Hackney

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Mayor Sadiq Khan
& Deputy Mayor Jules Pipe
City Hall
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) , March 2018

Dear Sadiq & Jules,

Hackney's response to the Draft London Plan

Thank you for the opportunity to comment on your Draft London Plan which is being prepared concurrently with Hackney's Local Plan 2033 (HLP33). The good growth principles and the new spatial growth strategy you are promoting aligns well with Hackney's own local aspirations and approach to Regeneration.

Hackney fully supports the 'good growth' principles as you set them out:

- building strong and inclusive communities
- making best use of land
- creating a healthy city
- delivering the homes Londoners need
- growing a good economy
- increasing efficiency and resilience.

Delivering genuinely affordable homes whilst providing development for a growing economy and vitally important community services are key objectives underpinning the HLP33 in Hackney.

You are proposing a number of key policy changes in the draft London Plan that Hackney strongly support:

- the approach to securing affordable housing on small developments
- the employment policies – including the protection of industrial land and uses and the provision of affordable workspace
- the approach to providing community infrastructure and the co-location of facilities
- the strong position on improving air quality
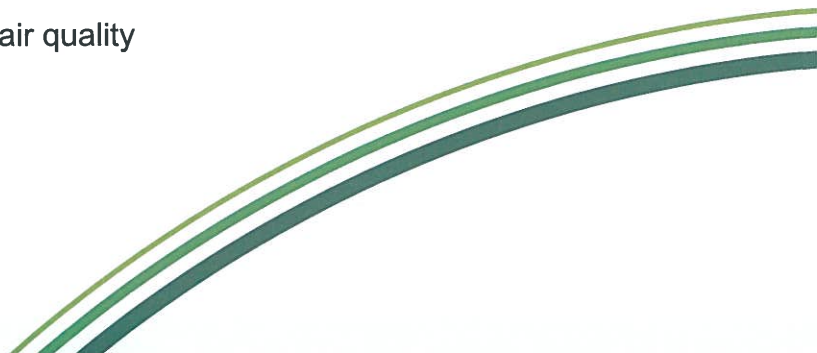
There are other proposed policy areas in the draft London Plan however, which, based on local evidence, require further thought and amendment – these include the approach to tall buildings, the affordable housing threshold, the proposed fire safety policy, the Crossrail 2 eastern phase and town centre designations in Hackney.

I have provided Hackney's detailed comments on individual policies as an appendix to this letter but they are summarised below:

Growth Strategy

The draft London Plan spatial growth strategy focuses around growth corridors linked to transport infrastructure. Two of these growth areas cover parts of Hackney: the *Crossrail 2 North Corridor* which includes the *Lee Valley Opportunity Area* to the north of the borough and the *Central London – City Fringe and Tech City* area in the south.

The Council looks forward to continuing to working with the GLA, TfL and other north London boroughs to develop a new *Opportunity Area Planning Framework for the Lea Valley* to provide additional jobs and homes, transport improvements and local services in the *Cross Rail 2 North Corridor*.

Hackney supports the recognition in the draft London Plan to growth opportunities in Stamford Hill and around the Lea bridge roundabout in Clapton and the Council is already developing policies and guidance for these new town centres through the HLP33, Stamford Hill Area Action Plan and a new masterplan for Clapton.

It is noted with interest that the key diagram, which illustrates the growth areas shows a Crossrail2 station at Dalston and a potential eastern branch running to Hackney Central and towards east London, Essex and Thurrock via Stratford. However, there is no mention of this in any of the policies or supporting text. We noted your recent letter to Mayor Glanville about an Eastern Phase being very much a future phase 2 with no specific delivery time for this. We would therefore welcome further discussions with you about the impact this will have on growth and how the London Plan will assist in unlocking the local land assets held for the eastern phase, some of which are owned by the GLA family.

The Council supports the delivery of an ambitious and extensive town centre Regeneration opportunity in Dalston, led by a Crossrail 2 station, and would wish to see this community led regeneration initiative feature in the London Plan alongside a commitment to collaborate from the GLA family.

The London Plan would benefit from further clarification on how proceeds from any Mayoral Community Infrastructure Levy 2 would be used to support the delivery of the growth planned for in the London Plan. In the event that no funding deal is secured for Crossrail 2, Hackney would want to ensure that the equivalent investment is made into other forms of public transport for the borough including long overdue Overground station enhancements and increasing Overground service frequencies to local stations on all routes.

Economy

The Council strongly supports the key change in the London Plan to provide stronger protection to London's industrial capacity: Hackney, as part of the Central Services Circle, falls within the "retain" category for industry. The focus on protection of industrial uses alongside consolidation, intensification and co-location of industrial uses, aligns well with HLP33.

The draft London Plan introduces new policies on affordable workspace and low cost business space which also reflects Hackney's existing policy which has become quite established and is set to expand through HLP33. The new policies on affordable workspace are supported.

Design and Tall Buildings

The Council welcomes the changes proposed to policies on density and design with emphasis on local context and character and a design led approach to optimising housing density. The new design led approach to density and the removal of the density matrix will result in better designed buildings which make the best use of land and better aligns with the approach currently taken by Hackney in decision making for individual sites.

There are however, concerns about the new approach to planning for tall buildings which Hackney considers to be too rigid and could counter some of the benefits of having a design led approach through the removal of the density matrix. The approach could have unintended consequences resulting in poor quality design, adversely inflating land values and affecting the delivery of affordable housing and workspace.

It is noted that new policies on building resilience and fire safety for all building proposals are proposed. The policy on fire safety goes beyond what would normally be considered a matter covered by the Planning legislation, and relates to matters within the Building Regulations. The objectives of the fire safety policy are strongly supported but there are concerns about how it could be resourced and implemented. We are concerned that it would add further confusion regarding roles and responsibilities which is a strong critique already emerging from the Hackitt review. Whatever may be concluded about the implementation of a new approach to fire safety through the Planning system then what is clear is the need for additional resources to implement and police this important aspect of building safety.

Town centres

Hackney is disappointed that there are no changes currently proposed to the designation of the boroughs town centres. Discussions between GLA officers and the Council have been on-going regarding upgrading the designations for Hackney Central, from a District centre to Major, and Stamford Hill, from a Local Centre to District.

With regards to the City Fringe, you will be aware that Hackney is developing an Area Action Plan for the Tech City area in Shoreditch - Future Shoreditch.

Future Shoreditch aims to deliver Tech City growth whilst protecting and enhancing the unique character of Shoreditch, carefully curating the ongoing demand for space that can support businesses create new jobs, provide new homes, community facilities and enhance the public spaces. The Plan will help shape development in the UK's largest and fastest growing creative tech cluster, by calling for exceptional design quality alongside significant improvements to air quality, streets and public spaces.

As well as a focus on employment and business growth, Shoreditch as part of London's Central Activities Zone is identified as a specialist cluster for arts, culture, entertainment and retail. We note with interest that Shoreditch is identified as an area of 'international or national significance' for the night time economy – this new status for Shoreditch is both an opportunity and challenge to be addressed in a balanced way in the Area Action Plan.

