Matter 3 –Places for People including site allocations
(PP1-PP10 and Appendix 3 site allocations)

Main issue –Whether the Plan sets out a positively prepared strategy for the development of the nine identified places within the Borough and whether this and the site allocations are justified, effective and consistent with national policy.

15.PP1 Public Realm:
a. Is it clear that PP1 is a planning policy? Does it provide a clear indication of how a decision maker should react to a development proposal in accordance with para 154 of the Framework?
b. Is it justified and effective? Are any changes necessary for Soundness?

Response to 15.a

3.1. PP1 is a planning policy. It requires the consideration of the public realm within the design of development schemes and sets out the criteria that should be considered in new development.

3.2. The Draft New London Plan (2018) (ED02) describes the Public Realm as ‘all the publicly-accessible space between buildings, whether public or privately owned, from alleyways and streets to squares and open spaces, including the Thames and London’s waterways (paragraph 3.3.17). The public realm is the ‘glue’ that holds cities together. It is where the daily life of the city is played out; where we meet, sit, relax, eat, play, wander, reflect, debate, dissent, do business and enjoy a whole host of other freedoms. In addition, as a consequence of the rise in more flexible models of working and an advanced digital connectivity, activities that had previously been confined to the office are becoming more visible in the public sphere – inside as well as outside of buildings. A successful public realm is dependent on its spatial and physical characteristics and by its social and cultural conditions.

3.3. Given the dense urban nature of a borough like Hackney, the Council puts the attainment of good quality public realm at the heart of its planning policy approach. Developers are actively encouraged through this policy to consider not only their own site in isolation but its impact on its surroundings and in particular the impact the development will make on any connected public spaces connected. Public realm is a key component of any planning assessment in Hackney and PP1 contains sets Council is seeking to achieve and how delivers should consider these objectives in the design of proposals. Policy PP1 is also
formatted in a way consistent with the presentation of other plan policies (and the proposed changes to the format of policies in the remainder of the section set out in para 3.8 below). PP1 is also supplemented by LP1 Design quality and local Character, LP41 Liveable neighbourhoods and LP42 Walking and Cycling, all of which set out the mechanism to deliver a high quality public realm in Hackney.

3.4. The Council considers the policy to be justified and effective and no changes are proposed. However, for clarity it is suggested that paragraph 4.2 is amended and supporting text added as follows:

Paragraph 4.2 - The place policies sit alongside and should be read in conjunction with the borough wide policy on public space public realm (PP1) .

New paragraph 4.4 All new development should, where appropriate, meet the criteria set out in PP1. PP1 will also alongside the specific place policies (PP2 - PP10) help guide future AAPs and masterplans.

16. General questions for PP2-PP10 and site allocations (for place specific questions see below):

a. Does the Plan clearly define PP2-PP10 as planning policies and is their purpose clear? Do they provide clear indications of how a decision maker should react to a development proposal?

b. Do PP2-PP10 identify what development will or will not be permitted and where within each of the nine identified places?

c. Are the areas covered by PP2-PP10 clearly defined within the Plan and are they justified? Are the geographical extent of these areas accurately defined on the Policies Map?

d. What is the purpose of including visions, character descriptions, urban design analyses, emerging opportunities, maps and diagrams and is it appropriate for such elements to be in policies? Is this approach justified, effective and consistent with para 154 of the Framework?

e. Are PP2-PP10 allocating sites and if so, how does this relate to Appendix 3? Do the policies clearly define the amount and type of development proposed to be delivered at each specific site?

f. How have the sites been selected for inclusion within PP2-PP10 and Appendix 3? What methodology has been used and is it justified? Are the sites based on robust evidence?

g. How has ‘indicative capacity’ and ‘indicative heights’ for the sites been determined and is this justified? Is it clear what the ‘short, medium and long term’ timescales mean and is this effective?

h. Are the strategic or development principles listed in PP3-PP10 justified and effective? Are any necessary for PP2?

i. Are the land use designations, development opportunities and town centre boundaries justified and effective?

j. What is the purpose of identifying landmark buildings on some of the maps in the Plan? Do PP2-PP10 set out specific policy requirements for these buildings or their surroundings and if so, are they justified?
k. Are the maps in this chapter necessary and effective? How do they relate to the Policies Map?

l. Are any of the suggested changes, set out in the representations, necessary for soundness?

Response to 16.a

3.5. Place policies PP2 - PP10 set out the area based vision for delivering sustainable growth in the borough. These areas are identified for growth in the evidence emerging from the Hackney Characterisation Study (ED024) which identified locations for growth, renewal and intensification as well as the Plan’s Growth Strategy which sets the spatial priorities and outcomes over the next 15 years.

3.6. The purpose of these ‘place policies’ is set out in the Local Plans (SD01) Growth Strategy (Chapter 3, page 9) which sets the strategic guidance for the Council in supporting area based work through emerging Area Action Plans, Supplementary Planning Documents and masterplans. PP2 to PP10 also identify ‘strategic principles’ which should inform applications for new development proposals within these growth areas ensuring that any decision is taken in consideration with PP1 and the development management policies (LP1-LP58) and are in keeping with the overall strategic vision of the growth area.

3.7. In order to make it clear in the Plan the Council proposes the following changes:

3.8. Strategic Principles for each of the Place Policies will be placed in a shaded text box (mirroring the presentation in the rest of LP33) and label these with their relevant Place Policy number.

**PP7 - Clapton and Lea Bridge Roundabout**

**PP7 Clapton and Lea Bridge Roundabout**

**Strategic Principles**

1. Relocate bus stand and re-provide an enhanced stand/depot potentially taking capacity from Clapton bus depot (see Place Policy for Hackney Central).
2. Eliminate the severance between Upper and Lower Clapton and between the Lee Valley Park and Hackney
3. Improve air quality within this Air Quality Focus Area and create a child friendly environment.
4. Create a residential and commercial community focal point at Lea Bridge roundabout.
5. Create a cohesive improved public realm experience between Upper and Lower Clapton.
6. Create new green links connecting open spaces to Clapton station and a new civic heart.
7. Support Clapton Tram Depot as an employment and destination place.
Response to 16.b

3.9. PP2 to PP10 provides the strategic framework for the desired strategic outcomes in these places without predetermining the location of sites (other than sites allocated in Appendix 3 of the Plan) likely to come forward in the plan period. It is the role of policies set out in LP1 to LP58 to determine what development will or will not be permitted through the development management process along with the strategic principles as set out in each associated place policy.

Response to 16.c

3.10. Location plans identify the broad locations of the place policy areas in PP2 to PP10 and areas of focus are identified on the Key diagram (and also illustrated on page 31 Enhanced Corridors). The areas of focus corresponds with the growth areas identified in the ‘Hackney Characterisation Study (2018) (ED024)’ which, in the case of Stamford Hill and Shoreditch, has been informed by work on the emerging AAP. The AAP boundaries are shown on the policies map. However, PP8 Shoreditch and Hoxton covers a wider area than that covered by the Shoreditch AAP. Boundaries for the other areas will be identified in the relevant masterplan SPD. It is not necessary to identify boundaries in order to implement the place policies since the strategic principles are spatial in nature and refer to particular parts of the area in question as annotated on the Urban Design analysis maps.

