Matter 1 – Compliance with statutory procedures and legal matters

Main issue – Whether the relevant procedural and legal requirements have been Met.

1. Duty to cooperate: Has the Council met the duty to cooperate and is this clearly evidenced? In particular:
   a. Have all the relevant strategic matters in relation to this duty been clearly identified?
   b. Has the Council maximised the effectiveness of plan-making activities by engaging constructively, actively and on an on-going basis with the prescribed bodies, in the preparation of the Plan in the context of these relevant strategic matters? Does the evidence clearly set this out?

Overview

1.1. The Council has met the legal requirements in relation to the ‘duty to cooperate’.

1.2. The Council’s “Local Plan 2033 Duty to Cooperate Statement”, dated January 2019, is included as core submission document SD07. The statement demonstrates how Council has met the duty to cooperate, as required by section 33A of the Planning and Compulsory Purchase Act 2004, by providing evidence of the active and sustained engagement between the relevant persons from the outset of the plan preparation. This has included regular meetings, involvement in the preparation of a joint evidence base, early and ongoing discussions on policy development and the sharing of findings from relevant partners’ emerging evidence base.

1.3. The statement includes a full list of the organisations that the Council has engaged with in accordance with this duty along with details of the content and frequency of engagement. The statement confirms that all of the prescribed bodies defined in Part 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) have been consulted on the development of the local plan. It confirms that cooperation arrangements been in place formally at the Direction of Travel (ED015) and Regulation 18 draft Local Plan (ED013) stages.
Response to 1.a

1.4. The relevant strategic matters in relation to this duty have been clearly identified in LP33 and the London Plan, informed by the ongoing engagement and cooperation between the Council, GLA and other prescribed bodies.

1.5. Section 33A of the Planning and Compulsory Purchase Act determines that the following comprises a “strategic matter” in relation to the legal duty to cooperate (and which is relevant to the Council in so far as it does not comprise a two-tier area for the purpose of Section 33A):

“Sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas”.

1.6. The National Planning Policy Framework (NPPF) 2012, against which the Hackney Local Plan 2033 (LP33) (core submission document SD01) is considered, makes clear that this includes the duty to cooperate on planning issues that cross administrative boundaries. In particular those that relate to the strategic priorities set out at paragraph 156 of the NPPF. As outlined in core submission document SD07, this includes the requirement to have strategic policies to deliver:

- the homes and jobs needed in the area;
- the provision of retail, leisure and other commercial development;
- the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- the provision of health, security, community and cultural infrastructure and other local facilities; and
- climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

1.7. Relevant to this consideration is the fact that many of the strategic matters and key issues to be addressed through compliance with the duty to co-operate are, in London, a matter for the London Plan or are otherwise addressed through the preparation of the London Plan. For example, the London Plan defines the overall amount of housing to be provided in Hackney and other London boroughs. The plan designates Hackney within several identified strategic Growth Corridors and Opportunity Areas that cross local authority boundaries and also provides these areas with indicative jobs and housing targets.

1.8. LP33 clearly references the relevance of the London Plan to its development and identifies the strategic priorities within its objectives (page 8) and policies. LP33 confirms that the Council will continue to work with the Mayor of London and the Greater London Authority (GLA) to develop a shared vision. It states that the LP33
has been produced alongside the new London Plan to ensure shared evidence is used, with Hackney helping to shape strategic elements of the new London Plan.

1.9. The relevant strategic matters in relation to the duty are therefore identified in both the London Plan and LP33. It is clear from the structure of LP33, and earlier local plan consultation documents (ED013 and ED015), that it has evolved in reference to a coherent structure of priority issues that relate to the strategic matters identified in Section 33A of the Planning and Compulsory Purchase Act and, for those that are relevant to the Council, to paragraph 156 of the NPPF. This has been supported by the development of the Policies Map (core submission document SD02), and maps within LP33, that provide clear visual aids to the areas for proposed growth and strategic policies that could have cross boundary impacts.

Response to 1.b

1.10. The Council’s “Local Plan 2033 Duty to Cooperate Statement” (core submission document SD07) clearly demonstrates and evidences that the Council has engaged constructively, actively and on an on-going basis with the prescribed bodies, in the preparation of LP33 in the context of the relevant strategic matters. This statement provides a summary of the engagement that has been held with all of the relevant parties and the details of the strategic matters that were considered.