Homes

The draft London Plan identifies a need for 66,000 new homes and a capacity for 65,000 new homes across London each year. Based on evidence on capacity and assumptions on housing from smaller sites, Hackney's contribution to this target from 2019/20 would be 1,330. Hackney agrees that this target, although challenging given the availability of land and demand for other land uses such as employment and community facilities, is an appropriate capacity based target for Hackney.

The new emphasis on the importance of delivering housing on small sites as a key step change to meet housing need is noted and acknowledge that by actively encouraging the subdivision and conversion of houses into flats this can help meet housing need. Hackney's own emerging policies support conversions of houses into flats as an important source of housing supply which can be achieved with a retention of family size homes – this is particularly important in meeting housing needs in various parts of the borough. A balanced and flexible approach is required – recognising the need for different sizes of homes.

Hackney supports the strategic affordable housing target of 50%. The HLP33 viability evidence demonstrates that it is viable to provide 50% affordable housing on the vast majority of sites across the borough. The Council have serious concerns about the imposition of a 35% threshold for a streamlined assessment of viability and would urge you to provide the flexibility in the London Plan for boroughs to implement a 50% threshold.

Hackney fully supports the proposal that boroughs seek affordable housing contributions from developments delivering less than 10 units – this reflects the proposals already made in HLP33 and Hackney's formal comments made last year in response to the Mayor's Housing Supplementary Planning Guidance.

These designations are set out and evidenced in HLP33. The Council's own evidence, enclosed for reference, proves that the proposed upgrades to these town centres meets the London Plan criteria on size and function.

Green Infrastructure

The Council supports the draft London Plan's target for 50% green cover across London by 2050. The urban greening approach aligns well with Hackney's objectives and emerging policies.

Community infrastructure

Hackney supports the draft London Plan's requirement for boroughs to identify requirements for social infrastructure and seek to meet this need through the allocation of suitable sites, supporting social infrastructure development proposals, working with service infrastructure providers and the co-location of social infrastructure with housing. This approach to providing community infrastructure fully aligns with HLP33.

The proposal to embed the established approach for 10sqm of play provision to be provided per child in residential developments is supported and reflected in HLP33 and its vision for a child friendly borough. The Council is keen to ensure that new spaces of the highest quality, provide access to all and where possible are linked to wider public realm improvements and the greening of urban corridors.

The new policy requiring large scale commercial developments that are open to the public to provide free publicly-accessible toilets is supported in principle subject to viability considerations, long term revenue support from the developer and the implementation of effective criteria around accessibility and security.

Transport

Hackney fully supports measures to increase the number of trips made by public transport, cycling and walking. The borough already has one of the highest levels of cycling in London and leads the way in delivering car free development.

However, to meet the Draft Plan's target for 80% of trips to be made by public transport, cycling or walking by 2041 across London would mean a very challenging target of over 90% in inner London boroughs such as Hackney - for this to be achieved it must be understood and acknowledged that significant additional investment in public transport will be required. Investment that is currently unavailable through either the LIP process or major schemes – Crossrail 2 Eastern phase being an example.

The Council supports the inclusion of healthy street indicators into policy and are keen to explore how these can be used at the local level to guide bespoke policies for different streets and different parts of Hackney.

Sustainable Infrastructure

Hackney supports the draft London Plan's strong policy approach on air quality and zero carbon which reflects Hackney's own HLP33. The Council asks the Mayor to support Hackney in its proposals in requiring similar high standards in all new developments.

I hope you find these comments helpful, relevant and pertinent to preparing the final version of the London Plan. The Council would of course welcome any further discussion on any of the matters raised and would be more than happy to share any of the local evidence base with GLA colleagues should that be helpful.

Councillor   y Nicholson
Cabinet Member for Planning, Business and Investment

Cc Mayor Philip Glanville – Mayor of Hackney

Ian Rae – Head of Planning, Hackney

Chapter	Policy	Hackney Response
1 Planning London's Future Good Growth Policies	General	Hackney welcomes and supports the six good growth policies, which provides a clear direction for the new London Plan.
1 Planning London's Future Good Growth Policies	GG2 Making the best use of land	Hackney support the principle of making the best use of land, and the reference to surplus public sector land, yet there is no mention of private sector land that is underused or surplus. Criterion C should be clear that the value of existing places includes the physical (built and natural environment) as well as non-physical (the make-up of the community and activities) Hackney supports measures to increase the number of trips made by public transport, cycling and walking. Hackney already has one of the highest levels of cycling in London and lead the way on delivering car free development. However, to meet the Draft London Plan's target for 80% of trips to be made by public transport, cycling or walking by 2041 across London would mean a very challenging target of over 90% in inner London boroughs such as Hackney - for this to be achieved significant further investment in public transport will be required.
1 Planning London's Future Good Growth Policies	GG3 Creating a healthy city	Hackney agree with principles set out in the policy which take a holistic approach to mental and physical wellbeing. Hackney supports the 'Healthy Streets' approach embedded in the draft Mayors London Plan (2017) and believes it provides a useful evidence-led framework for achieving the substantial shift towards sustainable transport use in London. In particular Hackney welcome the way that this approach unites the encouragement of walking, cycling with an emphasis on tackling poor air quality and traffic dominance and improving the place function of city streets. Hackney is keen to explore how the healthy street indicators can be used at the local level to guide bespoke policies for different streets and parts of Hackney.

1 Planning London's Future Good Growth Policies	GG4 Delivering the homes Londoners need	Hackney support the objectives of this policy. With regards to criterion E - incentivising build out milestones- further guidance on this would be welcomed.
1 Planning London's Future Good Growth Policies	GG5 Growing a good economy	Hackney welcome the reference to affordable housing. The policy could be strengthened by reference to affordable workspace, start up space and move space that are critical to foster growth. There could also be recognition of other sectors such as cultural, arts, retail and hospitality which all make a significant contribution rather than have a general reference to town centre network at criterion G.
1 Planning London's Future (Good Growth Policies)	GG6 Increasing efficiency and resilience	Hackney supports the recognition that strategic and local infrastructure is needed for good growth.
2 Spatial Development Patterns	SD1 Growth Corridors and Opportunity Areas	Hackney supports the emphasis on unlocking 'good growth' in homes and jobs in areas of good transport accessibility. The support for Crossrail 2 which is expected to provide a direct link between Dalston and Central London is welcomed. The key diagram which illustrates the growth areas shows a Crossrail 2 station at Dalston and a potential eastern branch running to Hackney Central and beyond. However, there is no mention of this in the policies or supporting text. The London Plan should provide some certainty and clarity on the potential eastern phase. Hackney would welcome further discussion with the GLA on the impact of the eastern branch on growth and unlocking land assets.
2 Spatial Development Patterns	Crossrail 2 North	Hackney supports the Lee Valley OA which will be applicable to some of the areas in Hackney. Welcome the explicitly reference to Stamford Hill, Clapton and the Lea Bridge roundabout.

| | | For boroughs in the southern part of the Lee Valley, there should be reference to the need for improve frequency, routes and capacity of buses and other transport measures to accommodate the growth before Crossrail 2 is fully operational.