3.11. For clarity the Council proposes the removal of the red line boundaries on the Urban Grain maps for Dalston (LP33 page 14 and 15) and Hackney Central (LP33 page 20). This should ensure that there is consistency with the other ‘Urban Grain’ maps in the Plan.

3.12. The following suggested additions are proposed for Stamford Hill and Shoreditch PP4 Stamford Hill is proposed on page 24 paragraph 4.30:

This policy applies to the whole of the AAP area as shown on the Policies Map. This area of Hackney is in the northeast part of the borough and has the most suburban sense of place of all of the areas within Hackney. Stamford Hill feels distinct in terms of its relatively low density with wider streets and larger properties compared to the southern part of the borough.

Add new paragraph after 4.77

PP8 - Shoreditch and Hoxton covers the geographical areas of all three wards of Hoxton East and Shoreditch; Hoxton West and Haggerston.

Response to 16.d

3.13. Paragraph 154 of the National Planning Policy Framework (2012) states:

“Local Plans should be aspirational but realistic. They should address the spatial implications of economic, social and environmental change. Local Plans should set out the
opportunities for development and clear policies on what will or will not be permitted and where. Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan."

3.14. The vision, character descriptions, urban design analysis, emerging opportunities, maps and diagrams provide the narrative of area based spatial analysis that was taken as part of the evidence base informing the ‘Hackney Characterisation Study (June 2018) (ED024)’. As explained in the Council’s response to 16a they are not policies but instead provide the context and justification for policy considerations in these areas set out in the Strategic Principles. They provide the rationalisation for the strategic principles and urban design analysis that would provide the overarching context for further detailed work in emerging AAPs, and masterplan SPDs. Hackney has a varied contextual spatial character in that there are vast differences in scale, form and socio-economic character between places such as Shoreditch in the south of the borough and Stamford Hill in the north. It is for this reason that it is deemed appropriate for these elements to be included in the Plan to set out the area based approach to tackling these unique challenges and providing the strategic link between the Local Plan and emerging AAPs and masterplan SPDs that will provide further detailed guidance and ultimately certainty to planning applicants and landholders in these growth areas as supported in paragraph 153 of the NPPF (2012).

Response to 16.e

3.15. The sites identified in PP2-PP10 list the site allocations detailed in Appendix 3. It should be noted that not all sites in Appendix 3 are located in a Place Policy areas. Appendix 3 clearly defines the amount and type of development proposed to be delivered at each specific site.

3.16. For clarity the following changes have been proposed in PP2 to PP10:

- All listed site under ‘Development Opportunities’ where relevant will be prefixed with the site allocations references number (see response to 18.f below),
- Site allocations falling within AAP boundaries of Stamford Hill (PP4) and Shoreditch and Hoxton (PP8) are to be removed (Please refer to the Council’s response to Q19 and Q23 below). Site allocations form the Site Allocations Local Plan (2016) will remain the adopted site allocation until replaced by the AAPs and these will be shown as such on the urban design analysis map.

Response to 16.f

3.17. The sites allocated in Appendix 3 of LP33 are:

(i) strategic sites that are capable of delivering large scale growth and/or;
(ii) sites that require further guidance to ensure that the optimum and most sustainable form of development is achieved on site.
3.18. The recently adopted Site Allocation Local Plan (SALP) (July 2016) (ED06) was reviewed so that sites that had commenced or had been completed were removed (as detailed in Appendix 4 of LP33). The same exercise was undertaken for the adopted AAPs which LP33 replaces (Dalston, Hackney Central and Manor House). Sites identified through the Hackney Central Masterplan (ED010) were also allocated.

3.19. Additional sites were identified through consideration of the evidence base for LP33 in particular the Strategic Land Availability Assessment (ED060), as well as pre-application information and a call for sites.

3.20. Sites within the Stamford Hill and Shoreditch AAP boundaries and were excluded from the process as they remain allocated through SALP(ED06) until replaced by the AAPs.

3.21. Given the up-to-date nature of the sources used, the methodology used in the selection of sites, the approach is justified and based on relevant evidence.

3.22. For the purposes of clarity between PP2-PP10 and Appendix 3 the Council is proposing to include the Appendix 3 site references on the listed sites within each place policy where they exist and reference these sites on the policies map.

Response to 16.g

How has ‘indicative capacity’ and ‘indicative heights’ for the sites been determined and is this justified? Is it clear what the ‘short, medium and long term’ timescales mean and is this effective?

3.23. Indicative capacities were informed by a consideration of a number of factors which are detailed in each of the site allocations (Appendix 3). These include:

- The site area
- Existing use and land use designations (listed under Planning Considerations) which informed the proportions and appropriate mix of uses.
- Urban design analysis and consideration of site constraints (detailed in Development Principles) which included an assessment of the urban character of the site and surrounding development and proximity to heritage assets
- Indicative building heights (determined by the urban design analysis)

3.24. The indicative building heights have been informed by policies within the Plan. The building heights identified reflect the prevailing height of the surrounding area unless specified that a taller elements are appropriate in accordance with LP1.

3.25. The approach to determining 'indicative' capacities and building heights is justified. More detailed analysis of the sites is also evidenced in the 'Hackney Central and Surrounds Masterplan SPD' (ED010) and ‘St Mary's Lodge Planning brief’ (ED071).
3.26. The timescales for development are in keeping with the timeframes used in determining the Council's Housing Trajectory; short term (0-5 years), medium term (6-10 years) and long term (11-15 years).

3.27. The following amendments are proposed for clarity in Appendix 3 of LP33:

**Appendix 3: Site Allocations**

The purpose of this section is to identify key strategic sites in the Borough, and provide site-specific development guidance and allocate particular uses for those sites during the 15 year plan period as set out in three delivery phases of 'short term' (0-5 yrs), 'medium term' (6-10 yrs) and 'long term' (11-15 yrs). The sites allocated in this section, along with other sites including permissions not yet implemented (pipeline), estate regeneration schemes and sites in the Shoreditch and Stamford Hill Area Action Plan areas will support the delivery of this Plan. Further information is set out in Chapter 13 Implementation and Monitoring.

**Response to 16.h**

3.28. The Strategic Principles set out in the Place Policies PP3 - PP10 seek to address the identified constraints and challenges in the Urban Design Analysis sections in PP3 to PP10. They provide the basis for further detailed work that will be undertaken as part of emerging SPDs and AAPs. They also provide clear guidance to developers in developing proposals for sites within these areas and as such the Council considers this to be a justified and effective approach.

3.29. With regards to PP2, the Council is currently undertaking consultation on the issues and challenges for this area though the Dalston Conversation - https://dalstonconversation.commonplace.is/about. The following changes are proposed in relation to PP2, based on the urban design analysis set out in PP2 which reflect emerging evidence base work undertaken by the Council in preparation of the Dalston Supplementary Planning Document (SPD):

**Emerging Opportunities**

4.15 Dalston is made up of a number of distinct urban character areas, each with its unique identity, function and role within the town centre. Some are highly sensitive and are within conservation areas or contain listed buildings.

4.16 Future development will need to recognise the individual qualities of the character area and consider the development’s impact within the overall town centre and the need to optimise development. A context based approach is in line with the draft London Plan and is encouraged in any future planning guidance for Dalston.

