Schedule of Changes to the Development Management Local Plan at Publication stage (June 2013)

The following schedule outlines the major changes made to the document following comments received during Regulation 18 consultation and any other further changes proposed by Council officers. Also summarised below are the reasons for the proposed changes. The complete list of Regulation 18 public consultation comments, the Council's response and any subsequent changes to the consultation draft of the DMLP is outlined in the Consultation Spreadsheet (see: http://www.hackney.gov.uk/Development-Management-DPD.htm).

Change Ref	Chapter and Section Title	Para No, Page No	Policy No.	Proposed Change	Reason for Change
CR1	Chapter 1 - Introduction	1.1.2, 1.1.3, p6	NA	Replace most of the text to state "This document is the Development Management Local Plan (DMLP) Publication version, which sets out detailed, generally criteria-based, proposed planning policies which the Council will be using to assess planning applications. The draft DMLP Public Participation version was subject to a 10 week period of extensive consultation ('Public Participation' version) between July and October 2012. Approximately 350 responses were submitted to the Council from a range of organisations and individuals. These responses have shaped and informed this Publication version of the DMLP, officers having carefully considered each response and amended the document as appropriate.	Update text to reflect that the document being presented is the Publication version rather than the Public Participation version, and summarising the level of response from Public Participation.
CR2	Chapter 1 - Introduction	1.1.2, p6	NA	Replace most of the text to state that "the DMLP Publication version contains the Council's development management policies that it intends to submit to the Planning Inspectorate for Examination. The Publication stage is seeking further responses to the changes that have been made to the proposed DMLP following Public Participation. The document will be consulted on in compliance with the legislative requirements (the Town and Country Planning Regulations 2004 and 2008 Amendments) and the Council's Statement of Community Involvement. (SCI)."	As above, update text to reflect that the document being presented is the Publication version rather than the Public Participation version.
CR3	Chapter 1 - Introduction	1.2.2, p7	NA	Replace 'is currently producing' with 'has adopted' Area Actions Plans for Dalston, Hackney Central, Hackney	To reflect the fact that all four AAPs have now been formally adopted.

				Wick and Manor House	
CR4	Chapter 1 - Introduction	1.2.3, p7	NA	Insert in first sentence “the Council is also producing the SALP, which is also at Publication stage and on which the Council has consulted on through the Public Participation version”.	To update the progress of the Site Allocations Local Plan.
CR5	Chapter 1 - Introduction	1.2.4, p7	NA	Insert in first sentence after the word ‘boroughs’ in the second line “to produce the North London Waste Local Plan.” Delete the second sentence and replace it with “At the time of writing, the production of this Plan is at Public Participation stage. “	To update the progress of the North London Waste Plan.
CR6	Chapter 1 – Introduction	1.2.6, p7 and 8	NA	Insert in second sentence “On the 1st October 2012, the LLDC acquired powers both to prepare plans and to determine planning applications within the LLDC area, which includes Hackney Wick. The LLDC is currently developing its Local Plan. Until that Plan is produced, the policies within this document apply to Hackney Wick (in addition to relevant Core Strategy policies and the Hackney Wick AAP).”	To update on the London Legacy Development Corporation’s role as planning authority for Hackney Wick, and that the Hackney Wick AAP policies are still applicable to that area.
CR7	Chapter 1 – Introduction	1.3.1, p8	NA	Insert in third sentence “The policies in this document have been produced in conformity with national and regional policies. Appendix 7 contains a compliance checklist of the policies against the NPPF.”	To reflect the fact that a NPPF compliance checklist of the DMLP policies has been carried out using the Planning Advisory Service template, and is attached as a new appendix 7.
CR8	Chapter 1 - Introduction	1.3.4, p8	NA	Replace most of the existing text with “At the time of writing, the Government had introduced or proposed to introduce a number of reforms to the planning system. Of particular note, the Government began consultation in April 2013 on amendments to the Communities Infrastructure Levy Regulations, had granted the Borough an exemption in certain areas to changes to the use classes order to allow permitted development rights for change of use from commercial to residential use, and had introduced legislation to allow an increase in permitted development rights for residential extensions. “	To update the status of some of the Government’s planning reforms, including the Council’s successful exemption request to the changes in permitted development rights from office to residential use.
CR9	Chapter 1 - Introduction	1.3.5, p9	NA	Replace second and third sentences with “Appendix 6 contains a matrix of compliance between the policies and the London Plan. At the time of writing, the Greater	To reflect the fact that Appendix 6 contains a compliance checklist between the London Plan and the DMLP, and the

				London Authority (GLA) was awaiting the Planning Inspector's report into the Examination of the Revised Early Minor Alterations to the London Plan. "	status of the review of the London Plan.
CR10	Chapter 1 - Introduction	1.4.1, p9	NA	Replace much of the text in points ii to vii with "ii. Developing draft policies and consulting on them (Public Participation) - this occurred during July and October 2012; iii. Assessing consultation responses and amending the document where appropriate – this has taken place between October 2012 and April 2013; iv. Consultation on the Publication version of the DMLP seeking further consultation feedback on revised policies – this is the current stage which will occur between 1 July and 8 September 2013; v. Assessing the responses to the Publication version and amending the document as appropriate, vi. 'Submission' of the document to the Planning Inspectorate and notifying respondees to previous consultation, and collating any further responses to send to the Inspectorate; vii. A public examination where the document is assessed by an Inspector from the Planning Inspectorate; viii. Publication of the Inspector's report; ix. Review of the Inspector's report, and if the Plan is found 'sound' make amendments where necessary and adoption by the Council."	To update on the process now that the document has moved to Publication stage, and to be more precise on the process.
CR11	Chapter 1 - Introduction	1.4.2, p9	NA	Changes to programme timetable – insert 1st July – 8 September 2013 for Publication (10 weeks), December for Submission, March 2014 for Examination Hearings, May for Inspector's report, July 2014 for adoption.	To update the programme for examination and adoption.
CR12	Chapter 1 - Introduction	1.4.3, p10	NA	Insert "1st July to 8 September 2013".	Update on the period of ten weeks during which Publication will take place.

