Matter 2 – Vision, spatial objectives and growth strategy

Main issue – Whether the vision, spatial objectives and growth strategy have been positively prepared, are justified and consistent with national policy and can realistically be achieved.

7. Does the Plan set out a clear vision and strategy for their area, which positively and proactively encourages sustainable growth?

2.1. Yes, the Local Plan 2033 (LP33) sets out a clear vision and growth strategy for Hackney, which positively and proactively encourages sustainable growth.

2.2. The vision and growth strategy reflects the Council’s Community Strategy (ED017), which sets out the social, economic, and environmental aspirations for Hackney. It places people at the centre, seeks to ensure that everyone has the opportunity to benefit from growth and that no sections of the community feel left behind. The vision also acknowledges the role of Hackney as part of the wider London economy, and the key challenges and opportunities facing the borough for the lifetime of the Plan. The vision is set out at the start of Section 2 (LP33) (SD01). This then flows into the 9 spatial objectives, through to the Growth Strategy (Section 3) and Place Policies (Section 4). Collectively these set out a clear vision and strategy for the Plan.

2.3. The growth strategy and spatial objectives set out the quantum of homes, jobs and commercial floorspace to be delivered in the Plan period. They also address other elements of sustainable growth such as livable and accessible neighbourhoods, access to open space, and need for a low carbon and carbon-resilient borough. The objectives are implemented through the policies in LP33, including the growth strategy, site allocations and thematic policies.

2.4. The vision guides LP33 to positively and actively encourage sustainable growth.
8. Have the spatial objectives within the Plan been positively prepared and are they suitably framed and justified?

2.5. Yes, the 9 spatial objectives which flow from the vision have been positively prepared and are suitably framed and justified. They have been shaped through extensive community engagement Consultation Statement (SD04), Consultation Report to Direction of Travel Consultation (ED015). The objectives clearly set the quantum of development required as identified and justified through robust evidence. This includes the Employment Land Review (ED034), Strategic Housing Market Assessment (ED029 and ED030) and the Town Centre and Retail Study (ED039). The importance of liveable and accessible neighbourhoods, green infrastructure, open spaces, health and wellbeing, community facilities have also been informed by evidence and addressed by the objectives. Relevant objectives are repeated at the start of each thematic chapter to demonstrate how they will be delivered through a range of policies.

9. One of the objectives is to deliver up to 26,250 additional homes. Why is there a ceiling? Is this justified and consistent with national policy?

2.6. The objective to deliver up to 26,250 homes is based on robust evidence on housing need as set out in the Strategic Housing Market Assessment (ref ED029- ED030). The annual need is 1750 homes per annum - this has been multiplied by 15 to reach a housing need figure for the plan period. The housing need figure is different to the capacity derived housing target which is 1330 per annum as set out in the Draft New London Plan (ref ED02). It is the Council’s aspiration to meet housing need within the borough. Policy LP12 sets out how the Council will deliver a minimum of 1330 homes per annum and create the conditions for growth to exceed this target to deliver up to 1750. The objective of seeking to meet the identified housing need by delivering up to 26,250 homes during the Plan period is challenging and aspirational. The Council has set out a mechanism which seeks to achieve this through the development of masterplans for Clapton, Homerton and through work looking at further opportunities along the borough’s corridors.

2.7. The objective, which also focuses on increasing the supply of genuinely affordable homes is consistent with Paragraph 47 of the NPPF 2012 as it seeks to meet the full objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework. The 26,250 is not a ceiling. However to set an objective to deliver more than 26,250 homes would not be deliverable therefore ‘up to 26,250’ is appropriate, consistent with the NPPF and justified.
10. Is the strategy to focus the most significant growth in the town centres of Dalston, Hackney Central and in Shoreditch justified? Is the encouragement of development within the enhanced corridor areas an appropriate approach which is soundly based?