**PP2 - Dalston - Strategic Principles**
- Implement a variety of public realm improvements across the town centre particularly along Kingsland High Street, Dalston Lane and Ridley Road
- Improve permeability through finer grain development within the town centre, particularly through new proposals for Kingsland Shopping Centre.
- Address noise, air quality and severance along Kingsland High Street
- Protect existing open spaces including the Dalston Eastern Curve Garden and maximise opportunities to create new public space
- Optimise development in a way which promotes the individual qualities of the distinct urban character areas and heritage assets in Dalston town centre
- Enhance the value of the Dalston Quarter as a concentrated area of community, creative and cultural activities
- Further enhance public transport accessibility through the potential arrival of Crossrail 2

**Response to 16.i**

**Are the land use designations, development opportunities and town centre boundaries justified and effective?**

3.30. The urban design maps are informed by area character analysis and evidence derived from the borough-wide Characterisation study. These maps reflect the policies map and provide a visual representation of the strategic principles and serve as the basis for further detailed masterplan work in future AAPs and SPDs.

3.31. Land use designations, development opportunities (site allocated in appendix 3 or saved Site Allocation Local Plan (SALP 2016 sites)) and town centre boundaries as shown on the policies map are reflected in the urban design analysis. It should be noted however that with regards to Hackney Wick the strategic principles and the associated land use designations, development opportunities and town centre boundaries were informed by the adopted LLDC Local Plan and the Hackney Wick and Fish Island SDP. For issues of clarity we have suggested some amendments in relation to PP4 (Stamford Hill) and PP8 (Shoreditch and Hoxton), as set out in our response to Q.19 and Q.23 below.

**Response to 16.j**

**What is the purpose of identifying landmark buildings on some of the maps in the Plan? Do PP2-PP10 set out specific policy requirements for these buildings or their surroundings and if so, are they justified?**

3.32. The landmark symbols identify well-known or prominent historic landmark buildings, modern landmark locations or landmark open spaces. It is acknowledged that PP2-PP10 do not set out specific policy requirements for these buildings and their surroundings so the Council suggests that all landmarks are deleted from the urban design maps.

**k. Are the maps in this chapter necessary and effective? How do they relate to the Policies Map?**
Response to 16.k

3.33. PP2-PP10 consists of location maps, urban grain maps and urban analysis maps. These maps set out the context of these places in relation to the borough as well as serving as a visualisation of the strategic principles required to realise the Council's vision for the places mentioned. Land use designations, site allocations, town centre boundaries on the urban design maps reflect the policies map and further reflect potential improvements to be expanded upon in subsequent Supplementary Planning Documents and Area Action Plans and through the development management process. Its for this reason that the Council deems their inclusion to be necessary and effective.

3.34. The maps contained in PP2-PP10 are important in illustrating the Strategic Principles set out in each Place Policy as well as the context of each area in relation to the borough. The Urban Design Analysis maps provide a more detailed contextual dimension to the Growth Areas/ Place Areas identified on Map 1: Key Diagram page 11 (Town Centres and Commuter Hubs and the Enhanced Corridors). As such there is a direct correlation between the Key Diagram and the Place Policies. The Urban Design Analysis maps reflect Land use designations, site allocations, town centre boundaries on the Policies Map were relevant. It should be noted however that these place policy maps do not designate policies in the same way as the policy map (SD02) but set out the strategic direction of the urban analysis of each of these places that would form the basis for further detailed work in future AAPs, SPDs and masterplans.

3.35. The following amendments are proposed for clarity on page 12 of LP33:

4. Places for People

4.1 To deliver our vision for Hackney in 2033 we have developed a series of place policies. Place policies provide the strategic guidance for the Council to develop the area based plans and guide new development in these areas.

1. Dalston
2. Hackney Central and Surrounds
3. Stamford Hill
4. Enhanced Corridors
5. Hackney Wick
6. Clapton and Lea Bridge Roundabout
7. Shoreditch and Hoxton
8. Manor House
9. Homerton

4.2 The place policies set out an area vision, an overview of the urban character taken from the boroughwide Characterisation Study, urban design analysis, development principles, land use designations and development opportunities. The place policies sit alongside and should be read in conjunction with the borough wide policy on public space public realm (PP1).
Response to 16.l

3.36. No, the Council do not believe that the suggested changes made by representors (SD06) are necessary for issues of soundness for the Local Plan however we have set out how we would address these concerns as a matter of clarity in this document in response to the matters raised by the Inspector or through Statements of Common Ground where relevant.

17.PP2 – Dalston:

a. Are the sites listed as being suitable for development in para 4.18 justified? Is it clear that they are allocated within the Plan and should cross reference be made to Appendix 3? As these are existing allocations in the Dalston Area Action Plan is there any particular reason why they have not already come forward for development?

b. Para 4.17 states that further details on site allocations will be set out in the Dalston Masterplan which is proposed to be a supplementary planning document (SPD). What will this masterplan contain? Will it set out further site allocations or policy requirements? Is this approach justified?

c. Are any suggested changes to D9 necessary for soundness?

Response to 17.a

3.37. Based on the Councils evidence supporting these allocations as key sites in delivering the LP33 ‘Growth Strategy’ and the Councils subsequent response to Q16f and Q16g above, the Council deems the allocation of these sites to be justified. The sites listed in LP33 para 4.18 are sites that have been allocated in the previously adopted Dalston Area Action Plan (2013) (ED07 Dalston AAP). The Dalston AAP is being replaced with an emerging Dalston SPD as a result we have sought to save sites that have not commenced or have been developed to date and are likely to come forward in the lifetime of this Local Plan as site allocations in Appendix 3. Our suggested approach to addressing cross referencing of listed sites is illustrated in the Councils response to Q18.a. below.

3.38. Sites allocated in the adopted Dalston AAP (2013) (ED07) were allocated for delivery towards the end of the 15 year life cycle of the adopted Dalston AAP. Notwithstanding this phasing of development there has been ongoing pre application discussions on some of the sites such as the Kingsland Shopping Centre (Site D5 - Appendix 3).

3.39. The following text will be deleted from the plan following adoption as its inclusion was to assist with understanding for the purposes or the Regulation 19 consultation:

4.18 The following sites have been carried forward from the previously adopted Dalston Area Action Plan (2013). Though these sites have not been implemented the Council has deemed it suitable to carry these sites forward for development during the lifetime of this plan:
Response to 17.b

3.40. Paragraph 153 of the National Planning Policy Framework (2012) states:

“Each local planning authority should produce a Local Plan for its area. This can be reviewed in whole or in part to respond flexibly to changing circumstances. Any additional development plan documents should only be used where clearly justified. Supplementary planning documents should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development.”

3.41. The proposed Dalston SPD will seek to provide further details and guidance to the ‘Strategic Principles’ set out in PP2 and site allocations in appendix 3. It will provide a comprehensive spatial strategy for the coordinated development of the Dalston town centre including Council owned sites around Ashwin Street and Dalston Lane, the existing Dalston Kingsland shopping centre site, and surrounding public realm. The SPD will be informed by significant changes in the area including the potential introduction of a new Crossrail 2 station into the town centre.

3.42. The purpose of the SPD is to establish the basis for place shaping regeneration that respects the existing unique character and social value of Dalston town centre, and to ensure the continued role of Dalston as a major town centre as set out in policy LP32 in the Local Plan.