CR13	Chapter 3 – Delivering Sustainable Growth	p15 3.2.1		Insert new paragraph into supporting text "The design of tall building development proposals in all the identified Tall Buildings Opportunity Areas must adopt a rigorous design and impact approach involving detailed local area analysis of site characteristics and the fabric of the surrounding environment and views as well as take into account the criteria for the management of tall buildings set out respectively in the Hackney Tall Building Strategy (2005), and the English/CABE's 'Guidance on Tall Buildings (2007). National, regional and local level design guidance and best practice standards, where appropriate, should be applied in the design of all development. Applicants should also refer to the detailed policies relating to the height of development proposals within the Area Action Plans for Dalston, Hackney Central and Hackney Wick, and the policy guidance in the South Shoreditch Supplementary Planning Document (SSSPD)."	In response to consultation that there must be more clarification including new policy about building heights and tall buildings.
CR14	Chapter 3 – Delivering Sustainable Growth	p16 3.2.5	NA	Insert new paragraph into supporting text "As indicated by Core Strategy 7 'Working with Infrastructure Partners' the impact and demands on infrastructure and the capacity of existing services and utilities to accommodate development individually and collectively is critical to sustainable growth. Applicants are therefore encouraged to engage with the appropriate bodies and other stakeholders regarding the infrastructure needs of a proposed development. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing infrastructure. Where appropriate physical improvement or financial contributions to meet the demand or necessarily upgrade will be sought from the development, and any improvements may have to be completed prior to occupation. Every application will be assessed against the relevant policies and proposals and their particular circumstances including viability. (Also see paragraphs	In response to consultation that impact and capacity on infrastructure in particular utilities arising from development should be highlighted.

				7.3.6, 7.8.14, 7.8.15, 7.8.16 and Policy DM44)."	
CR15	Chapter 3 – Delivering Sustainable Growth	p19 3.3.7	NA	Insert addition text to paragraph 3.3.7 "For residential development, the Council will assess applications for new dwellings against the London Plan Policy 3.5 and the GLA's Housing SPG (November 2012) and, where appropriate, against any future Council supplementary planning guidance. Only in exceptional circumstances may single person units of below 37sq.m be permitted, where they are of exemplar design and contribute to the achievement of other objectives and policies of this plan."	Update to reflect GLA's guidance on space standards. Also highlight that proposals below the minimum standard for a one bed residential unit will only be allowed in exceptional circumstances.
CR16	Chapter 3 – Delivering Sustainable Growth	p23	DM3	Policy DM3 has been amended to provide a threshold for the submission of a Health Impact Assessment (HIA) at 10 housing units or more, or 1000sqm or more for all other uses.	In response to consultation. There were no qualifying criteria for the submission of a HIA in the policy and so this has been amended to reflect the Mayor's Best Practice Guidance for Health Issues in Planning (2007).
CR17	Chapter 3 – Delivering Sustainable Growth	3.5.4-3.5.7 p25	N/A	Three new paragraphs have been added to the supporting text to policy DM4 to list uses exempt from the Mayoral and Hackney CIL.	In response to consultation. The paragraphs have been added to provide clarity for developers.
CR18	Chapter 3 – Delivering Sustainable Growth	3.5.10 p26	N/A	A new paragraph has been inserted in the supporting text to state that planning contributions and CIL will operate in a complimentary way, and reference is made to the Mayor's CIL, Hackney's CIL and the Planning Contributions SPD.	In response to consultation. The paragraph has been inserted to make the link between planning contributions and CIL clearer.
CR19	Chapter 3 – Delivering Sustainable Growth	p26	DM4	The policy has been amended to recognise that in some instances, financial viability prevents the delivery of planning contributions sought by the Council, with the need to submit a financial appraisal to demonstrate this.	In response to consultation. This is mentioned in the supporting text but this is an important point which needs to be reiterated in the policy as well.
CR20	Chapter 3 – Delivering Sustainable Growth	p26	DM4	Policy wording has been amended to reference CIL Regulations (2010) 122 and 123 (or any successors).	In response to consultation. The CIL Regulations list important criteria which financial contributions and contributions in kind towards infrastructure should meet.
CR21	Chapter 3 – Delivering Sustainable	3.6.10 p29	N/A	A new paragraph has been inserted in the supporting text to read: "In particular instances for example, for some Emergency Services, Health, MOPAC and Education	In response to consultation. There is a need for some key public service providers to rationalise services and allow

	Growth			Services, there is a need to rationalise services and in some cases allow for the net loss of such facilities in order to ensure that better and more accessible properties to serve the community are provided. Organisations which would benefit from this include the Emergency Services, MOPAC, the City and Hackney PCT and the Learning Trust.	for the net loss of their facilities.
CR22	Chapter 3 – Delivering Sustainable Growth	3.6.3 p29	N/A	To give distinctive prominence to places of worship a new paragraph has been inserted to underscore the Council's support for the retention of existing places of worship as well as support for the creation of new facilities.	In response to consultation. Places of worship are an important facility in the community in their own right and this has been reflected in the supporting text.
CR23	Chapter 3 – Delivering Sustainable Growth	p29	DM5	Policy title has been changed to “Protection and Delivery of Social and Community Facilities and Places of Worship”.	In response to consultation. Places of worship are an important facility in the community in their own right and this has been reflected in the policy title.
CR24	Chapter 3 – Delivering Sustainable Growth	p30	DM5	A new sentence has been added to the second paragraph of DM5 stating that there will be an allowance for the consideration of a net loss of floorspace for key public service providers.	In response to consultation. There is a need for some key public service providers to rationalise services and allow for the net loss of their facilities.
CR25	Chapter 3 – Delivering Sustainable Growth	p30	DM5	Reference to policy DM4 has been inserted in the second to last paragraph of policy DM5.	In response to consultation. The policy makes a reference to the need for some developments to contribute towards enhancing existing and contributing towards new facilities through CIL and/or Planning Contributions, and so there is a need to link this policy to DM4.
CR26	Chapter 4 – A Dynamic and Creative Economy	4.1.1, p33	NA	Add to the end of paragraph 4.1.1 “This chapter has been drafted for the Publication Version stage in the context of reforms to the planning system, such as changes to permitted development rights to allow change of use from offices (B1a) to residential (C3), and changes to Class A uses to allow for a wider range of uses, without the need for planning permission. Given these changes are currently time limited (three years from May 30th 2013) the following policies remain applicable to any change of use application.”	To identify that the chapter has been prepared in light of the recent Government changes to the planning system
CR27	Chapter 4 – A	4.2.2,	NA	Add to the end of paragraph 4.2.2 “While it is	In response to consultation. While the

