Hackney Local Plan 2033

Interim Integrated Impact Assessment

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

October 2017
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1. **Introduction**

**Overview**

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

1.2 Following consultation on the key issues between Wednesday 02 November and Wednesday 24 December 2016, Hackney has now produced a draft local plan for the borough which it will shortly be consulting the public on.

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

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

1.5 This report builds on the initial sustainability appraisal scoping report which was published for consultation between 15th May 2017 and 19th June 2017 which set out the key baseline information on the borough and identified the key issues around sustainability as well as a framework of objectives with which to assess the plan policies and constituted Stage A of the Sustainability Appraisal process.

1.6 This report constitutes Stages B & C of the sustainability appraisal process (see figure 2, in the introduction, below), where the proposed plan and its policies are thoroughly assessed, demonstrating how the preferred approach maximises the benefits and minimises negative impacts on Hackney and its people.

**Hackney Local Plan 2033**

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

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

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

1.10 The new Local Plan will amalgamate and update the Core Strategy (adopted in 2010) the Development Management Local Plan (adopted in 2015) and the Site Allocations Local Plan (adopted in 2016).

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

Consultation on the Integrated Impact Assessment

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

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

1.14 We will be seeking you views on this report for five weeks from the 23rd October 2017 until 27th November 2017.

You can respond in two ways;

Email us: planmaking@hackney.gov.uk

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

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

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

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

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

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

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

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

1.21 These reports will be contained as chapters within this document and provide their own self-contained conclusions.
2. The Sustainability Appraisal

Stage A: The Scoping Report

2.1 Hackney began the sustainability appraisal process in concert with gathering evidence and developing options for a new local plan in mid to late 2016.

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

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

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

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

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

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

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

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

2.7 It should be noted that the sustainability process (as set out in the official guidance) sets out that Stage D should be completed alongside the submission of the final plan (otherwise known as Regulation 19) for consultation. However, the council believes it will be useful to deliver a staged approach where the Sustainability Appraisal is published, as part of the IIA, at the draft plan consultation stage (known as Regulation 18), to allow for commentary to be received and suggestions included.

2.8 A final version of the updated sustainability appraisal would then be published, and submitted for examination. This would allow for the highest possible level of assessment of policies and any significant developments in the period leading up to examination, ensuring the best possible assessment.

Methodology

2.9 The Local Plan is made up of a set of Objectives, a Vision & Spatial Strategy; and 56 policies (organised into 8 chapters) which implement these by controlling the form and type of development that comes forward in the borough.

2.10 The first step is to assess the local plan objectives, and spatial strategy against the sustainability appraisal framework to identify synergies and conflicts between the two.

1 Add reference to SA process diagram from NPPG
Assessment of the spatial strategy is critical because the Local Plan is a spatial plan, and therefore implicitly applies objectives differently in different locations. This will identify the potential for significant beneficial and adverse effects occurring in the latter stages of the process.

The second step is to assess alternative approaches to addressing key issues identified as part of the Local Plan development process. At the outset of the development of the local plan, a series of key issues were identified and assessed through 8 topic papers. These were published as a Direction of Travel Paper\(^2\) in early 2016 by the council for consultation, and identified the following key issues:

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

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

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

2.13 Therefore, the SA assesses alternatives for the following issues:

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

\(^2\) Direction of Travel Paper, 2016
- Air Quality
- Overheating
- Flooding

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

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

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

3.2 Hackney Local Plan 2033 has nine objectives:

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

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

3. To deliver up to 30,000 additional homes, increasing the supply of genuinely affordable homes, alongside community facilities to meet existing and future needs.

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

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

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

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

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

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

3.3 The objectives aim to direct the plan to solving issues identified at the issues and options stage of consultation, and there is likely to be significant overlap with sustainability objectives.

3.4 The objectives are tested, individually, against the sustainability framework, with a commentary provided on this, which seeks to identify the impacts in the short, middle and long terms.
3.5 Table 1 sets out a matrix which summarises the interaction between the objectives and sustainability issues.

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

Key - Sustainability Impact

<table>
<thead>
<tr>
<th>++ Major Positive</th>
<th>-- Major Negative</th>
<th>0 Minimal Interaction</th>
</tr>
</thead>
<tbody>
<tr>
<td>+ Minor Positive</td>
<td>- Minor Negative</td>
<td></td>
</tr>
</tbody>
</table>

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

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

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

**Objective 2 – To tackle health inequalities, create an environment that promotes health and wellbeing, and enable skill development and lifelong learning**

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

**Objective 3 - To deliver up to 30,000 additional homes, increasing the supply of genuinely affordable homes, alongside community facilities to meet existing and future needs.**

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

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

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

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

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

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

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

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

3.13 This objective has no significant, immediate sustainability impacts identified. Provision of additional public transport will benefit area in terms of providing access to employment to Hackney residents, but also widen the labour market in Hackney significantly, (especially in the medium and long term in respect of Crossrail2) and allow commuting from distant areas. Overall this is likely to put additional pressure on land in Hackney for development in general, potentially threatening the ability to achieve affordable housing and economic growth. However, it will have sustainability impacts for both climate change and pollution, if, and when, better technologies such as electrification of buses, and use of renewable power in the supply are implemented.

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

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

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

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

**Alignment between Plan Objectives and Sustainability Objectives**

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

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

- The inherently limited supply of land available for development means that there is a significant tensions between the selection of uses for this land as part of the plan. This is most strongly reflected between delivering affordable housing and economic growth, but also between these and open space/biodiversity, though it should be noted that the plan aims to protect these spaces as much as possible. It is notable that sustainability objective 2 (efficient use of land) does not indicate long term sustainability.

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

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

4.2 These policies are principally aimed at delivering a response to issues raised and identified by the council and consultees so far, consultation responses highlighting key issues, set against the requirements for policies addressing certain issues set out by the NPPF and London Plan³.

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

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

4.5 The following key issues have been identified for:
   - Air Quality
   - Overheating
   - Flooding
   - Open Space
   - Town Centres
   - Car Free Development
   - Conservation and Heritage
   - Housing Size Mix
   - Affordable Housing Threshold
   - Type of Affordable Housing
   - Affordable Housing Tenure Split
   - Employment Land Provision
   - Type of Employment Floorspace
   - Employment Floorspace Affordability

**Air Quality**

4.6 Hackney suffers from high levels of pollution and therefore poor air quality, particularly with regard to emissions of Nitrous Oxide (NO2) and Diesel Particulate Matter (Known as PM10 & PM2.5). Since 2005 Annual mean NO2 levels have exceeded limits in each

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³ Both of these documents have been subject to the relevant sustainability processes indicating their high-level objectives are sustainable.
monitoring year, ranging from 150-175% of target. Particulate Matter levels have fallen but are still significant above safe levels. Hackney is designated as an air quality management area, denoting serious issues with air quality.

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

The following options were considered:

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

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

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

Consideration of Options

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

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

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

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

**Air Quality - Conclusions**

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

**Overheating**

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

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

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

The following options were considered:

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

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

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

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

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

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

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

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

Overheating – Conclusions

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

Flooding

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

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

The following options were considered:

1) New developments need to contribute to the provision of strategic infrastructure to alleviate flood risk when considered appropriate. Developments need to make use of Sustainable Drainage Systems (SDS) to reduce runoff and therefore control flooding, when there is an increase in the ‘impermeable area’ of the development, with development should halving the runoff using the systems. Amenity and Biodiversity should be maximised. In Critical Drainage Areas the design and provision of appropriate mitigation should be used to ensure a greenfield runoff rate is achieved (equivalent to if the site was open land). Developments within Flood Risk Zones
should not increase flood risk. The council will defend cooperate with water network operators to ensure appropriate sewerage and wastewater infrastructure.

2) All development must consider how it will reduce vulnerability to flood risk over the lifetime of development, using design and on and off-site mitigation, aiming to achieve greenfield runoff rates. Major developments must submit appropriate flood risk assessments, as well as developments within critical drainage areas. Developments must make use of SuDS to ensure greenfield runoff rates and to make use of the drainage hierarchy. Basement developments to consider flood risk. All development should, in liaison with Thames Water, take account of the capacity of existing on and off-site water and sewerage infrastructure and the impact of development proposals on this infrastructure.

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

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

Flooding – Conclusion

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

Open Space

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

The following options were considered:

1) Increase provision of communal open space from 10sqm to 14sqm per person from large scale residential schemes.
2) Maintain existing new provision requirements for 10sqm per person from large scale residential schemes.

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

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

Conclusion – Open Space

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

Town Centres

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

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

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

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

Hackney Central Town Centre

4.34 The following options were considered

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

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

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

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

Stamford Hill Town Centre

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

The following options were considered:

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

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

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

Local Centres

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

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

The following options were considered:

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

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

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

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

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

**Conclusion – Town Centres**

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

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

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

**Car-Free Development**

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

4.51 The options considered were:

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

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

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

Conclusion – Car Free Development

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

Conservation and Heritage

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

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

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

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

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

**Housing Size Mix**

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

Providing the right dwelling size mix and tenure is important in ensuring the Borough’s housing needs are met.

The following options were considered:

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

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

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

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

**Conclusion – Housing Size Mix**

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

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

**Affordable Housing Threshold**

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

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

4.69 The following options were considered:

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

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

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

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

**Affordable Housing Threshold – Conclusion**

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

**Type of Affordable Housing**

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

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

4.75 The following options were considered:

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

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

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

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

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

Affordable Housing Tenure Split

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

The following options were considered:

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

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

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

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

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

Employment Land Provision

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

4.85 The following options were considered:

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

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

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

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

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

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

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

Type of Employment Floorspace

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

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

The following options were considered:

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

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

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

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

Conclusion – Type of Employment Floorspace

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

**Affordability of Employment Floorspace**

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

4.97 The following options were considered:

1) Borough-wide uniform requirement for affordable workspace – 10% at minimum 80% of market rent in perpetuity.

2) Encourage new affordable floorspace within new development but not be prescriptive about the amount and cost.

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

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

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

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

**Conclusion – Affordability of Employment Floorspace**

4.101 Option 3 is considered to be the most sustainable approach, as it takes a spatially differentiated and nuanced approach to requirement for affordable workspace. This will ensure that the requirement to provide affordable workspace does not limit the bringing forward of schemes, while also ensuring that those that do come forward contribute to ensuring that economic growth benefits the local population. In addition, it would ensure that this space is clustered in areas of the borough where they can maximise co-location benefits with larger, more established businesses.
5. Stage B3: Assessing the Preferred Approach

Introduction

5.1 The previous section of this report focused on the assessment of alternative options for various issues raised during the plan preparation, and set out which of these was considered at that stage to be the most sustainable options. Following on from this, these preferred options have been incorporated with other issues not considered to present realistic or clear options, to deliver a draft local plan.

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

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

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

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

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

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

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

1. Design Quality and Local Character
2. Development and Amenity
3. Designated Heritage Assets/ Listed Buildings
4. Non Designated Heritage Assets
5. Archaeology
6. Advertisements
Sustainability Impacts

5.7 Policies 1, 3, 4 and 5 would have a major positive impact on all aspects of the sustainability of the borough’s heritage assets, primarily by protecting them from being altered or removed, and requiring any development of, or near to them, must respect the setting of the borough’s historic townscapes and landscapes, maintains and improves their character. The policy will protect a range of historic buildings, including designated (policy 3) and non-designated (policy 4) heritage assets, as well ensuring that potential archaeological remains are investigated and protected, and where possible put on display to the public.

5.8 Policy 1 also sets out requirements for the overall design and buildings, with a particular and has major positive impacts by requiring sustainable design and construction in all developments, strongly supporting climate change and strongly supporting sustainable design, and that they seek a range of key measures which support Hackney’s people, communities and health, as well as reduce crime by being accessible, secure by design and encourage health, through the requirement to use the active design principles. It also sets out that Tall buildings, which represent some of the highest potential impact developments need to relate and respond to the boroughs historic townscape; not lead to overshadowing and to make a positive contribution to the public realm, having a major positive impact on heritage assets as well as sustainable design and efficient use of land. These impacts are likely to be felt most strongly in the medium to long term, with there being a measure of uncertainty as to their impact resulting from them largely being reliant on changes in the behaviour of users.

5.9 Policy 2 would have minor sustainability impacts across a range of factors related to amenity, most strongly in terms of ensuring developments are built in such a way as to limit overlooking and maximise sunlight and daylight for occupants, and to protect them from a range of pollution issues including noise and air pollution, which is also supported by the aims of policy 56 (pollution). The effects of Policy 2 would be immediate and long term on new developments, but are limited in their effect on existing developments, except in ensuring existing development’s amenity is not unduly damaged.

5.10 Policy 5 would have minor positive impacts on heritage assets as well as efficient use of land, and health by ensuring that ensuring that they do not adversely affect the historic significance of buildings, and be sensitive to the character of an area, and that developments do not cause visual intrusion and light pollution into adjoining properties. The impacts of this policy highly certain and likely to occur in the short to medium term as the policy is applied to new applications.

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

**Hackney's People**

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

- 7 Social and Community Infrastructure
- 8 Health and Wellbeing
- 9 Arts, culture and entertainment facilities

**Key Sustainability Impacts**

5.13 Policy 7, as its title suggests, will have a major sustainability impact on both Social Infrastructure and Community and Health in the borough by supporting the provision of new social and community infrastructure, where there is an identified need, ensuring facilities are delivered in a balanced way which maximises the efficient use of land. In addition, it delivers major positive impacts on equalities by requiring these developments provide access for all, and are co-located with other social infrastructure. The policy also seeks to limit the loss of existing facilities unless they are replaced. The policy could be made more sustainable by requiring these developments, which attract a large number of users, often younger or elderly and/or more vulnerable are located in areas of the borough which have lower pollution and higher air quality, though it is notable that developments would be required to consider this under policy 56. The impacts of the policy are highly likely and will occur over the medium to long term, as developments are proposed and then built out. The policy does not seek to set out the type or need for infrastructure needed, providing the most flexible approach and ensuring long term ability to deal with changes in the needs of the people of the borough.

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

5.15 Similar to the previous policy, Policy 8 also will have a major positive impact on Community and Health, Walking and Cycling and Social Infrastructure by supporting developments which contribute to a high quality environment and support health and active lifestyles. In addition they require all new development, regardless of use, to promote physical activities, and encouraging residents to lead active lifestyles, and provision of facilities to support walking and cycling. The impact of the policy is highly likely to occur, within a medium to long timeframe, as new development comes forward. The effects of the policies are likely to be relatively permanent with regard to provision of facilities, but changes to behaviour anticipated are less certain and/or permanent.

5.16 The provision of major arts, culture and entertainment facilities in the borough, through Policy 8 will have a minor positive impact on both community and health, and on economic growth and employment by attracting people to the events and other peripheral
supporting companies and services. The policies are unlikely to have any significant negative impacts on sustainability as long as they are applied in balance with the rest of the plan policies.

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

Meeting Hackney’s Housing Need

5.18 This chapter of the plan focuses on policies related to residential development and meeting Hackney’s identified housing need. The policies making up this chapter are:

- 10. Housing Supply
- 11. Affordable Housing
- 12. Dwelling Size Mix
- 13. Build to Rent
- 14. Self/Custom-Build Housing
- 15. Housing Design
- 16. Housing Older and Vulnerable People
- 17. Residential Conversions
- 18. Student Housing
- 19. Shared Housing
- 20. Visitor Accommodation
- 21. Preventing the Loss of Housing
- 22. Gypsy and Traveller Accommodation

5.19 Policy 10 has a major positive impact on the efficient use of land as it sets out areas of the borough where housing can be delivered. It also has major positive impact on affordable homes and community facilities by requiring market housing to be delivered alongside and in balance with these developments. The provision of housing is identified as a key sustainability issue, but there is potential that if housing is delivered in preference to other types of land use, such as business and/or key infrastructure or facilities, that there could be long term significant impacts on the ability of the borough to support these objectives. This needs to be considered in balance with the fact that failure to deliver enough affordable homes will have significant impacts on the ability to deliver employment, education & skills and community an health benefits which can arise only when safe, secure and affordable housing are available. Assuming that policy 10 is delivered with the application of the other policies in the plan, the delivery of housing as part of well-designed, mixed use developments can support policies, but this needs to be carefully managed.

5.20 Policy 11 has, as its title suggests a major positive impact on affordable housing by requiring all new development maximise opportunities to deliver affordable housing. As
an individual policy, as set out in paragraph 5.19 there could be concerns about how this priority may impact on sustainability of other factors, but the policy requires maximisation have regard to site context and character, as well as economic viability, therefore protecting the historic fabric to an extent, as well as ensuing the most efficient use of land. The policy requires all developments of 10 units or more deliver at least half of development as affordable, with the split of this being 60% Socially rented vs 40% intermediate products. In doing so, the policy ensures that the majority of this housing is delivered at significantly below local market rates maximising the benefit, while ensuring this housing can be delivered, as lower rates will make the housing more challenging to sustainably deliver. Furthermore, the housing is to be delivered on-site, which provides a strong positive impact on community and health as well as poverty and equality by ensuring new development delivers housing for the local community. For schemes of 1-9 units, there is still a requirement to provide affordable housing though this is balanced against economic viability, which should provide an additional minor positive impact on small-scale developments. The effects of the policy are relatively certain as tenure will be clearly established in the planning permission, and the speed of the impact likely in the medium to long term, as developments come forward and are then built out.

5.21 Policy 12 will have a major positive impact on the provision of decent homes by ensuring that new developments come in a range of sizes which fit with local needs. This dwelling mix will ensure that there are sufficiently large homes for those needing them, as identified in the 2015 Strategic Housing Market Assessment. The provision of these homes is likely to have a minor positive impact on poverty and equality and community and health by ensuring local communities get access to better quality housing. Much as with policy 10, this is balances against local character and economic viability to ensure that the implementation of this policy does not create a negative impact on heritage assets or ability deliver other land uses. In addition, policy 17 requires that conversion of existing residential properties provide at least one family unit with three or more bedrooms, at ground level.

5.22 Policies 13, 14, 17, 18 deal with special types of housing which may be proposed by developers, with the policies focused on ensuring these types of developments meet high standards. Policy 13 deals with ‘build to rent’ housing where a major investor will ‘build and hold’ a development, gaining a constant return on investment over a longer time period. This form of development could post sustainability risks if the tenure of the units delivered changes (to owned etc) where this could negatively impact on poverty and equality and community and health by ensuring local communities get access to better quality housing. Policy 14 would have a similar, but less strong positive impact on provision of decent homes, by supporting the provision of self/custom houses which comply with the other policies set out in the plan.

5.23 Policy 17 restricts the conversion of existing homes into a larger number of units, by ensuring that the houses converted contain an adequate minimum amount of floorspace and that these do not damage the distinctive character of the area through over
development. The policy could be made more sustainable by reference being made to provision of adaptable dwellings for those less able, and by requirement to ensure that the newly converted property meets modern construction sustainability standards, though this is mitigated by policy 53 (sustainability in existing residential). Policy 18 deals with another specialist form of housing, Student Accommodation, and is primarily aimed at responding to, and controlling demand for this type of development. The policy will have a major positive impact on the affordability of this type of accommodation by requiring a minimum of half the rooms are affordable (in terms of student grants and loans), at no more than 55% of the maximum income a student could receive. The policy also seeks to limit the development of this type where it would lead to an overconcentration and detriment to local amenity. The provision of this type of highly ‘specialist’ housing could have a detrimental impact on the sustainability of providing fully accessible affordable housing. The policy combats this by ensuring that new development only permitted when there is no harm to the provision of other general needs housing, and will not result in the loss of self-contained housing.

5.24 Policy 15 will have a major positive impact on the delivery of sustainable design, as well as tackling climate change, by requiring housing meets GLA housing standards and accessibility standards, and tying developments to the council’s sustainable design and construction SPD. It also provides a major positive benefit to open space by requiring provision above standards in areas considered to be deficient in open space.