3.43. The Dalston SPD will not allocate sites however will provide guidance and further detail on how the various allocated sites in LP33 Appendix 3 is to come forward through a detailed masterplan for the town centre and surrounding area. The masterplan will provide the detail for achieving the development/land use set out in LP33.

3.44. The Council thus deems this approach to be justified as it is consistent with the national policy as set out in paragraph 153 of the NPPF.

Response to 17.c

3.45. The emerging Dalston SPD will provide guidance on D9 - Stamford Works (and the other Dalston sites) through detailed design analysis and coordinated consultation with the local community and site owners. It is not believed that changes to D9 are necessary for soundness testing of this allocation as either the details would be set out in further guidance through the Dalston SPD or dealt with through the development management process.

3.46. The following changes are proposed in Appendix 3 for sites D9 and D7:

**D9 - Stamford Works** (LP33 page 211)

*Timescale:* Medium **Short** term
18.PP3 – Hackney Central and surrounds

a. Are the opening up of the railway arches appropriate as set out in strategic principle 5, and how does this relate to LP30?
b. Is it necessary, for reasons of soundness, to add an additional strategic principle relating to impacts on designated heritage assets within this area?
c. The strategic principles include references to increasing development capacity and implementing a variety of public realm and transport improvements in the area etc. Should the Plan contain more specific details including what, where, when and how?
d. Are the setting out of development options justified and effective?
e. Why is the relocation of Clapton bus garage only a potential development in the strategic principles? Does this need to be delivered within the plan period?
f. Are the sites listed as being suitable for development in para 4.27 justified? Is it clear that these sites are allocated within the Plan and should cross reference be made to Appendix 3? Should other site allocations for this area (HC11, HC12, HC14 and HC15) as set out in Appendix 3 also be listed here?
g. What is the role and purpose of the existing Hackney Central and surrounds masterplan SPD and how does it relate to this Plan?

Response to 18.a

3.47. It is appropriate to set out aspirations for new and improved connections within PP3 of which the use of the existing railway arches as through routes between site allocation sites HC1 - Clapton Bus Garage and HC2 - 55 Morning Lane (Tesco) could be a solution to the issues of severance in that area. The adopted Hackney Central and Surrounds Masterplan Supplementary Planning Document (June 2017) - (ED010_Vol_2) sets out two design options for improved permeability by creating new routes linking HC2 - 55 Morning Lane (Tesco Site) to Bohemian Place and beyond to HC1 - Clapton Bus Garage. The policy is consistent with LP30 (as amended - See Matter 5) which focuses on guiding proposals for the change of use of railway arches and protecting existing industrial uses.

Response to 18.b

3.48. The following additional strategic principle is proposed on page 22:

- Encourage development that respects the setting of heritage assets by preserving and enhancing designated and non designated assets

3.49. The Council has suggested the inclusion of a new strategic principle to respond to comments made by Historic England in relation to heritage impacts in this growth area. Since the receipt of the representation the Council has had further discussions with Heritage England and have put forward further changes set out in this statement and in the Statement of Common Ground with Historic England. In light of this the inclusion of the
additional strategic principle is not necessary for soundness. LP3 sets the Council position on any losses in this regards we will include a strategic principle on designated heritage assets as it helps tie the place policies with LP3.

Response to 18.c
The strategic principles include references to increasing development capacity and implementing a variety of public realm and transport improvements in the area etc. Should the Plan contain more specific details including what, where, when and how?

3.50. PP3 sets out the overarching strategic principles that are focused on in more detail within LP33 Appendix 3 and the ‘Hackney Central and Surrounds Masterplan SPD’ (ED010) which further details on capacities and other public realm transport improvements.

3.51. It is suggested that the following changes be made to the strategic principles to provide further clarity on spatial locations for change. These changes have been agreed through a Statement of Common Ground with John Parmiter. Collectively these changes along with the site allocations and details in the masterplan provide the what, where, when and how.

PP3 Strategic Principles 4.27 (p22) Add to second bullet point:

- Implement a variety of public realm improvements, including improvements in Hackney Central town centre, around Amhurst Road and the Narrow Way which will increase footfall, improve the legibility, permeability....

Insert after second bullet point:

- Enhance the town square public realm in Hackney Central at the junction between the Narrow Way/ Mare Street/ Amhurst Road utilising the historic Old Town Hall building with the potential for an anchor use to maximise its position in this key location and to enliven and potentially enlarge the town square public realm

Response to 18.d
Are the setting out of development options justified and effective?

3.52. Hackney Central and Surrounds growth area sites listed under ‘development opportunities’ are site allocations in appendix 3 of LP33. As stipulated in our response to Q.16f and Q16g above these sites are justified and effective. For the purposes of clarity between these listed opportunity sites and Appendix 3 the Council is proposing to include the Appendix 3 site references on the sites listed on page 22 and 23 as illustrated in the Councils response to Q18.f below.
Response to 18.e
Why is the relocation of Clapton bus garage only a potential development in the strategic principles? Does this need to be delivered within the plan period?

3.53. The Council is in dialogue with both TfL as evidenced in the SoCG with TfL Commercial Development and Arriva over the relocation of the Clapton Bus Garage and the various options that could be ascertained on this site as identified in HC1 (page 175) these include HC10 and Place Policy 7(PP7). Given the nature and requirements of the bus services in Hackney any development on site will have a direct impact on bus services in the borough and other sites and places identified in the plan; HC10 and PP7 specifically. This flexible approach enables us to ensure that any development of sites does not compromise ongoing bus operations in this area. The underlying premise for identifying these sites is to provide a better spatial solution for these sites in unlocking land for development. Given that this site is intrinsically linked with the delivery of HC10 and PP7 and its emerging masterplan there is a collective desire between interested parties (including the landholder) for this to be delivered during the timeframe of the Plan.

The following suggested changes have been made in agreement with TfL (HC1 related site HC10) as set out in the Statement of Common Ground:

**Site Allocation HC1 - Clapton Bus Garage**

**Development principles (second paragraph)**

Subject to TfL’s agreement, there **may be** potential to relocate **the** Clapton Bus Garage site—(without compromising TfL’s **continuing** bus operations, including existing bus stand provision) to an alternative location, or reconfigure the site to facilitate **the** **continuation** **of** **use** of existing operations whilst achieving redevelopment aspirations."

**Site Allocation HC10 - 40-43 Andrews Road and Ash Road [sic] Bus Garage**

**Title** Amend title as follows:

HC10 - 40-43 Andrews Road and Ash **Grove** Road Bus Garage

vi) HC10 - 40-43 Andrews Road and Ash **Grove** Bus Garage - amend aerial photo and OS plan to show the full extent of the bus garage:
This suggested change would also be made to the Policies Map

HC10 Area: 0.49ha - **40-43 Andrews Road (2.2ha including Ash Grove Bus Garage)**

HC10 Development Principles -

The site **40 - 43 Andrews Road** is underused and currently temporarily used as a car pound. There is potential for joint development with the adjacent Ash Grove Bus Garage (located to the north) to **optimise the potential for development** maximise the performance of both sites. **This could include and to creating** a larger bus garage at Ash Grove to **increase capacity including potential relocation of some spaces and operations from** accommodate the Clapton Bus Garage, **as part of a mixed-use development alongside housing (including the provision of genuinely affordable housing in line with policy LP13) and commercial development along with improved access / egress arrangements.**

Should **40-43 Andrews Road** the site not be needed to accommodate **a larger bus garage including** the relocation of the Clapton Bus Garage, there is potential for mixed-use, employment-led development alongside residential, including maximising the provision of genuinely affordable homes, and conversion of the adjacent railway arches for employment (workspace) use…

Additional development principle -

**Notwithstanding the Priority Office Area designation, the improvement, re-provision and intensification of transport operations on the existing bus garage site will be prioritised over office provision.**

Option 1 - Mixed- Use Development (**40- 43 Andrews Road**)...