	Dynamic and Creative Economy	p34		acknowledged that the CAZ provides a mix of uses, it is not a designated town centre in Hackney, and as such it is not considered a focus for retailing and other town centres uses, especially considering that Hackney does not contain any designated CAZ Frontages as defined by the 2011 London Plan. Any retailing or leisure uses proposed within PEAs, irrespective of being within the CAZ or not, are to comply with Policy DM17 and therefore should be in a quantum which acts in a supporting capacity to the core employment generating uses required in PEAs. A proposal above 200sq.m and outside of a designated town centres will need to be accompanied by a sequential test and retail impact assessment demonstrating that there will not be adverse impact on the retail offer in the Borough's town centres."	CAZ is an area containing a mix of uses it is not a designated town centre and, therefore, is not the focus for retailing generally as per CS Policy 13. London Plan Policy 2.11(c) states that the expansion of retail capacity is appropriate within the CAZ Frontage which Hackney does not contain. Incidentally Annex 1 doesn't emphasise retail use in the City Fringe Opportunity Area. Therefore significant expansion of any retailing in the CAZ will need to be demonstrated as being acceptable following both a sequential test (above an established threshold) and a retail impact assessment. In order to clarify this situation and in accordance with the NPPF additional text will be added to paragraphs 4.2.2 and 4.2.4 and Policy DM7 will also be amended to clearly establish when and where a sequential test and retail impact assessment will be required.
CR28	Chapter 4 – A Dynamic and Creative Economy	4.2.3, p35	NA	Add a new paragraph as 4.2.3 which reads: "Given that Hackney's town centres are vital for the well being of the local residents and economy, and face stiff competition from other nearby surrounding town centres, it is important that they are promoted and developed in a way that allows them to strengthen their local distinctive offers, improve and enhance consumer choice and are able to adapt to future changes and challenges. The Council will therefore require applications for main town centre uses to be located in its town centres, then in edge-of-centre locations and only if suitable sites are not available would out-of-centre sites be considered. When considering edge-of-centre and out-of-centre proposals, preference would be given to accessible sites that are well connected to the town centre, and to proposals which	Amendment considered necessary to link the changes made to paragraphs 4.2.1 and 4.2.3 in response to the consultation and to further express the NPPF requirements in the Hackney context.

				satisfy the sequential test and are not likely to have significant adverse impact on the Borough's town centres as a whole."	
CR29	Chapter 4 – A Dynamic and Creative Economy	4.2.4, p35	NA	Amend second sentence of paragraph onwards of 4.2.4 to read: "The NPPF allows local planning authorities to set local thresholds to be applied in relation to requiring a retail impact assessment. Policy DM7 sets a threshold for Hackney of 200sq.m. This threshold is considered appropriate given that Hackney's town centres are characterised by relatively small sized shop units. The GLA's London Small Shops Study 2010 identifies small shops and workspaces of typically around 70 – 90sqm. This is considered too low as a threshold at this level would implicate the majority of retail proposals including a single retail unit. 200sqm on the other-hand will capture larger proposal which are more likely, when located outside of existing centres, to have adverse effects on existing shopping centres, unless demonstrated otherwise. The 200sqm threshold is also consistent with PPS 4 which has been replaced by the NPPF. Above this local threshold the Council will require both a sequential test and a retail impact assessment to be undertaken for main town centre uses not in an existing town centre. Therefore proposals for new or extensions to existing edge or out-of-centre main town centre uses in excess of 200sqm need to satisfy the sequential test and retail impact assessment criteria if planning permission is to be granted".	In response to consultation. While the CAZ is an area containing a mix of uses it is not a designated town centre and, therefore, is not the focus for retailing generally as per CS Policy 13. London Plan Policy 2.11(c) states that the expansion of retail capacity is appropriate within the CAZ Frontage which Hackney does not contain. Incidentally Annex 1 doesn't emphasise retail use in the City Fringe Opportunity Area. Therefore significant expansion of any retailing in the CAZ will need to be demonstrated as being acceptable following both a sequential test (above an established threshold) and a retail impact assessment. In order to clarify this situation and in accordance with the NPPF additional text will be added to paragraphs 4.2.2 and 4.2.4 and Policy DM7 will also be amended to clearly establish when and where a sequential test and retail impact assessment will be required.
CR30	Chapter 4 – A Dynamic and Creative Economy	4.3.8, p39	NA	Amend 4.3.8 to read: "In the primary shopping frontages of Stoke Newington the Council seeks to maintain a higher proportion (60%) of ground floor units in Class A1 use compared to other uses. Secondary shopping frontages are defined for Hackney Central (outside of the AAP area), the majority of Stoke Newington and Finsbury Park District Shopping Centres. Some parts of Blackstock Road and Seven	Use of clearer language – no change to meaning or content.