5.25 Policy 16 will have a major positive impact on poverty and equality due to the policy supporting housing for older and vulnerable people, where a need can be demonstrated. In such cases, the policy ensures there are also minor positive benefits in terms of ensuring half of units are affordable, and schemes are accessible and near to services their users need. It is highly likely that these impacts would arise within the medium to long term, as the policy applied to developments. The policy could be made more sustainable by ensuring this kind of housing is provided as part of other, mixed use developments, therefore providing a greater level of community interaction for these groups, although this needs to be balance against the specific and often challenging needs of vulnerable individuals.

5.26 Policy 19 responds to the demand for new types of ‘shared’ accommodation, such as those where rooms are individually owned but facilities are shared between individuals (similar to student accommodation). The impact of this policy is likely to reflect that set out in paragraph 5.22, that is, it will have a major positive impact on provision of affordable and decent homes, as it requires that new developments must be set at rents which are affordable to local (ward) level incomes, in accordance with policy 11. In addition, the policy requires that developments provide a suitable level of communal space, having a minor positive impact on community and health, and that the developments meet space standards. The policy could be made more sustainable by ensuring these kinds of developments set up management frameworks similar to policy 13, which ensure equitable treatment of residents.

5.27 Policy 20 deals with the provision of visitor accommodation such as hotels. The policy would have a major positive impact on economic growth and potentially on employment too, by ensuring that new developments are directed to the Central Activities Zone and major town centres, therefore supporting the tourist economy and providing employment.
However, there is potential that provision of hotels could have a major negative impact on affordable housing and other forms of economic growth by replacing or taking sites from these uses and jeopardizing the efficient use of land. Therefore, the policy limits the provision of new accommodation unless it is within project need for the borough, and will not harm the balance and mix of uses in the area, or lead to an over concentration, therefore ensuring their provision is balanced. In addition, the policy has a high potential of bringing minor benefits in terms of communities and health by requiring that new facilities are open to the public.

5.28 Policy 21 will have a major positive impact on several factors, as it limits the redevelopment or loss of residential floorspace. Primarily, it ensures that unless the residential floorspace is no longer suitable, and it is inappropriate to re-provide it on site, this type of floorspace will be strongly protected, with a major positive impact on the provision of affordable housing. This is further enhanced by any redevelopment being an equivalent or higher density, or provision for specialist housing where there is a shortage. This will ensure that the type of size of housing can be altered by redevelopment. The policy could have potentially negative impacts on the provision of other land uses (for example, social and community uses, and employment. This is dealt with by allowing for developments to proceed for community uses where a need can be demonstrated, and, when buildings are within employment land (see para xx) for the land to be returned to an employment (b use) class. The policy is also inherently positive for Climate Change by avoiding the loss of the embodied carbon of existing buildings, though the policy could be made more sustainable if redevelopment would incorporate sustainable design features and energy-reducing technologies.

5.29 Policy 22 will have a major positive impact on poverty and equality by setting out policy for provision of new specialist accommodation for Gypsies and Travellers and Travelling Show people to meet the needs of this protected group. The policies ensures that where a need can be demonstrated for the community the council will support provision. Further minor positive are provided by requirements that sites proposed are suitable for residential development, with good access to facilities which support community and integration. The policy also limits the loss of travellers sites unless an equivalent number of pitches are provided, though this could made more sustainable my ensuring these are within the borough, thereby ensuring the community is not displaced.

**A Strong and Competitive Economy Which Benefits All**

5.30 This chapter of the plan includes policies aimed at delivering economic growth and protecting designated areas of Hackney for employment uses:

- 23. New Employment Floorspace
- 24. Protecting and Promoting Office floorspace in the Borough
- 25. Protecting and Promoting Industrial land and floorspace in the Borough
- 26. Affordable and Low Cost workspace
- 27. Railway Arches

5.31 Policy 23 would have a major positive impact on employment and economic growth by enabling the provision of new employment floorspace in the borough. The policy establishes and defines areas of the borough where employment floorspace is focused
and directs new employment development into these areas, known as Priority office areas, priority industrial areas and designated town centres, therefore ensuring that the provision of this floorspace does not compete with housing or other uses, and ensures there is not significant damage to the related sustainability objectives. The creation of protected areas provides a major positive for efficient use of land by ensuring residential amenity is protected, and that the employment floorspace can function effectively.

5.32 Policies 24 and 25 are supplemental to 23, setting out the form of new office (24) and industrial (25) employment floorspace in Hackney. The policies would have a major positive impacts on employment and economic growth, as they ensure that developments are well designed and have a range of unit sizes and types, with emphasis on provision of spaces for small and independent commercial enterprises, if implemented, the provision of this type of floorspace will also have a major positive impact on poverty and equality by allowing the borough’s residents easier access to business space and increasing the size of the labour market.

5.33 Policy 24 requires that new development within priority office areas (POAs) must be employment led, with 50% of overall floorspace in B1 use, and this approach is targeted, with the proportion rising to 60% in the major POAs of Shoreditch Dalston and Wenlock. In doing so the policy ensures that a balance is struck between supporting economic growth whilst allowing provision of other uses, such as retail and affordable housing, therefore balancing the aims of the policy with other needs. The policy restricts the loss of any B1 floorspace within POAs, but takes a more balanced approach to developments outside these protected areas, allowing for a loss when marketing evidence show a lack of demand, or, if the proposal is for replacement employment floorspace, this is of a higher quality, and that a marketing strategy is set out for the new space.

5.34 Policy 25 requires a similar set of restrictions within Priority Industrial Areas (PIAs) where new development will only be permitted if there is re-provision of the same amount of industrial floorspace or intensify the use, or significant increases in job density, therefore ensuring that any new development maximises the efficient use of land. It is notable that the policy down not allow for provision of housing on these sites. This is primarily due to the issues related to noise, pollution and general amenity when mixing industrial uses with residential, which the policy seeks to avoid, therefore providing a minor sustainability impact on community and health, and equalities.

5.35 Policy 26 supports the above policies by requiring that major new mixed use developments across the borough must provide a quantum of affordable workspace, in the sense it is to be delivered at least 60% of market rate, falling to 40% in the Shoreditch POA, and must be provided on site. This type of floorspace ensures that small and medium sized enterprises do not find themselves forced out of these areas, therefore ensuring that the plan has a major positive impact economic growth and employment across a range of sectors, and reflects more closely the needs of the local population. The effect is likely to be permanent and long term due to the requirement for this floorspace to be provided in perpetuity, including re-provision if this space is subsequently redeveloped.

5.36 Policy 27 has been developed to deal with a particular industrial typology, that is, railway arches. These have been increasingly sought for a range of uses outside of historic use
(for warehousing and industrial uses). The policy will have a major positive impact on employment by ensuring these units are retained with the primary use being for employment, incorporate active frontages where they are located in town centres, and retain any existing low cost employment space.

Planning for Vibrant Town Centres

5.37 Policies in this chapter deal with retail and other uses, and set out the planning for town centres. It contains the following policies:

- 28. Town Centres
- 29. Hackney Central and Dalston
- 30. Stoke Newington, Stamford Hill and Finsbury Park
- 31. Local Shopping Centres
- 32. Shops outside of designated centres
- 33. Small and Independent shops
- 34. Evening and night time economy
- 35. Over-concentration of uses
- 36. Street markets

5.38 Policy 28 will have a major positive impact on economic growth and efficient use of land by designating town centres and requiring the new retail and leisure development is directed into them. This approach also sets out a hierarchy where the two major town centres, Hackney and Dalston will be the focus of growth, while smaller centres will be expected to take reduced levels. This ensures that the policy is proportionate to the size of the centre and ensuring that growth does not displace existing facilities or other elements of town centres, such as sustainable provision of community facilities and employment floorspace. The policy does not designated Shoreditch as a town centre, but sets out that the Central Activities Zone (CAZ) frontage, will be considered as the town centre boundary, and limits the creation of large new retail and leisure uses unless they can provide evidence they would not harm the vitality and viability of the centres, therefore ensuring that major new uses do not erode the many smaller developments operating in this area, delivering minor positive impacts for the vitality of town centres, as well as poverty and equality where these businesses are owned by the local population. Overall this policy acts as a foundation for the operation of other policies, so its effects are reliant on other facts for implementation. However if implemented the policy is likely to have medium and long term effects.

5.39 Policies 29, 30 and 31 set out the approach to delivering growth in the different levels of town centre, and will have a major positive impact on economic growth and poverty and equality by ensuring that the town centres remain the key retail and leisure destinations and amenity is protected for local communities. This is balanced against other sustainability needs by taking a proportionate approach is taken to restricting loss of retail. In the major centres, key parades and street frontages are protected with a requirement that that there are no more than two adjoining street frontages not in retail use, reduced to three within the secondary shopping area, which forms the outer area within the town centre boundary. Within Stoke Newington, Stamford Hill and Finsbury Park Centres, this requirement is tightened slightly to two units, but the overall proportion is reduced, making the policy slightly more flexible. In local centres there is no
requirement regarding the number of units, but the proportion of all units in retail should remain above 50%. Overall this ensures the protection of centres, while accepting that other uses, such as business and housing may be more in demand, therefore supporting affordable housing and business space. In all centres, losses are acceptable in circumstances where evidences shows the units does not have a realistic prospect of being used for retail, and any resulting changes must incorporate a shop front and have an active frontage, therefore providing a balanced approach we ensures the vitality of centres but not creating vacant properties by restricting their direction more sustainable uses.

5.40 Policy 31 deals with retail units outside of the town centres. The policy will have a major positive impact on both economic growth and poverty and equality by ensuring that smaller local shops outside of town centres, which typically serve local needs, are protected by resisting their loss unless there is an alternative shopping facility within 400m walking distance, it’s loss does not undermine a parade (if it is part of one) and it re-provides a shop front, therefore providing a balanced approach which would ensure that the aim of supporting economic growth is balanced with other factors.

5.41 Policy 33 will have a minor positive impact on economic growth, and employment by supporting provision of small shop units within new schemes, and not permitting the amalgamation of smaller shopping units. These units in particular benefit very small firms and local people looking to set up shops. The policy is graduated, requiring only major retail developments and major developments to incorporate small shopping units. In town centres these must be equivalent to at least 10% of the floorspace, allow new development to come forward but ensuring it supports the local economy, and in major developments, where there is no accessible provision of shops within 400m, new units must be incorporated to serve the local population.

5.42 Policy 34 responds to pressure, especially in the south of the borough for new evening and late-night uses. Enabling these uses has minor positive impact on economic growth, but can also lead to minor negative impacts for the amenity, and wellbeing of residents if not managed. In order to balance this, the policy only allows new night time economy uses if these can be demonstrated to have no impact on adjoining properties. To ensure that the overall impact on the area is controlled, the policy also takes account of the cumulative impact of these uses. These types of uses are typically structured around A4 and D2 uses, which create particular disturbance. In order to combat this, this policy also supports diverse night time uses in these areas.

5.43 Policy 35 responds to the demand for A5 (hot food takeaway) and betting shops in the borough. The policy would have a major positive impact on poverty and equality and community and health as it strictly controls the provision of these uses. Primarily this is done by restricting the proportion of A5 uses and betting shops to 5% of a town (or local) centre’s units. This policy has a particularly strong impact for young people by prevent the creation of new A5 units within 400m of the boundary of secondary schools or community colleges, and requires that where either of these uses can be provided, there is at least 3 units of non-A5 between them.

5.44 Policy 36 deals with the markets in the borough, by refusing permission for development which would result in the loss of market or pitches unless there is a comparable
replacement provision. It also directs growth in markets to town centres. This will have a major positive impact on economic growth, as well as equality and diversity. The policy could lead to an overprovision of markets, which may have impact for amenity and transport in the borough, but this is dealt with by restricting the provision of new stalls or pitches when they will have a cumulative impact.

### Improving Accessibility and Promoting Sustainable Transport

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

- 37. Liveable Neighbourhoods
- 38. Walking and Cycling
- 39. Transport and Development
- 40. Public Transport and Infrastructure
- 41. Parking and Car Free Development

5.46 Policy 37 will have a major positive impact on multiple sustainability factors by requiring that new developments contribute to the concept of living neighbourhoods, which builds on the Healthy Street concept set out by TFL\(^4\) to bring forward changes which will contribute to increasing walking and cycling rates in the city. The strong positive impact is on Walking and Cycling, as the policy requires new development to create environments which encourage these uses, while reducing private motor vehicles, improving the public realm through safer road crossing and wayfinding, and reallocation of road space for walking and cycling. This will also support major positive impacts on community and health by increasing the amount of exercise, and on air quality & noise and pollution by reducing the number of vehicles on the roads, contributing to this. It is notable the policy specifically requires developments to tackle poor air quality with a particular focus on children and the elderly. Finally the policy will have a major positive impact on biodiversity and climate change by requiring new developments contribute to greening of neighbourhood through tree planting and other green space. The policy is likely to have a strong overall positive impact in the short to medium terms if implemented, with the impact felt across all forms of land use. As the policy aims to shape the form of development if applied in a balanced way it is unlikely to limit new development coming forward.

5.47 Policy 38 will have similar major positive impacts as policy 37, as it restricts development unless this can demonstrate that it will improve the pedestrian environment, and provides a high quality environment by promoting walking and cycling, including setting the cycle parkins standards and expansion of cycle hire facilities. In addition, the policy requires that developments are permeable and easy and safe to walk through having a minor positive impact on reducing crime. Overall, the policy sets out details supporting policy 36, and so the timing and likelihood of its effects are similar.

5.48 Policy 39 deals with the overall impact of new developments on transport and dealing with the impact. It will have a major positive impact on walking and cycling, as well as the Hackney’s people’s health by requiring that developments reduce the need to travel

\(^4\) [http://content.tfl.gov.uk/healthy-streets-for-london.pdf](http://content.tfl.gov.uk/healthy-streets-for-london.pdf)
by encouraging high density development, minimise private vehicle trips and submit a travel plan which sets out how this will be achieved. In addition, the policy will have a major positive impact on air quality by requiring that impacts at the time of construction of the development are minimised through construction and logistics plans and other mechanisms aims at reducing the impact on air quality and public safety. Finally, the policy will have a minor positive impact on air quality in the medium to long term by requiring that an assessment is made of ongoing freight movements and ensuring the use of low emission vehicles in consolidated deliveries.

5.49 Policy 40 will have a similar sustainability impact to policies 37 and 39 as it sets out requirements for how new development should support public transport infrastructure. This will have a minor positive impact on air quality, noise and pollution and community and equality by requiring that new development protect existing public transport infrastructure, requires the provision of financial contributions to support improvements to respond to the impact of development, and support improving rail infrastructure. The policy may have a slightly less sustainable impact due to support for car clubs, which will increase private car movements, but considering their infrequent use this is considered to not affect the overall sustainability of the policy. The impact of the policy is likely to be felt in the medium to long term owing to the slow nature of upgrades to public transport networks.

5.50 Policy 41, as the name suggests, implemented requirements for developments to be ‘car free’ that is, not provide any new parking spaces, or allowing residents to apply for parking permits within controlled parking zones. This would have a major positive impact on air quality, noise and pollution and community and health. The policy also supports reducing poverty and equality by only allowing new parking spaces to be created when these are wheelchair accessible, and essential for operational and servicing needs, when a clear justification of this need is made through a transport assessment. This ensures that reducing the number of spaces does not have an undue impact on the ability of offices and other employment uses by limiting their ability to function, and ensuring new residential developments are open and accessible to all, especially those with reduced mobility. The policy also supports changes to land use to support reductions in the number of cars by encouraging the redevelopment of car parks, refusing permission to create new car parks, and resisting the loss of boundary treatments and gardens to provide vehicular access. In addition, the policy will have a minor positive impact on climate change by requiring that at least 20% of new parking spaces are equipped with an electric vehicle charging point, and developments contribute to expansion of car clubs in their areas. Overall the policy will have impacts in the short and medium terms by immediately reducing the availability of spaces for private vehicles, with a high degree of certainty about these impacts coming forward.

Hackney’s Green and Public Spaces

5.51 Policies in this chapter set out the borough’s approach to creating and maintaining open space for amenity and biodiversity.

42. Protection and enhancement of Green Infrastructure
43. Biodiversity and Sites of Importance of Nature Conservation
44. New Open Space
45. Green chains and green corridors
46. Play Space
47. Allotments and food growing
48. Tree management and landscaping
49. Waterways, canals and residential moorings

5.52 Policy 42 will have a major positive impact on biodiversity, communities and health and walking and cycling, as the designates areas of open space and pathways linking them from new development, only allowing it where the development delivers a compensatory contiguous replacement of better or equivalent open space as well facilities, and is more easily accessed by cycling and walking, or the community benefit of the development will outweigh the harm caused by the loss of open space to that community. This is further supported by allowance to development small scale developments which are ancillary to the open space, as long as these do not impact on the biodiversity or overall function of the open space. The policy does not allow the need for housing or economic growth to trump the need for open space, forsaking benefits in the short term for significant sustainability benefits in the long term regarding increased resilience to climate change and maintaining biodiversity in the borough. The policy also any protects other ‘non designated’ open space in the borough with a similar major positive impact on biodiversity and communities and health, by requiring replacement space and that any replacement links to green chains between designated open spaces, and requires that new developments maximise urban greening through provision of living walls and living roofs on major schemes which have roof plates of over 100sqm which cannot be used to support amenity space. Overall, the policy will have significant positive sustainability impacts, as outline above, in the short, medium and long terms, with the benefits increasing over time as open spaces become more critical to dealing with the impacts of population growth and climate change.

5.53 Policies 43 and 45 will have a major positive impact on biodiversity by protecting Sites of Importance for Nature Conservation (SINCs) and requiring that developments next to these sites, or protected sites to the north east of the borough in Walthamstow, do not have a detrimental impact on these sites, and maximise opportunities to improve them. It also requires the same developments link into the wider green infrastructure of the borough, such as green links, and that smaller developments, when within the designated green link corridors, are developed in a way which contributes to green infrastructure.

5.54 Policy 44 builds on policies 42 and 43 by requiring that all major development in the borough provide new open space, at a rate of 14sqm per person in residential schemes and 4sqm per employee in non-residential. This will have a major positive impact on community and health and poverty and equality by ensuring new developments contribute to the overall proportion of open space in the borough. The policy also sets out areas of the borough which are deficient in open space and tightens the requirements in these area regarding provision. To ensure development continues to come forward if these requirements cannot be met, the policy allows for provision of other green infrastructure measures which will have a major positive impact for biodiversity, such as green roofs or walls. The provision of open space in this way will ensure that the major positive impact on biodiversity and community and health can be delivered with a high
degree of certainty and permanence, in the medium and long terms while also ensuring that economic growth and affordable housing can continue to be delivered as needed.

5.55 Policies 46 and 47 deal with alternative uses for open space, namely Allotments and Play Space. The policy protects existing play spaces and allotments for re-development and supports provision of new ones, having a major positive impact on community and health and sustainable design. In the case of play space, the policy requires major mixed use schemes, which will generate a child yield of 10 or more provide 10sqm of dedicated floorspace per child. It also sets out that these spaces should be well located to take advantage of accessible routes for walking and cycling, and be sustainable and easy to maintain, providing minor positive sustainability benefits for walking and cycling and sustainable design.

5.56 Policy 48 deals with the management of trees and existing landscaping (such as spaces along roads and around existing buildings which is not considered to be open space). The policy will have a major positive impact on biodiversity and climate change, by strongly protecting existing trees and other natural features from development. In the case of trees protected by Tree Protection Orders (TPOs), this extends to the development having an impact on the tree. The policy balances these restrictions by allowing for the loss of non-designated trees when these can be compensated by new trees or other adequate planting, or removal if this is in the interest of good arboriculture practice. The policy could be improved by the addition of requirements on the type and species of new trees and other cover to be delivered, to ensure these maximise biodiversity benefits for native species, however overall provides strong benefits in the short term by protecting existing assets, and in the medium and long term by establishing good practice and encouraging the provision of a larger number of trees.