1.11. As referenced above, given the role of the London Plan in addressing the strategic matters that are relevant to the duty to co-operate the statement confirms the close relationship that the Council has with the GLA. Hackney officers have an ongoing and close relationship with officers at the GLA and attend regular meetings to discuss strategic matters that are affecting the borough and London. This is to ensure that both parties are actively engaging in the preparation of both the London Plan and the LP33.

1.12. In London there are also regular meetings between officers and elected members such as the London Councils Leaders Committee, Association of London Borough Planning Officers (ALBPO) which includes a local plan sub group, and the London Planning Officers Society (POS). The ALBPO meetings take place on a monthly basis and cover a wide range of policy matters.

1.13. The type of engagement that the Council has had with neighbouring authorities, and a summary of the strategic matters discussed, is set out in the duty to cooperate statement (core submission document SD07). It confirms that the development of LP33 has involved extensive discussions with neighbouring authorities regarding the evolution of policies and evidence base and the outcomes of these discussions for plan changes. Prior to the consultation on LP33 officers also met with representatives of each of the neighbouring boroughs to discuss any potential cross-boundary issues relating to the draft policies, as well as other matters relating to cross-boundary issues.
2. London Plan: Is the Plan in conformity with the London Plan as required by the provisions of Section 24 of the 2004 Act?

1.14. **LP33 is in conformity with the London Plan as required by legislation and reflected in the GLA’s submission to the Regulation 19 Plan and the Examination.**

1.15. **Core submission document SD05** (copies of representations received at regulation 19) includes the letter, dated 7th January 2019, from the GLA (ID35). This was provided in response to the request for a statement from them on the general conformity of LP33 with the London Plan (Planning and Compulsory Purchase Act 2004, Section 24(4)(a) (as amended). The letter is included at page 19 of this core submission document.

1.16. The letter from the GLA sets out detailed comments on where the Council may need to amend existing and proposed policies and supporting text to be **more in line** with the current London Plan and the emerging Draft New London Plan. It also includes comments provided by Transport for London (TfL) which the GLA endorse. The submission letter highlights affordable housing threshold approach as a matter on which a revision would bring the plan into general conformity with the London Plan. Their response also highlights the council’s approach to tall buildings and the gross rather than net approach to affordable contributions as other areas for which a change to LP33 would be more in line with the London. Further suggested changes have been put forward by the Council in response to these comments as detailed in Matters 4 and 8.

1.17. The Council’s response is included in the Council’s response to the Inspector’s initial queries in document **LBH EX01a** and **LBH EX01b**. This, and the Council’s response to Matter 4, explain the background to the Council’s approach to securing affordable housing.

1.18. It is the Council’s view that LP33 is in general conformity with the adopted London Plan. Further changes have ensured that LP33 is more in line with the emerging London Plan. This includes in relation to gross affordable housing and threshold approach to viability and tall buildings (addressed in the Council’s Matter 4 and Matter 8 statements respectively).

1.19. **The Council has complied with the requirements of the Town and Country Planning (Local Plan) (England) Regulations 2012 and the Council’s adopted Statement of Community Involvement (January 2014) (ED023).**

1.20. The LP33 consultation statement ([Core submission document SD04](#)) sets out details of how the Council has consulted on the Local Plan in compliance with the requirements of Regulation 18 and 19 of the Town and Country Planning (Local Planning) (England) regulations 2012 as amended.

1.21. Appendix 1 of the LP33 consultation statement (SD04) includes the Regulation 18 consultation statement which sets out details of the bodies that were invited to make representations, how they were invited to make representations, a summary of the representations received and details of how they were taken into account in preparing LP33. This confirms the Council used a wide range of media, events, workshops and meetings to inform individuals, stakeholders and organisations about the Local Plan, and to seek comments. This fully accords with the procedures for consulting on the development of a Local Plan as set out in the Council’s adopted Statement of Community Involvement (January 2014) (ED023).

1.22. The LP33 consultation statement also confirms that in accordance with regulation 19 the Council consulted on LP33 from 9 November 2018 to 7 January 2019. A ‘Statement of Representation Procedure’ was prepared and documents were made available for inspection at the locations detailed in ‘Statement of Facts’. These documents are included in Appendix 2 of the consultation statement.

1.23. These statements were sent to each of the general and specific consultation bodies invited to make representation under Regulation 18. It was also sent all any other organisations and individuals who made representations to the Regulation 18 plan.