				Sisters Road lying within Hackney in the Finsbury Park District Shopping Centre have been designated as secondary shopping frontages and not primary shopping frontages because the majority of the Finsbury Park District Shopping Centre containing a higher proportion of larger retail uses lies within the London Borough of Islington. Neither primary nor secondary shopping frontages are defined for 'Local Shopping Centres.' Where the current proportion of A1 uses in a secondary shopping frontage is below the minimum threshold as set out (50% in these secondary frontages), the Council will only accept Class A1 uses. The boundary of the proposed primary and secondary shopping frontages within town centres is shown on the draft Policies Map and a schedule of affected properties listed in Appendix 3."	
CR31	Chapter 4 – A Dynamic and Creative Economy	P36	DM7	Amend final paragraph of Policy DM7 to read "Proposals for new or extension to existing edge or out-of-centre, retail or leisure development in excess of 200 sq.m gross floorspace will not be granted planning permission, unless they meet the Council's sequential assessment requirements and the Council is satisfied with a retail impact assessment submitted with an application for proposals in excess of the above threshold."	In response to consultation. While the CAZ is an area containing a mix of uses it is not a designated town centre and, therefore, is not the focus for retailing generally as per CS Policy 13. London Plan Policy 2.11(c) states that the expansion of retail capacity is appropriate within the CAZ Frontage which Hackney does not contain. Incidentally Annex 1 doesn't emphasise retail use in the City Fringe Opportunity Area. Therefore significant expansion of any retailing in the CAZ will need to be demonstrated as being acceptable following both a sequential test (above an established threshold) and a retail impact assessment. In order to clarify this situation and in accordance with the NPPF additional text will be added to paragraphs 4.2.2 and 4.2.4 and Policy DM7 will also be amended to clearly establish when and where a sequential test and retail impact

					assessment will be required. .
CR32	Chapter 4 – A Dynamic and Creative Economy	4.3.10, p39	NA	Supporting text of paragraph 4.3.10 is amended to read "Other uses such as Police Shops/front counter facilities are appropriate in town centres and would be allowed where they would contribute to the safety and security of the area, and an appropriate shopfront design is retained or proposed, and there is no loss of substantial retail frontage."	In response to consultation. Make specific reference to Police Facilities and when they may be appropriate in town centres.
CR33	Chapter 4 – A Dynamic and Creative Economy	4.3.12, p40	NA	Add new sentences after the second sentence of 4.3.12 as follows: “Whilst seeking to promote a mix of uses, the Council is concerned to ensure that the retail character and function of its town centres is protected by stating the proportion of A1 units that must be present within its town centres’ secondary shopping frontages and within its local shopping areas as well as setting conditions to prevent over proliferation of non-retail uses either within the town centres or within particular frontages of the centres. In this regard, the proportion of A1 uses in the Secondary Shopping Frontages of its District Shopping Centres and in its Local Shopping Centres must not be below 50% (as a proportion of total units measured across the total Secondary Shopping Frontage or the total units measured across the total Local Shopping Centre area). Equally, proposals which may result in a concentration of non-retail units within a particular frontage or over proliferation of non-retail uses in the town centres will not also be permitted. The secondary shopping frontages are identified on the draft Policies Map and a schedule of affected properties listed in Appendix 3.”	Use of clearer language and further elaboration in support of DM9 – no change to meaning or content.
CR34	Chapter 4 – A Dynamic and Creative Economy	4.3.14, p41-42	DM9	Amend paragraph 4.3.14 and DM9 to remove the requirement for shops to be vacant for one year.	The focus should be based solely on the marketing of premises for one year rather than in addition to vacancy which might promote premises being left in a run down condition rather than make necessary

					improvements and actively market for new tenants.
CR35	Chapter 4 – A Dynamic and Creative Economy	P43	DM10	Amend DM10 to cross reference CS Policy 13	Provide clearer link to related Core Strategy policy
CR36	Chapter 4 – A Dynamic and Creative Economy	4.4.2, p43	NA	The first sentence of paragraph 4.4.2 is amended to read: "Evening and night-time economy uses comprise a wide range of uses which include A3 restaurants, A4 drinking establishments, A5 hot food takeaways, D2 cinemas, dance and concert halls, casinos and bingo halls (especially where these operate at night and have drinks licences) and some sui generis uses such as theatres, night clubs and amusement arcades."	In response to consultation. Examples of the wide range of uses which constituent the night time economy are outlined in amended paragraph 4.4.2. D2 uses such as Cinemas, music and concert halls, bingo and dance halls etc are included because they generally operate in the evening and in many instances have a drinks licence. A5 and certain sui generis uses such as theatres, night clubs and amusement centres and casinos are also considered as night-time uses in the context of this policy.
CR37	Chapter 4 – A Dynamic and Creative Economy	4.4.4, p44	NA	Insert a new paragraph 4.4.4 which reads: "In the case of Shoreditch the Council designated, within its Licensing Policy, a Special Policy Area (SPA) to manage the night-time economy in the area. The affected area is indicated as Proposal 298 and shown on the Policies Map. The area of Shoreditch not covered by the SPA status is small and, therefore, offers opportunity for the location of a limited number of night-time uses. Within this SPA there is a presumption against granting any new licenses, additionally any application for the intensification of use such as to increase either the capacity of a premise or the hours of use is normally refused unless the applicant can demonstrate that this will not add to the cumulative impact already being felt in the area. Also, from a planning perspective, any planning application for new night-time economy uses (restaurants and cafes (A3), drinking establishment (A4), hot food takeaways (A5) and assembly and leisure (D2)) is similarly refused unless the	In response to consultation. Although Shoreditch is considered a suitable location for evening and night-time economy uses, it is also an area identified as having a saturation of night time uses. A large part of it is covered by a Special Policy Area (SPA) designation which carries a presumption against permitting any new night-time economy uses or the intensification of existing uses either by increase to the capacity of a premise or the hours of operation, unless the applicant can demonstrate that this will not add to the cumulative impact already being felt in the area. Therefore, only a small part of Shoreditch is available and suitable for the location of night-time uses, hence why the reference is included. The