The Lee Valley OA in the new London Plan indicates capacity for 21,000 additional homes and capacity for 13,000 additional jobs, while the 2016 London Plan for Upper Lee Valley indicates an area of 3,900 hectares, a minimum of 20,100 homes and indicative employment capacity of 15,000. Hackney would be interested in understanding how the indicative growth figures were derived. In particular, Hackney would like to see the job potential in this Opportunity Area maximised. |
|---|---|---|
| 2 Spatial Development Patterns | Policy SD9 Town centres: Local partnerships and implementation | Part C of this policy supports the introduction of A4Ds to remove PD rights for office, light industrial and retail to residential, which is welcomed. |
| 2 Spatial Development Patterns | SD1 Opportunities areas | Hackney welcomes the linkage of opportunity areas with the growth corridors and transport infrastructure which will be crucial to the delivery of growth in these areas. |
| 2 Spatial Development Patterns | SD4 – CAZ | Hackney would be interested in further discussion and understanding about how the growth figures for homes and jobs for the City Fringe / Tech City OA were derived. The new London Plan indicates 15,000 and 50,500 jobs, while the 2016 London Plan for the same OA indicates an area of 901 hectares, a minimum of 87,000 new homes and indicative employment capacity of 70,000. The number of homes have significantly increased while the number of potential jobs has gone down in an area that is part of the key driver for both London's economy and the UK economy as a whole.

Hackney welcomes that Shoreditch is identified as Specialist Cluster for arts, culture and entertainment, and a cultural and creative specialist cluster of activity. |

		Hackney support the identification of Shoreditch as a CAZ retail cluster. This aligns with the local retail evidence produced for the new Local Plan (LP33). The emerging Area Action Plan for Shoreditch will define the form, location and extent of the CAZ retail areas.
2 Spatial Development Patterns	SD5 Offices in CAZ	Hackney welcome the explicit recognition that new residential development should not compromise the strategic functions of the CAZ, and that greater weight should be given to offices and other CAZ strategic function including in the "core commercial areas" identified in the City Fringe/ Tech City OAPF. The use of Article 4 and land use swaps is supported.
2 Spatial Development Patterns	SD6 Town Centres	The overarching approach set out in this policy whereby London's town centres should be supported as resilient, inclusive and viable hubs for a range of town centre and commercial uses and housing-led intensification is supported by Hackney and is in line with the approach set out in LP33. Adaption and restructuring of town centres to respond to multi-channel shopping, changes in technology consumer behaviour, management and servicing.
2 Spatial Development Patterns	SD7 Town centre network	Hackney object to the proposed town centre network as it does not currently reflect the strong evidence that Hackney Central should be classified as a major centre and Stamford Hill should be classified as a district centre. Hackney's justification for these changes to the town centre hierarchy are set out below: ***Justification for change of Hackney Central from district to major centre*** <table><tr><td>**London Plan definition: Major centre**</td><td>**Hackney's evidence**</td></tr><tr><td>Typically found in inner and some parts of outer London with a</td><td>An in-centre survey undertaken as part of <u>Hackney's Retail and Town Centres Study (2017)</u> found that 32% of visitors arrive in Hackney Central by bus and 13% arrive by rail,</td></tr></table>

| | | borough-wide catchment. | indicating that Hackney Central draws visitors from a wide catchment as these visitors will have travelled from other areas of the borough and beyond to visit the centre. 41% of visitors walk to the centre.

In addition, a household telephone survey undertaken as part of the Retail and Town Centres Study establishes that Hackney Central is the second most popular shopping and leisure destination for residents in the survey area (an area which is slightly wider than the borough boundary) following Dalston, with 26.4% of respondents stating they visit the centre. | |
| | | They generally contain over 50,000 sqm of retail, leisure and service floorspace with a relatively high proportion of comparison goods relative to convenience goods. | A survey undertaken by Experian in December 2017 (based on a slightly revised town centre boundary, proposed as part of Hackney's Draft Local Plan 2033 (LP33) establishes that the total quantum of retail, leisure and service floorspace within Hackney Central is 74,790sqm.

Hackney Central is performing a strong role as comparison good shopping destination, with a number of large format anchor stores including Primark, Marks and Spencer, TK Maxx and Tesco. The centre has a comparison goods turnover of £72m which is the highest in the borough. Commercial retail rents in Hackney Central have increased steadily over the last 5 years from £18.00 per sq.ft in 2012 to £36.00 | |

		per sq.ft in 2016, placing it above rental values in the other town centres in the borough.	
	They may also have significant employment, leisure, service and civic functions.	In addition to its strong retail performance, Hackney Central offers a significant reservoir of employment land and affordable workspace and a strong community of co-working, artists and SMEs has developed in this area. As the Tech City employment cluster grows, new businesses and those displaced from elsewhere in the City Fringe are moving into Hackney Central and it is expected that this process will continue over time. Hackney Central also has an important civic function, being home to the Town Hall and Council offices (in itself providing c4,000 jobs). Furthermore, Hackney Central offers a range of commercial leisure venues such as the Hackney Empire theatre which hosts dance, music and comedy shows, the Hackney Picturehouse cinema and St. John at Hackney Church which doubles up as a popular live music venue.	

Justification for change of Stamford Hill from a Local Centre to a District Centre

London Plan definition: District centre	Hackney's evidence
Distributed more widely than Metropolitan and Major centres, providing	Stamford Hill is currently the largest local centre in the borough, offering around 120 commercial units. It achieves a comparison goods turnover of £30.8m, which compares strongly with other district centres in London. The centre is served

		convenience goods and services for more local communities and accessible by public transport, walking and cycling.	by two good-sized supermarkets (Sainsbury's and Asda) which draw trade from a wider catchment than would be expected for a local shopping centre. The centre also contains a sizeable quantum of comparison and services floorspace, and benefits from a good level of accessibility.	
		Typically, they contain 5,000–50,000 sqm of retail, leisure and service floorspace.	A survey undertaken by Experian in December 2017 establishes that the total quantum of retail, leisure and service floorspace within Stamford Hill is 19,040sqm.	
		Some District centres have developed specialist shopping functions.	The large Charedi community in the area generates a powerful clustering effect on local shops and businesses that enriches the neighbourhood and draws in visitors from outside, creating a unique competitive advantage within the local economy.	
2 Spatial Development Patterns	SD8 town centre development principle and development plan document	Hackney supports the continuation of the sequential town centres first approach. In line with the criteria of Part B of this policy, Hackney has defined the extent of town centre boundaries and primary and secondary shopping frontages, and made changes to these where necessary through the LP33. It is noted that the London Plan suggests that Impact statements should be undertaken in situations where over of 2500sqm of retail, leisure and office floorspace is proposed outside of a town centre. In line with the NPPF, the policy should enable boroughs to set their own local thresholds.		