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4. **Sustainability appraisal (SA) : Does the Integrated Impact Assessment (IIA) (SD03) meet legal and national policy requirements relating to sustainability appraisal? In particular:**

   a. Is the methodology appropriate and the appraisal suitably comprehensive? Does it adequately assess the likely significant effects of policies and proposals?  
   b. Has it evaluated all reasonable alternatives and is it clear why alternatives have not been selected?  
   c. Is it clear how the SA has influenced the Plan? Is there anything in the SA which indicates that changes should be made to the Plan?

**Overview**

1.24. The Council has produced a sustainability appraisal (SA) as part of an Integrated Impact Assessment (IIA) ([core submission document SD03](#)) of LP33 which also incorporates an equality impact assessment, habitats regulation assessment and
health impact assessment. This meets legal and policy requirements related to sustainability appraisal.

1.25. Paragraph 32 of the NPPF requires local plans to be informed throughout their preparation by a SA that meets the relevant legal requirements including in relation to requirements for a Strategic Environmental Assessment. The relevant legislation for these is set out in:

- The Planning and Compulsory Purchase Act 2004 (as amended);
- The Environmental Assessment of Plans and Programmes Regulations 2004 (as amended); and
- The European Directive 2001/42/EC

1.26. Together these require a strategic environmental assessment to assess any significant environmental effects of emerging local plan policies and proposals which has been incorporated into a broader SAI which takes into account social and economic impacts. The SA should demonstrate how the policies chosen will contribute to the achievement of sustainable development. This includes assessing them as they are developed against reasonable alternative options.

1.27. The current IIA builds on earlier versions of the SA which includes:

- A SA scoping report - developed at the same time that the Council was gathering evidence and developing options for a new Local Plan. Published for consultation in May 2017 and, following revisions, in July 2017. This included a framework against which to assess the emerging local plan; and
- An earlier draft of the IIA (Evidence base document ED014) - published for consultation in October 2017 and which included a full SA of the draft Regulation 18 LP33 plan and policies.

1.28. The Council has taken into account and complied with all of the relevant legal and policy requirements for SA throughout the development of LP33 and that this is reflected in the above documents and the current IIA. The Council has also taken into account National Planning Policy Guidance (NPPG) in developing the SA.

Response to 4.a

1.29. The SA scoping report identified 20 sustainability objectives to test the Local Plan objectives, policies and proposals as they were developed. The key issues to be addressed within the plan were identified at the issues and options stage of consultation and informed by the scoping assessment. Options for addressing these, including reasonable alternatives, informed the development of LP33 and were evaluated as part of the SA process.

1.30. A full appraisal of the chosen approach for all policies against the 20 sustainability objectives was undertaken alongside the Regulation 18 draft LP33 and the
Regulation 19 proposed submission LP33. This included taking account of their likelihood of effects; the timeframe for impacts; how they might change over time; and the permanence of change. Appendix 1 of the current IIA also provides a summary of any sustainability implications of policy changes between the Regulation 18 and Regulation 19 versions of LP33.

1.31. The SA illustrates the assessment of the likely significant effects of policies and proposals by presenting a summary of the interaction between the LP33 objectives and policies against the sustainability objectives in a suite of matrix tables. These highlight whether the sustainability impact of the proposal is:

- Major positive
- Minor positive
- Minimal interaction
- Major negative
- Minor negative

1.32. The SA also gives consideration to ways of mitigating adverse effects and maximising beneficial effects as well as to propose measures to monitor the significant effects of implementing LP33.

1.33. The methodology engaged for the SA process is therefore considered to be appropriate as well consistent with the approach taken by authorities in the development of local plans. The appraisal stages have also shown to be suitably comprehensive. Indeed, the Council has in fact gone beyond the basic requirements by publishing a first draft of the full SA alongside the draft Regulation 18 LP33. The IIA also sets out in a clear and consistent manner a robust assessment of the likely significant effects of the policies and proposals.

**Response to 4.b**

1.34. Paragraphs 3.33 to 3.149 of the IIA clearly set out an assessment of the options that were considered as part of the local plan development to address the key issues that were raised. It considers in detail the approaches that were put forward where there was considered to be a range of alternative approaches to meeting the local plan objectives. It then identifies for each issue what was considered to be the most sustainable option to take forward any why. The key issues where policy options and alternatives could be assessed against clear choices between different spatial planning approaches to respond to a sustainability issue included:

- Air Quality
- Overheating
- Flooding
- Open Space
- Town Centres
- Car Free Development
1.35. For some other issues it is considered that there would be no reasonable alternatives. For example, national and regional policy may require a specific policy response to an issue or in other situations it might be unlikely that other policy options would realistically be pursued and therefore this would be considered to exceed the test of reasonable alternatives.