Option 2 - Bus Depot Site

Utilise 40-43 Andrews Road to create a larger bus garage at Ash Grove to accommodate **spaces from** the relocation of Clapton Bus Garage. The adjacent railway arches should be converted for employment (workspace use).
**Option 3: Mixed use development incorporating larger bus garage (40-43 Andrews Road and Ash Grove Bus Garage)**

Comprehensive mixed use redevelopment to create a larger bus garage to provide increased capacity, including potential relocation of spaces and operations from the Clapton Bus Garage; provision for parking, charging and fuelling of hybrid, electric and hydrogen buses; state of the art maintenance and repair facilities; improved access and egress; housing (including the provision of genuinely affordable homes in line with policy LP13) and commercial development.

**Capacity**

Option 3 - Bus garage, housing (including the provision of genuinely affordable homes in line with policy LP13) and commercial development

---

**Response to 18.f**

f. Are the sites listed as being suitable for development in para 4.27 justified? Is it clear that these sites are allocated within the Plan and should cross reference be made to Appendix 3

3.54. The sites listed in paragraph 4.27 are justified (as detailed in the Council’s response to 16(f) and (g) above). The majority of sites listed on page 22 and 23 have been assessed through the adopted ‘Hackney Central and Surrounds masterplan’ (2017) (ED010).

3.55. The following changes are suggested and have been agreed with Historic England and are set out in a Statement of Common Ground:

**Hackney Central and Surrounds**

**Development Opportunities**

The Council has identified a number of key development opportunities suitable for development during the lifetime of this plan including:

- Clapton Bus Garage, *Bohemia Place* (Site Allocation HC1)
- 55 Morning Lane (Tesco Site) (Site Allocation HC2)
- Hackney Central and Overground Station Car Park (Site Allocation HC3)
- 333-337 Mare Street (Iceland Foods) and 231-237 Graham Road (Site Allocation HC4)
- 339-357 Mare Street, 6-18 Amhurst Road (including Marks & Spencer) (Site Allocation HC5)
- Florfield Road (Site Allocation HC6)
- *London College of Fashion*, 182 Mare Street (Site Allocation HC7)
- 27-37 Well Street (Lidl) (Site Allocation HC8)
- 51-56 Mare Street (Site Allocation HC9)
- 40-43 Andrews Road and Ash Grove Bus Garage (Site Allocation HC10)
- Travis Perkins, 111 Dalston Lane (Site Allocation HC11)
- 230 Dalston Lane and Hackney Downs Station Entrance (Site Allocation HC12)
- Lower Clapton Health Centre (Site Allocation HC13)
- 164-170 Mare Street (Site Allocation HC14)
- Tesco Metro, Well Street (Site Allocation HC15)

For the purposes of clarity the following changes have been made to the following sites allocated in Appendix 3:

**Site Allocation HC1 - Clapton Bus Garage**

The following proposed modifications to LP33, Appendix 3 for HC2 (page 176) and HC6 (page 184) have been made in response to Historic England and have been set out in a Statement of Common Ground between the Council and Historic England:

**Development principles**

“........Any proposed mixed use development must preserve the historic setting and key views of St John-at-Hackney Church and Churchyard, St Augustine’s Tower and the Old Town Hall, and maintain the church yard’s unique sense of enclosure. Appropriate indicative heights are 3 - 4 storeys. A heritage assessment of buildings on site and a recording condition may be required”.

**HC2 - 55 Morning Lane (Tesco Site)**

**Development principles**

There is potential for redevelopment of the existing Tesco superstore and car park for the provision of new commercial (retail/ workspace) floorspace, including a potential new Tesco store and residential development, including genuinely affordable homes, with taller building elements to facilitate legibility and wayfinding. This provides opportunity to create improved permeability through the town centre by the creation of pedestrian routes through the site and the through the railway arches at Bohemia Place, including new uses in the arches on the Tesco site, creating active frontages. Appropriate indicative heights are 2 -10 storeys alongside taller elements [insert footnote link to glossary definition of tall building] which should be sited to minimise overshadowing and create visual connection with existing taller buildings that act as landmarks along the north south routes. Any taller buildings must have regard to and address heritage assets in the vicinity.
HC6 - Florfield Road

Development principles

Development proposals should:

Create a consistent building alignment and parapet height along Reading Lane. Indicative appropriate building heights are 2-6 storeys and 4-6 storeys (except for a taller building of up to 15 storeys to act as a landmark to and from the civic and cultural hub set back from Reading Lane to minimise overshadowing of existing buildings). Any taller element of the building must have regard to and address heritage assets in the vicinity.

Taller building elements must comply with the taller buildings policies in the London Plan and Hackney’s Local Plan adequately address the eleven codes of the Hackney Tall Buildings Strategy and design-related criteria contained in the London Plan and Hackney’s Local Plan, with particular regard to be had to the impact on heritage assets.

Response to 18.g

g. What is the role and purpose of the existing Hackney Central and surrounds masterplan SPD and how does it relate to this Plan?

3.56. The currently adopted Hackney Central AAP (2012) (ED09) is being replaced by PP3 which will set out the vision and broad strategic principles for this growth area. The adopted Hackney Central and surrounds masterplan SPD (ED010) sets out how the vision and the strategic principles for this growth area will be delivered and identifies a series of improvements including the refurbishments and/or redevelopment of key sites together with public realm enhancements. It provides guidance to landowners of sites contained within it thus providing certainty through the development management process.

3.57. The ‘Hackney Central and Surrounds SPD’ is a supplementary planning document to LP33 and sets out detailed guidance to the strategic principles in the ‘Hackney Central’ growth chapter of the Local Plan.

19.PP4 – Stamford Hill

a. Para 4.27 includes a list of sites that are ‘suitable for development’. Is it clear that these sites are allocated within the Plan and are they justified? What type of development will the sites deliver? Why are they not included as site allocations in Appendix 3?
Response to 19.a

3.58. Only site SH1 - 71-73 Lordship Road (St Mary's Lodge) is allocated in the Plan. This is included in Appendix 3 (page 215). The Council is currently in the process of developing a Stamford Hill Area Action Plan (ED011). This AAP will provide area-specific policy and guidance to address and manage development and growth in the Stamford Hill area.

3.59. For clarity we suggest the deletion of the five (5) sites set out in the ‘Development Opportunities’ section of PP4 Stamford Hill. The sites identified in Para 4.37 include existing site allocations (allocated in the Site Allocations Local Plan 2016 - see appendix 4). It is not the intention to these allocate sites through LP33.

3.60. These sites will remain designated as site allocations until replaced upon adoption of the Stamford Hill Area Action Plan (as set out in Appendix 4 pages 226 to 227). The AAP will also seek to allocate further sites for development including Ravensdale Industrial Estate. 71-73 Lordship Road (St Mary's Lodge) is located just outside of the AAP boundary so is allocated in LP33.