3 Design	D1 London's form and characteristics	This is a welcome move towards a design approach based on an analysis of context and local character
3 Design	D2 Delivering good design	Hackney supports the greater emphasis on design review and scrutiny as a mechanism for delivering good design.
3 Design	D4 Housing quality and standards	Hackney welcomes the incorporation of housing standards into the London Plan but would seek more local flexibility in relation to the negotiation of large units for areas housing communities with a significant proportion of larger families such as Stamford Hill. ,
3 Design	D6 Optimising housing density	Hackney welcomes the new design led approach to determining site capacity and the move away from the current density matrix. Hackney supports the aspiration to optimise housing density on all sites based on an assessment of existing and planned infrastructure.
3 Design	D7 Public realm	Hackney welcomes the more rigorous analysis of the impact of development on the public realm and the detailed proposals for creating world class public realm in the all London boroughs
3 Design	D8 Tall buildings	Whilst Hackney welcomes the policy requirement for more detailed assessment of the visual, functional and environmental impacts of taller buildings, the proposed tall buildings policy requiring boroughs to identify locations for tall buildings and specify appropriate heights is not supported. Hackney consider that this is an issue which should be determined on a case by case basis by reference to the borough's own examination of local context and the assessment of impact of each individual proposal within that context in line with the proposed policy on density (D8). Hackney considers the proposed policy to be too rigid and there are concerns that this could counter some of the benefits of having a design led approach through the removal of the density matrix. The approach could have unintended consequences resulting in poor quality design, adversely inflating land values and affecting the delivery of affordable housing and workspace.

		On a more detailed matter, the policy could mention the risk of suicide attempts from tall buildings, and the need for measures to reduce the likelihood of suicide attempts. Public Health England provides guidance on suicide prevention in public places which could be used to inform the policy.
3 Design	D10 Safety, security and resilience to emergency	Hackney supports this policy.
3 Design	D11 Fire Safety	Hackney welcomes the move towards encouraging developers to think about fire safety at an early design stage and the objectives of the fire safety policy are strongly supported. However, the policy goes beyond what would normally be considered a matter covered by the Planning legislation. The fire safety matters described in D11 A 1-5 are currently dealt with under the Building Regulations. Hackney is concerned that the policy would add further confusion regarding roles and responsibilities which is a strong critique already emerging from the Hackitt review. Hackney would also emphasise the critical issue of Local Authority Building Control and planning enforcement resources. Boroughs will need extra resources to effectively provide advice on fire safety matters and analyse any reports. In addition there may be a requirement to duplicate fire safety checking at both the Planning Application and Building Regulation stage. Effective consultation with the Fire Brigade at an early stage is a crucial aspect of the process and there are resource issues associate with this and it is not clear how their observations will feed into the process. It is also unclear as to what would happen if the approved development and Fire Strategy / Statement is amended at Building Regulations stage.

		Whatever may be concluded about the implementation of a new approach to fire safety through the Planning system then what is clear is the need for additional resources to implement and police this important aspect of building safety. Further guidance about what constitutes a suitably qualified third party assessor would be needed in order to implement this policy.
3 Design	D3 Inclusive design	Hackney supports this policy in principle, although there should be clarification about heights as it may exceed the requirements of the Building Regulations. Planning teams may find difficulties when developers use Fire Engineers and / or Approved Inspectors to say that evacuation lifts are unnecessary in some buildings as there will be a fire management plan to deal with such an evacuation.
4 Housing	H1 Increasing housing supply	Based on evidence on capacity and assumptions on housing from smaller sites, Hackney's contribution to this target from 2019/20 would be 1,330. We agree that this target, although challenging given the availability of land and demand for other land uses such as employment and community facilities, is an appropriate capacity based target for Hackney.
4 Housing	H10 Redevelopment of existing housing and estate regeneration	Hackney supports the programme approach to assessing like-for-like replacement of affordable homes on a floorspace basis for estate regeneration proposals. Hackney also supports the recognition that where a borough is redeveloping an estate as part of a *wider programme* then it may be possible to re-provide a different mix of affordable housing on the estate (taking account of the wishes of people who want to return to the estate) if the overall level of provision is maintained across the programme, It would also be for the London Plan to include a policy to clarify the situation where supported accommodation is to be replaced by conventional affordable housing.

4 Housing	H11 Ensuring the best use of stock	Hackney support the intent of the policy although further guidance on how this can be achieved through the planning system would be useful.
4 Housing	H12 Housing size mix	Hackney understands the need for flexibility in central and highly accessible areas however is not supportive of boroughs not being able to set prescriptive requirements based on need identified in local assessments.
4 Housing	H13 Build to rent	Boroughs should be able to set affordable housing tenure requirements for Build to Rent schemes locally. There are significant affordability issues in Hackney and the policy should enable Boroughs to decide what proportion of affordable housing should be a particular tenure such as London Living Rent, which is considered to be more affordable locally. Hackney Council wants to see a well-managed private rented sector that provides truly affordable, decent and safe housing for Hackney residents. Hackney share the Mayor's 'strong preference' for London Living Rent as the ideal DMR rental product (in paragraph 4.13.4), as a consistent, city-wide and publicly-mandated rent level. We would however want the Build to Rent affordable tenures to more prescriptively require minimum levels of London Living Rent and London Affordable Rent – the current wording provides moral rather than legal weight. This fast track viability route for Build to Rent schemes (in paragraph 4.13.6) allows for 10.5% of residential units to be provided at London Living Rent. A higher minimum level of London Living Rent should be specified as a threshold for fast track planning. We propose too that the London Plan Build to Rent policy discourages the bunching of affordable units at upper level income bands by explicitly capping at £60,000 p.a. household income the level at which discounted market rent units are affordable at not more than 40% gross income towards housing costs.

		Further guidance would be welcome in the Affordable Housing and Viability SPG on the distinct methods of calculating Build to Rent values rather than in RICS guidance notes, in order to help build confidence around the consistency in viability testing across different Build to Rent applications and for appropriate methodological adjustments in relation to conventional for sale financial appraisals. The wording on covenants, clawbacks and review mechanisms should provide sufficient flexibility for London boroughs to set longer timeframes (up to or beyond 20 years), especially for high value areas like Hackney where the temptation of developers to convert rent to sale units at the soonest opportunity will be highest.
4 Housing	H14 Supported and specialised accommodation	The London Plan would benefit from a definition of 'young people' among the categories provided for in the supported and specialised accommodation section. Is this younger people in care, young people in priority need as defined in homelessness legislation?
4 Housing	H15 Specialist older persons housing	Support the inclusion of the annual borough benchmarks for specialist older persons housing within the overall housing targets identified in policy H1.
4 Housing	H16 Gypsy and Traveller accommodation	Support the re-introduction of a bespoke Gypsy and Traveller policy in the new London Plan. Need in itself does not translate into pitch targets, and targets for boroughs does not appear to have been set in either the new London Plan or Topic Paper 17. This is in direct contrast to tables 4.1 and 4.4 of the new London Plan which sets targets for general housing and specialist older person housing by borough. H16 represents an opportunity for the London Plan to take a strategic lead on a London-wide needs assessment, setting individual or sub regional targets for boroughs and clearer routes / assistance to delivery on an issue which many boroughs have struggled to effectively address. As section 4 of Topic Paper 17 highlights since 2008 10 new pitches - spread between three London boroughs - have been delivered, while the need between