1.36. For each of the key issues the SA identifies the options considered, provides an assessment of their sustainability implications and sets out in a conclusion for each issue the rationale for the chosen option.

1.37. The Council therefore considers that it has met the requirement to evaluate all reasonable alternatives and that the IIA has set out in a clear and comprehensive manner the reason alternatives have not been selected.

Response to 4.c

1.38. It is clear from the comprehensive reporting of the SA how the SA process has informed the development of the plan and influenced policies. As set out above the thorough assessment of options and reasonable alternatives makes it clear to the reader why those options have been chosen.

1.39. As referenced throughout the SA, and reinforced at paragraph 3.247 of the IIA, it is critically important to take into consideration that for some issues the local plan is highly limited in its ability to diverge significantly from existing National and Regional Policy. In terms of the sustainability impact of regional policies that dictate a local approach there is confidence however in the fact that they are subject to their own sustainability appraisal of options.

1.40. Paragraphs 3.242 to 3.272 of the IIA provide an overall summary of the key findings from the SA process and analysis and set out recommendations for dealing with any significant negative sustainability impacts as well as maximising identified positive impacts. 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. Overall, the SA findings demonstrate that the plan represents the most sustainable approach possible within the scope of spatial planning.
1.41. In terms of whether the SA indicates whether changes to LP33 should be made, this exercise actually took place between the Regulation 18 LP33 and the Regulation 19 LP33 stages to ensure the most sustainable approach was put forward in the Publication (Regulation 19) version of the Plan. Paragraphs 3.271 and 3.272 identify the minor improvements to policy that were identified in the Regulation 18 LP33 IIA and what changes were made to reflect these in the Regulation 19 LP33 IIA.

5. Habitats Regulations Assessment (HRA): Does the IIA (SD03) meet legal and national policy requirements relating to the habitats of designated European Sites or Natura 2000 sites? In particular:
   a. Does it adequately address whether the Plan would adversely affect the integrity of relevant sites either alone or in combination with other plans or projects?
   b. Does it accord with recent and relevant judgements relating to HRA including People Over Wind? Is there any need to carry out an appropriate assessment?
   c. Is it clear how the results of the HRA screening assessment have influenced the Plan?

Overview

1.42. The Council has produced a screening assessment for a Habitats Regulations Assessment (HRA) as part of an Integrated Impact Assessment (IIA) (core submission document SD03) of LP33. This meets legal and national policy requirements relating to the habitats of designated European Sites or Natura 2000 sites.

1.43. Where a local plan is likely to have a significant effect on a European site or a European offshore site (either alone or in combination with other plans or projects) the Conservation of Habitats and Species Regulations 2017 (as amended) require an appropriate assessment of the implications for the site in view of that site’s conservation objectives. The first stage of a HRA is therefore to determine whether the Local Plan is likely to have a significant negative or positive effect on these sites before deciding whether to proceed to an appropriate assessment. For LP33 this was determined through the HRA screening assessment.

1.44. The Conservation of Habitats and Species Regulations 2017 (as amended) transpose the Directive 92/43/EEC, on the conservation of natural habitats and of wild fauna and flora (EC Habitats Directive), into national law. They also transpose elements of the EU Wild Birds Directive in England and Wales. It is noted that at paragraph 5.5 of the HRA it references earlier legislation that transposed this directive into UK law. For the purposes of clarification the Council has considered the most up to date legislation and can confirm that the legal requirements relating to habitats of designated European sites (including Natura 2000 sites) have been met
and that the conclusions set out in the HRA screening report remain appropriate and relevant.

Response to 5.a

1.45. The Council is satisfied that the HRA screening has adequately addressed whether LP33 would adversely affect the integrity of sites, either alone or in combination with other plans and programmes.

1.46. The HRA screening report confirms that there are no European sites within Hackney. It does however acknowledge that it is within the catchment of the following sites and that LP33 could therefore potentially impact upon them.

- Lee Valley SPA and Ramsar site
- Epping Forest SAC

1.47. Appendix 3 of the HRA screening report undertakes an assessment of the impacts of each policy in LP33. It also sets out the criteria against which the policies were screened in paragraph 5.28. This assessment concluded that there were no individual policies within LP33 that were considered likely to lead to significant effects on site integrity.