				applicant can demonstrate that this will not add to the cumulative impact already being felt in the area. The onus is on applicants to prepare a convincing case regarding cumulative impact. Further detail regarding the application of the SPA policy is outlined in Hackney's Statement of Licensing Policy 2011. It should also be noted that a potential SPA for the Dalston Town Centre and its immediate surroundings is being consulted upon in the summer of 2013."	proposed amendment makes reference to the SPA and indicates that the boundary of the area will be shown on the Policies Map.
CR38	Chapter 4 – A Dynamic and Creative Economy	4.4.6, p45	NA	Add the following sentences to paragraph 4.4.6 as follows: "Applicants will be required to submit management plans detailing how the operation of their proposals will be managed in ways that do not exacerbate potential adverse impacts. Management plans should demonstrate how proposals satisfy both planning and licensing issues."	Better link planning policy with existing licensing policy requirements.
CR39	Chapter 4 – A Dynamic and Creative Economy	P45	DM11	Amend final paragraph of Policy DM11 to read: "(ii) The cumulative impact of the use considering the number, capacity and location of other night-time economy uses in the adjacent area, particularly for proposals within Shoreditch which is part covered by a Special Policy Area designation and Dalston."	A large part of Shoreditch is covered by a Special Policy Area (SPA) designation which carries a presumption against permitting any new night-time economy uses or the intensification of existing uses either by increase to the capacity of a premise or the hours of operation, unless the applicant can demonstrate that this will not add to the cumulative impact already being felt in the area. Therefore, only a small part of Shoreditch is available and suitable for the location of night-time uses, hence why the reference is included. The proposed amendment makes reference to the SPA and indicates that the boundary of the area will be shown on the Policies Map.
CR40	Chapter 4 – A Dynamic and Creative Economy	4.6.1, p48	NA	Add the following sentence to the end of paragraph 4.6.1: "The employment policies should be read together, particularly Policies DM14 and DM15 which will apply in most instances where employment land and premises are involved, and Policy DM17 will also apply where a site is	Better explain the inter-relationship of policies DM14, DM15 and DM17.

				located in a PEA.”	
CR41	Chapter 4 – A Dynamic and Creative Economy	4.6.2, p48	NA	Add a new paragraph at 4.6.2 as follows: “Whilst the suite of employment policies contained in this chapter provide a level of flexibility which aim to recognise individual site characteristics and to allow supporting uses to cross subsidise the improvement of employment floorspace where appropriate, the underlying purpose of the policies is to protect and where possible enhance the employment potential of employment land and buildings. Hackney has a limited reservoir of designated employment land. Together PEAs and the CAZ represent only approximately 6% of the Borough’s total land area. This limited supply will come under increasing pressure following the Government’s changes to permitted development rights governing the change of use of offices to residential. The Council has been successful in having its area of CAZ along with a number of PEAs and town centre sites exempt from these changes as shown in Figure 1. Whilst this is positive, a number of designated and non-designated employment sites across the Borough will be affected by the changes meaning it is especially important that the employment potential of sites is protected and enhanced over the life of this plan.”	Further contextualise the employment land and floorspace policies including recent Government changes to the planning system.
CR42	Chapter 4 – A Dynamic and Creative Economy	4.7.2, p49	NA	Amend paragraph 4.7.2 to read: “Policy DM14 sets out the criteria for proposals for the redevelopment of sites containing employment land and floorspace, and where the loss of employment land and floorspace may be considered acceptable. The starting point for considering the redevelopment of such land and floorspace is the commercial opportunities and potential of sites, and applicants need to demonstrate that they have fully considered these when submitting an application. Applicants should demonstrate through marketing evidence that their development proposals are providing the maximum economically feasible amount of employment land and floorspace possible for the site. This	More clearly outlines the process applicants need to undertake in demonstrating schemes provide the maximum economically feasible amount of employment land and floorspace possible.

				evidence should include marketing the site for a range of employment or employment-led scenarios. Only after it has been satisfactorily demonstrated that a commercial or primarily employment-led scheme is not possible for a site will a non-employment-led or non-employment scheme be considered, taking into account site characteristics and the need not to undermine the long term functioning of the area as an employment location. Where a scheme is not employment-led an uplift in employment floorspace compared to the existing quantity should be delivered. This should be possible in many instances given that sites are generally being redeveloped at higher densities. If not, the Council will consider other benefits offered by the scheme, including the comparison between the number and quality of jobs between the existing or former use and the proposed use. Clear and robust marketing evidence must demonstrate that there is no demand for use of land or floorspace as it exists, or alternatively for employment purposes if reconfigured into smaller units, or for alternative employment generating use. Alternative employment generating uses will generally include non B class uses which have similar operational requirements and generate comparable employment density. It must also be demonstrated that these uses will not impact on the function of nearby B class use and that they are appropriate in amenity terms where part of mixed use development. D2 and certain Sui Generis uses such as Police Facilities are examples of alternative employment generating uses. The requirements for marketing evidence are contained within Appendix 4."	
CR43	Chapter 4 – A Dynamic and Creative Economy	4.7.2, p49-50	NA	Insert at end of paragraph 4.7.2 this text explaining what is meant by "alternative employment generating use" to read: "Alternative employment generating uses will generally include non B class uses which have similar operational requirements and generate comparable employment density. It must also be demonstrated that these uses will not impact on the function of nearby B	In response to consultation. Provide clarification as to what is meant by 'alternative employment generating use' in support of Policies DM14 and DM17.

