out of a total of 228 in the whole of the Plan. Moreover the emphasis is on mitigation rather than prevention.

It is good that CO2 emissions in Hackney are amongst the lowest in the country (para 12.1). However as the International Panel on Climate Change (IPCC) has clearly warned, they need to be reduced still further. It will not be enough simply to attempt to mitigate the effect of them.

‘LP55 Mitigating Climate Change’ on page 150 sets out aspirations but insufficient attempt has been made to link these to policies and they are incompatible with some of the policies and proposals which are contained in the Plan.

The commitment to reduce carbon emissions by 80% by 2050 (p.151) falls well outside the time frame of the Plan and therefore means very little. The commitment should properly reflect the requirements laid out by the IPCC in its most recent report of October 2018.

The word ‘sustainable’ appears in various places throughout the report but there is no definition of what it is intended to mean.

7. I consider the following modifications, at least, necessary to make the Plan sound:

i. The contents of Chapter 12 should be given greater prominence by moving it to the front of the Plan

ii. The following paragraph, or similar, should be included:

“An overriding objective of the Plan shall be to heed the warnings and follow the recommendations given from time to time by the International Panel on Climate Change on global warming and climate change, the most recent being its Special Report on 8 October 2018. This climate change objective (CCO) shall apply to every policy and proposal contained within the report. Where there is any inconsistency between the CCO and any policy, proposal or other matter, such policy, proposal or other matter shall be abandoned or suitably modified.”

iii. The first line of Para 12.7 should be amended to read: “Hackney is committed to contributing to reducing carbon emissions from the borough by at least 45% from 2010 levels, by 2030 and by 100% by 2050.”

iv. The following statement should be included in the Chapter:

“Where the word ‘sustainable appears in this report it is intended to mean ‘of a nature that either reduces or does not increase CO2 emissions.” Or similar wording.
Chapter 2 para 5
4/5. I believe the Hackney Local Plan 2033 Proposed Submission is not sound because it is not justified.
6. Reasons:
As for Representation 1.
The aim of making London a ‘World City’ and to strengthen Hackney’s role in it is misguided. Air and sea travel contribute significantly to the increase in CO2 emissions and there needs to be a reduction in both. This is not compatible with the notion of making London a ‘World City’.
7. The following modification is needed:
The paragraph should be deleted.
Part B

Representation 3

Chapter 7
4/5. I believe the Hackney Local Plan 2033 Proposed Submission is not sound because it is not justified.
6. Reasons:
As for Representation 1.
The Plan states that ‘homes are responsible for almost half of all emissions in Hackney’.1) (12. It is essential therefore that Hackney prioritise any provision of additional housing for the benefit of those who are not able to obtain housing on the open market.

7. The following modification is needed:
This Chapter and underlying policies need to be revisited and revised so that the focus is on meeting the housing needs of those people who already live or work within the borough and who cannot afford either the market price of houses for sale or the market rents of properties for renting. It should not be geared towards building new homes whether for sale or rent which will be unaffordable by the vast majority of the existing residents of the borough.
Hackney Local Plan – Proposed Submission 2018 - Representation Form

Part A
Title: Dr
First name: Penny
Last name: Vera-Sanso
Organisation: n/a
Email: Telephone:
Address:

I wish to participate in an oral part of the examination

I wish to be notified of when the Hackney Local Plan is submitted to the Planning Inspectorate; when the Hackney LP examination will occur; when the Inspector’s report is published; and when the Hackney LP is adopted.
Signature: P Vera-Sanso Date: 25 January 2019

Representation 1

Chapter 2 is not sound and not justified.

Chapter 2 has incompatible objectives.

This incompatibility is demonstrated by the plan’s statement that ‘the average home costs 17 times the average salary in the Borough’ and the need for ‘affordable workspaces’ in a context where ‘average commercial rents are increasing by 90-95% since 2009’ (2.2). ‘Competing demand for the use of land … for economic and housing purposes’ (2.3) will only be significantly heightened if Hackney sees itself as ‘a key component of London as a World City’ (2.5).

It is well documented internationally that seeking and maintaining World City status puts local people in competition with the strongest global forces, effectively cleansing the area of the local population, in waves of gentrification as residents are unable to meet rising housing costs and are unable to rent workspaces as rents level up with the high rates that office space commands. The plan therefore cannot be a plan for ‘Hackney – A Place for Everyone’ (2.1).
It is also well documented that population expansion of 16% (p5, fig 1) and densification will not ‘mitigate’ or ‘further reduce our carbon footprint’ (2.7) but will increase it. Rather than planning for a population increase that reflects natural population growth, the increase is based on the assumption of drawing a large number of new residents and workers to Hackney. Increasing the number of homes by 27% (Figure 4) is entirely incompatible with mitigating or reducing Hackney’s carbon footprint.

The Borough’s Vision (p7) : ‘Hackney is a place where everyone has had the opportunity to benefit from the growth the Borough has seen and no sections of the community feel left behind’ is not sound and not justified.

In a Borough with the fifth highest child poverty of any local authority in London, with more than 1 in 3 residents living in poverty, well above the London average, with the third highest poverty rate and the highest infant mortality rate by a large margin (see London Poverty Profile) the goal of making Hackney a ‘key component of London as a World City’ will not make Hackney ‘a Place for Everyone’ but will drive out waves of current residents and their children, forced out by rising prices on housing and workspaces.

Objectives (p8) of expanding housing by 26,250 homes and jobs by 23,000 suggests that the expectation is that Hackney should be more of a dormitory for other parts of London, as urban households would, on average, expect to have at least 2 persons in work.

Rather than having an expansionist vision, Hackney’s strategic planning needs to be taking a measured view on densification and commercial development at a time when there are negligible state resources to fund developments that will benefit Hackney’s current residents, who are amongst the poorest in London and the least able to resist gentrification.

Representation 2

LP13 affordable housing LP13 iv is not sound and not justified.

In a Borough’s whose vision is ‘Hackney – A Place for Everyone’ off-site affordable housing should not just only be considered in truly
exceptional housing but: a) cannot be appropriate for large sites and b) must not result in people being moved out of Hackney. Payments in lieu do not fit the vision of ‘Hackney – A Place for Everyone’ in a Borough where average housing is 17 times the size of the average salary (Chp2) and must not be considered if people are thereby forced out of the Borough.

**Representation 3**

LP30 Railway Arches A is **not sound and not justified**.

Allowing railway arches to be used as office space, or to drift into office use does not fit with Chapter 2’s recognition for the vision of ‘Hackney – A Place for Everyone’. This is a cascade spotted by the railways as a way of getting higher revenue. It a waste of space that is better used as industrial or, in certain locations, as retail and entertainment space.