1.48. The HRA screening then goes on to identify the other plans and programmes that must be considered to determine whether there would be any significant impacts of LP33 in combination with the implementation of these. Paragraph 5.31 lists the most relevant plans that were considered. The assessment recognises that 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. Notwithstanding, the role of LP33 is to direct development to the most sustainable locations and there are a number of policies in the plan that seek to positively manage and promote biodiversity, green infrastructure, air quality and sustainable methods of travel. These policies therefore seek to minimise any adverse impacts of development.

1.49. The screening therefore concluded that LP33, in combination with other plans and programmes, is unlikely to lead to significant adverse effects on European sites and as such an appropriate assessment of LP33 was not required.

Response to 5.b

1.50. The Council can confirm that it considers the HRA screening report to be consistent with recent and relevant judgements including People Over Wind (Court of Justice of the European Union, 12 April 2018).
1.51. This is because the conclusions of the HRA screening report were not reliant on the implementation of separate mitigation measures to deal with significant effects that, in line with this judgement, should only be taken account of within an appropriate assessment. Indeed, as set out above the design of the policies themselves and the effect of the plan overall is to direct development to the most sustainable locations with policies in the plan seeking to positively manage and promote biodiversity, green infrastructure, air quality and sustainable methods of travel. Whilst these policies are unlikely to give rise to a significant positive effect to the identified sites they will help to manage the impact of development to ensure that there are no significant adverse effects. It is therefore not considered that a separate appropriate assessment of LP33 is required.

**Response to 5.c**

1.52. Appendix 3 of the HRA screening report undertakes an assessment of the impacts of each policy in LP33. It also sets out the criteria against which the policies were screened in paragraph 5.28. This assessment concluded that there were no individual policies within LP33 that were considered likely to lead to significant effects on the sites integrity and therefore at this stage of LP33 development there are no policies that require modifications as a consequence of the screening report. This will also be in part as a result of the robust process that was undertaken for the SA which already influenced the policies chosen to be the most sustainable options.

6. Other legislative requirements:

   a. Has the Plan been prepared in accordance with the Local Development Scheme, including in terms of timing and content?
   b. Regulation 8(5) of the Town and Country Planning (Local Plan) (England) Regulations 2012 requires any new plan to list the policies in existing adopted plans which it is intended to supersede. Are these identified within the Plan?
   c. Has the Plan been prepared in accordance with the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Plan) (England) Regulations 2012 in all other respects?
   d. Is the plan period appropriate and is it clearly defined within the Plan?

**Response to 6.a**

1.53. **LP33 has been prepared in accordance with the Local Development Scheme 2018 -21 (ED022) in respect to the timing of its production and the content of the plan.**

**Response to 6.b**
1.54. **LP33, at paragraph 1.3, identifies the adopted development plan policies that it is intended to replace, by reference to the plan documents. LP33 is a comprehensive rather than partial plan review and will replace these development plan documents in their entirety, with the exception of the specific sites in the SALP which are identified in Appendix 4 in Shoreditch and Stamford Hill. These will remain until superseded by the AAPs (which in turn will identify which site allocations that are intended to be superseded). LP33 would be more clearer and more effective if reference to these sites were included in the introduction. This will ensure LP33 is in line with the requirements of the Town and Country Planning (Local Plan) (England) Regulations 2012.**

**Modifications to the LP33 Introduction**

1.55. **It is proposed paragraph 1.3 is modified as follows:**

Once adopted LP33 will replace the Core Strategy (2010), Development Management Local Plan, Site Allocations Local Plan (2016), Hackney Central AAP (2012), Dalston AAP (2013) and Manor House AAP (2013). **LP33 will also replace certain allocations set out in the Site Allocations Local Plan (2016) which are detailed in Appendix 4.** It is the Council’s key strategic planning document, and will sit alongside:..

**Response to 6.c**

1.56. **The Council can confirm that LP33 has been prepared in accordance with the Planning and Compulsory Purchase Act 2004 (as amended) and the Town and Country Planning (Local Plan) (England) Regulations 2012 (as amended) in all other respects to those already identified and evidenced above.**

1.57. **As evidence of this the table below summarises other matters covered by the legislation that are relevant to the preparation of LP33 but which have not necessarily been addressed in the responses to questions 1 to 6.b above.**