		2007 and 2017 is a minimum of 231 and a maximum of 701 residential pitches (Table 2 summary of need for residential pitches 2007-2017).
4 Housing	H17 Purpose-built student accommodation	Hackney supports the need for provision of student accommodation to be linked to higher education institutions is welcomed and is something Hackney are requiring in emerging local policy as well. Support for temporary use of the accommodation during vacation periods is also welcomed.
4 Housing	H18 Large-scale purpose-built shared living	The London Plan should introduce minimum space standards for this type of accommodation from the outset. Many local authorities in London are receiving applications for 'co-living' or large scale shared housing and without minimum standards regarding bedroom size and the level of provision of shared amenity space there is potential for many inadequate schemes being constructed. Hackney's new Local Plan will require large-scale shared housing to meet minimum bedroom sizes which are currently used to guide HMO developments. Hackney supports requirement for affordable housing. Hackney supports requirements for better renting such as the choice of up to three years tenancy length to offer security of tenure. Hackney's Better Renting campaign would be a useful resource: https://hackney.gov.uk/better-renting Without improved tenancy lengths, space standards and affordability terms we would propose removing this section from the Plan. The policy should also require a percentage of genuinely affordable accommodation. The Plan should promote well-managed, high quality shared living for singles / couples on low incomes, especially for younger people unable to afford market rents, including under-

		35s affected by the requirements of the Local Housing Allowance Shared Accommodation Rate.
4 Housing	H2 Small sites	The principle of the policy is supported and the potential for small sites to contribute significantly towards meeting housing needs is acknowledged. Design codes could speed up housing delivery and give small housebuilders more certainty regarding residential development proposals. Design codes however may not be able to capture all issues which need to be considered when determining applications and given current resources, they would most likely have to be broad level assessments of local character, still requiring further assessments at the application stage. Local character also changes as new development comes forward and so design codes should be reviewed regularly. Given the high need for family housing in Hackney, it is considered that the presumption in favour of small housing development through residential conversions should recognise the need to retain a family sized unit when converting houses into flats, as Hackney's adopted local plan currently requires. Part F of the policy should also include locally designated employment areas in being exempt from the presumption in favour of small housing development. It is unclear why the presumption in favour of small housing developments should not be applied to estate regeneration schemes. Hackney is currently progressing the Housing Supply Programme which seeks to deliver housing largely through infill development on small sites on Council owned land, with most of the sites within the curtilage of existing estates.
4 Housing	H3 Monitoring housing targets	Hackney welcomes the acknowledgement that local authorities should not be penalised where housing delivery has been constrained due to factors that are outside their control. Non-self-contained accommodation for students and shared living relieve a lot of pressure on the wider housing market and ease some of the burden on general conventional

		housing. The rationale behind three rooms being counted as one unit for monitoring purposes, although explained briefly in the SHLAA, is not clearly understood, and the calculations which led to the 3:1 ratio are not available to interrogate and should be as part of the evidence. The 1:1 ratio for non-self-contained accommodation for older people being counted as a single home is supported.
4 Housing	H4 Meanwhile use	Hackney supports this in principle.
4 Housing	H5 Delivering affordable housing	Hackney support the requirement for public sector land delivering 50 per cent affordable housing across its portfolio. Hackney would appreciate a clearer definition here of 'public land': Would this policy apply on public sector land held by urban development corporations and JVs? (e.g. LLDC Eastwick/Sweetwater sites) Would this policy apply on land which is held privately on a long lease where the local authority retains the freehold? (e.g. Berkeley/LB Hackney at Woodberry Down) Would a 'public land' application be treated as 'fresh' for the purposes of affordable housing provision where they are revising or varying an existing outline permission, or in reserved matters applications? Hackney would also welcome any detail of how this programme or portfolio requirement would be monitored geographically and over time. While Hackney's own estate regeneration and housing supply programme currently models for over 70% affordable housing across the portfolio, we would welcome any clarity on how this aspiration will be met on development across other public sector estates (e.g. TfL) and whether the London Plan will provide for additional affordable housing on sites in boroughs with acute affordability pressures.

4 Housing	H5/H6 Delivering affordable housing/Threshold approach to applications	Hackney supports the strategic target for 50% of all new homes to be affordable, and is supportive of some of the specific measures in place to achieve this. Hackney has achieved on average 35% affordable housing delivery across all housing in recent years and local viability evidence suggests 50% is achievable going forward. Boroughs should therefore be able to set affordable housing threshold and requirements locally, going above the 35% set by the London Plan where evidence suggests this is achievable. Hackney would like support for setting a local threshold based on local evidence. Hackney also supports a review of the threshold in 2021. Hackney is supportive of the review mechanisms in place to help maximise affordable housing delivered. Hackney also supports the threshold approach extending beyond conventional C3 housing to apply to student housing, specialist/supported housing and shared housing.
4 Housing	H7 Affordable housing tenure	Hackney is supportive of the fact that 40% of the affordable housing tenure split can be determined locally in addition to the 30% minimum for social/affordable rent. Hackney has an overwhelming need for social/affordable rented housing and being able to set tenure splits locally is essential. Hackney is also supportive of the new affordable housing products such as London Living Rent as they are more affordable in London. Hackney would like to know however how often the London Living Rent and London Affordable Rent rent levels will be updated and the data sources used so that Hackney can decide whether to update locally more frequently if necessary.

4 Housing	H8 Monitoring of affordable housing	Support the policy however Hackney seek clarification on whether part D prescriptively describes as a monitoring requirement that s106 agreements and review mechanism outcomes be available to view in the public domain.
5 Social Infrastructure	Education (General point)	Local authorities are required by law to assess the need for school places, and deliver any additional capacity required. This process is supported, in London, by the GLA's own demographic projections that provide essential detail on the situation in neighbouring boroughs, as well as an overall macro analysis. Strategic plans are then produced by local authorities to deliver any additional places needed. It should be ensured that proposals for new schools are assessed in accordance with need and the impact Free Schools can have on this should be acknowledged and addressed as Free School programme effectively works outside the strategic approach mentioned above.
5 Social Infrastructure	S1 Developing London's social infrastructure	Hackney supports this policy.
5 Social Infrastructure	S16 Digital Connectivity Infrastructure	Hackney supports this policy.
5 Social Infrastructure	S2 Health and social care facilities	Hackney supports this policy.