3.61. The Council suggests the following amendments to clarify this position.

PP4 Stamford Hill page 28 - Development Opportunities

The Council has identified a number of key development opportunities suitable for development during the lifetime of this plan. These include but are not limited to the following sites. Further details on development capacities and site allocations will be set out in the Stamford Hill Area Action Plan:

- 41-45 Stamford Hill
- 151 Stamford Hill
- Telephone Exchange, Upper Clapton Road
- 71-73 Lordship Road (St Mary's Lodge)
- Ravensdale Industrial Estate

3.62. For further clarity and not to be confused with sites that may come forward in the emerging Stamford Hill AAP area the Council proposes the following changes to the reference number of 71-73 Lordship Road (St Mary’s Lodge) in Appendix 3:

SH1CLD1 - 71-73 Lordship Road (St Mary's Lodge)
20. PP5 – Enhanced Corridors

a. Are any suggested changes to PP5 necessary for soundness to ensure effectiveness?
b. Should there be a cross-reference to other policies within the Plan that are relevant to the enhanced corridor areas?

Response to 20a

3.63. The following set of changes have been suggested by the Council in relation to PP5 in response to Reg 19 consultation responses (SD06). These provide clarity but are not required for reasons of soundness.

3.64. The following change has been proposed on LP33 page 29, paragraph 4.43:

**Area Character**

The River Lee corridor *forms part of the wider Lee Valley Regional Park and is different in that it is an important artery for walking, cycling, wildlife, river communities and for leisure and recreation. It forms a strong, green boundary along Hackney’s eastern edge and has a cohesive identity that policies in this Plan seek to protect or enhance.* At Hackney Wick and Lea Bridge it is a focus for investment and change, but it also balances the urban intensity of the borough with open space and leisure. It is partly this contrast that makes Hackney such an attractive place to live and invest in.

3.65. The following change has been proposed on the Enhanced Corridors map located on page 31 of LP33:

Correct the location of Haggerston Overground station and the Residential led site on the map.

3.66. Further Strategic Principles have been proposed under ‘Lee Valley Corridor’ page 32 as follows:

**Lee Valley Corridor**

- Improve access to and across the Lee Valley, and improve connections with Waltham Forest.
- Optimise developments to enhance the special character of the area.
- Create a higher quality edge to the Lee Valley by improving the routes which run along it, and improving the relationship of buildings to it.
- Improve the Lea Bridge roundabout at Clapton as a priority residential, public realm and commercial opportunity area, and gateway to Hackney.
Enable access to the wider Lee Valley Regional Park for local residents and visitors to benefit from the continuous network of venues, open space and habitats, waterways, paths and cycle routes.

In accordance with LP49 development should seek to enhance and contribute to the development of new Green Chains and Green Corridors.

Response to 20b

b. Should there be a cross-reference to other policies within the Plan that are relevant to the enhanced corridor areas?

3.67. This Place Policy covers a wide geographical area within the borough and as a result the majority of policies in LP1 to LP58 and the policies map are relevant to it and as such should be read in accordance with the rest of LP33. The Council proposes the following additional 'Strategic Principle' under 'Lee Valley Corridor' as also proposed in response to Q20a above:

In accordance with LP49 development should seek to enhance and contribute to the development of new Green Chains and Green Corridors.

21.PP6 – Hackney Wick: Further to the statement of common ground between London Legacy Development Corporation (LLDC) and the Council (SD055) for this area my queries are:

a. Are the Council suggested changes to para 4.49 of the Plan, to make it clear that the LLDC is the planning authority for the Hackney Wick place area, adequate?
b. Should the Plan contain policies for an area which is covered by another planning authority and another local plan? How does this Plan relate to the LLDC Local Plan for this area and are any policies duplicated? Are there any inconsistencies between the two Plans?
c. Para 4.58 includes three sites that are ‘suitable for development’. Is it clear that these sites are allocated within the Plan and are they justified? What type of development will the sites deliver? Why are they not included as site allocations in Appendix 3? Are they included in the LLDC Local Plan?
d. The Council also suggests an additional development principle to protect and enhance blue and green infrastructure in this area. Is this necessary for soundness?

Response to 21a

3.68. The suggested changes to para 4.49 would provide clarity and consistency with the Policies Map (November 2018) (SD02) in referencing that the Planning Authority for this part of Hackney is the London Legacy Development Corporation (LLDC). The suggested wording to paragraph 4.49 of the Plan is as follows:
Located on the eastern boundary of the borough and under the planning authority of the London Legacy Development Corporation (LLDC), Hackney Wick has been shaped by the course of a number of waterways – first the Hackney Brook and River Lea, then Hackney Cut canal, which connected the Lea to the Regents Canal and Thames docklands. Railway developments and road layouts led to further isolation of the area.

3.69. Further to the above changes we propose adding the following text at the bottom of page 36:

**Statement:**

Following the 2012 London Olympic Games, the London Legacy Development Corporation (LLDC) was established as a mayoral development corporation. It is the Local Planning Authority part for the London Borough of Hackney (as well as the other Olympic host boroughs). The area covered by the LLDC is shown on the Policies Map. It includes Hackney Wick and the area around and including Queen Elizabeth Olympic Park detailed in PP6.

The Planning powers will transfer back from LLDC to Hackney during the lifetime of this Plan. This Place Policy is consistent with the LLDC's Local Plan and associated Hackney Wick and Fish Island SPD.

The LLDC Local Plan remains the development plan for Hackney Wick, for the purposes of decision making under S38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) until powers are transferred back to Hackney.

Response to 21b

b. Should the Plan contain policies for an area which is covered by another planning authority and another local plan? How does this Plan relate to the LLDC Local Plan for this area and are any policies duplicated? Are there any inconsistencies between the two Plans?

3.70. LP33 does not contain policies covered by another planning authority as clarified in the suggested changes set out in the Council's response to 21(a). However, it is appropriate to include PP6 on Hackney Wick within LP33 as planning powers for this part of Hackney are due to transfer back to the Council during the lifetime of LP33 (currently programmed for 2024/25). PP6 is consistent with the LLDC Local Plan and where there are deemed to be minor amendments relating to the Conservation Area boundary are needed to address conformity between PP6 and the LLDC Plan.
Response to 21c

c. Para 4.58 includes three sites that are ‘suitable for development’. Is it clear that these sites are allocated within the Plan and are they justified? What type of development will the sites deliver? Why are they not included as site allocations in Appendix 3? Are they included in the LLDC Local Plan?

3.71. The three sites mentioned in para 4.58 are allocated in the adopted LLDC Local Plan (July 2015) and the emerging Plan. Further guidance on all Hackney Wick Station area, East Wick and Here East, and Bartrip are set out in the Hackney Wick and Fish Island SPD (March 2018). These sites are not allocated in LP33. To clarify this the following changes are suggested in paragraph 4.58:

The **following sites have been identified by the LLDC as** Council has identified a number of key development opportunities suitable for development during the lifetime of the LLDC Local Plan **including**:

- Bartrip Street South
- Hackney Wick Station Area
- East Wick and Here East

Response to 21d

d. The Council also suggests an additional development principle to protect and enhance blue and green infrastructure in this area. Is this necessary for soundness?