5.57 Policy 49 provides protection and regulation of water-based assets in the borough. The policy would have a major positive impact on water quality, biodiversity and sustainability and community and health by requiring that new development is restricted along waterways and riparian areas unless it ensures public access along any waterfronts, does not damage nature conservation, and enhances the waterfront, therefore ensuring any new development delivers a clear improvement to these environments. The impact of these policies is highly likely in the short to medium term, although in the longer term the policy map need to take account of increased risk of flooding and higher water levels on any improvements which are proposed.

5.58 Policy 49 also sets out policies around the use of the waterways for permanent residential mooring of canal boats. The policy would have a positive impact on the provision of affordable housing in the borough by supporting moorings when they do not reduce the navigability of the canal, or have a negative impact on biodiversity or public access, therefore balancing them against other needs in a similar form to major built developments with equivalent sustainability benefits.
Responding to Climate Change

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

50. Building Resilience to Climate Change – Flooding
51. Building Resilience to Climate Change – Overheating
51. Mitigating Climate Change – Proposed Developments
53. Mitigating Climate Change – Existing Developments
54. Mitigating Climate Change - Decentralised Energy
55. Improving the Environment - Waste
56. Improving the Environment - Pollution

Policy 50 would have major positive impacts on Flood Risk, Water quality and Sustainable design as it requires that all development have regard to reducing flood risk both to and from developments over the expected lifetime of the development. This ensures that developments will have regard to the increased risks from flooding which will result from climate change, as well as contributing to controlling them to the same level as if there was no development through SUDs. In cases where developments cannot do this, it requires provision of planning obligations ensure reduced overall flood risk from the development, ensuring a sustainable approach. The policy will also have minor benefits for flood risk by ensuring that any development takes account of existing flood defences and how they can be accessed. The policy may have a minor negative impact on the provision of economic growth and affordable housing due to increased requirements to reduce flooding, but this will be limited to areas already at higher risk of flooding, and while this may have a negative impact in the short term, the increased risks from flooding in the medium to long terms will make developments more sustainable by their higher resilience to flooding.

Policy 51 would have major positive impacts for climate change, community and health and sustainable design by requiring new developments to take account of internal and external temperatures and cooling in the design, and to regulate these through the form, materials and technologies. This will benefit future occupants of buildings and residents across the borough by ensuring that all buildings seek these improvements, as well as ensuring that there is a measure of resilience in terms of combatting the Urban Heat Island (UHI) effect. Finally, the policy will have a minor positive impact (in combination with policy 43) by supporting methods which increase biodiversity.

Policy 52 and 53 are aimed at mitigating climate change through changes to the built environment, both in proposed new developments and alterations to existing developments. The policies would have a major positive impact on climate change, sustainable design, biodiversity. In terms of climate change, the policies require that new residential development is zero-carbon, by the use of low carbon materials and construction methods, or by paying a carbon off-setting payment to Hackney which is then used by the borough to support sustainable technologies which reduce carbon by an equivalent amount, therefore slowing climate change. In the case of existing developments, policy 53 requires that developments provide the maximum feasible reductions, but balance this against protecting heritage and character of buildings in order
to ensure the sustainability of heritage assets in the borough. In terms of sustainable design and biodiversity, the policy requires that developments make use of technologies and designs which minimise exposure to the effects of climate change, and they make use of the council’s existing sustainable design and construction SPD which supports the use of green roofs, solar panels and other technologies. Again, to balance against potential damage to character and heritage assets, this is applied to a less rigorous degree to existing developments. Overall, the policies ensure that in the medium to long term carbon emissions are reduced, as well as development being designed to be resilient to climate change (supporting policies 50 and 51) with the effects high certain.

5.63 Policy 53 would have minor positive impacts on climate change and on efficient use of land by requiring developments to incorporate adequate systems to power the development into the design the building, or, where available to connect to existing networks within adjacent developments, with the policy strongly supporting this approach where viable. These systems would have a minor negative impact on air pollution due the fact that they move power emissions into the urban environment, and this could have significant sustainability impacts unless dealt with through the policy.

5.64 Policy 55 would have a major positive impact on waste by requiring that developments minimise waste, both in the short term at the construction phase of development, and for future occupants by requiring that developments clearly set out waste storage and collection facilities in plans. The policy also requires developments to adhere to the objectives of the North London waste plan, which is in development, and protects existing waste sites, unless a new, equivalent site can be found. The effects are highly likely in the short, medium and long terms.

5.65 Policy 56 would have a major positive impact on Water Quality, the Efficient Use of Land, Air Quality, and Noise and Pollution by setting out the ways developments are expected to limit pollution. In terms of Water Quality, the policy requires that new developments do not pose an unacceptable risk to water sources in the borough, with this being assessed on a case by case basis with input from the Environment Agency, and requiring those considered to mitigate risk. In terms of efficient use of land, the policy requires that developments ensure that they identify and deal with contaminated land and, in cases where activities in a proposed use may create potentially polluting activities, they incorporate mitigation and monitor for any impacts on the ground. This is of significant benefit as remediation of contaminated land has long term benefits for humans and the natural environment, and its cleanup can be extremely costly and can delay the use of land for other needs, such as housing.

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

In terms of noise and vibration, the policy only allows development when noise created by the development would be mitigated to prevent adverse impacts on other dwellings and occupants, therefore having a major positive impact on existing properties. The policy also ensures that residential developments, by their design do not create adverse noise impacts, limiting noise from internal circulation spaces and other noise creating elements, such as lifts and ventilation. Overall the policy would have an immediate positive impact which would continue into the long term by nature of existing for the lifetime of the development.
6. **Stage B4: Key Effects of the Plan**

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

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

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

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

### Significant Negative Impacts of the Preferred Approach

6.5 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 to the type, scale and form of development in Hackney. This is due to the fact that many potential negative impacts of individual policies, such as a singular focus on delivery of certain types of development in favour of others, are not proposed, and policies for land use (primarily Housing, Employment and Open space) typically ‘zone’ discreet areas of land in the borough for their uses, ensuring that the significant tension over the use of the highly limited amount of land does not arise.

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

### Maximising Sustainability Effects

#### Biodiversity

6.7 Biodiversity is strongly supported by the plan, primarily through the strong enhancement and protection offered by policies 42 (Protection and enhancement of green infrastructure) and 43 (Biodiversity and SINC) which seek to protect and enhance the boroughs open spaces and waterways which form the key reserve for biodiversity, and through the strategy of linking these areas through Policy 45 (Green Chains and Corridors). There are synergies between the protection and enhancement of biodiversity and responding to climate change, especially policy 51 (Overheating), and to amenity of
new and existing residents as part of the open space policies and policy 37 (Liveable Neighbourhoods)

6.8 There are significant tensions between the redevelopment of sites for buildings and protection of these sites for biodiversity, with the former having a potential negative impact, but throughout the plan, policies aim to mitigate this by requiring the use of ‘urban greening’ most notably through policy 1 (Design Quality and Local Character) and policies 51, 52 and 53 (Overheating and Mitigating Climate Change) by requiring the use of green roofs, green walls and other public realm planting. Over the long term, regard needs to be had to the potential impact of climate change as a stressor of biodiversity, especially with regards to flooding and waterways.

Efficient Use of Land

6.9 Efficient use of land is the single most challenging sustainability objective to deliver on, due to the fact that it deals with the primary challenge in Hackney, which is a lack of developable land. This means that decisions on whether to use land to deliver on other key sustainability objectives and major sections of the plan, such as economic growth, which is supported by employment policies (23-27) and housing (10-22) have an inherent cost. In order to combat this, employment policies designate areas of the borough for employment land uses, aims to curb losses and to focus employment floorspace as sustainably as possible, and housing policies aim to ensure that housing delivered across the rest of the borough maximises the type and tenure to create the homes that are needed. By holding these in balance the plan ensures an optimal positive impact is achieved.

6.10 The plan also contains policies which strongly support efficient use of land through policies 28-31 which focus on zoning Town Centres as the key areas for growth in both housing and employment, and protect existing amenities in these areas. In doing so, they ensure that, along with the protection of open spaces, development makes the most efficient use of land with the optimal synergy with other objectives.

Air Quality

6.11 Air Quality presents another balanced picture, with strongly positive impact deriving from policies in the plan which seek to protect the health of individuals, most notably policy 56 (pollution) and Policy 2 (Development and Amenity), but this must be balanced against the general increase in air pollution which is likely to stem from growth, driving higher vehicular traffic. It is notable that policy 41 (Parking and car free development) provides mitigation by increases by strongly limiting the ability to use private cars in the borough and encouraging the use of electric vehicles, therefore controlling these emissions, but the strong support for individuals making use of streets for walking and cycling and through the liveable neighbourhoods strategy means that individuals are likely to be exposed to higher levels of pollutants, in the short to medium terms. Over the long term, the use of low emissions vehicles and erosion of private car ownership supported by the policies will help to mitigate this.

A potentially negative impact was identified that the promotion of decentralised energy schemes via policy 54, could have potentially significant negative effects in terms of air
quality, by bringing otherwise distant emissions into the borough and requiring them to be considered with regard to most developments. The plan needs to consider how this can be mitigated and is discussed in the recommendations section, below.

**Noise and Pollution**

6.12 Reducing Noise and Pollution is strongly supported by the plan in policies 56 (Pollution) and through policy 2 (development and amenity). The impact of noise and pollution arising from the growth proposed in the plan is strongly mitigated by these policies, leading to a positive overall impact.

**Flood risk**

6.13 Reducing Flood Risk is strongly supported by the plan through policy 50 (Building Resilience to Climate change – Flooding) which requires developments to take account of flood risk. It should be noted that flood risk reduction is required through national planning policy which has a strong bearing on restricting where development can be located. The policy extends this and increases sustainability by ensuring that developments take account of potential increase long term threats due to climate change.

**Water Quality**

6.14 The plan has a strong positive impact on protecting water quality through policy 56 (pollution) which ensures these resources are safeguarded, and that, through restrictions and remediation of contaminated land, new pollution sources do not enter water bodies.

**Walking and Cycling**

6.15 A number of policies deal specifically with promotion of walking and cycling, specifically the eponymous policy 38, and the creation of liveable neighbourhoods under policy 37. Multiple policies related to design and amenity also require that developments have regard to accessibility by walking and cycling. As discussed in paragraph xx [air quality] there are potential negative impacts on the achievement of this objective deriving from a high level of traffic on roads, pollution. In addition, the plan cannot directly force behavioural change to these modes by individuals, instead only altering the availability of different modes (to reduce car use and increase opportunities to cycle and/or walk through location of development, therefore limiting the impact.

**Climate Change**

6.16 Responding to climate change is strongly supported by the plan, principally through policies 52 and 53 (Mitigating Climate change in proposed and existing developments), which require residential developments to be zero-carbon in terms of offsetting emissions from construction and incorporate a range of technologies to reduce emissions over the lifetime of the building. In addition, the overall policy body promoting walking and cycling (see above) will have a positive impact on climate change. The provision of decentralised energy will help to increase overall energy efficiency by combining heating and power
and removing power lost in transmission, but it should be noted that this may have significant air quality impacts.

**Heritage Assets**

6.17 The sustainability of Heritage assets is strongly supported both through the direct protection of these assets through policies 3, 4 and 5 (Designated and Non Designated Heritage Assets, and Archaeology) and through design policies aimed at ensuring that new development maintains and improves existing character (Policies 1, 15 and 28). There is a potential for heritage assets to be negatively affected by the provision of new housing and employment floorspace if this is not adequately controlled, and there may be instances where these are considered to have more important to overall sustainability than protection of assets, but overall the rarity of these decisions mitigates any significant effect.

**Sustainable Design**

6.18 The plan will have a strong positive impact on the sustainability of sustainable design due primarily to the policies aimed at mitigating climate change (52 and 53) which ensure that this forms part of the way developments come forward. As the policy is primarily related to the form of new developments it has limited overall impact on sustainability.

**Poverty and Equality**

6.19 The plan strongly supports poverty and equality through a range of policies, principally related to provision of much needed employment and housing, as well as ensuring that the design of these developments is accessible to all (Policy 15) and caters to the full range of needs (Policy 16) of various populations. As long as these policies are implemented effectively, there is likely to be a major positive impact on poverty and equality as a result of the plan.

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

**Open Space**

6.21 Open space is strongly supported by the plan via the very strong protections provided by the open space policies (42-47). This includes protecting open spaces, as well as allowing enhancements through development which improves amenity. The policies ensure that new developments provide an equivalent amount of open space, including on non residential schemes, therefore ensuring that this remains highly sustainable.

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

6.22 Community and Health, social infrastructure and (reductions in) Crime and improving education is strongly supported throughout the plan and maximises benefits from new development to support communities, primarily through the policies encouraging walking and cycling, as well as policy 7 (social and community infrastructure) which prevents the loss of community facilities, and should ensure that and potential negative impact on the
sustainability of these objectives is limited. The overall strategy of pursuing liveable
neighbourhoods should create conditions which benefit communities and reduce crime
through better wayfinding and security through natural surveillance. Health in young
people is strongly maximised through policy 35 (Over concentration of uses) which
prevents the location of takeaways within 400m of schools. It is notable the
improvements in air quality supported by the plan will also support this objective.

6.23 The Health Impact assessment, part of this IIA will assess health in detail for individual
policies.

Affordable Homes, Economic Growth and Employment

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

6.25 Affordable housing is principally supported by policy 11 which sets out the approach to
delivering affordable housing, and ensures that all new developments that come forward
in the borough, as well as conversions of existing properties contribute to provision of
affordable housing. The wider housing policies (10-22) also look to enhance type and
size of accommodation, as well as encouraging specialist uses where there is demand,
which ensures that any new housing created, regardless of tenure, is appropriate to the
local market, including limiting the provision of new hotel units instead of new housing,
and ensuring that new types such as build to rent are protected into the medium and long
term from loss or change.

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

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

Waste

6.28 Dealing with waste is strongly supported through policy 54 of the plan, which requires that at both the construction and occupation stages, developments ensure that waste is dealt with. The plan is inherently limited in affecting individual behaviour, but policies maximise the impact in terms of ability to drive forward other council plans and programmes for waste and recycling.

Recommendations

6.29 Overall, the SA findings indicate that the plan represents the most sustainable approach possible within the scope of spatial planning. Therefore the SA recommends that the plan is taken forward to the next stage of consultation.

6.30 The plan does not currently contain a schedule of monitoring indicators or other performance related mechanisms, which need to be developed in order to ensure that the plan can demonstrate it has contributed to sustainability. This would also inform the development of stage B5 of the sustainability appraisal. This, and step B5 should be completed as part of the next stage of the plan.

6.31 However, there are also several minor improvements to policy which have been identified. These are set out below:

- Policy 7, Social and Community Infrastructure could be made more sustainable by adding reference to ensuring that new developments of this type have regard to locating themselves in areas of higher air quality, and/or ensure that they protect users from the impact of noise and pollution.
- Policy 17, regarding conversion of existing housing could be improved by ensuring that the policy makes reference to ensuring these new dwellings are adaptable for the disabled and elderly, therefore ensuring greater sustainability in terms of poverty and equality.
- Policy 19, regarding shared housing can be made more sustainable in the medium and long term by ensuring these types of developments have long tenancies and protection of their overall tenure through restrictions similar to those for policy 13 (build to rent).
- Policy 49, regarding the borough’s waterways could be made significantly more sustainable by including reference to ensuring any new development or improvements take account of the potential for increased chance of flooding or other impacts of climate change to ensure they benefit the population in the long term.
7. **Stage B5: Monitoring the likely significant effects**

7.1 As set out in the recommendations, step B5 will be completed as part of the next stage of the local plan and will be completed at this point.
8. The Equalities Impact Assessment (EqIA)

Introduction

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

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

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

8.2 These have been grouped into the follow categories to aid analysis:

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

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

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

8.4 These are then codified into the following actions:

- Remove or minimise disadvantages suffered by persons who share a relevant Protected Characteristic that are connected to that characteristic;
8.5 LP33 sets out the borough-wide planning policies that the Council will use to inform decisions on development proposals and to assess planning applications which come forward. The policies are informed by national and regional policy and the Council’s Community Strategy.

The Plan contains a total of 56 policies covering a range of issues identified at previous stages and through the requirements of the London Plan, and are grouped into the following chapters:

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

8.6 The plan has been prepared to inform the Regulation 18 consultation due to take place between 23rd October 2017 and 3rd December 2017. The EQIA will assess the likely impact of the policies on the equality groups and, where required, suggest mitigation to avoid negative impacts.

Methodology

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

8.8 The following steps are undertaken:

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

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

**Age**

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

**Sex**

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

**Sexual Orientation**

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

Race

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

Faith

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

Disability

- 14.3% of residents in the Hackney have a long term health problem or disability, much higher than the London average (13.8%).
- 61.6% of older people have a high level of disability.

Other Characteristics of Protected Groups

- Hackney has an employment rate below the London average at 69% of the population, compared to 72.9% across the city.
- Hackney has a higher than average level of individuals on out-of-work benefits (10.7% v a London average of 7.7%). Commensurate with this, it has a higher youth unemployment rate (6.3%) than the London average at 5.7%.
- 8.2% of the population have no qualification, while 54.9% have a degree level or above qualification, indicating a high level of inequality in educational levels.
- Across London, the average crime rate was 7.97 offences per 1000 population between 2012-2013 compared to 10.49 per 1000 in Hackney (Metropolitan Police, 2013).
- Life expectancy in Hackney is lower than the London average with males expected to live to the age of 78 (3rd worst in London) and females to 83. Life expectancy is 5.6 years lower for men in the most deprived areas of Hackney than in the least deprived areas and for women its 3.6 years lower.
- It is estimated that roughly 53,000 Hackney residents age 19-64 have at least one common mental health disorder, of whom around half have depression and/or anxiety. It is estimated that approximately 1,200 Hackney residents age 65+ have dementia.
- Physical inactivity is an issue in Hackney. On one estimate, almost 55,000 adults in Hackney and the City are doing less than 30 minutes of moderate exercise a week.
10. **Step 2: Assessment of the positive and negative equalities impacts of the plan**

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

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

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

10.3 The chapter contains the following policies:

1. Design Quality and Local Character
2. Development and Amenity
3. Designated Heritage Assets/ Listed Buildings
4. Non Designated Heritage Assets
5. Archaeology
6. Advertisements

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

10.5 One policy in this section which has been identified as having potential minor negative impacts on equalities groups is Policy 3 (Designated Heritage Assets / Listed Buildings) which seeks to protect listed buildings and historic buildings. Some listed buildings may have special architectural qualities or features which must be preserved and could prohibit the implementation of improved accessibility standards such as ramps or lifts. This policy could therefore be considered to have minor negative impacts on less mobile members of the community, such as the elderly or disabled which may find it difficult to access such buildings.

**Hackney's people**

10.6 The chapter contains the following policies:

7. Social and Community Infrastructure
8. Health and Wellbeing
9. Arts, culture and entertainment facilities

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

**Meeting Hackney’s Housing Need**

10.8 The chapter contains the following policies:

1. Housing Supply
2. Affordable Housing
3. Dwelling Size Mix
4. Build to Rent
5. Self/Custom-Build Housing
6. Housing Design
7. Housing Older and Vulnerable People
8. Residential Conversions
9. Student Housing
10. Shared Housing
11. Visitor Accommodation
12. Preventing the loss of Housing
13. Gypsy and Traveller Accommodation

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

10.10 For example, policy 11 Affordable Housing seeks to maximise provision of affordable housing which will be beneficial for those who may be on lower incomes such as the young, elderly, faith groups, BME communities and those with disabilities. Similarly policy 12 on dwelling size mix seeks to ensure adequate provision of family sized units and specifically seeks a higher proportion of larger units in Stamford Hill where family sizes amongst the Jewish population tend to be proportionally larger than average. This policy is therefore considered to be highly positive for families with children and particularly for faith groups in Stamford Hill.