2.8. Yes, the approach is justified. Dalston and Hackney Central are Hackney’s Major town centres. Shoreditch is part of London’s Central Activities Zone - the vibrant and globally-iconic core of London accommodating one third of London jobs, internationally renowned for its culture, night-time economy, tourism, shopping and heritage, and home to more than 230,000 residents (Draft New London Plan (ref ED02, pp67). All three areas are highly accessible by public transport, and are the most appropriate areas to accommodate comprehensive growth in the borough.

2.9. The encouragement of development in enhanced corridors is appropriate and soundly based. It is based on robust evidence set out in the boroughwide Characterisation Study (ED024) and aligns with the small site policies within the LP33 and the new London Plan. In April 2019, the Council secured funding from the GLA’s Homebuilding Capacity Fund (HCF) to support accelerated housing delivery in the Key Corridors. A number of significant spine roads run through the borough and link the main town centres. These routes are illustrated on the LP33 key diagram, Map 1 pp 11, includes: the A10 stretching from the south of the borough through to Dalston High Street and Stamford Hill in the north of the borough, Mare Street, Clapton Common to Seven Sisters spine; Old Street to Hackney Road; and Dalston Lane, Morning Lane to Wick Road. For these corridors, the HCF funding will be used to look at the existing character, and identify opportunities for redevelopment, securing optimum densities with a particular focus on small site delivery.

11. Were alternative options for the distribution of growth considered during the Plan’s preparation and were they subject to SA? Is it clear why alternative growth strategies were discounted?

2.10. Options for locations for growth and distribution of land uses were considered during the Plan’s preparation. The identification of broad areas for growth were informed by the Characterisation Study (ED024) which is an in depth investigation into the local character across Hackney. This was used as a basis to identify opportunities for future growth that to enhance local character. The option of delivering higher densities in town centres would have caused unacceptable harm to character. The need to protect existing open spaces was also a key factor in considering the distribution of growth. This led the Council (based on the 3 Rs of reinforce, repair, re-invent- see paragraph 2.21) to identify further new areas previously not identified for growth - Clapton, Homerton and the corridors.

2.11. Further to this, the strategy for distribution of different types of growth across the borough was considered, i.e. growth in housing, employment and retail, and these
have been subject to a thorough sustainability appraisal (SD03). Existing town
centres have long been areas for focused delivery of mixed use development
including retail, commercial and residential uses. Priority Employment Areas (now
PIAs and POAs) are locations for delivery of employment floorspace. This is an
approach has been effective over the years and was considered the most
appropriate approach going forwards. Evidence in relation to quantum of need for
new housing, employment and retail space was taken into account to inform the
distribution of growth.

2.12. With regards to the specifics of the individual elements of the growth, these were all
subject to an in depth assessment throughout the preparation of the plan in the
sustainability appraisal (SD03). Stage B2 of the SA appraised alternative options for
a number of key issues, including, but not limited to approaches to employment land
and town centres.

2.13. For example, with regards to growth in the town centres, the reclassification of
Hackney Central and Stamford Hill within the town centre hierarchy and the
appropriateness of existing town centre boundaries was assessed in the SA. LP33
re-categorises Hackney Central and Stamford Hill centres upwards in the town centre
hierarchy. It was concluded in the SA that the reclassification would support growth
and attract investment. The option of the centres being retained in their current
designations was considered but discounted.

2.14. The approach to growth in the borough’s designated employment areas was
assessed by the SA. The options considered included: to allow market forces to
determine uses; protect all employment land; or afford greater protection to certain
designated areas. The SA concluded that the maintenance of designated
employment areas and thus concentrating most, but not all, employment uses to
these areas will provide a sustainable balanced approach for Hackney. Market forces
may allow for housing growth, but it could at the expense of amenity and supply of
employment land and buildings, which would not support the growth strategy.

12. Para 3.6 of the Plan refers to an Area Action Plan (AAP) being produced for
Shoreditch to guide growth. Para 3.9 also states that an AAP will be produced to plan
for development to meet specific needs in the Stamford Hill area. Why is it necessary
to produce these additional development plan documents? Is this approach justified
and is it clear what the purpose and function of the AAPs will be?