<table>
<thead>
<tr>
<th>Legal Requirement</th>
<th>Evidence</th>
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<tbody>
<tr>
<td>Survey of the area (Section 13 of the P&amp;CPA)</td>
<td>The technical evidence base documents and other supporting documents that provided information to support the development of LP33 on matters including: - Viability - Employment - Housing</td>
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<tr>
<td>Keep under review the matters which may be expected to affect the development of the area or the planning of its development.</td>
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12
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<thead>
<tr>
<th>Topic</th>
<th>Description</th>
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<tbody>
<tr>
<td>Community infrastructure</td>
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<td>Open space</td>
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<td>Town centres</td>
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<td>Climate change</td>
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<td>Flood risk</td>
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<td>Design and heritage</td>
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<tr>
<td>Transport</td>
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<tr>
<td><strong>Evidence base documents</strong> (ED01 to ED060)**</td>
<td>which reflect the above matters and the London Plan</td>
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<tr>
<td><strong>Evidence documents ED01 and ED02</strong></td>
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<tr>
<td><strong>Examination Document ED021</strong></td>
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<tr>
<td><strong>Council’s authority monitoring report 2017/18</strong></td>
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<tr>
<td><strong>Regard to national policy and guidance</strong> (Section 19(2) of the P&amp;CPA)</td>
<td>Proposed submission local plan 2033 (core submission document SD01)</td>
</tr>
<tr>
<td><strong>Monitoring reports</strong> (Section 35 of the P&amp;CPA; Regulation 34 of the T&amp;CPR)</td>
<td>The Council’s authority monitoring report 2017/18 (Examination Document ED021)</td>
</tr>
<tr>
<td><strong>Additional matters to which regard is to be had.</strong> (Section 19(2) of the P&amp;CPA; Regulation 10 of the T&amp;CPA)</td>
<td>Proposed submission local plan 2033 (core submission document SD01) which includes reference to:</td>
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<tr>
<td>- Supporting the objectives of the Mayor of London’s draft Transport Strategy (2017);</td>
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<td>- Relationship to the North London Waste Plan;</td>
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<td>- Appropriate land uses and consideration of amenity; transport and accessibility, green and open spaces</td>
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<td>The approach had regard to the matters in Regulation 10 (b) in relation to preventing major accidents and limiting the consequences of such accidents and (c)ii major hazards; and (d) the national waste management plan via the North London Waste Plan.</td>
<td></td>
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<tr>
<td><strong>Contributing to the mitigation of, and adaptation to, climate change.</strong> (Section 19(1A) of the P&amp;CPA)</td>
<td>Proposed submission local plan 2033 (core submission document SD01)</td>
</tr>
<tr>
<td><strong>Integrated impact assessment</strong> (core submission document SD03)</td>
<td><strong>Examination documents</strong> ED049 to ED054</td>
</tr>
<tr>
<td><strong>Adopted policies map.</strong> Map to show how the adopted policies map would be amended by the document, if it were adopted. (Regulation 5(1)(b), 9(1), 17 and 22(1) of the T&amp;CPR)</td>
<td>Policies map (core submission document SD02)</td>
</tr>
<tr>
<td><strong>Independent examination and submission of documents</strong></td>
<td>The requirements of Section 20 (1) to (3) and regulation 22 have been met by the Council and the documents</td>
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that have been submitted have been made available on the council’s website

In accordance with Regulation 22(3) the Council has made the relevant documents available for inspection and has made this information available in the statement of fact.

In accordance with Regulation 22(3) (b) and (c) notification has been given to each of the relevant consultation bodies that the documents are available for inspection and of the places and times at which they can be inspected. Notification has also been given to those persons who requested to be notified of the submission of the local plan to the Secretary of State that it has been submitted.

Response to 6.d

1.58. The plan period is appropriate and is clearly defined within the plan title and vision which reference 2033 in line with paragraph 157 of the NPPF 2012 which requires Local Plans to be drawn up over an appropriate time-scale, preferably a 15-year time horizon.

1.59. Part one of LP33 clearly sets the vision for Hackney in 2033. Preparation of the plan started in 2016. Key evidence, underpinning plan policies cover the period from 2018 -2033 including:

- Hackney Council’ Strategic Housing Market Assessment Update, 2017 (ED029) projections which relate to the period 2018 - 2033
- Hackney Town Centre & Retail Study 2017 (ED039) which relates to the period 2017 - 2033
- Hackney Employment Land Study 2017 (ED034) which relates to the period 2018 – 2033.

1.60. The Community Strategy which informs the Plan vision also adopted in 2018 (as discussed in the Council’s statement in response to Matter 2). Therefore the plan period is considered to be appropriate.

1.61. On adoption the text at 1.5 of the plan can be amended to clarify the date of plan adoption and the life of the plan to 2033.