3.72. The following additional development principle has been proposed by the Council in response to London Wildlife Trust's representation at Reg19 (SD05):

- Protect and enhance the unique blue and green infrastructure as part of Hackney Wick’s character

3.73. This has been included to reflect the concentration of green and blue infrastructure in the area. However, the Council does not consider this amendment to be necessary for soundness as both LP33 and the adopted LLDC Local Plan include policies to protect and enhance blue and green infrastructure.

22.PP7 - Clapton and Lea Bridge roundabout

a. Para 4.66 includes one site that is ‘suitable for development’ at the Tram Depot. Is it clear that this site is allocated within the Plan, is it justified, and should cross reference be made to Appendix 3?

b. The text also refers to further development opportunities being established through a masterplan for the area. What will this masterplan comprise? Is it proposed to set out site allocations or policy requirements not within the Plan, and if so is this appropriate?
Response to 22a

3.74. The Tram Depot is allocated within the Plan (CL1 - Appendix 3, p213). To provide further clarity in LP33 we are suggesting a minor modifications to reference the Tram Depot as being one of the identified sites allocated in Appendix 3 of the Plan. As detailed in the Council’s response to Q16f above we will do this by including the following wording within PP7:

Development Opportunities

The Council has identified the following key development opportunities site suitable for development during the lifetime of this plan and as such this site has been earmarked as a site allocation in Appendix 3 of this Plan. Further development opportunities and development capacities will be established through a masterplan for the area:

- CL1 - Tram Depot, 38-40 Upper Clapton Road, E5 8BQ

3.75. Based on the Councils evidence supporting allocation sites as key in delivering the LP33 ‘Growth Strategy’ and the Councils subsequent response to Q16f and Q16g above, the allocation of this site is justified.

3.76. The following changes to CL1 - Tram Depot have been proposed in response to representations from the GLA and Mr Green at Reg19 (SD06):

Indicative Capacity: 5025 residential units and the intensification retention of the existing quantum of employment of industrial floorspace.

Response to 22b

b. The text also refers to further development opportunities being established through a masterplan for the area. What will this masterplan comprise? Is it proposed to set out site allocations or policy requirements not within the Plan, and if so is this appropriate?

3.77. The emerging masterplan for this growth area will provide guidance for the development of the Clapton and Lea Bridge Roundabout and surrounding area. This study will focus on the opportunities to redevelop a number of strategic sites in the area around the Lea Bridge roundabout (linked to its re-configuration) to create a better public realm, healthy streets and improve air quality. Hackney's recent Characterisation Study (2018) identified Lea Bridge Roundabout as a place needing ‘fundamental intervention which transforms the junction into a new town centre for Clapton’. The proposed SPD will provide further evidence and ultimately a masterplan to unlock development potential and deliver new homes. The emerging masterplan will set the Council’s approach in delivering major infrastructure in this area as well as providing developers and landowners further guidance
and certainty on how they can bring their sites forward through the development management process in accordance with paragraph 153 of the NPPF (2012).

3.78. The emerging masterplan will not set out site allocations or policy requirements. It will however elaborate on the strategic principles set out in PP7 and will be a tool to engage the community and key stakeholders in identifying opportunities for development and subsequent urban design guidance. This work may inform site allocations that will be built into the future review of LP33. There is a commitment between the Council and TfL as set out in a Statement of Common Ground to work together to deliver change in this growth area through the masterplan. For the reasons set out above the council considers the approach to be appropriate.

23.PP8 - Shoreditch and Hoxton

a. Para 4.78 refers to the production of the ‘Future Shoreditch Area Action Plan’ (AAP). Para 153 of the Framework states that each local planning authority should produce a local plan and that ‘any additional development plan documents should only be used where clearly justified’. Is the production of a separate AAP justified in this instance and is the Plan clear on why it is necessary and what it will contain?

b. Notwithstanding the proposal to produce a separate AAP, para 4.58 of the Plan includes a list of sites that are ‘suitable for development’. Is the Plan allocating these sites and if so, is this clear and are they justified? Why are they not included as site allocations in Appendix 3?

c. Appendix 3 contains site allocations SHX1, SHX2, SHX3 and SH1. Are these within the PP8 area and if so, how do they relate to the policy and the proposed AAP? Are they justified and effective? Are any suggested changes to SHX3 necessary for soundness? Are the setting out of development options for SHX3 justified and effective?

**Response to 23.a**

3.79. Shoreditch forms part of London’s City Fringe and Central Activities Zone (CAZ) and is the largest employment area in the borough, it is the focus of fast paced change and development. There is the need for joint consideration and deliberation of the issues facing Shoreditch in order to create a more detailed and comprehensive vision and set of objectives for the area that can not be addressed in a strategic plan. The Shoreditch AAP will set out an overarching approach to development in this area through a series of policies and site allocations required to support growth and development towards the social, environmental and economic goals that underpin the vision for Shoreditch and the development principles set out in PP8.

3.80. This granular approach would provide much needed guidance to landholders, developers and applicants in this growth area by helping applicants to submit successful applications as well as providing developer certainty. The production of the AAP is fully justified in
accordance with paragraph 153 of the NPPF. Further details on the associated timescale for adoption can be found in the boroughs Local Development Scheme 2018-21 (ED022).

3.81. LP33 paragraph 4.71 to 4.78 set out the rationale for the development of an AAP (Future Shoreditch) for this growth area and the development opportunities being identified in the Future Shoreditch AAP to meet the Council’s growth strategy.

Response to 23.b

b. Notwithstanding the proposal to produce a separate AAP, para 4.58 of the Plan includes a list of sites that are ‘suitable for development’. Is the Plan allocating these sites and if so, is this clear and are they justified? Why are they not included as site allocations in Appendix 3?

3.82. LP33 does not allocate sites within the Shoreditch AAP boundary (as shown on the policies map). However, this place policy covers Shoreditch and Hoxton - an area wider than the area covered by the Future Shoreditch AAP. Sites outside the AAP area SHX1, SHX2 and SHX3 are allocated in the plan in Appendix 3. The sites identified in Para 4.78 of LP33 include existing site allocations (allocated in the Site Allocations Local Plan 2016)

3.83. It is not the intention to allocate sites through LP33, however, these sites will remain designated as site allocations until replaced upon adoption of the Shoreditch Area Action Plan (as set out in Appendix 4). The AAP will also seek to allocate further sites for development.

3.84. In order to provide clarity between the Place Policies (PP2-PP10) and sites allocated in Appendix 3 of the Local Plan the Council propose the deletion of the sites set out in LP33 paragraph 4.78. These sites will also be annotated as SALP sites on the key of the associated Urban Design Analysis map on page 43.

Development Opportunities

4.78 The Shoreditch AAP will The Council has identified a number of key development opportunities suitable for development. It will include site allocations to provide site specific guidance, allocate uses and provide These include but are not limited to the following sites. Further details on development capacities and site allocations will be set out in the Future Shoreditch Area Action Plan.

- 110 Clifton Street, EC2A 4HT
- 64 – 80 Clifton Street and 4 – 8 Holywell Lane, EC2A 4HB
- 36 – 45 Great Eastern Street, EC2A 3ER
- Telephone Exchange, Shoreditch High Street, E2 7DJ
- Telephone House, 110 Tabernacle Street, EC2A 4LE
Response to 23.c

Appendix 3 contains site allocations SHX1, SHX2, SHX3 and SH1. Are these within the PP8 area and if so, how do they relate to the policy and the proposed AAP? Are they justified and effective? Are any suggested changes to SHX3 necessary for soundness? Are the setting out of development options for SHX3 justified and effective?