5 Social Infrastructure	S3 Education and childcare facilities	Support the policy however Hackney would like to see a requirement for all new schools to sign up to TfL's STARS programme as an effective tool for ensuring sustainable travel to school is prioritised and for embedding road safety into the school.
5 Social Infrastructure	S4 Play and informal recreation	Hackney supports this policy.
5 Social Infrastructure	S5 Sports and recreation facilities	Hackney supports this policy.
5 Social Infrastructure	S6 Public toilets	Hackney supports this policy.
5 Social Infrastructure	S7 Burial space	Hackney supports this policy.
6 Economy	E1 Offices	Policy provision D currently fails to recognise existing office clusters within the City Fringe Opportunity Area Framework that are outside of the Central Activities Zone and town centres office locations (such as Hackney Central and Dalston) the corridors along Kingsland Road and Mare Street (London Fields). In accordance with the OAPF, these areas should be the focus for new office and workspace. As such is recommended that Policy provision D is amended as per the following: D The diverse office markets in outer and inner London (outside the CAZ and NIOD) should be consolidated and - where viable - extended, focusing new development in town centres and other existing office clusters supported by improvements to walking, cycling and public transport connectivity and capacity including: 1) the strategic outer London office location at Croydon town centre

		2) other town centre office locations (see Town Centre Network office guidelines in Figure A1.4) 3) <u>parts of the city fringe opportunity area outside the CAZ and other town centre office locations</u> 4) existing urban business parks (such as Chiswick Park, Stockley Park and Bedfont Lakes), taking steps towards greater transport sustainability of these locations 5) locally-oriented, town centre office provision to meet local needs. Hackney supports Support provisions E&F which encourage Boroughs to introduce Article 4 Directions to ensure office areas are not undermined.
6 Economy	E2 Low-cost business space	Hackney welcomes and supports the inclusion of a policy on Low-Cost business space however it is recommended that provision B (2) and (3) is amended to strengthen this policy by including reference to "affordability" to ensure that the B1 space being re-provided is of a rent level that is "low cost" to support the needs of micro, small and medium sized businesses. New B1 floorspace being provided in new development is likely to be provided at higher specification and thus command higher rents which is challenging for micro, small and some medium size businesses. See suggested policy revisions below: B Development proposals that involve the loss of existing <u>low cost</u> B1 space (including creative and artist studio space) in areas where there is an identified shortage of lower-cost space should: … 2) ensure that an equivalent amount of B1 space is re-provided in the proposal (which is appropriate in terms of type, specification, use, <u>affordability</u> and size), incorporating existing businesses where possible, or
6 Economy	E3 Affordable Workspace	Welcome and support the inclusion of a policy on Affordable Workspace. Boroughs are considered best placed to set out more detailed locally specific policies based on local evidence in development plan documents.

| 6 Economy | E4 Land for industry, logistics and services to support London's economic function | Hackney is identified in the "retain" category. This corresponds to local evidence which indicates a need to effectively manage industrial floorspace capacity in the borough.

The policy needs to recognise local policy approaches set out in Borough development plan documents. Most of the borough's industrial capacity falls within locally designated Priority Employment Areas or non-designated sites. It is recommended that the policy is amended as per the below:

London's land and premises for industry, logistics and services falls into three categories:
1) Strategic Industrial Locations (SIL) – see Policy E5 Strategic Industrial Locations (SIL)
2) Locally Significant Industrial Sites (LSIS) - see Policy E6 Locally Significant Industrial Sites
<u>3) Locally Designated Industrial Sites</u>
3) <u>4)</u> non-Designated Industrial Sites78 - see below.

It is also recommended that footnote 78 is amended to read as follows:

Sites containing industrial and related functions that are not formally designated as SIL, ~~or~~ LSIS or <u>a local industrial designation</u> in a Local Plan. |
| 6 Economy | E7 Intensification, co-location and substitution of land for industry, logistics and services to support | Hackney supports the policy approach indicated for SIL and LSIS which encourage the intensification and more efficient use of industrial land within these designations. However the policy provisions as worded regarding Non-designated Industrial Sites is not supported as it undermines Hackney's current and emerging policy approach to the protection and provision of employment and industrial foorspace. As such these provisions should not apply to locally designated employment/industrial areas. Most of the boroughs industrial capacity falls within locally designated Priority Employment Areas (PEAs) or non-designated sites. In accordance with adopted policy, where a site is redeveloped within designated PEAs any new development must be employment-led. |

	London's economic function	The Hackney Local Plan 2033 reclassifies PEAs into Priority Office Areas and Priority Industrial Areas in response to the findings of Hackney's Employment Land Study. The Plan adopts a more rigorous approach to industrial land management, protecting and intensifying industrial land and floorspace within designated Priority Industrial Areas (PIAs). Within PIAs: New development or redevelopment of sites within Priority Industrial Areas will only be permitted if they: i. maintain, re-provide the same quantum or intensify existing industrial uses (B1c, B2, B8); and ii. Maintain or re-provide equivalent employment floorspace within existing B1a Use Class or significantly increase job densities within B Use Classes. Based on the current wording of E7, the boroughs existing Priority Employment Areas and proposed Priority Industrial Areas would fall within the non-Designated industrial sites category and as such provision E7(D) of the policy would apply. Provisions D1 and D4 in particular would impact on the ability of the sites to deliver employment-led schemes and could enable the loss of industrial capacity in these local designations. We welcome further discussion with GLA officers to develop a policy approach that is appropriate for locally designated employment/industrial areas to ensure the industrial capacity within these designated areas is carefully managed.
6 Economy	E9 Retail, markets and hot food takeaways	Hackney supports this policy.
6 Economy	E10 Visitor infrastructure	Hackney is close to meeting its current and future demand for visitor accommodation based on a 2013 GLA study and therefore careful consideration is needed to ensure an appropriate mix and balance of uses continue to come forward within the CAZ based on identified needs.

		It is recommended that Part D of the policy should acknowledge that future provision of visitor accommodation should come forward where there is an identified need. See suggested text below: Within the CAZ, strategically important serviced accommodation should be promoted in Opportunity Areas _where there is an identified need_, with smaller-scale provision in the commercial core parts of the CAZ (see Policy SD5 Offices, other strategic functions and residential development in the CAZ), subject to the impact on strategic office space. Intensification of the provision of serviced accommodation in areas of existing concentration should be resisted, except where this will not compromise local amenity or the balance of local land uses.
7 Heritage and Culture	HC1 Heritage conservation and growth	Para A: This is a welcome strengthening of existing policy, requiring not just identification but evidence and understanding. Para B: This is a welcome strengthening of existing policy, requiring a clear vision, utilising significance in the design process, integrating conservation and delivering positive heritage benefits. Para C: Previous Paras C and D merged into one Para C. This is a welcome strengthening of existing policy, with new requirements to consider cumulative impacts on setting and to identify enhancement opportunities by integrating heritage considerations early on in the design process. Para D: This is stronger with new requirements for identification earlier and designing around archaeology, landscapes mentioned, greater clarity on protection of not yet scheduled remains. This is a welcome strengthening of existing policy, although the requirement for public display "where appropriate" seems to have been lost in the changes.