10.11 Various policies within the housing section have been identified as having positive impacts on different age groups. Policy 13 (Built to Rent) seeks to provide homes for rent, policy x seeks to provide student accommodation, and policy 19 seeks to provide shared housing such as co-living schemes and HMOS, all of which are considered to have positive impacts for younger members of the community who may be unable to buy in the area but who are seeking rental accommodation. Similarly, policy 16 which supports the provision of housing for older and vulnerable people will have a positive impact on older age groups and the disabled.

**A Strong and Competitive Economy which Benefits All**

10.12 The chapter contains the following policies:

1. New Employment Floorspace
2. Protecting and Promoting Office floorspace in the Borough
3. Protecting and Promoting Industrial land and floorspace in the Borough
4. Affordable and Low Cost workspace
5. Railway Arches
These policies protect and promote all types of employment floorspace within the borough, including both office space and industrial space, and designates specific employment areas in the borough. These are generally considered to have a neutral impact on the equalities groups. Policy 26 encourages affordable and low cost employment space which may provide benefits to start-up businesses, which may be characterised by those from younger age groups, or charitable organisations.

**Planning for Vibrant Town Centres**

The chapter contains the following policies:

28. Town Centres  
29. Hackney Central and Dalston  
30. Stoke Newington, Stamford Hill and Finsbury Park  
31. Local Shopping Centres  
32. Shops outside of designated centres  
33. Small and Independent shops  
34. Evening and night time economy  
35. Over-concentration of uses  
36. Street markets

These policies direct town centre uses, such as retail, leisure and commercial development to Hackney’s town centres, designate primary and secondary shopping areas and set out the criteria to be met before any change of use away from retail. The overall aim is to protect and promote shops and other town centre uses within these areas; the concentration of such uses within a central location will have positive impacts on less mobile members of the community, such as the elderly, disabled, or parents with buggies by reducing the need to travel long distances to access shopping facilities and other services. Similarly, Policies 31 and 32 protect shops within small local shopping centres and those isolated shops or parades outside of designated centres. These policies are also considered to have positive impacts on less mobile members of the community by ensuring access to convenience shops within short distances.

One element of policy 34 evening and Night Time Economy is encouraging the diversification of the types of evening and night time economy uses with the aim of reducing the emphasis on bars and drinking and encouraging more cultural uses, restaurants and cafes. It is considered that this could have a positive impact on those looking for alternative types of evening entertainment, perhaps older members of the community or religious groups.

One element of policy 35 is to avoid the over-concentration of hot food takeaway within Hackney’s town centres and in close proximity to schools, which is considered to be beneficial for all who suffer from obesity, and particularly school age children.

Policy 36 seeks to protect markets in the borough. Older traditional markets such as Ridley Road, often provide goods and services as well as employment for Afro-Caribbean, Asian and other BME communities. Shopping in markets often provides cheaper food for poorer members of the community, and can be popular amongst the
older population. The protection of markets is therefore considered to have positive impacts on older residents and BME communities.

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

**Improving Accessibility and Promoting Sustainable Transport**

10.20 The chapter contains the following policies:

37. Liveable Neighbourhoods
38. Walking and Cycling
39. Transport and Development
40. Public Transport and Infrastructure
41. Parking and Car Free Development

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

10.22 Policy 41 Parking and Car Free Development encourages car free development. Wheelchair accessible parking will be provided in accordance with London Plan standards, however the remainder will generally be car free. Whilst this is beneficial in many aspects for example for improving the health of residents who suffer from respiratory diseases, the policy has been identified as potentially having minor negative impacts on families with young children or the elderly who may need access to parking facilities close to dwellings.

**Hackney's Green and Public Spaces**

10.23 The chapter contains the following policies:

42. Protection and enhancement of Green Infrastructure
43. Biodiversity and Sites of Importance of Nature Conservation
44. New Open Space
45. Green chains and green corridors
46. Play Space
47. Allotments and food growing
48. Tree management and landscaping
49. Waterways, canals and residential moorings

10.24 These policies protect and enhance green infrastructure and biodiversity, trees and allotments across the borough, promote the creation of green links, and set out open space and play space standards required in new development. They are generally
considered to have a neutral impact on the equalities groups, apart from policy 46 Play Space which is considered to have a positive impact on children.

**Climate Change**

10.25 The chapter contains the following policies:

50. Building Resilience to Climate Change – Flooding
51. Building Resilience to Climate Change – Overheating
52. Mitigating Climate Change – Proposed Developments
53. Mitigating Climate Change – Existing Developments
54. Mitigating Climate Change - Decentralised Energy
55. Improving the Environment - Waste
56. Improving the Environment - Pollution

10.26 These policies seek to protect the borough from the impacts of climate change, including flood risk and overheating, as well as setting out energy and standards for new development. All are considered to have a neutral impact on the equalities groups, apart from policy 56 Improving the Environment – Pollution which sets out the approach to minimising all types of pollution, including air pollution which is considered to have a positive impact on residents with respiratory conditions and young children in the borough are disproportionately affected by high air pollution levels.
11. **Step 3:** Identify whether and to what extent there are any significant negative impacts on these groups arising from the plan and its policies.

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

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

11.3 However, the report did identify one area in which the policy could be improved to maximise benefits. These were:

- **Policy 3 (Designated Heritage Assets)** could be improved by making reference to ensuring that improvements to these buildings take account of the needs of those with protected characteristics, most notably access for those with disabilities and the very young and old.
12. **Habitats Screening Assessment**

12.1 The objective of a Habitats Regulations Assessment (HRA) is to identify if and how the Local Plan would cause an adverse effect on the integrity of Natura 2000 or European sites, which include Special Areas of Conservation (SACs), Special Protection Areas (SPAs), and as outlined by national policy, Ramsar Sites, and to advise on appropriate policy mechanisms for delivering mitigation measures where such effects are identified.

12.2 The Habitats Directive forms the cornerstone of Europe’s nature conservation policy, built around the Natura 2000 network⁵.


12.4 The main aim of the Habitats Directive is to promote the maintenance of biodiversity by requiring Member States to take measures to maintain or restore natural habitats and wild species listed on the Annexes of the Directive⁷.

12.5 The Directive requires Member States to introduce a range of measures including appropriate Habitat Directive Assessment of plans and projects that can potentially have an impact on Natura 2000 sites. Articles 6(3) and 6(4) of the EC Habitats Directive establish these requirements:

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**Article 6(3)**

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

**Article 6(4)**

If, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of a social or economic nature, the Member State shall take all compensatory measures necessary to ensure that the overall coherence of Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted.

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⁶ JNCC http://jncc.defra.gov.uk/page-1374

⁷ JNCC http://jncc.defra.gov.uk/page-1374
12.6 The need for Habitat Regulations Assessment set out in Article 6 of the Habitats Directive is interpreted into UK law and implemented through Regulation 48 of The Conservation (Natural Habitats & c) Regulations 1994 (as amended in 2007).

**Regulation 48:**

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

12.7 The National Planning Policy Framework (NPPF) published in 2012 states that Ramsar sites (wetlands of international importance) should receive the same protection as designated Natura 2000 sites. This being the case, appropriate assessment is required for both European and Ramsar sites.

**Natura 2000 and Ramsar Sites**

12.8 Natura 2000 sites are nature protection areas established under the 1992 Habitats Directive. The aim of the network is to assure the long-term survival of Europe’s most valuable and threatened species and habitats. It is comprised of Special Areas of Conservation (SAC) designated by Member States under the Habitats Directive, and also incorporates Special Protection Areas (SPAs) designated under the Conservation of Wild Birds Directive (79/409/EEC). Ramsar sites are those designated under the International Convention on Wetlands of International Importance, and are not under EU legislation. The NPPF however recommends that they are afforded the same level of consideration and protection as SPAs and SACs.

12.9 Sites close to Hackney which the Plan could potentially impact include Lee Valley SPA/Ramsar, Epping Forest SAC, Turnford and Cheshunt Pits SSSI, Rye Meads SSSI, Amwell Quarry SSSI, Walthamstow Reservoirs SSSI.

**Scope and Objectives**

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

**Conclusions**

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12.11 In June 2009 and 2013 an HRA (Appropriate Assessment stage) was carried out on the submission of the Borough's Core Strategy and Development Management Local Plan respectively.

12.12 As part of the IIA the findings of the Habitats Regulations Assessment for the Core Strategy (2010) and the Development Management Local Plan (DMLP) (2013) were reviewed. It is considered that given that the scope and policy expectations of Local Plan 2033 which may affect European Sites does not differ on a large enough scale to the Core Strategy and DMLP, and that there have been no changes in European Sites within 15km of the London Borough of Hackney area, and that both plans were ‘screened out’ as unlikely to have any significant adverse effects on European sites, a further assessment at this stage is not considered necessary.

12.13 Whilst there are likely to be minimal impacts on air quality, recreational pressure and water resources, measures are in place in the Local Plan 2033 to mitigate against these.

12.14 It is therefore concluded that the Local Plan 2033 policies can be 'screened out' as being unlikely to lead to significant adverse effects on European sites and do not need to be taken forward for the next stage of Appropriate Assessment.
13. **The Health Impact Assessment (HIA)**

**Introduction**

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

13.2 This document is structured as follows:
- 1. Introduction
- 2. Policy context
- 3. Local context
- 4. Health Impact Assessment findings by Draft Local Plan policy chapter
- 5. Conclusion and recommendations

**Background**

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

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

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Design Council (2017). Designing good mental health into cities: the next frontier for urban design
14. **Step 1: Background & Policy Context**

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

- **The National Planning Policy Framework** directs local planning authorities to work with public health leads to understand and take account of the health status and needs of the local population to ensure that Local and Neighborhood Plans are health promoting;
- **The National Planning Policy Framework** states that Planning should take account of and support local strategies to improve health, social and cultural wellbeing for all. Consequently, the priorities set out in Hackney’s Joint Health and Wellbeing Strategy and other strategies such as the Healthy Weight Strategy are relevant to the Local Plan formulation;
- **The London Plan** notes that the planning system can play a key role in promoting health and reducing health inequalities. The London Plan states that in preparing Local Development Plans, boroughs should work with key partners to identify and address significant health issues facing their area and monitor policies and interventions for their impact on reducing health inequalities; and integrate planning, transport, housing, environmental and health policies to promote the health and wellbeing of communities;
- **The London Plan** states that new developments should be designed, constructed and managed in ways that improve health and promote healthy lifestyles to help to reduce health inequalities. The impacts of major development proposals on the health and wellbeing of communities should be considered, for example through the use of Health Impact Assessments (HIA);
- **The Mayor of London Social Infrastructure Supplementary Planning Guidance** states that Health Impact Assessment (HIA) is a useful tool to inform the development of local policies and plans. HIA identifies opportunities for maximising potential health gains and minimizing harm, and addressing inequalities, taking account of the wider determinants of health. To have a material impact, an HIA should be undertaken as early as possible in the plan making process.

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

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

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

14.4 The Hackney Joint Health and Wellbeing Strategy 2015-18 has four priorities:
1. Improving the health of children and young people, in particular tackling childhood obesity and working with pregnant mothers and children under five years old
2. Controlling the use of tobacco, with a renewed emphasis on stopping people from starting smoking as well as helping them to quit
3. Promoting mental health, focusing on relieving depression and anxiety for working age adults
4. Caring for people with dementia, ensuring our services are meeting the needs of the older population.

14.5 The Hackney Healthy Weight Strategy includes the following directional statements relevant to the areas of influence of the Planning system:
1. Parks, outdoor spaces and the built environment in Hackney and the City will be attractive, safe and well-used by all members of the community
2. Everyone in Hackney and the City will be more active as part of their daily lives and the places where they live, work and learn will help them
3. Everyone in Hackney and the City will find it easier to buy, prepare and eat affordable, healthy food

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

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

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

14.9 Obesity has a wide range of negative health, social and economic impacts; shortening lives, increasing ill health and worsening quality of life, as well as increasing NHS and social care costs. In Hackney, almost 90,000 adults are overweight or obese. Obesity is higher among more deprived groups. Over 40% of children in year 6 are overweight or obese. Hackney has one of the highest child obesity rates in London and England. Fast

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11 Based on analysis of patient BMI measurements in Hackney GP records in April 2015
12 National Child Measurement Programme, 2015/16
food outlets tend to sell food that is high in fat and salt, and drinks that are high in sugar. Higher concentration of fast food outlets, which is associated with area deprivation, has been linked to higher prevalence of obesity. Hackney has almost 300 fast food outlets, based on 2014 data (Joint Strategic Needs Assessment, Society and Environment, 2016). Planning is one of the levers to address obesity by creating a ‘healthy weight environment’. This is an environment that supports people to avoid becoming overweight or obese through how the place is designed and what it provides (for example, access to healthier food and drink and opportunities to be physically active as part of daily life). Planning can influence the built environment to improve health and reduce obesity and excess weight in local communities. Local planning authorities can have a role in enabling a healthier environment by supporting opportunities for communities to access a wide range of healthier food production and consumption choices.

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

14.11 Local planning authorities and planning applicants could have particular regard to the following issues:
- proximity to locations where children and young people congregate such as schools, community centres and playgrounds
- evidence indicating high levels of obesity, deprivation and general poor health in specific locations
- over-concentration and clustering of certain use classes within a specified area
- odours and noise impact
- traffic impact
- refuse and litter

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

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13 TCPA (2014) Planning Healthy Weight Environments (see especially box 1 on page 11)

14 Chief Medical Officers (2015) Infographic on Physical Activity
spaces promotes physical activity, for play, leisure and active travel will be vital for reducing physical inactivity in Hackney.

14.13 It is estimated that roughly 53,000 Hackney residents age 19-64 have at least one common mental health disorder, of whom around half have depression and/or anxiety. It is estimated that approximately 1,200 Hackney residents age 65+ have dementia (Joint Strategic Needs Assessment, Mental Health and Substance Use, 2016). Physical activity can reduce the risk of developing common mental health disorders and dementia. Mental health and dementia are priorities in the Hackney Joint Health and Wellbeing Strategy 2015-18. The Centre for Urban Design and Mental Health sets out a series of urban design opportunities to improve mental health, notably:  
- Accessibility to green places in the course of people’s daily routines
- Integration of physical activity into people’s daily routines
- Creating pro-social spaces (places that facilitate strong social connections)
- Enhancing safety and security

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

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

14.16 Access to appropriate, affordable housing is one of the most important factors in promoting positive health and wellbeing. Housing circumstances have a major impact on

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15 Design Council (2017) Designing good mental health into cities: the next frontier for urban design
people’s physical, mental and social wellbeing. For example, damp and cold homes are linked to respiratory and cardiovascular disease, noise and overcrowding can affect child development and family relationships, and problems meeting housing costs are the source of significant stress and anxiety. Many housing-related health harms are particularly damaging for the youngest and oldest age groups. Many properties in the private rented sector are in poor condition and contain some of the most vulnerable residents (Joint Strategic Needs Assessment, Society and Environment, 2016).

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

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

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

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

14.21 Climate change is a major public health issue, with the World Health Organisation noting:\(^{16}\)

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

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

14.23 An initial assessment of primary care site utilisation in Hackney and the City suggested that about 50% of GP practices are fully or over utilised. Whilst there is capacity within the remaining estate, some localities are likely to struggle to increase services and match the capacity of a growing population. The assessment of the functional suitability of existing practices suggests that about 58% of City and Hackney’s GP practices, with minor investment, are functionally acceptable. The remaining require either significant investment or relocation. This implies therefore that over 40% require substantial investment or new sites (GP Confed Primary Care Workforce and Estate, 2015).

14.24 The key issues in relation to health and wellbeing in Hackney include obesity, smoking, physical inactivity, depression and anxiety, and dementia. Health and wellbeing is shaped by the places and environments in which people live their lives. The food environment and the physical activity environment can facilitate healthier eating and more active living, both of which dramatically reduce risks of developing ill health. The development of social infrastructure to meet the current and future needs of the

\(^{16}\) https://publichealthmatters.blog.gov.uk/2016/08/12/climate-change-and-the-significant-seven/
population will be integral to supporting Hackney’s development. Consequently, the development and implementation of planning policies has the potential to contribute substantially to improving the health of people in Hackney, and reducing the health inequalities between the most and least deprived groups.
15. **Step 2: Findings**

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

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

15.2 This document assesses the Draft Local Plan chapters against the HUDU Rapid HIA topics, with comments organised by Local Plan chapter. The analysis uses the rating scheme outlined below:

<table>
<thead>
<tr>
<th>Rating</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>+</td>
<td>The policy positively addresses the determinants appropriate to that policy.</td>
</tr>
<tr>
<td>=</td>
<td>The policy broadly addresses the determinants appropriate to that policy, but changes are likely to strengthen the policy.</td>
</tr>
<tr>
<td>-</td>
<td>The policy does not fully address the appropriate determinants and changes are recommended to ensure that appropriate measures are considered by planners and developers.</td>
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### Spatial Objectives

15.3 (+) The spatial objectives for the Draft Local Plan (1.13) include an objective (objective 2) to tackle health inequalities, and create an environment that promotes health and wellbeing. This objective addresses input from Public Health on the original draft spatial objective (to promote healthy lifestyles). The new spatial objective reflects how the environment (not just individual choices) impacts on health, and the role of planning in reducing inequalities in health between groups.

15.4 (+) Spatial objectives also commit to the development of genuinely affordable housing; community facilities; new jobs; liveable neighbourhoods where people choose to walk, cycle and socialise; protection, enhancement and linking of green spaces; and improvement of air quality.

15.5 The objectives of the Draft Local Plan are strongly consistent with a holistic approach to improving the wider determinants of health and wellbeing.

**Protecting and Enhancing Heritage and Leading the way in Good Urban Design**
15.6 (+) Policy 1 (Design Quality and Local Character) refers to making development inclusive and accessible to all. This is relevant to reducing social isolation, improving mental health and increasing physical activity.

15.7 (=) Policy 1 has responded to earlier public health input, by requiring development to promote good health through the use of active design principles and the Healthy Streets approach. These measures (along with making development accessible/inclusive) can contribute to increasing physical activity and socialising, with major positive impacts on physical and mental health. The reference to active design would be clearer with the addition of reference to active design in buildings and spaces, and that the Healthy Streets approach aims to create streets where people choose to walk, cycle and spend time.

15.8 (=) It is important to ensure planning permissions for new developments always prioritise the need for people (including people with limited mobility) to be physically active as a routine part of daily life. To help shape the content of planning applications (to operationalise Policy 1), it would be useful to cite an illustrative example of applying active design principles in the policy. This could be ensuring staircases are designed and positioned to encourage people to use them, including clear signposting, and ensuring staircases are attractive by making them well-lit and well decorated. This would be in line with the National Institute for Clinical Excellence guidance on physical activity and the environment.

15.9 (=) Policy 1 should also refer to ensuring active design in planning of schools and nurseries. This is vital given the high levels of child obesity and physical inactivity in Hackney. It would include ensuring sufficient, well-designed outdoor and indoor space for active recreation/play.

15.10 (=) For the Policy 1 section on building heights, it would be advisable to include a reference to incorporating measures to reduce risk of suicide attempts, where appropriate, with signposting to the Public Health England resource on suicide prevention in public places, which provides guidance on measures to consider in tall building design (such as physical barriers and markings).

Hackney's People

15.11 (+) Policy 7 (Social and Community Infrastructure) seeks to retain or re-provide existing social infrastructure. It also promotes co-location and maximising use of buildings at evenings and weekends.

15.12 (+) Policy 7 directs facilities to be located in areas that are easily accessible by walking, cycling or public transport – contributing to increasing physical activity and reducing air pollution, by reducing the need for car use.