				class use and that they are appropriate in amenity terms where part of mixed use development. D2 and certain Sui Generis uses such as Police Facilities are examples of alternative employment generating uses. The requirements for marketing evidence are contained within Appendix 4."	
CR44	Chapter 4 – A Dynamic and Creative Economy	4.7.5, p50	NA	Add a new paragraph at 4.7.5 as follows: "As such, draft Policy DM14 sets out the criteria that need to be satisfied for redevelopment proposals on sites containing employment land and floorspace. The policy is also applicable to proposals in PEAs and proposals in PEAs should satisfy both Policy DM17 and Policy DM14."	More clearly outlines the application of the employment land and floorspace policies.
CR45	Chapter 4 – A Dynamic and Creative Economy	P50-51	DM14	Amend Policy DM14 to read: "When considering the redevelopment of sites, applicants must firstly consider the commercial opportunities and potential of that land and floorspace, and demonstrate in the first instance that the maximum economically feasible amount of employment land and floorspace possible has been examined through the submission of marketing evidence (see Appendix 4). Where the above has been demonstrated, the loss of employment floorspace will only be permitted where: • Additional 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 (in	In response to consultation. Further clarify the current policy position around requiring the maximum economically feasible amount of employment floorspace possible to be provided and incorporated in any redevelopment scheme. Further, it should be noted that Policy CS18 still applies when assessing planning applications. Given much of Hackney's existing floorspace which is being redeveloped is currently either B1c or B8 and the change generally relates to offices, it is appropriate for the Council to be seeking higher employment densities especially if loss of existing floorspace is being proposed. The quality of the floorspace as outlined in Policy CS18 and Policy DM15 will also be taken into consideration when assessing planning applications. Marketing evidence is considered necessary in all instances where loss of employment land is proposed to ensure the development is responding to actual market signals. A marketing strategy is also required for all

				• 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 4). The Council will seek through legal agreement the creation of employment and apprenticeship positions for Hackney residents during the construction phase and operation of development. In addition, where development results in the loss of employment land, the Council will seek a planning contribution to the Council's Sustainable Training and Employment Scheme."	new employment floorspace to ensure it is of a high design quality and meets the needs of the market and is likely to be let.
CR46	Chapter 4 – A Dynamic and Creative Economy	4.8.2, p53	NA	Add the following sentence to paragraph 4.8.2: "In support of paragraph 6.63 of the Core Strategy all applications incorporating new business floorspace should be accompanied by a marketing strategy demonstrating that the above design parameters have been incorporated where appropriate."	Further reference the need for a marketing strategy in support of the related amendment to DM15.
CR47	Chapter 4 – A Dynamic and Creative Economy	P54	DM15	Amend Policy DM 15 to read: "Where development proposals involve or require the provision of new business (B1) floorspace, either in commercial or mixed-use schemes, the Council will require the provision 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 . All applications incorporating new business floorspace should include a marketing strategy (refer to Appendix 4) where appropriate which demonstrates the design and layout of the existing or proposed floorspace is of a high quality, is flexible and meets the needs of likely end users."	In response to consultation. While it is accepted particularly for larger schemes that development is unlikely to be implemented until an end user has been identified this is not always the case for smaller mixed use schemes. In some instances tokenistic employment floorspace has been provided which is either poorly designed and/or poorly marketed and subsequently remains vacant. This space is then generally the subject of a change of use application to residential at a later date. Also in many instances planning approvals are sold on and not implemented by the original applicant. Notwithstanding this the proposed amendment removes specific

					reference to where "an end-user has not been identified" and makes clearer reference to the need for a marketing strategy in accordance with Appendix 4.
CR48	Chapter 4 – A Dynamic and Creative Economy	P54	DM15 - footnote	Amend footnote to DM15 to reference relevant sources and to read as follows: "Small or micro workspaces are units with a net floorspace of around 90sqm or less in the B1(a), (b) and (c) and B2 use classes and 70sqm for retail uses, which provide for a range of uses, and where appropriate, flexibility between uses (for example small offices and light industrial studios). This information is based on an assessment of existing premises, Hackney's Retail Health Check 2010 and the GLA's London Small Shops Study June 2010."	In response to consultation. To reference relevant sources of information.
CR49	Chapter 4 – A Dynamic and Creative Economy	4.9.1, p54	NA	Amend the second sentence of paragraph 4.9.1 to read: "The Hackney Employment Growth Options Study (2006) suggests that suitable and affordable workspaces need to be provided and preserved given that there is market failure in this area and that they are essential to Hackney's economic vitality and catalyst for regeneration".	In response to consultation. To reference relevant source of information.
CR50	Chapter 4 – A Dynamic and Creative Economy	4.9.2, p54	NA	Add a new paragraph at 4.9.2 as follows: "London Plan Policy 4.1 identifies the need to ensure a good supply of workspace in terms of type, size and cost, supporting infrastructure and suitable environments for larger employers and small and medium enterprises, including the voluntary and community sectors. In light of this the Council's Core Strategy sets out the need for smaller employment space that is affordable and easily sub-divided for different uses to meet the needs of a rapid expansion of micro and small businesses in certain parts of the Borough as set out in the Delivering Sustainable Growth Chapter."	Make clear reference to relevant London Plan policy.
CR51	Chapter 4 – A Dynamic and Creative Economy	4.9.3, p54-55	NA	Amend paragraph 4.9.3 to read: "There is a need, therefore, for the provision of affordable employment floorspace within the Borough. This can partly be secured through development and through planning agreements as part of mixed use development.	Introduce in accordance with consultation responses a sliding scale in terms of defining affordable rent