		Para E: Heritage at Risk. "Where heritage assets have been identified as being At Risk, boroughs should identify specific opportunities for them to contribute to regeneration and place-making, and they should set out strategies for their repair and re-use." This is a new policy and is welcomed. Funding for Heritage at Risk Officers will be required to make this work well. It may be unrealistic for boroughs to set out strategies for the repair and re-use of buildings which they do not own or control.
7 Heritage and Culture	HC3 Strategic and Local Views	Paras F and G introduce the idea of Local Views in boroughs. This is a new policy and is welcomed.
7 Heritage and Culture	HC4 London View Management Framework	Paras A to F are broadly similar except: Para C "Where a silhouette of a World Heritage Site is identified by the Mayor as prominent in a designated view, and well-preserved within its setting with clear sky behind, it should not be altered by new development appearing in its background." This is a welcome strengthening of existing policy. Para F4, concerning development in the foreground, is a welcome new policy.
7 Heritage and Culture	HC5 Supporting London's culture and creative industries	This is new policy and is broadly welcomed. This policy encourages Boroughs to identify Creative Enterprise Zones in areas where there are clusters of creative industries. There are is a strong clusters of creative industries in Hackney including in Shoreditch, and Hackney Wick, Hackney Central and Dalston. Hackney would like to work with the GLA to consider future designations.
7 Heritage and Culture	HC6 Supporting the night-time economy	Hackney is supportive of this policy which encourages diversification of the night time economy and promotion of the night time economy in appropriate locations.

7 Heritage and Culture	HC7 Protecting public houses	Hackney supports this policy however would welcome a definition of public houses in the glossary or supporting text to distinguish a public house from other drinking establishments, such as a bar. Clarification would also be welcome regarding whether the intention is to protect the public house use or the building, and whether the policy would apply to former public houses.
8 Green Infrastructure and Natural Environment	Policy G1 Green infrastructure	Hackney supports the Mayor's ambition to achieve 50% green cover across London by 2050 by protecting existing green space and encouraging a more integrated approach to green infrastructure.
8 Green Infrastructure and Natural Environment	Policy G3 Metropolitan Open Land	Hackney supports the continued protection of MOL.
8 Green Infrastructure and Natural Environment	Policy G4 Local green and open space	Hackney supports this policy which encourages connectivity across the network of green and open spaces and emphasises the importance of provision of green space in areas of deficiency.
8 Green Infrastructure and Natural Environment	Policy G5 Urban greening	Hackney supports the introduction of the Urban Green Factor as a tool to assist in identifying the appropriate amount of urban greening required in new developments. A degree of flexibility is required to ensure that the tool can be adapted to local circumstances to meet local needs. Considerations might include: - how the Urban Green Factor works alongside Hackney's local policy requiring a specific quantum of communal amenity open space per person in major schemes; - how such green infrastructure is maintained; - a mechanism whereby some developments could contribute to green infrastructure in the wider public realm to ensure that greening is not contained only to the developments themselves but also benefit nearby streets, for example, if there is no space for SUDS on site, perhaps some could be funded on a nearby street.

8 Green Infrastructure and Natural Environment	Policy G6 Biodiversity and access to nature	Hackney supports this policy
8 Green Infrastructure and Natural Environment	Policy G7 Trees and woodlands	Hackney supports this policy.
8 Green Infrastructure and Natural Environment	Policy G8 Food growing	Hackney support this policy.
8 Green Infrastructure and Natural Environment	Policy G9 Geodiversity	Springfield Park in Hackney is designated as London's only Geological Nature Reserve (since 1997). This policy, which seeks to protect geodiversity and promote public access, is supported.
9 Sustainable Infrastructure	SI1 Improving air quality	On a number of occasions the policy and associated text specifies that it applies to 'major development'. Hackney would seek the Mayor's support in developing local policies to apply similar standards to smaller developments In particular for smaller developments in more polluted areas, it will often be beneficial for an air quality assessment to be completed in order to identify whether any sensitive use is appropriate for an area and/or whether mitigation can feasibly be completed.
		The policy does not require planning authorities or developers to explicitly take in to consideration the possible strategic impacts of multiple major and the many minor developments taking place in an area and particularly during the development phase. Ideally the plan would take in to consideration strategic impacts and identify a method or propose guidance to assess strategic impacts from multiple developments.
		In our response to the Mayor's Environment Strategy we requested "*up to date mapping in order to identify areas within London that require further intervention through the planning system as a result of poor air quality*". While the nitrogen dioxide action areas are referred

		to within the policy, these will not include all parts of the borough that fail or have the potential to fail national air quality objectives. Such mapping would promote greater consistency across London. The mapping could also include wider areas to work towards meeting the WHO targets for particulate matter and nitrogen dioxide.
		Technical guidance on measures that could protect the end users of development from poor air quality would also be useful.
		It is important that it is made clear that irrespective of mitigation and offsetting that development shouldn't be allowed where it is not possible to be protective of human health.
		The allocation of Air Quality Focus Areas is welcomed. Part A 2) of the policy states that "particular care should be taken with developments that are in AQFAs…" It would be useful if it was defined what "particular care" means as it is unlikely applications will be treated differently than in other areas without this.
9 Sustainable Infrastructure	SI15 Water transport	This policy encourages the use of water freight. This is a proposal which we support in theory but this needs to be balanced against other demands on the canals such as moorings and recreation. It would be interesting to understand the potential costs associated with water freight as use of this may impact on development viability.
9 Sustainable Infrastructure	SI16 Waterways – use and enjoyment S17 Protecting London's waterways	Section 9.16.2 makes reference to the London Mooring Strategy. However, a section on live-aboard boats (making reference to both residential moorings and provision for boaters with no home mooring (continuous cruisers)) should also be included within the Housing chapter of the Plan in order to recognise that boats are a form of housing. Live-aboard boats should be recognised in the Housing chapter in the same way that gypsy and traveller accommodation is, with a set of policies specific to this group. Policies could include reference to service infrastructure, specifically including new mooring hoops, water points and waste disposal facilities to support existing and new waterways dwellings, as well as policies that recognise the impact of development on elements such as rights to light and access to sustainable energy (solar).
		Snapshot data of the number of continuous cruisers on waterways in Hackney shows the number of continuous cruisers increased by 565% between 2010 and 2014. The number

		has continued to increase. While live-aboard boating is a lifestyle choice, it is important to recognise that there is a strong correlation between increasing unaffordability of housing in London and the increase in live-aboard boaters. It is noted that Policy SI16 states that new moorings should be offline from main navigation routes which is slightly more prescriptive than Hackney's LP33 which states they must not hinder navigation along the waterway.
9 Sustainable Infrastructure	SI6 Digital connectivity infrastructure	Further design guidance on parts A2 and A4 of the policy would be useful.
9 Sustainable Infrastructure	General	In relation to the draft Mayor Environment Strategy, one of the consultation questions was "Question 4. Would you support emergency measures, such as short-term road closures or vehicle restriction, during the periods of worst air pollution (normally once or twice a year)?" Given the contribution of development works to poor air quality in London, Hackney asks consideration be given to a new policy to stop polluting development activities across London during significant pollution episodes.
9 Sustainable Infrastructure	SI7-SI10 Waste	Please refer to comments submitted by the North London Waste Plan Authority on behalf of Hackney and other boroughs.
10 Transport	T1 Strategic approach to transport	Hackney supports the vision of increasing Londoner's overall use of sustainable transport to 80% by 2041 subject to the comments raised for policy GG2. Details in the draft MTS showed that the biggest shift towards sustainable transport modes needs to come in journey between Outside London and Inner London. These require modal shifts of 25% and 20% respectively or 15% beyond the reference scenario/'do minimum' in each case as set out in the MTS. Hackney welcomes the introduction of ambitious mode share targets and the rebalancing of the transport system away from cars towards walking, cycling and public transport.
10 Transport	T2 Healthy streets	Hackney strongly supports the 'Healthy Streets' approach embedded in the draft Mayors London Plan (2017) and believes it provides a useful evidence-led framework for achieving the substantial shift towards sustainable transport use in London needed to support the mobility needs of the capital's rapidly growing population and to tackle the negative health