3.85. SHX1, SHX2 and SHX3 are located in the PP8 area. Site allocation SH1 is located in the north of the borough as detailed in the Council’s response to Q.19.a above. Sites SHX1, SHX2 and SHX3 all fall out of the defined Shoreditch AAP boundary but form part of the wider Shoreditch and Hoxton area.

3.86. The sites are justified and effective in accordance with our methodology as set out in our answer to Q.16.f and Q.16.g above they are strategic sites that require further guidance in their development in order for them to come forward during the lifetime of the Plan.

3.87. The Council does not consider that there are any suggested changes necessary to address issues of soundness however the following change is being proposed for clarity as suggested by the Council in response to the summary of representations received at Reg 19 (SD06) and a further minor amendment to the site address:

SHX3 - 46-48 Eagle Wharf Road, Hackney, London, N1 7ED
Ward: Hoxton West

Ownership: Private
Area: 0.52ha 1.05ha
Existing Use: B8 storage
Are the setting out of development options for SHX3 justified and effective?

3.88. Development options set out for 46-48 Eagle Wharf Road on page 222 of LP33 are justified and effective. They provide sufficient flexibility in the potential mix of uses on site and encourages a comprehensive development of the site including a crossrail 2 ventilation shaft. This site allocation includes two of the three sites identified by Crossrail 2 for a ventilation shaft/works site - the third site being Shoreditch Park which is contrary to policy and has received significant local objection. Further information is set out in a statement from Crossrail 2 team.

24.PP9 – Manor House
a. Para 4.84 includes two sites that are ‘suitable for development’. Is it clear that these sites are allocated within the Plan, are justified, and should cross reference be made to Appendix 3?
b. Site allocation MH1 is also set out in Appendix 3. How does this relate to PP9 and should it be included? Is the site justified?
c. The Council has suggested some changes to PP9 including in relation to green links and step free access at Manor House tube station. Are these necessary for soundness?

Response to 24.a

3.89. Yard Buildings (MH2) Boys Club and Deaf Centre (MH3) are both allocated in LP33 as is Woodberry Down (MH1) (Appendix 3 p169 -173). To provide further clarity on these sites being allocated in LP33 we are suggesting minor modifications to PP9 to reference sites MH1, MH2 and MH3 as being identified site allocations in Appendix 3 of the Plan. The Council suggests the following amendments:

Development Opportunities

In addition to this, the Council has identified the following key development opportunities suitable for development during the lifetime of this plan including:

- (MH1) Woodberry Down, Seven Sisters Road, N4 1DH
- (MH2) Yard Buildings, 318 Green Lanes
- (MH3) Boys Club and Deaf Centre

Response to 24.b
b. Site allocation MH1 is also set out in Appendix 3. How does this relate to PP9 and should it be included? Is the site justified?
3.90. MH1 Woodberry Down is located within PP9. For the purposes of consistency and in order to address and enhance opportunities identified in Development Principles set out in PP9 page 49 to integrate Woodberry Down with any future masterplanning opportunities in Manor House we propose adding MH1 to PP9 as identified in the above changes.

3.91. This site is justified and effective as set out in our answer to Q.16.f and Q.16.g above. It is a strategic site that requires further guidance in its development in order for it to come forward during the lifetime of the Plan.

Response to 24.c
c. The Council has suggested some changes to PP9 including in relation to green links and step free access at Manor House tube station. Are these necessary for soundness?

3.92. The suggested changes being proposed by the Council in response to representations at Reg 19 are not necessary for soundness but will help to ensure consistency with other policies in the Plan and as a result the Council proposes the following changes as set out in (SD06);

The following change is proposed in paragraph 2.82:

“There is a concentration of hotels and B&B on the Seven Sisters Road, and the centre is located next to a major regeneration scheme in Woodberry Down. Finsbury Park is a major open space on the doorstep of the area, and the enhanced Woodberry Wetlands makes the already important nature habitat for migrating birds in particular more publicly accessible, without compromising its ecological importance, nor adversely affecting the waterborne leisure activities in the adjacent EastWest Reservoir.”

3.93. The Council has suggested the inclusion of a further development principle with regards to green links:

- Improve and enhance green links in the area to take advantage of the completion of new routes proposed in the Woodberry Downs masterplan and the completion of the Woodberry Down wetlands

3.94. LP44 addresses improving interchanges at local stations (and associated access). However, it is also suggested that a reference to step free access at Manor House be inserted on page 49 in development principles bullets to the fourth bullet

- Improve movement and accessibility to and through the area for all modes of transport, to promote sustainable and healthy transport choices, step free access at Manor House tube station and achieve better community integration.

3.95. A further strategic principle on Woodberry Downs wetlands is proposed:
Secure the completion of Woodberry Wetlands to enhance the landscape along the New River and reservoirs between Finsbury Park and Green Lanes, providing a better green link with Clissold Park."

3.96. The following correction is proposed in PP9 paragraph 4.85:

“The diagram below illustrates the nature of intervention on the spectrum of reinforce-repair-reinvent that is required within Dalston Manor House as identified in the boroughwide Characterisation Study.”

25.PP10 - Homerton
a. The text states that development opportunities will be established through a masterplan for the area. What will this masterplan comprise and is this clearly defined within the Plan? Is it proposed to set out site allocations or policy requirements not within the Plan and if so, is this appropriate?
b. Are any suggested changes necessary for soundness?

Response to 25.a

3.97. Homerton is one of the boroughs new growth areas as identified in the growth strategy, informed by the Characterisation Study and reflects the Mayor of Hackney’s manifesto commitment to develop a masterplan for this area. PP10 includes an area character assessment and an urban analysis of this growth area informed by the Hackney Characterisation Study and ‘Strategic Principles’ which set out the strategic policies related to improving the identified challenges for the area. Further details of how these strategic principles will be implemented along with guidance on sites and capacities will be established through a Masterplan for the area as mentioned on page 54 of the Plan.

3.98. The Masterplan will review the existing connectivity in the area, with an aim to improve linkages and wayfinding between Chatsworth Road, Homerton station and Well Street. In developing the masterplan for Homerton the Council will seek to engage closely with local people, communities, organisations and landowners to identify the key issues and challenges within the area and seek to address these through providing detailed spatial solutions to inform and direct development in line with LP33 policies. The proposed SPD will not be allocating sites, it will however identify areas of potential change and development opportunity through design guidance. Work on scoping out the masterplan is in its early stages.

Response to 25.b
b. Are any suggested changes necessary for soundness?

3.99. Suggested changes are not necessary for soundness. TfL Planning made the following representation at Reg 19 “This section on Homerton is less detailed than the Places for
People sections for other sub-areas. TfL requests greater clarity in setting out barriers to walking and cycling movement and how integration of the high street with public transport could be improved. This is particularly important given the regional importance of the nearby hospital as a significant destination”. Strategic principles already include reference to active frontages and green spaces. In accordance with the strategic principles further detailed work will be undertaken as part of the emerging Homerton SPD to set out detailed solutions to identified spatial challenges as identified in the Urban Design Analysis (LP33 paragraph 4.93 - 4.97) and the Hackney Characterisation Study (2018) (page 142 to 143).