				The following proposed policy, therefore, sets out that the Council will seek the inclusion of a proportion or significant element of affordable workspace, or the reprovision of such floorspace, within major commercial development schemes (generally B1 and B2 development), and within major mixed-use schemes in the Borough's designated employment areas. In applying the policy, small/micro workspace will be for the full range of any of the Class B use floorspace of around 90m^2 or less (gross). Generally, the Council will consider affordable workspace to be where rent and service charges, excluding business support services, are on average at least 20% less than comparable local market rates for the duration of a lease (although it is noted that, for some sectors and locations, much reduced rents may be needed to render them affordable to target occupiers such as locations in the Shoreditch and Wenlock PEAs). While 80% flat rate reduction compared to market rents may be acceptable in some cases, the Council's preference is for a sliding scale of 60% of markets rents from years 1 to 3; 80% from years 4 to 6; and 90% from years 7 to 10. A sliding scale is preferred as it will allow a larger rent relief during the initial stages of a company's development which will reduce as a company matures and is likely to be able to pay higher rents. This will also enable a more seamless transition to market level rent at the end of the 10 year period."	
CR52	Chapter 4 – A Dynamic and Creative Economy	4.9.4, p55	NA	Add a new sentence to the end of paragraph of 4.9.4 as follows: "This is in addition to ensuring existing businesses are also reprovided for, where appropriate in any redevelopment of sites, given it is the Council's ambition to allow existing business to remain and grow in size as well as attract new businesses to the Borough."	Clarifying that existing business where possible should be reprovided for in addition to providing affordable workspace.
CR53	Chapter 4 – A Dynamic and Creative	4.9.5, p55	NA	Add the following to the end of paragraph 4.9.5: "Where affordable workspace is to be provided, it is important that developers initiate dialogue with a Council	References Council's list of approved workspace providers

	Economy			registered workspace provider early on in the pre-application stage and that at the planning application stage a workspace provider is identified. A list of the Council's registered workspace providers can be found on the Council's web site under the Regeneration pages."	
CR54	Chapter 4 – A Dynamic and Creative Economy	P56	DM16	Amend DM16 to read: "The Council will seek 10% of the new floorspace within major commercial development schemes in the Borough, and within new major mixed-use schemes in the Borough's designated employment areas, to be affordable workspace, subject to scheme viability. The applicant should submit evidence of agreement to lease the workspace preferably on a sliding scale compared to the local market rate for at least 10 years to a Council registered Workspace Provider. This must include confirmation from the Workspace Provider of willingness to manage the shell and core, to an agreed specification, on concessionary lease terms which will allow the space to be let to end users at affordable rents. Details of the potential management arrangements and rents to be charged for a minimum of 10 years must be submitted with the proposal for assessment by the Council. The Council's preferred sliding scale is 60% of markets rents from years 1 to 3; 80% from years 4 to 6; and 90% from years 7 to 10, subject to negotiation. If on-site provision is not possible, financial contributions for equivalent off-site provision will be sought in accordance with the Council's Planning Contributions SPD. In addition, proposals for the redevelopment of existing low value employment floorspace reliant on less than market-level rent should reprovide such floorspace suitable, in terms of design, rents and service charges, for these existing uses, subject to scheme viability, current	In response to consultation. Reflect that the provision of affordable workspace is subject to scheme viability, to add a staggered reduction in rents over the 10 year period and reference a list of approved workspace providers.

				lease arrangements and the desire of existing businesses to remain on site.”	
CR55	Chapter 4 – A Dynamic and Creative Economy	4.10.2, p57	NA	Amend paragraph 4.10.2 by adding a sentence to the first line of paragraph 4.10.2 so as to read "Policy DM 14, which applies to all employment land and floorspace, and Policy DM 17, which covers sites in PEAs, should be read together."	In response to consultation. To more clearly reference the link between Policies DM14 and DM17.
CR56	Chapter 4 – A Dynamic and Creative Economy	4.10.11, p59	NA	Amend paragraph 4.10.11 to read: “Policy DM17 needs to be read together with Policies DM14, DM15, and DM16. Specifically in relation to Policy DM14, an applicant must consider the commercial opportunities and potential use of a site in the first instance, and seek to maximise its employment potential. The additional requirement in Policy DM17 is that, if a mixed-use scheme is acceptable, the majority of the floorspace must be for commercial, employment-generating use unless satisfying the criteria in the policy. An additional policy context is that the complete loss of commercial floorspace in a proposed scheme in PEAs will not be granted planning permission in any circumstance. Policy DM17 if adopted will supersede policies 11.1 and 12.1 on employment land contained in the Council’s adopted South Shoreditch SPD. That SPD will be reviewed in due course.”	More clearly outlines the application of the employment land and floorspace policies.
CR57	Chapter 4 – A Dynamic and Creative Economy	P59-60	DM17	Amend the second sentence of DM17 to read: “A Class, C1, C3 and D1 uses are considered acceptable within PEAs, subject to the following criteria: ……..”	In response to consultation. A class uses and other town centre uses should be concentrated in designated town centres as per CS13. However A classes uses will be acceptable in PEA provided they are auxiliary to the primary employment generating uses as per CS17. The respondent is correct though in that DM17 should be amended to refer to A-class uses rather than just A1.
CR58	Chapter 4 – A Dynamic and Creative	P59-60	DM17	Amend Policy DM17 adding the following sentence: “C1 and D1 uses are generally only appropriate in areas with a PTAL rating of 5 or above.”	This requirement is already outlined in paragraph 4.10.2 and is being made for consistency between the policy and

	Economy				supporting text.
CR59	Chapter 4 – A Dynamic and Creative Economy	P61	DM18	Amend third sentence of DM18 to read: "Other commercial uses may be appropriate, such as A and D class uses, for arches in certain locations, provided they meet the sequential approach for such uses outside of the Borough's Shopping Centres and comply with other policies in this plan."	In response to consultation. To make consistent with the wording in 4.11.2. While not specifically mentioned in the consultation responses DM18 has also been amended to remove specific reference to vehicle repair so as to keep the policy consistent in terms of referencing use classes rather than specific uses.
CR60	Chapter 4 – A Dynamic and Creative Economy	P61	DM18	At an additional bullet point to Policy DM18 as follows: • "Not obstruct the public highway; and"	This amendment was included as some uses such as vehicle repair spill out onto the public highway which can restrict vehicle and pedestrian movement.
CR61	Chapter 5 - Providing Better Homes	P63	DM19	Add to the end of the policy "All new housing, both private and affordable, should comply with the London Plan policy 3.5 'Quality and Design of Housing Developments' (July 2011) and the GLA's Housing Supplementary Planning Guidance (Nov. 2012) or any replacement. A minimum of 10% of all homes within a scheme should be built to be wheelchair accessible or easily adaptable, and also should be in compliance with other HABINTEG guidance."	To ensure that a good standard of homes at satisfactory sizes that provide accessibility are being designed.
CR62	Chapter 5 - Providing Better Homes	P64	DM20	"(subject to the requirements for supported housing as set out in DM26)" added onto the end of bullet point (vi).	To clarify in the policy that the loss of housing will only be permitted if it is change of use to supported housing, but only if the requirements of Policy DM26 on Shared and Supported Housing are met.
CR63	Chapter 5 - Providing Better Homes	5.3.1, p65	NA	Replace paragraph with "The NPPF defines affordable housing as "social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable	To update the document in relation to the NPPF definition of affordable housing.