15.13 (=) The supporting text for Policy 7 refers to the Infrastructure Delivery Plan and working with stakeholders such as the Clinical Commissioning Group (CGG) to ensure the provision and enhancement of services and facilities to meet changing local needs. Requiring (in the policy text) new development to have regard to the capacity of social infrastructure and provide/contribute to costs entailed in meeting any increased social infrastructure needs could support Planning to help deliver this ambition. Planning Policy
should ensure that the CCG has the opportunity to comment on Policy 7 and the supporting text.

15.14 (=) The inclusion of a policy on Health and Wellbeing (Policy 8) is positive, as it complements the ‘mainstreaming’ of health and wellbeing considerations into a wide range of other policies. This holistic approach should be reflected in the text of the policy, as the current draft policy appears to suggest that health is mainly about physical activity.

15.15 (=) Policy 8 A should be changed to, ‘New development that contributes to positively influencing the social determinants of health, enabling healthy lifestyles and reducing health inequalities will be supported.’

15.16 (=) Policy 8 B. i. should be changed to ‘Ensure development is designed to contribute to creating healthy environments, including promoting physical activity, promoting good mental and physical wellbeing and reducing environmental factors which can contribute to poor health through appropriate arrangement and design of buildings and uses, access, open space and landscaping, the provision of facilities to support walking and cycling, and ensuring schemes meet ‘Secured by Design’ principles’.

15.17 (=) To ensure clarity on how the Local Plan will promote health and wellbeing, supporting text statement 3.6 should be changed to ‘Healthy urban planning aims to promote healthy, successful places for people to live and work in. This can be achieved by providing the homes, jobs and services that people need, reducing environmental risks and delivering well designed buildings and urban spaces which will create the conditions for healthy, active lifestyles. In addition to access to healthcare services, a number of other factors are known to influence a person’s health status and lifestyle, including economic, environmental and social conditions. These factors are referred to as the wider or social determinants of health. The built environment can help influence changes in lifestyle and help achieve positive health outcomes. The Council will seek to secure a local environment which promotes health and wellbeing through new development.’

15.18 (-) Supporting text statement 3.7 relating to requirements for Health Impact Assessment (HIA) are positive and responsive to Public Health input on previous drafts. However, these requirements should be included in the policy (instead of the supporting text) to ensure HIA expectations have weight in influencing planning practice.

Meeting Hackney’s Housing Needs

15.19 (+) The Plan includes a policy (Policy 11 Affordable housing) to maximise the supply of genuinely affordable housing, with definitions of what is expected to support implementation of the policy. This is highly positive, given the health and wellbeing impacts of housing, and the local conditions of high rents and house prices.

15.20 (+) Policy 16 (Housing Older and Vulnerable People) stipulates that all new general-purpose homes must be designed to be adaptable to meet the needs of those with disabilities and the elderly as well as assisting independent living at home. The policy
also requires 50% affordable housing within proposals for specialist housing for older people.

15.21 (+) Policy 19 (Shared Housing) is also positive in promoting aspects such as affordable rents and provision of communal amenity space.

15.22 (=) Policy 16 supporting text (4.18) notes the range of vulnerable people likely to have particular housing needs, such as people with mental health problems, learning disabilities or alcohol misuse, and states that the Council will support proposals to accommodate needs. It could be useful to signpost to sources of guidance for design considerations in meeting the housing needs of members of these different groups.

A Strong and Competitive Economic with Benefits All

15.23 (+) Policy 26 (Affordable and Low Cost Workspace) stipulates the provision of affordable or low cost workspace, which can be positive for increasing employment opportunities for people on lower incomes, who tend to have worse health.

15.24 (=) The chapter policies makes no reference to increasing employment opportunities for local residents, in the construction/development process or in jobs created in employment sites. Employment is an important contributor to good health. The policies in this chapter do not explicitly aim to contribute to increasing employment possibilities for residents of the borough.

Planning for Vibrant Town Centres

15.25 (+) Policy 34 (Evening and night time economy) addresses the need to ensure that the night time economy does not have a negative impact, through noise, smells, antisocial behaviour or highway safety; and potential negative cumulative impacts from the proposed use in relation to other night time economy uses in the area. The supporting text also refers to the Special Policy Areas and restrictions on expansion in in areas where concentrations already exist, such as Shoreditch and Dalston.

15.26 (+) The restrictions on concentration of betting shops and payday loan shops in Policy 35 (Over-concentration of uses) are positive. Gambling and severe debt may contribute to negative mental and physical health impacts. For example, there is evidence that greater opportunities for gambling increase the number of regular and problem gamblers in an area.

15.27 (+) The reference to the Healthier Catering Commitment is positive. For accuracy, the text of Policy 35 A iv. should be reworded to state, “a commitment is made to operate in compliance with the Healthier Catering Commitment”. Similarly, supporting text statement 6.25 should state that “All new takeaways are required to operate in compliance with the Healthier Catering Commitment”.

15.28 (=) Policy 35 in relation to hot food takeaways is responsive to public health considerations about the local health and social impacts of obesity, the Council Healthy Weight Strategy and the Hackney Obesity Strategic Partnership. The measures proposed
are in line with the Planning Practice Guidance on the food environment; notwithstanding the major improvement opportunity noted below.

15.29 (-) Given the Local Plan strategic objective to reduce health inequalities, the local priority to reduce child obesity (health and wellbeing strategy priority) and the high child obesity levels in the borough, the Policy 35 restriction on new hot food takeaways within 400 metres of the boundary of a secondary school should also apply to town centre locations. It is strongly recommended that the Local Plan removes the exclusion of town centres from this restriction, and A. iii. in Policy 35 is reworded to state “It is not located within 400 metres of the boundary of a secondary school or community college.”

**Improving Accessibility and Promoting Sustainable Transport**

15.30 (=) Policy 37 (Liveable Neighbourhoods) requires developments to create an environment where people actively choose to walk and cycle as part of daily life; reduce the dominance of private motor vehicles; contribute to the Healthy Streets Approach; contribute to a safe road environment; contribute to greening neighbourhoods; and improve the pedestrian environment. These are all very positive steps in promoting health and wellbeing, through increasing physical activity through active travel, reducing exposure to air pollution, improving health through access to green space, and facilitating strong social connections, which support mental health. There are opportunities to further improve how the policy supports delivery of these aims, as outlined below.

15.31 (=) Policy 37 would be strengthened by adding to the safe road environment point (iv) that this aims to progressively reduce traffic accident casualties in line with ‘Vision Zero’ objectives (to bring the plan policy in line with the new Mayor’s Transport Strategy). In the same way, the point about reallocation of road space (ix) should state that this will include seeking to reallocate space by the side of roads away from car parking use towards uses that create more liveable neighbourhoods and promote more sustainable means of travel.

15.32 (+) Policy 38 (Walking and Cycling) contributes positively to physical activity by requiring new development to prioritise walking and cycling, and setting out specific requirements to facilitate this (such as wayfinding, lighting, seating). It is also positive that the policy promotes design of footpaths to be suitable for older people and people with disabilities, both groups with lower levels of physical activity and including people who may be at risk of social isolation.

15.33 (+) Policy 41 (Parking and Car Free Development) is very positive in requiring all new developments in the borough to be car free (with limited exceptions, for example for wheelchair accessible parking). Any measures that contribute to reducing private car use are considered positive for public health, through increasing physical activity by sustainable transport modes, reducing air pollution.

**Hackney's Green and Public Spaces**

15.34 (+) Plan Policy 42 (Protection and Enhancement of Green Infrastructure) sets out how Hackney will protect and enhance green spaces, and seek to create a network of green
space. This is highly positive, due to the physical and mental health benefits of access to green space.

15.35 (+) Through map 12 (open space deficiencies) and Policy 44 (New Open Space) the Plan seeks to ensure that development contributes to the development of new open space in areas of deficiency. This is positive as access to green space is associated with reductions in health inequalities. This is complemented by Policy 45 (Green Chains and Green Corridors) which seeks to enhance the development of a network of green infrastructure in Hackney; promoting links between green spaces.

15.36 (+) The inclusion of Policy 47 (allotments and food growing) is positive, in contributing to a healthier food environment and the physical and mental health benefits of access to nature, social connections and physical activity.

15.37 (+) Policy 46 (Play Space) contributes to the provision of play spaces, and gives consideration to accessibility, inclusivity and providing a range of experiences. The policy and supporting text responds to earlier Public Health input to define expectations regarding the quality (as well as quantity) of play space.

15.38 (−) It would be positive for Policy 48 (Tree Management and Landscaping) to include a requirement for all developments to include the planting of new trees, as well as the protection of existing trees. This would contribute to urban greening and the mental health benefits of access to green space during daily life.

15.39 (−) It would be useful for the Plan policies to set out expectations for how to improve the accessibility and quality of open spaces to increase their use, especially among communities who may use open spaces less at present, such as people with disabilities. If appropriately designed, open space can contribute to positive mental health, through physical activity, access to nature and the development of strong social connections. Measures proposed by the National Institute of Health and Clinical Excellence (NICE) Physical Activity and the Environment guidance to make spaces accessible include:

- provision of safe areas in which children can play and picnic facilities
- measures to prevent or reduce antisocial behaviour, for example lighting
- clear signs that can be understood by everyone, including people with visual impairments and learning disabilities
- seats with arms and backrests, sited at frequent intervals
- shelter and shade
- accessible toilets that are clean, well maintained and unlocked during daylight hours

Climate Change

15.40 (+) The chapter sets out measures to build resilience to climate change through reducing flood risk (Policy 50), including sustainable urban drainage systems, and preventing overheating (Policy 51), such as through measures that promote biodiversity.

15.41 (+) Policies are presented to mitigate climate change through proposed developments (Policy 52), existing developments (Policy 53) and Decentralised Energy Networks
(Policy 54). For example, all new residential development should meet a zero carbon emissions target emission rate.

15.42 (+) Policy 56 (Improving the Environment – Pollution) outlines measures to reduce air pollution (for example in the construction process) and promotes siting of new developments to reduce exposure of vulnerable groups to air pollution; in line with National Institute of Clinical Excellence guidance. The policy also sets out measures to reduce water pollution, address risks from land contamination, and minimise/mitigate noise impacts from construction and in the design of developments.
16. **Step 3: Conclusions and Recommendations**

16.1 The draft Local Plan contains many positive elements for improving public health and reducing health inequalities. These show how spatial planning can promote health and wellbeing, and build on ongoing collaborative discussions between Spatial Policy and Public Health. These positive aspects of range from spatial objectives; promoting active design; creating liveable neighborhoods; increasing walking and cycling and reducing private car use; promoting Health Impact Assessments; affordable housing requirements; limiting concentrations of hot food takeaways, betting shops and payday loan shops; protecting, promoting and joining up green spaces; to preventing and mitigating the impact of climate change.

16.2 Officers from Public Health have fed into the development of the policies in this draft Local Plan. Refinement and improvements resulting from these discussions include reference and links to the Council’s Healthy Catering Commitment, Healthy Streets and public realm, enhancement of the proposed green infrastructure network.

16.3 There are opportunities for further improvements to enable the delivery of the Local Plan to contribute fully to the spatial objective of tackling health inequalities in Hackney and creating an environment that promotes health and wellbeing.

16.4 The recommendations stemming from this HIA are outlined below, and will be subject to further consideration and assessment of their implication on the overall spatial planning in the borough as part of the dynamic nature of plan making:

- Explain (with examples, such as stairwells) what is meant by active design in Policy 1 (Design Quality), and refer to active design in planning of educational facilities
- Refer to suicide prevention measures for planning tall buildings in the Policy 1 section on building heights
- Include in Policy 7 (Social and Community Infrastructure) a requirement for new developments to have regard to social infrastructure capacity and provide/contribute to meeting social infrastructure needs
- Consult with the Clinical Commissioning Group and NHS England on the draft Local Plan social infrastructure policy content (continuing discussions initiated by Planning)
- Include Health Impact Assessment requirements for new developments in Policy 8 (Health and Wellbeing), rather than the supporting text, to ensure weight of HIA
- Consider how to ensure developers have sources of guidance for how to address particular housing needs of vulnerable groups, in Policy 16 (Housing Older and Vulnerable People)
- Include provisions in policies in chapter 5 (Economy) relating to local employment opportunities in construction and in jobs created through development
- Ensure that the policy restricting new takeaways (A5 uses) within 400 metres of secondary schools and community colleges applies in town centre locations (remove existing exclusion of town centre locations from the policy)
- Refer to progressively reducing traffic accident casualties in line with Vision Zero objectives in Policy 37 (Liveable Neighbourhoods)
- Specify in Policy 37 that opportunities should be pursued to reallocate space by the side of roads (kerbside) away from car parking to other more sustainable uses
- Include a requirement for all new developments to include new tree planting in Policy 48 (Tree Management and Landscaping)
Include guidance on measures to ensure accessibility of green and public spaces for groups who may have greater barriers to use of those spaces, such as people with limited mobility
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Appendix 1: Equalities Impact Assessment of Local Plan Policies
Chapter 2: Protecting and Enhancing Heritage and Leading the way in Good Urban Design

<table>
<thead>
<tr>
<th>1. Design Quality and Local Character</th>
<th>Race</th>
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<th>Faith</th>
<th>Sexual orientation</th>
<th>Analysis</th>
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<tbody>
<tr>
<td>A. All new development must be of the highest architectural and urban design quality. Innovative contemporary design will be supported where it respects historic character. Development will only be permitted if all of the following criteria are met. Development must be:</td>
<td>O</td>
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<td>This policy encourages good architectural and urban design principles which will benefit all equalities groups. Principles such as the Healthy Streets approach encourages walking and cycling through improved routes and enhanced public spaces where people can interact. This approach will be particularly beneficial for less mobile members of the community such as disabled and older residents and parents with young children.</td>
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</tbody>
</table>
Are Equality groups affected because of proposed Policy:
Key: (+) Positive Impact or (-) Negative Impact or (0) Neutral

<table>
<thead>
<tr>
<th>Analysis</th>
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<tbody>
<tr>
<td>Race</td>
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<tr>
<td>ix. promote good health, including through the use of active design principles(^1) and the Healthy Streets approach(^2), ensuring inclusive and attractive streets that people want to spend time in; and</td>
</tr>
<tr>
<td>x. improve the public realm, frontage to the street and facilitate movement through areas with direct, safe, accessible, and easily recognisable routes (legibility); and</td>
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<td>xi. secure and designed to minimise crime and antisocial behaviour;</td>
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<td>xii. robust and flexible in use; and</td>
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<td>xiii. respond positively to natural features and other open space; and</td>
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<td>xiv. incorporate well designed integrated landscape design; and</td>
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<td>xv. preserve significant and protected views; and</td>
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<td>xvi. thoughtfully and efficiently integrate building services equipment.</td>
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</table>

**Building heights**

B. All new buildings must respect the setting of the borough's historic townscapes and landscapes. Tall buildings will only be permitted where they meet all of the following criteria. The development must:

i. relate and respond to its immediate and wider surrounding context: the base of the building must

---


\(^2\) https://tfl.gov.uk/corporate/about-tfl/how-we-work/planning-for-the-future/healthy-streets
2. Development and Amenity

All development proposals must be appropriate to their location and should be designed to ensure there are no significant adverse impacts on the amenity of occupiers and neighbours in terms of loss of light and privacy. The individual and cumulative impacts of development proposals on amenity will be considered in considering their acceptability. Consideration of the merits of development proposals will be balanced against the impact on amenity.

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<th>Race</th>
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This policy seeks to ensure there are no adverse amenity impacts resulting from development, which will impact positively on all, with no specific impacts on the equalities groups.

3. Designated Heritage Assets / Listed Buildings

A. The total or substantial demolition of a listed building will not be permitted unless exceptional circumstances are shown that outweigh the case for retention.

B. Proposals for a change of use or alterations and extensions to a listed building will only be permitted where there is no harm to the special architectural and historic interest of the building; and development that would cause substantial harm to the setting of a listed building will not be permitted.

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This policy seeks to protect listed buildings and historic buildings. Some listed buildings may have special architectural facilities which could prohibit the implementation of improved accessibility standards such as ramps or lifts, so this policy could be considered to have minor negative impacts on less mobile members of the community, such as the elderly or disabled.
4. **Non Designated Heritage Assets**

   A. New development must enhance or preserve the significance, character appearance, and setting of non-designated heritage assets including those on the Local List and Buildings of Townscape Merit.

   B. There will be a presumption against the demolition of locally listed buildings.

   C. Developments proposals which involve the loss of a non-designated historic asset will be required to:
      1. submit a Heritage Statement to assess the significance and assess the potential harm to the significance of the non-designated heritage asset; and
      2. retain or restore the structures, features and materials of the asset which contribute to its architectural integrity and historic interest.

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<th>Race</th>
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<td>This policy seeks to protect and preserve non-designated heritage assets and is not considered to have any disproportionate impacts on any of the equalities groups.</td>
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</table>

5. **Archaeology**

   The Council will seek to protect, enhance and promote its archaeological heritage (both above and below ground), and will encourage its interpretation and presentation to the public. It will take the necessary measures required to safeguard the archaeological remains found, and refuse planning permission where proposals would adversely affect archaeological remains or their setting.

   Desk based assessments and, where necessary, archaeological field evaluation will be required before development proposals are determined, where development

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<td>This policy seeks to protect the borough’s archaeological heritage and is not considered to have any disproportionate impacts on any of the equalities groups.</td>
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</tbody>
</table>
### Are Equality groups affected because of proposed Policy:

**Key: (+) Positive Impact or (-) Negative Impact or (O) Neutral**

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This policy seeks to ensure advertisements are high quality and appropriate to their location and is not considered to have any disproportionate impacts on any of the equalities groups.

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**Chapter 3: Hackney’s People**

### 7. Social and Community Infrastructure

**A.** All proposals for social and community infrastructure will be supported where they meet all of the following criteria:

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<th>Race</th>
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<td>This policy protects and seeks to provide social and community infrastructure across the borough and resists the loss of existing social and community infrastructure. It will have a positive impact on all equalities groups in terms of community cohesion.</td>
</tr>
</tbody>
</table>
Are Equality groups affected because of proposed Policy:
Key: (+) Positive Impact or (-) Negative Impact or (O) Neutral

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<th>Race</th>
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<tr>
<td>i.</td>
<td>meet an identified need;</td>
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<tr>
<td>ii.</td>
<td>are of a high quality and inclusive design providing access for all; and</td>
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<td>iii.</td>
<td>provide flexible, affordable and adaptable buildings and where possible provide mixed used development, co-locate with other social infrastructure uses and maximise use of buildings in evenings and at weekends.</td>
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B. Large trip generating facilities should be located in town or local centres unless it can be demonstrated that the facility is needed outside of these centres and that the location is accessible by walking, cycling or public transport by those who will use the facility.

C. Proposals involving the loss of existing social and community infrastructure will not be permitted unless one of the following criteria is met:

| i. | a replacement facility that meets the needs currently met by the existing facility is provided; or |           |        |     |       |                   |          |
| ii. | adequate alternative facilities are already within walking distance, which are capable of meeting the needs currently being met by the existing facility without leading to a shortfall in provision for the specific social infrastructure; or |           |        |     |       |                   |          |
| iii. | It has been demonstrated that the facility is no longer required in its current use and it has been demonstrated that it is not suitable and viable for any other forms of social infrastructure for which there is a defined need in the locality, or for which there is a current or future need identified in the Infrastructure Assessment and Delivery Plan. |           |        |     |       |                   |          |
### Are Equality groups affected because of proposed Policy:

**Key:** (+) Positive Impact or (-) Negative Impact or (O) Neutral

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<tr>
<th>D. The incorporation of community facilities into mixed use residential schemes where it meets an identified need will be encouraged.</th>
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<th>Disability</th>
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<th>Age</th>
<th>Faith</th>
<th>Sexual orientation</th>
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<td>This policy helps to promote healthy and active lifestyles amongst all Hackney residents. It will have a high positive impact on all equalities groups. Specific initiatives such as Secure by Design will assist all equalities groups, who may at time or in certain situations feel unsafe, to feel safer.</td>
</tr>
</tbody>
</table>

#### 8. Health and Wellbeing

New development that contributes to a high quality environment that enables all Hackney residents to lead a health and active lifestyle will be supported.