		impacts of poor air quality and the diseases associated with a sedentary lifestyle. In particular Hackney welcomes the way that this approach unites the encouragement of walking, cycling with an emphasis on tackling poor air quality and traffic dominance and improving the place function of city streets. Hackney is keen to explore how the healthy street indicators can be used at the local level to guide bespoke policies for different streets and parts of Hackney.
10 Transport	T3 Transport capacity, connectivity and safeguarding	Hackney supports the policies on transport capacity, connectivity and safeguarding. Hackney supports the approach that Development Plans should develop effective transport polices and the requirement to safeguard land for future projects to support sustainable development in London.
10 Transport	T4 Assessing and mitigating transport impacts	Hackney supports the approach that requires development to identify and mitigate any adverse impacts of development on the transport network.
10 Transport	T5 Cycling	The recognition that new development should help to remove the barriers to cycling and can support the delivery of a London wide network of cycle routes is welcomed. There should be further consideration regarding Policy T5 (C) which seem to suggest that where development cannot meet the cycle parking demand on site that an on street parking facility could be provided instead, thus placing greater pressure on public space. The cycle parking standards as set out in Table 10.2 can be welcomed, especially the higher parking standards for inner London. However, the parking standards remain lower for outer London which seems directly contrary to the Mayors objectives for achieving more 80% sustainable travel by 2041 as set out in Policy T1. Hackney introduced its own cycle parking standards as part of the Hackney Transport Strategy 2015 – 25. In most cases (23 categories) Hackney's cycle parking standards are expect more than cycle parking requirements in either the Old or the New London Plan.

		The New London Plan's proposed cycle parking standards could be increased in line with Hackney's approved standards (for example parking linked to A1 non-food retail; B1 Offices; B1 Light Industry; land use types B2-B2; C1 Hotels; C2 Hospitals and D2 Sports Halls) to further encourage cycling and assist with meeting the Mayors own target of 80% sustainable mode share.
10 Transport	T6 – T6.5 Parking	Hackney welcomes the tightening of car parking standards across many land use classes and locations and is pleased to see, for the first time, 'car-free' as a car parking maximum standard for residential, employment and retail developments in Inner and Central London and areas of high public transport accessibility. Hackney supports the strengthened minimum standard for infrastructure for ultra-low emission vehicles in residential developments - which is now 20% of off-street parking spaces to be equipped with charging facilities with passive provision for all remaining spaces. However, while the new London Plan mentions the need to provide similar facilities for employment, retail and hotel developments, it does not mention a minimum quanta of charging infrastructure. This needs to be clarified especially bearing in mind the different lower standards of minimum provision which applied to these land use types in the existing London Plan – ie 20% + 10% passive for employment uses and 10% + 10% passive for retail developments. Hackney welcomes the inclusion for the first time of car-free maximum standards for residential car parking in Central London; and Inner London (PTAL 4 and higher). Furthermore, while the maximum ratio for Inner London (outside PTAL 5 and 6) has been reduced to one space per 75 square metres, this is still ten times the level permitted in Hackney. The London Plan should provide the flexibility for boroughs to set their own standards. Hackney welcomes the new requirement for a Car Parking Design and Management Plan which should be particularly useful in the better management of disabled parking provision.

		In the past this type of parking has sometimes been overprovided leading to misuse of this type of parking.
10 Transport	T7 Freight and servicing	Hackney welcomes the approach as set in Policy T7 to promote sustainable freight / servicing movements, improve the safety and efficiency of freight / servicing and promotion of regional consolidation and distribution centres (both macro and micro) and the use of Construction Logistic and Delivery Service Plan (including CLOCS) to tackle the growing problem experienced by increased delivery and construction vehicles on roads in London. Provision of logistics space within London would allow large consignments to travel during off peak hours for distribution from the new hubs, using smaller / less polluting vehicles. Adding consolidation facilities to new developments is a move in the right direction but does not address the underlying problems. While issues of compatible mixed uses with consolidation centres (noise disturbance road safety for example) have not been addressed. TfL could use its corporate property team to investigate how these spaces could be used to provide "white branded" logistical space that is so sorely needed to begin to address the challenges of the rise in white van deliveries. Click and collect can play an important role too. E commerce is rapidly changing the way that freight operates and there are likely to be further technical innovations in freight in the lifetime of the strategy (eg AVs, drones)? Could road pricing per mile or a premium toll on peak time freight deliveries be used to incentivise more efficient delivery and servicing - along with the increased use of cleaner vehicles and cargo bikes? Hackney supports the requirement for Area based Plans to define freight and servicing strategies
10 Transport	T9 Funding transport infrastructure	The policy identifies that Mayoral Community Infrastructure 2 (MCIL2) will be introduced in April 2019 for Crossrail 2 – but if no agreement on Crossrail 2 funding is agreed then the funding is to be used for non-specified strategic transport projects. There should be greater transparency about what these alternative transport projects would be in order to justify the

	through planning	implementation of MCIL2. In the event that no funding deal is secured for Crossrail 2, Hackney would want to ensure that the equivalent investment is made in other forms of public transport for the borough.
12 Monitoring	M1 Monitoring	Hackney supports all the Key Performance Indicators as set out in Table 12.1, and the importance of having a succinct set of Key Performance Indicators (KPIs) to monitor the success/effectiveness of the Plan's policies. However, we need to acknowledge the fact that there is a need for measuring the impact of these policies as well. For example; an indicator to measure whether affordable housing provided is genuinely affordable.
General		In the current London Plan contaminated land is dealt with under Chapter five. We are concerned that the draft London Plan does not address contaminated land and soil protection in London and would request that these issues are included. We would request that the Mayor includes contaminated land within the London Plan and in particular: 1. Sets out clear policies for contaminated land and soil protection; 2. Identifies COCs that are commonly present in soils and made ground across London and that may occasionally be present at levels that could result in harm; 3. Develops less conservative suitability for use criteria for London to ensure investigation and remedial works (whether under planning system, Part 2A of the Environmental Protection Act 1990 or Environmental Damage Regs) are only undertaken where necessary but remain protective of the health without degrading the environment. Current approaches to addressing contaminated land through the planning system are fragmented across London with an array of approaches being taken. This has resulted in a significant lack of consistency in approaches to addressing contaminated land issues across the Capital. We would urge the Mayor to take action to better coordinate how

		contaminated land and soil protection is addressed across London through the London Plan.