2.15. Area Action Plans for Shoreditch and Stamford hill are necessary and the preparation
of them is justified. The two areas are very different in terms of their location,
population, character, challenges and opportunities and AAPs are therefore needed
for very different reasons.
2.16. Shoreditch has experienced phenomenal growth over the past 20 years, and continues to attract to draw investment, larger businesses, new residents and more visitors. It is recognised in the London Plan as being within the Central Activity Zone and part of the City Fringe Opportunity Area. Whilst the area is predominantly an area of employment, residential communities are an integral part of Shoreditch. The popularity of the area has seen continued competition between land uses that includes retail, leisure, employment, residential, the evening and night time economy.

2.17. The Future Shoreditch AAP will provide an opportunity to create comprehensive vision and tangible objectives specifically for the area. It will provide more detailed planning and design guidance on the preferred uses(s), mix, scale, height, massing and accessibility of future development on identified opportunity sites. This will help provide greater certainty and ensure wider community and sustainable objectives will be delivered.

2.18. The Stamford Hill Area Action Plan evolved from discussions relating to Neighbourhood Planning which took place in Stamford Hill during 2013/2014. Two local groups with different agendas applied for Neighbourhood Forums in Stamford Hill. Both groups had local support but different approaches in relation to planning. Working with both sides, the Council developed an alternative approach and agreed to prepare an Area Action Plan. Consultation on the RTPI Plan making award winning Reg 18 version of the AAP was carried out in 2017 and the Strategic planning team are currently collecting more evidence with a view to carrying out consultation on the Reg. 19 version towards the end of 2019.

2.19. Stamford Hill is home to the largest Orthodox Jewish Community in the UK, the Charedi Community is experiencing growth at a much faster rate than other communities in Hackney, as they tend to have much larger families. Average household size within the Charedi Community is 5.7 persons, almost three times the Hackney average. Consequently, the area also has the highest numbers of children in any ward in the Borough.

2.20. The AAP will create a framework for growth which safeguards the areas unique character and be used to guide future development in the area. The Plan will ensure that development delivers real benefits to the community, particularly in terms of maximising the supply of large family homes, improving public space and public realm, providing new schools and community facilities and improving local shopping at Stamford Hill.
13. Overall, will the growth strategy achieve the Council’s vision, meet the spatial objectives and deliver sustainable development in accordance with national policy?

2.21. Yes, the growth strategy flows from the vision and spatial objectives. It is informed by the Characterisation Study (ED024 pp178), which looks at the distinctive characteristics of areas in the borough. It considers the nature of intensification and intervention and identifies growth areas and other areas that are sensitive to growth by considering the 3Rs and assessing whether different parts of the borough should:

- **Reinforce** the current character and condition
- **Repairs** the historic fabric or
- **Reinvent** local character through development which is informed by lost grain

2.22. LP33 has incorporated the findings of the Characterisation study and enabled the Council to develop a new policy approach to development in the Borough to deliver sustainable development. The Strategy clearly indicates where the main geographical areas of growth will be, and this has been developed in more detail through the Places for People section of the plan. The targets set are justified, realistic and deliverable within the timeframe of LP33.

2.23. Section 13 Implementation and Monitoring of LP33, sets how the objectives and policies will be implemented and delivered. The effectively of the LP33 policies will be monitored through the Authority Monitoring Reports.

2.24. The vision, objectives and growth strategy are consistent with the NPPF (2012) which advocates an overall presumption in favour of sustainable development.

14. Are any changes to the vision, objectives or growth strategy, as suggested through the representations, necessary for soundness?

2.25. A number of changes have been proposed by representors mostly relating to the spatial objectives but these are not necessary for soundness.

2.26. The vision, spatial objectives and growth strategy are consistent and deliverable.