A. New development will only be permitted where all of the following criteria are met. The development must:

i. Be designed to promote physical activity and wellbeing, through appropriate arrangement of buildings and uses, access, open space and landscaping, the provision of facilities to support walking and cycling, and schemes meet ‘Secured by Design’ principles;

ii. Integrate the public realm and public transport, and in particular ensure that local facilities and services are easily accessible by foot or bicycle;

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#### 9. Arts, culture and entertainment facilities

A. New large scale arts, culture and entertainment facilities must be located within the Central Activities Zone, Strategic Cultural Areas, and town centre locations.

B. Smaller scale proposals will be permitted in areas that are accessible by public transport, walking and cycling routes by those that are likely to use the

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This policy supports arts, cultural and entertainment facilities in appropriate locations. Access to these facilities is known to be beneficial for health and wellbeing and these impacts are considered to be equally positive for all residents with no disproportionate impact on the equalities groups.
Are Equality groups affected because of proposed Policy:
Key: (+) Positive Impact or (-) Negative Impact or (O) Neutral

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facility, including in other designated Cultural Quarters

C. The dual use of sites for a mix of arts and culture related uses and use of vacant units in highly accessible areas and town centre locations for temporary arts related activities will be supported.

D. Development involving the loss of arts, culture and entertainment facilities will be resisted, unless re-provided in accordance with other policy requirements. Where loss of the facility is necessary to secure a development which will deliver wider planning benefits for the community, and this can be demonstrated to the Council's satisfaction, a contribution towards public art or creative projects is provided in accordance with the Council's Planning Contributions SPD.

E. All new major developments in Hackney's Strategic Cultural Area (Olympic Park and Lee Valley Regional Park), designated Cultural Quarters (Dalston), Central Activities Zone and town centres (identified in the Policies Map) must contribute towards public art or art projects.

Chapter 4: Meeting Hackney’s Housing Need

<table>
<thead>
<tr>
<th>10. Housing Supply</th>
<th>Race</th>
<th>Disability</th>
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<th>Faith</th>
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### Are Equality groups affected because of proposed Policy:

**Key:** (+) Positive Impact or (-) Negative Impact or (O) Neutral

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#### A. The Council will create the conditions for growth to deliver up to 30,000 new homes between 2018 and 2033, increasing the supply of genuinely affordable homes, alongside community facilities through high quality urban neighbourhoods, to meet Hackney’s needs.

#### B. The majority of this housing growth will be planned to take place in and around Shoreditch (up to 12,000 homes), in the north of the Borough at Woodberry Down (up to 7,000 homes), around Dalston (up to 5,000 homes) and Hackney Central (up to 4,000 homes), and along the Borough’s ‘Enhance Corridors’ identified in Key Diagram 1.

#### 11. Affordable Housing

**A.** New development must maximise opportunities to supply genuinely affordable housing. The Council will seek the maximum reasonable amount of affordable housing and will have regard to economic viability and the distinct economics of build-to-rent schemes; public funding available; site context and surroundings; the character of the development; and design constraints.

**B. Schemes of 10 units or more**

_i._ At least 50% of all residential units on schemes of 10 residential units net or more must be affordable housing, subject to financial viability. The Council will expect affordable housing to be provided on site. Within these schemes the following types of affordable housing should be provided:

This policy promotes housing growth and will have positive impacts on all residents with no disproportionate impact on equalities groups.

This policy seeks to maximise the provision of genuinely affordable housing, seeking 50% affordable housing products on large scale residential schemes. Affordable homes are considered to provide high positive impacts in terms of providing homes for those who may be on lower incomes or have larger families such as faith groups, BME communities, the young, elderly and those with disabilities.
Are Equality groups affected because of proposed Policy:

Key: (+) Positive Impact or (-) Negative Impact or (O) Neutral

<table>
<thead>
<tr>
<th>Affordable Housing Product</th>
<th>Type of affordable housing based on Government definition</th>
<th>Proportion required</th>
<th>Age</th>
<th>Faith</th>
<th>Sexual orientation</th>
<th>Analysis</th>
</tr>
</thead>
<tbody>
<tr>
<td>Social Rent/London Affordable Rent</td>
<td>Social</td>
<td>60%</td>
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<tr>
<td>Living Rent or London Shared Ownership or other genuinely affordable products that the Council considers appropriate</td>
<td>Intermediate</td>
<td>40%</td>
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ii. It must be suitably demonstrated to the Council's satisfaction that the affordable housing proposed is genuinely affordable relative to local ward level incomes. There is scope for other types of affordable housing products to form part of on-site affordable provision alongside or in-place of the listed products if its affordability relative to local ward level incomes can be demonstrated.

C. Schemes of 1-9 units

(i) For schemes which fall below the 10 unit threshold, a financial contribution will be required, the scale of which will be determined by economic viability, the number, location and size of the units proposed. Further guidance will be set out in the Housing SPD.

D. Affordable housing requirements are not limited to Class C3 in the Use Classes Order and will be sought from alternative housing products and developments such as shared housing, supported and specialist housing and student housing.

E. Schemes which do not meet or exceed the requirements of B and C above will be required to
submit detailed viability information, and will be subject to an early review mechanism.

F. For developments which are demonstrated through a viability assessment to have an affordable housing contribution below the Council’s requirements and there is a chance that viability will improve prior to completion of the development, the Council will require an updated viability assessment, and if the development is capable of delivering more affordable housing than originally stated, payment in-lieu contributions of equal value will be required.

G. Where additional homes are proposed through amended planning applications (i.e. through re-submissions or variations of existing planning applications or submission of a new planning application for an extension resulting in an increase in existing homes) within four years of the commencement of the original planning permission and the total number of homes proposed increases to 10 or more, affordable housing for 50% of all residential units will be sought preferably on-site, or if this is not possible by way of in-lieu contributions. Similarly, where development sites are split, or separate proposals are brought forward on neighbouring or nearby sites by the same owner, affordable housing requirements will be assessed on the total number of net residential units proposed across all related sites.

12. Dwelling Size Mix

A. Developments should provide the following mix of dwelling sizes

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This policy seeks to ensure an appropriate mix of dwelling sizes are provided across different housing tenures. The provision of one third family sized dwellings within the social and market tenures will have a positive impact.
Are Equality groups affected because of proposed Policy:
Key: (+) Positive Impact or (-) Negative Impact or (O) Neutral

<table>
<thead>
<tr>
<th>Bedrooms / Dwelling size</th>
<th>Rac_e</th>
<th>Dis_ability</th>
<th>Gen_der</th>
<th>Age</th>
<th>Fai_th</th>
<th>Sexual orientatio_n</th>
<th>Analysis</th>
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<tbody>
<tr>
<td>Preferred dwelling mix – social</td>
<td>1 Bed</td>
<td>2 Beds</td>
<td>3+ Beds</td>
<td>30-34%</td>
<td>30-34%</td>
<td>33-36%</td>
<td></td>
</tr>
<tr>
<td>Preferred dwelling mix – intermediate</td>
<td>Lower % than 2 bed</td>
<td>Higher % than 1 bed</td>
<td>15-25%*</td>
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</tr>
<tr>
<td>Preferred dwelling mix – market</td>
<td>Lower % than 2 bed</td>
<td>Higher % than 1 bed</td>
<td>33%</td>
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*in parts of the Borough where house prices are considered higher relative to other parts, based on the most up-to-date data, shared ownership units 3 beds and above proposed should be in the lower end of this range.

B. The Council will seek a higher proportion of 4+ bed dwellings in the Stamford Hill AAP area. The Stamford Hill AAP will provide further guidance on this.

C. The Council will consider variations to the dwelling size mix sought if this can be justified based on the tenures and type of housing proposed, site location, area’s characteristics, design constraints, economic scheme viability, and, where shared ownership is proposed, the ability of potential occupiers to afford the homes proposed.

13. Build to Rent
A. Standalone Build to Rent developments or Build to Rent blocks on a larger mixed tenure development will be supported provided they comply with all other plan policies and they meet all of the following criteria:

i. The homes are held as Build to Rent under a covenant for at least 15 years; and

This policy supports build to rent developments subject to certain criteria. These types of homes will be particularly attractive and beneficial to younger members of the community who may not be able to afford to buy homes in the borough. The requirement to provide long tenancies would be beneficial to families. The requirement for affordable housing to
Are Equality groups affected because of proposed Policy:
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<th>Analysis</th>
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<td>ii. All units are self-contained and let separately; and</td>
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<tr>
<td>iii. The development is in unified ownership and unified management; and</td>
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<tr>
<td>iv. The development has professional and on-site management; and</td>
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<tr>
<td>v. Longer tenancies of three years or more are offered with defined in-tenancy rent reviews.</td>
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<tr>
<td>B. Affordable housing delivered as part of the development will be required to be either Living Rent or London Affordable Rent.</td>
</tr>
<tr>
<td>C. Schemes will be required to comply with Policy 1 (Design Quality and Local Character) and standards identified in the Mayor of London’s Housing SPG however there may be flexibility in applying these standards given the uniqueness of Build to Rent developments, provided that designs meet an identified need and are of an exceptional design and standard. S106 agreements on Build to Rent schemes will include a ‘clawback’ mechanism in the event of units being sold out of the Build to Rent sector. Further guidance will be provided in the Councils Housing SPD (emerging).</td>
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<tr>
<th>14. Self/Custom-Build Housing</th>
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<tbody>
<tr>
<td>A. Proposals for self/custom build housing projects to meet demand will be supported provided they are compliant with all other plan policies.</td>
</tr>
<tr>
<td>B. Large developments of 0.25ha or more should explore options to make provision for serviced plots of land for self/custom build housing.</td>
</tr>
</tbody>
</table>

This policy supports self-build housing where appropriate. It is not considered to have any disproportionate impact on the equalities groups.
### 15. Housing Design

A. The Council will expect all homes and extensions to existing properties to be of high quality design and meet the internal and external space and accessibility standards set out in the London Plan and GLA Housing SPG and sustainable design and construction standards set out in the Council’s Sustainable Design and Construction SPD, as a minimum.

B. Higher levels of private open space in new housing developments above the minimum standards identified in the Mayor of London’s Housing SPG will be required in areas of the Borough deficient in publicly accessible open space (as identified in figure xx (Open space chapter).

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This policy seeks to ensure homes meet space and accessibility standards, which will be beneficial for the disabled, the elderly and families and have a neutral impact on other equalities groups. The provision of additional open space in areas of open space deficiency will be beneficial to all but with no specific impacts on the equalities groups.

### 16. Housing Older and Vulnerable People

A. Proposals for the development of a housing aimed at meeting the specific needs of older people and vulnerable people will be supported provided all of the following criteria are met:

i. There is a demonstrable need for the type of accommodation proposed within the Borough; and

ii. Schemes are located in accessible areas where the daily needs of older people in terms of convenience shopping, community facilities and public transport can be met; and

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This policy supports the development of housing for older and vulnerable people and resists its loss. This will have positive impacts on elderly and disabled people and neutral impacts on the other equalities groups.
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### iii. Schemes are designed to a high standard, meeting any relevant guidance for the form of accommodation proposed; and

### iv. Schemes will be required to demonstrate that the proposed accommodation has considered the needs of the intended occupiers and that the type of facilities proposed, the level of independence promoted and the amount of provision of support and/or care proposed is appropriate for the intended occupiers.

**B.** All new general-purpose homes must be designed to be adaptable to meet the needs of those with disabilities and the elderly as well as assisting independent living at home.

**C.** Proposals for specialist housing for older people will be required to provide 50% affordable housing with the tenure split outlined in the table below. Alternative affordable housing products will be considered where it is demonstrated that the accommodation proposed is affordable to older people in the Borough and suitable to their needs.

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<th>Specialist Housing</th>
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<th>Affordable rent</th>
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<td>30-40%</td>
<td>60-70%</td>
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**D.** The Council will have regard to economic viability, site context and surroundings; the character of the development; and design constraints where the affordable housing requirements are not met.

**E.** Proposals for the loss of existing accommodation for older and vulnerable people will be resisted unless one of the following criteria apply:
### Are Equality groups affected because of proposed Policy:

**Key:** (+) Positive Impact or (-) Negative Impact or (O) Neutral

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1. It can be suitably demonstrated that the existing accommodation is of a low standard and unable to meet the needs of the intended occupiers; or
2. It can be suitably demonstrated that the needs met by this form of accommodation can be met or re-provided elsewhere in the Borough; or
3. Adequate replacement accommodation to meet the needs of older and vulnerable people is provided, subject to satisfying other plan policies; or
4. It can be demonstrated that there is no longer an identified need for the existing accommodation due to there being a surplus of this type of accommodation in the Borough.

#### 17. Residential Conversions

A. The conversion of houses to flats will only be permitted if all of the following criteria are met:
   1. the existing house consists of no less than 120 sq.m of original floorspace, including internal circulation; and
   2. adequate access would be provided to each dwelling; and
   3. each dwelling would be self-contained; and
   4. the distinctive character of the building/area would not be adversely affected by development with particular regard to heritage assets.

B. Conversion schemes must provide a minimum of one family unit of 3 or more bedrooms at ground floor. Family dwellings must be suitable for a minimum of 4 people.

This policy sets out the criteria that must be met for conversion from a house to flats. The loss of large housing units in the borough could potentially have a negative impact on provision of homes for larger families, although this may be partly offset by criteria B of the policy which seeks to provide at least one family sized unit on the ground floor. The policy is therefore considered to have a neutral impact on all equalities groups.

#### 18. Student Housing

This policy sets out the criteria that
Are Equality groups affected because of proposed Policy:
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A. Proposals for new student accommodation will only be permitted if all of the following criteria are met:

i. The accommodation is needed to house students from academic institutions based in Hackney, or within London;

ii. there is no harm to the provision of general needs housing and not result in the loss of self-contained dwellings;

iii. the site is highly accessible by public transport and provide good access to local shops, services and facilities;

iv. the development does not lead to an over-concentration of such uses which may be detrimental to local amenity, or the balance of uses within the area affecting the character and function of an area;

v. 10% of rooms provided are wheelchair accessible or easily adaptable for occupation by wheelchair users;

vi. A minimum of 50% of student rooms will be required to be affordable for students in the context of student maintenance loans and rents.

vii. The rent for affordable student rooms should be set at a maximum of 55% of the maximum income that a new full-time student studying in London and living away from home could receive from the Government’s maintenance loan for living costs for that academic year.

B. Details of the management of such developments must be submitted with an application, setting out how the impact of development on local amenity will be minimised.

must be met for the provision of student housing. Provision of such housing would be beneficial to younger members of the community, specifically students. The policy also requires the provision of affordable rooms which would be particularly beneficial to students from poorer backgrounds. The policy would have a neutral impact on other equalities groups.
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<th>19. Shared Housing</th>
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<td>A. Development involving the provision of new shared housing will only be permitted if all of the following criteria are met:</td>
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<td>This policy supports the provision of shared housing such as HMOs and co-living schemes subject to certain criteria. This type of housing can be more affordable than conventional housing and is typically orientated towards younger members of the community and therefore is considered to have positive impacts on the age category. It is considered to have a neutral impact on other equalities groups.</td>
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<td>i. Rents must be affordable relative to ward-level incomes, or contributions towards affordable housing must be made in accordance with Policy 11 (Affordable Housing); and</td>
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<td>ii. Rooms and communal spaces are of a high quality and of adequate size and the development provides a good standard of accommodation in accordance with Council requirements in terms of space standards, management requirements, facilities, daylight and sunlight, aspect and amenity space (the Council’s “Guidance for Houses and Flats in Multiple Occupation” should be used as a benchmark); and</td>
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<td>iii. Suitable communal amenity space is provided to meet the needs of occupiers; and</td>
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<td>iv. The development must not have a detrimental impact on the amenity of neighbouring occupiers; and</td>
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<td>v. The development must not lead to an over-concentration of these types of uses in the area; and</td>
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<td>vi. 10% of the units provided are easily adaptable for occupation by wheelchair users.</td>
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<td>B. Loss of any good quality shared accommodation properties which meet the Council’s standards in the guidance for HMOs mentioned in A(ii) will be resisted unless adequate replacement facilities are provided or it can be demonstrated that the existing facility is no longer required.</td>
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<td>C. Proposals for HMOs will only be permitted if in addition to meeting the above criteria, the following criterion is met:</td>
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<td>In the case of conversions the existing floorspace area of the original building is more than 120 sq.m including internal circulation.</td>
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20. Gypsy and Traveller Accommodation

A. Proposals for new sites and pitches to meet the needs of Gypsies, Travellers and Travelling Showpersons as defined by national planning policy will be supported provided that all of the following criteria are met:

1. there is a demonstrable need supported by the Council's needs assessment; and
2. the site is suitable for residential development and has good access to services and facilities to meet the needs of residents; and
3. development on the site does not have a detrimental impact on the natural environment; and
4. development on the site does not have a detrimental impact on the amenity of neighbouring and nearby residents and businesses; and
5. development is respectful of and sensitive to the local character; and
6. the site is easily accessible from the public highway; and
7. the site is not vulnerable to flood risk

B. Proposals for the loss of existing travellers sites and pitches will be resisted unless an equivalent number of replacement pitches are provided.

This policy supports the provision of homes for gypsies and travelers subject to the criteria outlined, and resist their loss. This policy will therefore have positive impacts on gypsies and travellers (race) and neutral impacts on the other equalities groups.
21. Preventing the Loss of Housing

The redevelopment, conversion or change of use of land or buildings involving loss of residential floorspace will be resisted and will only be permitted where at least one of the following conditions are met:

i. The land or buildings are no longer suitable for residential use and it is considered inappropriate to re-provide residential accommodation; or

ii. Replacement housing of an appropriate type is being provided at either an equivalent or higher density, or to address a specialist housing need for which there is a particular shortage in the Borough; or

iii. Redevelopment is necessary to create better quality homes and dwelling mix, and improve the living environment, as part of major regeneration schemes; or

iv. A proposal seeks to combine small dwellings to create larger dwellings in the Stamford Hill Area Action Plan area; or

v. The proposal will enable sub-standard units to be enlarged to meet residential space standards; or

vi. The proposal is for an essential community use or infrastructure for which there is demonstrable need, and it can only be provided by the loss of existing residential floorspace; or

vii. The site or building is in an Employment Land Designation (PIA, POA, LSIS) and the change of use is to a B Class employment use.

Where a loss of affordable housing is proposed, a like-for-

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This policy resists the loss of housing. Criteria iv specifically seeks to combine small dwellings in the Stamford Hill area to create larger family units. Some faith groups proportionately tend to have larger family sizes; as a result this policy is considered to have a positive impact on these communities. It is not considered to have any disproportionate impact on the other equalities groups.
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22. Visitor Accommodation

A. The amount of new visitor accommodation including short term lettings will be managed having regard to up to date assessments of current and future room demand and supply.

B. Large scale hotels (50+ rooms) will only be permitted in the Central Activities Zone and district and major town centres. Small scale hotels in other areas may be permitted if they meet specific needs.

C. Proposals for any new visitor accommodation including short term lettings will only be permitted if all of the following criteria are met. The development must:

i. not result in a total supply (which includes approved schemes not yet built) of visitor accommodation rooms greater than the projected need for rooms; and

ii. not harm the balance and mix of uses in the area, and the character and function of the area, and would not result in the loss of general purpose housing, and is fully compatible with surrounding land uses; and

iii. not cause an unacceptable level of disturbance to, or loss of amenity to, occupiers of surrounding premises; and

iv. not lead to an over-concentration of similar uses within the locality; and

This policy seeks to ensure that hotels are located in the most accessible locations such as town centres and the CAZ and sets criteria for the new quality of new visitor accommodation, including the provision of at least 10% wheelchair accessible rooms, which is considered to have a positive impact on this group. The policy is considered to have a neutral impact on the other equalities groups.
| Equality groups affected because of proposed Policy:  
Key: (+) Positive Impact or (-) Negative Impact or (O) Neutral |
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| v. make adequate provision for servicing, and pick up and set down points for taxis and coaches; and  
vi. includes at least 10% wheelchair accessible bedrooms. |
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<td>D. Ancillary facilities such as conference rooms, restaurants or gymnasiums should be accessible to the public, unless there are valid and appropriate reasons why such facilities should not be accessible to the public.</td>
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### Chapter 5: A Strong and Competitive Economy which Benefits All

| 23. New Employment Floorspace |
|---|---|---|---|---|---|---|
| A. New employment floorspace (B class) in the Borough will be supported in Locally Significant Industrial Areas, Priority Office Areas, Priority Industrial Areas and designated town centres. New employment space outside of these locations will only be permitted if all of the following criteria are met:  
i. it can be demonstrated that there is a reasonable prospect of being occupied;  
ii. the employment use is small-scale and would contribute towards place making; |
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<td>This policy seeks to encourage new employment opportunities in sustainable parts of the borough to sustain and enhance the local economy. It is not considered that this policy would have disproportionate impacts on any of the equalities groups.</td>
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iii. or the employment space is being provided as part of a temporary use
iv. and does not have an unacceptable impact on residential amenity.

B. Within Priority Office Areas, office-led (B1a Use Class) development will be permitted. These areas comprise of:

- Dalston
- Homerton
- Kingsland Road
- Mare Street
- Shoreditch
- Wenlock

C. Within Priority Industrial Areas, industrial mixed use development will be supported. These are comprise of:

- Anton Street
- Belfast Road
- De Beauvoir
- Hackney Downs
- Red Square
- Shacklewell
- Theydon Road

D. Within the following Locally Significant Industrial Land, industrial development will be permitted and other uses other than ancillary development will be resisted.

- Millfields
- Mare Street
- Kingsland Road
- Prout Street
- Tilia Street
### 24. Protecting and Promoting Office floorspace in the Borough

#### New Office Floorspace

A. New development involving the provision of new office (B1a) floorspace must comprise of well designed, high quality buildings and floorspace incorporating a range of unit sizes and types that are flexible, with good natural light, suitable for sub-division and configuration for new uses and activities, including for occupation by small or independent commercial enterprises.

B. All applications incorporating new office floorspace should include a marketing strategy which demonstrates the design and layout of the proposed floorspace is of a high quality, is flexible and meets the needs of likely end users.

#### Priority Office Areas (POAs)

C. New development within designated POAs will only be permitted if it is employment-led where B1a use class is the primary use in line with the below thresholds, subject to viability.

i. In Shoreditch POA – 60% of the overall new floorspace is B1a use class.

ii. In City Fringe POAs (Mare Street, Homerton, Kingsland Road, Dalston, Wenlock) – more than 50% of the overall floorspace is B1 use class with the majority of this floorspace comprising of B1a floorspace.

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This policy seeks to encourage new office floorspace in sustainable parts of the borough and to protect existing office floorspace. It is not considered that this policy would have disproportionate impacts on any of the equalities groups.
D. Retail, hotel, community, leisure, residential development in POAs will only be permitted if all of the following criteria are met:

i. The development forms part of an employment-led mixed-use schemes including conversion schemes meeting the thresholds identified in i. and ii. above;

ii. Proposals must be appropriate to the characteristics and functioning of the site and will not compromise the on-going operations of businesses in the POA.

iii. Proposals must satisfy the requirements of Policies including; other employment policies xx, hotel policy xx, retail policies xx.

iv. Residential uses are not provided at ground floor level.

D The change of use of ground floor commercial uses to residential use will not be permitted.

**Retention of Office Floorspace**

E. Development involving the loss of B1a office floorspace in the Priority Office Areas will not be permitted.

F. Development involving the loss of B1 office floorspace outside of Priority Office Areas will only be permitted where all of the following criteria are met:

i. Robust marketing evidence is submitted which demonstrates that there has been no demand for the existing or vacant land and floorspace for its current or former use, and the possibility of retaining, reusing or redeveloping it for similar or alternative smaller or more flexible units for employment generating use, or other
Are Equality groups affected because of proposed Policy:
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alternative employment generating use has been fully explored;

ii. Any new employment use provides a range of higher quality, more flexible floorspace and preferably a higher density employment than the previous; and

iii. It is demonstrated that the new commercial floorspace being provided has a strong likelihood of being occupied through the submission of a detailed marketing strategy.

25. Protecting and Promoting Industrial land and floorspace in the Borough

**New Industrial Floorspace**

Where proposals involve the provision of new industrial floorspace (B1c, B2, B8), the development must be of an appropriate scale and should be flexible and adaptable for different types of uses and suitable to meet future needs.

New development or redevelopment of sites within Priority Industrial Areas will only be permitted if they:

- maintain, re-provide the same quantum or intensify existing industrial uses (B1c, B2, B8)
- Maintain or re-provide equivalent employment floorspace within B1a Use Class or significantly increase job densities within B Use Classes.

Where mixed used development is proposed (including residential), the scheme should be designed to ensure that there are no environmental impacts or conflicts between uses and provides adequate access and servicing.

Within Locally Significant Industrial Sites, development involving non-industrial uses will not be permitted.

This policy seeks to protect industrial floorspace. It is not considered that this policy would have disproportionate impacts on any of the equalities groups.
Retention of Industrial Floorspace

New development must protect, and where possible enhance, the existing stock of industrial land and floorspace to meet local needs.

The loss of industrial land and floorspace outside of PIAs will only be permitted where all of the following criteria are met;

Robust marketing evidence is submitted which demonstrates that there has been no demand for the existing or vacant land and floorspace for its current or former use, and the possibility of retaining, reusing or redeveloping it for similar or alternative smaller or more flexible units for employment generating use, or other alternative employment generating use has been fully explored;

Any new employment use provides a range of higher quality, more flexible floorspace and preferably a higher density employment than the previous use; and

It is demonstrated that the new commercial floorspace being provided has a strong likelihood of being occupied through the submission of a detailed marketing strategy (refer to Appendix 1).

26. Affordable and Low Cost workspace

A. New major employment or mixed used development in the borough’s designated employment areas and town centres should provide affordable or low cost workspace.

i. Development in the Shoreditch: 10% of the new floorspace (gross) should be affordable at no more than 40% of market rent in perpetuity, subject to viability.

This policy seeks to encourage affordable and low cost employment space in the borough. The types of businesses who may occupy these affordable workspaces may include start-ups, who may be from younger age groups, or charitable organisations and the voluntary sector who may seek to redress issues of social inequality faced by socially excluded communities within the borough.
ii. In remaining POAs: 10% of the new floorspace (gross) should be affordable at no more than 60% of market rent in perpetuity, subject to viability.

iii. In PIAs and POAs: Proposals involving the redevelopment of existing low cost employment floorspace should re-provide such floorspace in perpetuity, in terms of rents and service charges, for these existing uses, subject to scheme viability, current lease arrangements and the desire of existing businesses to remain on-site.

B. Affordable Workspace should normally be provided on-site. Only in exceptional circumstances where it can be demonstrated robustly that this is not appropriate in terms of the policies in this Plan, it may be provided off-site. A cash in lieu contribution should only be accepted where this would have demonstrable benefits in furthering affordable workspace in the Borough and other policies in this Plan.

C. Where additional floorspace is proposed through amended planning applications (i.e. through re-submissions or variations of existing planning applications or submission of a new planning application for an extension resulting in an increase in existing employment floorspace) within four years of the commencement of the original planning permission and the total amount of new employment floorspace exceeds 1000sqm, affordable workspace will be sought in line with A and B above.

27. Railway Arches

A. Proposals for the use of railway arches for industrial and office development and ancillary uses will be

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<td>This policy seeks to promote the use of Railway Arches in the borough for industrial and office development and ancillary uses. It is not considered that this policy would have disproportionate</td>
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### Chapter 6: Planning for Vibrant Town Centres

#### 28. Town Centres

- **Major centres**
  - Dalston
  - Hackney Central

- **District centres**
  - Stoke Newington
  - Stamford Hill
  - Finsbury Park

- **Local centres**
  - Broadway Market
  - Chatsworth Road
  - Dunsmure Road

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

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<td>This policy directs town centre uses, such as retail, leisure and commercial development to Hackney’s town centres. The concentration of such uses within a central location will have positive impacts on less mobile members of the community, such as the elderly, disabled, or parents with buggies by reducing the need to travel long distances to access shopping facilities and other services.</td>
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<td>All criteria met: incorporation of active frontage uses, no obstruction, primary use for employment.</td>
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<td>Impacts on any of the equalities groups identified.</td>
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<td>CAZ (Central Activities Zone)</td>
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**B. Development of retail and leisure uses outside of the town centres and retail frontages listed in part (a) of this policy will not be permitted unless it can be demonstrated that there is no suitable premises available in the designated centres and that there would be no harm to the vitality and viability of these centres.**

**29. Hackney Central and Dalston**

**A. New retail and commercial development will be permitted within the major town centres of Hackney Central and Dalston**

**Primary Shopping Areas**

**B. Any redevelopment in the primary shopping areas of Kingsland Shopping**

This policy sets the primary and secondary shopping areas and frontages within the major town centres of Hackney Central and Dalston, with an overall aim of protecting and promoting shops and other complementary town centre uses within these areas, to ensure a good mix of uses within these centres. The protection of shops is considered to have a neutral impact on the equalities groups.
Centre and Ridley Road market within Dalston must re-provide the equivalent or greater quantum of A1 retail floorspace.

### Primary Shopping Frontages

C. A1 retail uses should be the predominant use within the primary frontages, constituting at least 60% of all units within the primary frontage as a whole. Development involving the loss of A1 uses will only be permitted where the proposal does not result in the overall proportion of A1 falling below 60%

D. In exceptional circumstances a change of use may be permitted if the proportion of A1 falls below 60% if it can be demonstrated through at least one year’s marketing evidence that there is no realistic prospect of the unit being used for A1 retail

E. The proposal must incorporate a shop front, have an active frontage and contribute to the vitality and viability of the town centre.

### Secondary Shopping Area

F. A diversity of A-class, commercial / office and community uses will be supported within the secondary shopping areas.

G. The change of use from retail (A1) will only be permitted where the proposal meets all of the following criteria:

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Key: (+) Positive Impact or (-) Negative Impact or (O) Neutral
## Are Equality groups affected because of proposed Policy:

**Key:** (+) Positive Impact or (-) Negative Impact or (O) Neutral

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i. The proposal will not result in the equivalent of a group of two or more adjoining standard size shop units within a parade being in non-retail (A1) uses; and  
ii. Individually or cumulatively the development will not have an adverse effect on the vitality and viability of the centre as a whole and/or on the individual shop unit; and  
iii. A shop front and active frontage is retained or provided; and  
iv. The proposal is for another A-class, commercial / office or community use.

### 30. Stoke Newington, Stamford Hill and Finsbury Park

A. New retail and commercial development of an appropriate scale will be permitted within the district town centres of Stoke Newington, Stamford Hill and Finsbury Park.

B. A1 retail should be the predominant use within district centres, constituting at least 60% of all units within the district centre as a whole.

C. In exceptional circumstances a change of use may be permitted if the proportion of A1 falls below 60% if it can be demonstrated through at least one year’s marketing evidence that there is no realistic prospect of the unit being used for A1 retail.

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This policy sets out the criteria to be met before any change of use away from retail is permitted in the district centres. The protection of shops is considered to have a neutral impact on the equalities groups.
### Are Equality groups affected because of proposed Policy:

*Key: (+) Positive Impact or (-) Negative Impact or (O) Neutral*

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<th>D.</th>
<th>Change of use away from A1 retail uses within the district shopping centres will only be permitted if all of the following criteria are met:</th>
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<tbody>
<tr>
<td></td>
<td>i. The proposal will not result in the equivalent of a group of three or more adjoining standard size shop units within an individual parade being in non-retail (A1) uses; and</td>
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<tr>
<td></td>
<td>ii. Individually or cumulatively the development will not have an adverse effect on the vitality and viability of the centre as a whole and/or on the individual shop unit or parade; and</td>
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<td>iii. A shop front and active frontage is retained or provided; and</td>
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<td>iv. The proposal is for another A-class, commercial / office or community use</td>
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| E. | Any redevelopment of larger units over 1,000sqm must retain the existing quantum of retail floorspace. |

31. **Local Shopping Centres**

Local Shopping Centres should provide a range of retailing and community services to meet the needs of the local community.

A. A1 retail should constituting at least 50% of all units within each Local Shopping Centre.

B. In exceptional circumstances a change of use may be permitted if the proportion of

This policy sets out the criteria to be met before any change of use away from retail is permitted in the local centres. The protection of shops in local shopping areas is important in providing easy local access to essential facilities, and is particularly beneficial for less mobile members of the community such as the elderly, disabled, or parents with buggies by reducing the need to travel long distances to access shopping facilities and other services.
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<tr>
<td>A1 falls below 50% if it can be demonstrated through at least one year’s marketing evidence that there is no realistic prospect of the unit being used for A1 retail.</td>
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<td>C. Change of use away from A1 retail uses within a Local Shopping Centre will only be permitted if all of the following criteria are met:</td>
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<tr>
<td>i. The proposal is for another A-class use or meets local community needs; and</td>
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<td>ii. The proposal will not have an adverse effect on the vitality and viability of the centre as a whole and/or on the individual shop unit; and</td>
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<td>iii. A shop front and active frontage is retained or provided.</td>
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32. Shops outside of designated centres

A. Individual shops or parades outside of designated town and local centres will be safeguarded for A1 retail purposes. Development involving the loss of A1 retail will only be permitted if all of the following criteria are met:

i. There are alternative shopping facilities for local residents within reasonable walking distance of 400m from the retail unit; and

ii. The retail character of the parade is not undermined (if it forms part of a parade); and

This policy protects shops outside of designated shopping centres and is considered to be particularly beneficial for less mobile members of the community such as the elderly, disabled, or parents with buggies by ensuring access to convenience shops within short distances.
### 33. Small and Independent shops

**A.** The provision of small shop units suitable for small and independent retailers will be supported.

i. New retail development of more than 1000sqm gross internal floorspace in designated town centres must incorporate small shop premises, equivalent to at least 10% of the total amount of proposed gross internal retail floorspace.

ii. Major developments must incorporate small shop units where there is no accessible provision of essential shops available within 400m walking distance.

iii. New retail development will be subject to conditions to prevent the future amalgamation of units into larger premises without planning permission.

**B.** Proposals involving the amalgamation of individual shop units incorporating A Use Classes will not be permitted.

### Analysis

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This policy supports small and independent shops. These may be more affordable for business owners or those that wish to start up small businesses, but the policy is not considered to have any impact on the equalities groups.

### 34. Evening and night time economy

**A.** New evening and night-time economy uses will be primarily located in the

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This policy encourages limited expansion of the evening and night time economy in the boroughs designated centres, provided certain criteria are met. This element of the
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<td>Borough’s designated centres. Only limited expansion will be permitted in</td>
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<td>B. Proposals for evening and night time economy uses will only be permitted if both of the following criteria are met:</td>
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<td>i. There is no negative impact on the amenity of adjoining or adjacent residential accommodation and non-residential uses, such as through noise disturbance, cooking smells, anti-social behaviour, and highway safety; and</td>
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<td>ii. There is no negative cumulative impacts resulting from the proposed use in relation to the number, capacity and location of other night-time economy uses in the area.</td>
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<td>C. Proposals involving the diversification of the types of evening and night time economy uses will be supported.</td>
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<td>35. Over-concentration of uses</td>
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<td>Hot food takeaways</td>
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<tr>
<td>A. Proposals for new hot food takeaways (A5 use class) within all designated centres will only be permitted where all the following criteria are met:</td>
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<td>i. It would not result in more than 5% of the units in the centre being A5 uses; and</td>
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<td>ii. There would be at least three non-A5 units between the proposed use and an existing A5 use; and</td>
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<td>This policy seeks to avoid the over-concentration of hot food takeaways, betting shops and payday loan shops within Hackney’s town centres. Childhood obesity is an issue within Hackney with 12.5% of reception year children and 27.0% of year 6 children being obese. This policy restricts the development of new hot food takeaways within 400m of a school, which will be beneficial to school age children. The policy is considered to have a neutral impact on the other equalities groups.</td>
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### Are Equality groups affected because of proposed Policy:

Key: (+) Positive Impact or (-) Negative Impact or (O) Neutral

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<td>iii. It is not located within 400 metres of the boundary of a secondary school or community college, excluding town centre locations and iv. A commitment is made to participate in the Council’s Healthy Catering Commitment.</td>
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**Betting shops and payday loan shops**

B. Proposals for new betting shops or payday loan shops (sui generis uses) within all designated centres will only be permitted where:

i. It would not result in more than 5% of the units in the centre being a betting shop or payday loan shop; and

ii. There would be at least three other town centre uses between the proposed use and an existing betting shop or payday loan shop.

36. Street markets

A. The Council will protect and promote the street markets of Ridley Road, Hoxton Street, Broadway Market, Kingsland Waste, Well Street and Chatsworth Road.

i. Development which would result in the permanent loss of markets or pitches will be refused unless appropriate comparable replacement provision is made.

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This policy seeks to protect markets in the borough. Older traditional markets such as Ridley Road often provide goods and services as well as employment for Afro-Caribbean, Asian and other BME communities. Shopping in markets often provides cheaper food for poorer members of the community, and can be popular amongst the older population. The protection of markets is therefore considered to have positive impacts on older residents and BME communities. The policy will have a neutral impact on the other equalities groups.
### Chapter 7: Improving Accessibility and Promoting Sustainable Transport

#### 37. Liveable Neighbourhoods

**A.** New development and its associated transport systems should contribute towards transforming Hackney’s places and streets into one of the most attractive and liveable neighbourhoods in London.

**B.** All new development must:

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<td>The policy seeks to enhance neighbourhoods by promoting sustainable, liveable transport options to benefit all. The Council recognises that a flexible and balanced approach is needed to prevent excessive car usage within the borough. Promoting an accessible, low cost and reliable public transport network as well as a pedestrian friendly environment would be an advantage to all.</td>
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<td>i. Create an environment where people actively choose to walk and cycle as part of everyday life.</td>
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<td>ii. Reduce the dominance of the private motor vehicles both in terms of traffic and congestion on our roads and managing excessive parking on our streets.</td>
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<td>iii. Contribute to the Healthy Streets approach to improve air quality, reduce congestion and make Hackney's diverse communities become greener, healthier and more attractive places in which to live, play and do business.</td>
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<td>iv. Contribute to a safe road environment.</td>
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<td>v. Contribute towards greening our neighbourhoods: creating a cleaner, healthier environment that is able to cope with changes to the climate.</td>
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<td>vi. Make improvements to the pedestrian environment including the provision of high quality public realm, safe road crossings where needed, seating, wayfinding and increased tree and vegetation coverage. Provide and where appropriate financially contribute towards creating well connected, high quality, convenient and safe cycle routes and infrastructure.</td>
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### Are Equality groups affected because of proposed Policy:
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<td>vii. Tackle poor air quality, seeking to reduce NOx emissions to achieve the National Air Quality objective and in particular reduce the exposure of children and vulnerable people to transport-related air pollution.</td>
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<td>viii. Provide for and financially contributing towards measures to support Low Emission Neighbourhoods (LENs) including but not limited to the increased use of car sharing, low emission vehicles including taxis, freight consolidation and associated engagement with businesses, residents and other stakeholders to support these aims.</td>
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<td>ix. Support permeability and the reallocation of road space to promote walking and cycling.</td>
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#### 38. Walking and Cycling

**A. All new development must promote sustainable transport by prioritising walking and cycling in the Borough.**

**Walking**

**B. New development will only be permitted where it:**

| + | + | + | + | + | + |

This policy seeks to encourage development that will improve the local environment for walking and cycling within the borough. National statistics suggest that there is an epidemic of obesity in England. In 2015, 58% of women and 68% of men were overweight or obese. Obesity prevalence increased from 15% in 1993 to 27% in 2015 (Statistics on Obesity, Physical Activity and Diet – NHS Digital, March 2017).

Within Hackney obesity is more common among women than among men. Among
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i. Improves the pedestrian environment and contributes towards achieving a world class public realm linking the site to transport infrastructure as well as facilities and amenities including the provision of high quality safe road crossings where needed, seating, signage and increased tree and vegetation coverage.

ii. Is permeable - easy and safe to walk through - and adequately lit;

iii. Provides high quality footpaths that are wide enough for the number of people expected to use them and designed to be suitable for vulnerable road users including older people and people with disabilities.

iv. Contributes towards improved wayfinding including signposted links to key infrastructure, transport nodes, green spaces and canal towpaths where appropriate.

**Cycling**

C. In order to promote cycling in the Borough and ensure a safe and

men, the prevalence is 106 per 1,000 men; among women, the prevalence is 163 per 1,000 women. There is a high than average prevalence of obesity in the Black and local Charedi (Orthodox Jewish) population of Hackney.
Are Equality groups affected because of proposed Policy:
Key: (+) Positive Impact or (-) Negative Impact or (O) Neutral

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accessible environment for cyclists, the Council will seek to ensure that development:

i. Provides for and makes contributions towards connected, high quality, convenient and safe cycle routes for all, in line or exceeding London Cycle Design Standards.

ii. Contributes to a world class public realm which encourages cycling wherever possible.

iii. Provides cycle parking for building users and visitors to the development in accordance with Hackney’s cycle parking standards (see below). Cycle parking shall be secure, accessible, convenient, and weatherproof and will include an adequate level of parking suitable for accessible bicycles, tricycles and cargo bikes.

iv. Makes provision for high quality facilities that promote cycle usage including workplace showers, changing room and lockers. The provision should be proportionate to the scale of development and cycle parking provided.
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<td>v. Provides links to public transport nodes as well as facilities and amenities.</td>
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<td>vi. Contributes towards improved wayfinding.</td>
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<td>vii. Promotes and contributes towards the introduction and expansion of cycle hire facilities.</td>
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39. Transport and Development

A. New development must meet the transport needs of the development and address its transport impacts in a sustainable manner and in accordance with best practice.

B. Any significant negative impact on the operation of transport infrastructure, must be satisfactorily mitigated.

   Major development proposals are required to include the submission of either a Transport Assessment and Travel Plan, or a Transport Statement and Local Level Travel Plan, in accordance with the London Borough of Hackney thresholds.

C. New development will only be permitted where it:

   This policy seeks to ensure that the transport needs of development are met and encourages high-density development to be located around transport nodes and highly accessible areas. This will have a positive impact on less mobile members of the community such as the disabled, elderly and parents with young children.
### Are Equality groups affected because of proposed Policy:

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i. Reduces the need to travel and encourages high-density and high-trip generating development around transport nodes and highly accessible areas.

ii. Integrates land use and transport and will encourage mixed use developments which support compact growth and regeneration.

iii. Minimise the demand for private car trips.

iv. Fully mitigates any adverse impacts upon the capacity of transport infrastructure, including pavements and other walking routes, cycle routes, public transport and roads.

v. The transport and environmental impacts of development construction must be minimised and mitigated through Constructions and Logistics Plans (CLPs) incorporating adherence to the Construction and Logistics Community Safety Scheme (CLOCS) and the Freight Operator Recognition Scheme (FORS)³

On-site machinery and vehicles used should comply with industry best-practice emission standards contributing to the Council’s air quality objectives.

vi. Assesses the ongoing freight impact of the development and minimises and mitigates the impacts of this on the transport system through Delivery and Servicing Plans (DSPs) including references to use of low-

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³ Developers are expected to meet as a minimum FORS Silver standard and comply with best-practice contained in any superseding guidance.
### 40. Public Transport and Infrastructure

New major development must:

- **A.** Protect existing and proposed transport infrastructure, particularly routes for walking, cycling and public transport, from removal or severance. Proposals which are contrary to the safeguarding of strategic infrastructure improvement projects, including Crossrail2 will be refused.

- **B.** Make a financial contribution towards improvements to the bus network and associated infrastructure including new bus services, bus priority measures and frequency upgrades.

- **C.** Contribute to improving rail infrastructure at local stations including travel interchange facilities and step free access.

- **D.** Supports car club development, cycle hire facilities and other sustainable transport initiatives and improves access to public transport facilities by walking and cycling.

### 41. Parking and Car Free Development

The policy promotes car free...
All new developments in the Borough must be car-free with on-site parking limited to:

i. Wheelchair accessible parking which is required to be provided in accordance with best practice standards, as set out in the London Plan.

ii. Essential operational or servicing needs as justified through a Transport Assessment.

A. The Council will not issue on-street parking permits in connection with new residential developments within Controlled Parking Zones. Returning residents within an Estate Regeneration scheme will be subject to the eligibility criteria as set out in the scheme’s legal agreement.

B. Proposals for the redevelopment of existing car parks for alternative uses will be supported and the removal of boundary treatments and gardens to provide vehicle crossovers and on-site parking will be resisted.

C. New development must incorporate designated spaces for deliveries within the boundaries of the development and provide Delivery and Servicing Plans which encourage provision for low-
Are Equality groups affected because of proposed Policy:
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<td>emission consolidation and last mile delivery modes.</td>
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<td>D. A minimum of one fifth of all off-street parking places created need to be equipped with electric vehicle charging infrastructure in line with the London Plan. Facilities for charging electric Powered Two Wheel vehicles should also be considered. Contributions will also be required for on-street provision of electric vehicle and other low emission vehicle infrastructure.</td>
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<td>E. All major residential developments will be required to contribute towards the expansion of the local car club network.</td>
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<td>F. Proposals for, or including, new public car parks (and other motor vehicle public parking, including for coaches) will be refused. Proposals for the redevelopment of existing car parks for a different use shall be subject to the car-free and Transport Assessment need requirements within this policy.</td>
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### Chapter 8: Hackney’s Green and Public Spaces

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<th>42. Protection and enhancement of Green Infrastructure</th>
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<td>A. All new development should enhance the network of green infrastructure and green links across the borough and seek to improve access to open space, particularly in areas of deficiency.</td>
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<td>B. Development involving the loss of designated open space will not be permitted unless:</td>
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<td>i. there is compensatory contiguous replacement of better or equivalent quantity and quality of public open space and setting including facilities to enhance or diversify people’s experience of the open space, and</td>
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<td>ii. replacement is in a location with better or equivalent access by walking, cycling or public transport, and</td>
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<td>iii. the quality of the remaining and replacement open space is not eroded by the proposed development, and</td>
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This policy seeks to protect and enhance Green Infrastructure within the borough and is not considered to have any disproportionate impacts on any of the equalities groups.

An estimated 75.6% of households live in flats in Hackney, which is significantly above the national average of 16.7% and the average for Greater London of 44.9% (Housing Needs Assessment 2009) which may make access to parks and open space more of a requirement in Hackney.
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<td>iv.</td>
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<td>the community benefit of the proposed development significantly and demonstrably outweighs the harm caused by the loss of the open space.</td>
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C. Development on Amenity Green Space will only be permitted where:
   i. replacement and/or enhancement of open space of better or equivalent quality is provided either on site or a location within the vicinity of the site, especially in the identified areas of deficiency, and
   ii. wherever possible any replacement connects to the network of open space infrastructure including the green chains or green corridors, or
   iii. it can be shown that the relationship between buildings and associated open space(s) can be improved in terms of use, security, setting and landscape quality.

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

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

F. Lee Valley Regional Park
i. Development proposals in proximity to the Lee Valley Regional Park should improve access and links to the Park and waterways.
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<td>This policy seeks to protect the borough’s biodiversity and is not considered to have any disproportionate impacts on any of the equalities groups.</td>
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43. Biodiversity and Sites of Importance of Nature Conservation

A. Biodiversity across the borough will be protected and enhanced.

i. All development should maximise opportunities to create new or make improvements to existing natural environments, nature conservation areas, habitats or biodiversity features and link into the wider green infrastructure network.

ii. New development on or adjacent to Sites of Importance for Nature Conservation (SINCs) and Walthamstow Reservoirs Special Protection Area or Walthamstow Marshes Sites of Special Scientific Interest (in neighbouring Waltham Forest) must not have a detrimental impact
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This policy sets out open space standards required for new development and prioritises on-site provision in areas of deficiency. It is not considered to have any disproportionate impacts on any of the equalities groups.
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<td>accessible open space set out above, or where this is not practicable,</td>
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<td>ii. Make physical improvements to the public realm to improve access to existing public open spaces, or</td>
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<td>iii. Where it is not possible to provide new open space, green roofs and / or walls and other green infrastructure measures may contribute towards meeting the requirement.</td>
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C. Outside of the areas of deficiency, where it is demonstrated that it is not possible to provide the levels of communal open space on site, financial and / or physical contributions may be acceptable for the enhancement of existing public open space in the locality.

D. All new open space should meet the following criteria:

i. Be provided on site
ii. Be of high quality
iii. Be incorporated into the design of the scheme from the outset
iv. Maximise biodiversity benefits
v. Be publicly accessible where possible
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45. **Green chains and green corridors**

E. All new development adjacent to existing green chains and green corridors must be developed in a way that contributes towards the green infrastructure network. In the areas of potential new green chains identified on Map 2, financial contributions may be sought to develop new green chains in the future.

This policy seeks to protect and enhance Green Chains and Green Corridors in the borough and is not considered to have any disproportionate impacts on the equalities groups.

46. **Play Space**

A. The Council will protect existing play and recreation facilities and support the development of new facilities. New major residential developments and mixed-use schemes that are likely to generate a child yield of 10 or more are required to provide 10sqm of dedicated play space per child on-site.

   i. If it is not feasible to provide play space in addition to the communal open space

This policy protects play space and promotes the development of new play space within major developments.

Children's play space is important for the development of physical, social and emotional skills in children and can improve health and reduce health inequalities.

Among children attending maintained schools in Hackney and the City in 2010-11, 13.5% of children in Reception year were overweight and 14.6% were obese, giving a total of 28.0% who were overweight or obese. Among children in Year 6, 15.9% were overweight and
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<td>25.0% were obese. These rates are little changed from the previous year and there is no obvious trend in either age group over the last five years. Black pupils are most likely to be obese and Asian pupils are least likely to be obese in Hackney (Health and Well Being Profile 2012). It is therefore considered that this policy has positive impacts on young children and a neutral impact on other equality groups.</td>
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**Are Equality groups affected because of proposed Policy:**

Key: (+) Positive Impact or (-) Negative Impact or (O) Neutral

| requirements set out in policy 42 then it is permissible to incorporate play space within on-site public open space. |          |        |     |       |                   |          |
| B. New play spaces should: |          |        |     |       |                   |          |
| i. Be well located and easily accessible by pedestrian, cycling or bus routes. |          |        |     |       |                   |          |
| ii. Be inclusive to all |          |        |     |       |                   |          |
| iii. Provide a range of different types of play facilities and experiences for children of different abilities |          |        |     |       |                   |          |
| iv. Be sustainable and easy to maintain |          |        |     |       |                   |          |

47. **Allotments and food growing**

A. The Council will protect existing allotments and support the provision of new food growing spaces.

This policy seeks to protect existing allotments and support the provision of new food growing locations within the borough. Research suggests that the use of allotments has a positive impact on the wellbeing of users along with the light exercise it provides and is a source of affordable food for local people. The policy is not considered to have any disproportionate impacts on any of the equalities groups.
Are Equality groups affected because of proposed Policy:  
Key: (+) Positive Impact or (-) Negative Impact or (O) Neutral

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<td>This policy seeks to protect and retain existing landscape features and trees of amenity value within the borough and is not considered to have any disproportionate impacts on any of the equalities groups.</td>
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### Are Equality groups affected because of proposed Policy:

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**Key:** (+) Positive Impact or (-) Negative Impact or (O) Neutral

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**adequate replacement planting is proposed, or the removal is in the interests of good arboricultural practice.**

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**49. Waterways, canals and residential moorings**

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

**Development alongside waterways and canals**

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

1. Public access in the form of a continuous green link along the waterfront or towpath is maintained, created or enhanced. This may include, where appropriate, the incorporation of an undeveloped buffer strip alongside the watercourse.

2. There is no conflict with nature conservation, biodiversity interest or heritage value. Mitigation or compensatory

This policy seeks to protect and retain existing Waterways, canals and residential moorings within the borough and is not considered to have a disproportionate impacts on any of the equalities groups identified.
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measures may be necessary.

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

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

**Residential moorings**

C. Proposals for residential moorings will be supported provided supporting uses and facilities are or will be in place, and, where appropriate they have regard to the Park Plan and Area Proposals of the Lee Valley Park Authority. Proposals for residential moorings and associated facilities must not:

i. Hinder navigation along the waterway;

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

iii. Impede public access; or

iv. Detrimentally affect leisure provision, amenity and the character and appearance of the waterway and surrounding area.
## Chapter 9: Climate Change

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<thead>
<tr>
<th>Analysis</th>
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<tbody>
<tr>
<td>This policy seeks to protect the borough from flood risk and its associated impacts and is not considered to have a disproportionate impact on any of the equalities groups identified.</td>
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<tr>
<td>hierarchy. Where this is shown, through appropriate evidence, to be unfeasible, planning obligations will be expected to reduce the overall flood risk within the site and in the vicinity.</td>
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<tr>
<td>F. All development should, in liaison with Thames Water, take account of the capacity of existing on and off-site water and sewerage infrastructure and the impact of development proposals on this infrastructure. Applicants will be required to demonstrate that capacity exists on and off-site in the sewerage network to serve the development or that it can be provided ahead of occupation to avoid sewer flooding.</td>
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<td>G. Where necessary, and as advised by Thames Water, the Council will seek improvements to water and/or sewerage infrastructure related and appropriate to the development so that improvements are completed prior to occupation of development.</td>
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<tr>
<td>H. All developments should take account of the location, capacity and requirements of, and access to, existing, and need for improved, flood defences, and where needed supporting improvements.</td>
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<td>51. Building Resilience to Climate Change – Overheating</td>
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<tr>
<td>This policy seeks to encourage design that prevents overheating of</td>
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### Mitigating Climate Change – Proposed Developments

A. All new developments in Hackney should actively seek to mitigate the impact of climate change through design which minimises exposure to the effects, and technologies which maximise sustainability.

B. All new residential development should meet a zero carbon emissions target emission rate in line with the energy hierarchy and Sustainable Design and Construction SPD.

C. Major non-residential developments must achieve the BREEM ‘Excellent’ rating (or an equivalent rating under any other system which may replace it) and where possible achieve the maximum number of water credits, and must be built to the following standards:

   i. 2013 – 2016: minimum of 40% reduction in carbon dioxide emissions

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<td>This policy seeks to reduce carbon dioxide emissions through sustainable design and construction and is not considered to have a disproportionate impacts on any of the equalities groups identified.</td>
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new developments this will be beneficial for those households affected by fuel poverty especially low income households. This policy is not considered to have a negative impacts on any of the equalities groups identified.
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</table>
| **ii.** 2016 – 2019: Building Regulations standards  
**iii.** 2019 – 2031: zero carbon |
| D. Where it is demonstrated that it is not possible to reduce CO2 emissions on-site by the specified levels, carbon off-setting payments will be required and secured via legal agreement. |
| o | o | o | o | o | o | This policy seeks to reduce carbon dioxide emissions through sustainable design and construction and is not considered to have a disproportionate impacts on any of the equalities groups identified. |

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**53. Mitigating Climate Change – Existing Developments**

Development including the re-use or extension of existing buildings should achieve the maximum feasible reductions in carbon emissions and support in achieving the strategic carbon reductions target in the London Plan, while protecting, heritage and character of the buildings. Development should consider synergies with new build elements on sites and developments should seek to achieve the zero-carbon target across the site.

<table>
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<th>53. Mitigating Climate Change – Existing Developments</th>
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<tbody>
<tr>
<td>Development including the re-use or extension of existing buildings should achieve the maximum feasible reductions in carbon emissions and support in achieving the strategic carbon reductions target in the London Plan, while protecting, heritage and character of the buildings. Development should consider synergies with new build elements on sites and developments should seek to achieve the zero-carbon target across the site.</td>
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**54. Mitigating Climate Change – Decentralised Energy Networks (DEN)**

All developments should maximise opportunities to incorporate decentralised energy to support reductions in energy use and emissions.

New major development should connect to an existing network; unless this is clearly demonstrated that it is not technically feasible or economically viable.

<table>
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<tr>
<th>54. Mitigating Climate Change – Decentralised Energy Networks (DEN)</th>
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<tbody>
<tr>
<td>All developments should maximise opportunities to incorporate decentralised energy to support reductions in energy use and emissions. New major development should connect to an existing network; unless this is clearly demonstrated that it is not technically feasible or economically viable.</td>
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<td>Are Equality groups affected because of proposed Policy:</td>
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<tr>
<td>Only when it can be clearly demonstrated that all options to link into existing schemes have been explored should development provide on-site DEN. Developments should be designed to connect to other developments at a later date.</td>
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<tr>
<td><strong>55. Waste</strong></td>
</tr>
<tr>
<td>A. Developments should seek to minimise waste during both construction and operation of the development, and should provide clear consideration in plans for the facilities needed for the storage and collection of waste and recycling.</td>
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<tr>
<td>B. The council will support the objectives of the North London Waste Plan in assessing the need for and provision of new waste sites if needed.</td>
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<td>C. Existing waste sites will be safeguarded unless compensatory provision is made which maximises waste capacity.</td>
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<td><strong>56. Improving the Environment - Pollution</strong></td>
</tr>
<tr>
<td><strong>Air Pollution</strong></td>
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<tr>
<td>A. All new development must not exceed air quality neutral standards or contribute to a worsening of air quality at the construction or operation stage, over the lifetime of the development. They should consider the existing air</td>
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<td>quality and not locate sensitive uses in areas that are exposed. New</td>
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<td>development, especially those catering for vulnerable people and</td>
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<td>uses such as elderly and children(^4) should be sited and designed</td>
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<td>to minimise exposure to air pollution.</td>
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<tr>
<td><strong>Water Pollution</strong></td>
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<tr>
<td>B. New developments should not pose an unacceptable risk to water</td>
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<td>quality and developments which, in the opinion of Hackney and the</td>
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<tr>
<td>Environment Agency will be required to provide appropriate mitigation</td>
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<td>to alleviate the risk.</td>
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<tr>
<td><strong>Contaminated Land</strong></td>
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<tr>
<td>C. New development should address risks to sensitive receptors (both</td>
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<td>on and off site) from land contamination through proportionate action(s)</td>
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<td>before and during construction and during operation where appropriate,</td>
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<td>planning conditions, over the lifetime of the development.</td>
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<tr>
<td>D. Development which proposes potentially contaminating or polluting</td>
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<td>activities must incorporate mitigation for harmful effects and where</td>
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<td>necessary provide monitoring of any impact.</td>
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<tr>
<td><strong>Noise and Vibration</strong></td>
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affected by high air pollution levels. The reduction of air pollutants such as particulate matter would have a positive impact on these groups.

Other aspects of the policy are not considered to have a disproportionate impacts on any of the equalities groups identified.
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<tbody>
<tr>
<td>E. Development will only be permitted where noise created as part of the development is mitigated to prevent adverse impacts on health and quality of life. Development should be located in areas where occupiers will not be exposed significant adverse noise levels which cannot be effectively mitigated.</td>
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<tr>
<td>F. All residential development proposals shall minimise the potential adverse noise impact on and between dwellings through housing layout, design and materials. New development will only be permitted where the locations of lift and circulation spaces is designed to limited the transmission of sound to noise sensitive areas. They should be adequately separated from major noise sources or designed to mitigate the impact.</td>
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