				housing provision". The definition is further expanded in Annex 2: Glossary to the NPPF."	
CR64	Chapter 5 - Providing Better Homes	5.3.5 – 5.3.9, p65 and p66	NA	Replace most of paragraph 5.3.5, and insert new paragraph 5.3.6, with " To meet the Council's targets for affordable housing delivery, proposed schemes will need to consider a number of criteria, such as viability, and maximising the delivery of affordable housing on site. The NPPF states that local plans should set policies to meet identified need for affordable housing on a site, unless off site provision or a financial contribution of broadly equivalent value can be robustly justified. The London Plan states that "affordable housing provision is normally required on site. In exceptional circumstances it may be provided off-site or through a cash in lieu contribution ring fenced, and if appropriate pooled, to secure efficient delivery of new affordable housing on identified sites elsewhere. The Core Strategy (CS Policy 20) sets out a sequence that affordable housing should be delivered on-site in the first instance, off site provision may be considered in exceptional circumstances, and in-lieu contributions as a last resort. The Mayor of London's Housing Supplementary Planning Guidance (adopted November 2012) sets out these exceptional circumstances." New paragraph 5.3.6 – "5.3.6 An additional exceptional circumstance to those set out in the Mayor's Housing SPG is that, where off-site provision of affordable housing is permitted, the alternative sites selected should preferably be in the 'vicinity' of the main application site to ensure the benefits of the affordable housing provision are realised locally, unless it is demonstrated that the mix on the main site and on the alternative recipient sites results in mixed and balanced communities in terms of tenure in those locations. As a guide, vicinity could be considered as within a 10 minute walking distance or 800 metres from the main application site, the precise location(s) will be considered on a case by case basis. An assessment area	To reflect the content of the adopted Mayor of London Housing SPG with reference to exceptional circumstances for off-site provision or in-lieu contributions for affordable housing, and to add a further exceptional circumstance in relation to any off site provision being within the vicinity of the original application site. The circumstances from policy DM21 have been moved to the supporting text as it is not considered necessary to repeat London Plan policy.

				of mixed tenure should be based on the Mayor's Housing SPG suggestion of a Middle Super Output Area, which is a reasonable size assessment area for the Hackney context." References made to CS Policy 20 in paragraphs 5.3.7 and 5.3.9	
CR65	Chapter 5 - Providing Better Homes	5.3.13 p67	NA	Add to the end of the paragraph "All developers are advised to liaise with the Council's Housing Directorate Enabling Team (where there is a residential element) particularly at the pre-application stage. A list of RPs approved by the Council can be found on the Council's website: http://www.hackney.gov.uk/affordable-housing-spd.htm"	To initiate dialogue with the Council's Housing Directorate Enabling Team when it comes to residential development and to encourage the use of Registered Providers (RPs).
CR66	Chapter 5 - Providing Better Homes	P68	DM21	Paragraph 3 rewritten to say "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, or the site threshold above, affordable housing for 50% of all residential units will be sought preferably on-site, or if not possible by way of in-lieu contributions." Specific reference to exceptional circumstances (points i to iv in paragraph 4) has been removed from the policy itself to avoid repeating regional policy. Added "On-site provision of affordable housing is required, subject to the content of paragraphs 5.3.5 and 5.3.6 above."	In response to consultation in relation to a reasonable timeframe in which affordable housing will be sought for amended applications. The addition is to explain what an amended planning application is. The four years reflects the three years (plus current additional one year) that planning permission lasts for. Following the consultation responses received that raised issues over what would be considered exceptional, the examples of exceptional circumstances have been removed from the policy so as not to limit the circumstances that are already explained in CS Policy 20 and the Housing SPG.
CR67	Chapter 5 - Providing Better Homes	5.3.7, p66	NA	Add to the paragraph the following – "Core Strategy policy 20 states that the GLA's Affordable Housing Toolkit Assessment or a similar scheme appraisal model should be used in presenting the viability of a scheme."	In response to consultation, to emphasise that viability is a consideration in affordable housing delivery linked to Core Strategy policy, and to provide guidance on the preferred appraisal model.

CR68	Chapter 5 - Providing Better Homes	5.3.14, p67	NA	Insert after second sentence – “This position statement provides guidelines for the GLA's Investment Partners operating in Hackney, to help shape the local outcomes we would like to see from the future programme of new affordable homes in the Borough, having regard to local priorities.”	In response to consultation, to emphasise that the proportions of affordable rent sought are guidelines, as a basis for negotiation.
CR69	Chapter 5 - Providing Better Homes	5.3.15, p67	NA	New paragraph at 5.3.15 that says “The Council recognises the increasing importance of the private rented sector in meeting housing needs in the Borough, and supports the provision of ‘build-to-rent private rented homes’, where these are well-designed, where evidence is provided that high standards of management will be put in place, and where the benefits of such housing are balanced against the level of affordable housing provision. The Council will work with the GLA and other delivery partners to seek to increase and improve the private rented sector in line with the London Plan and the Mayor’s Housing SPG.”	To reflect the London Plan, the Housing SPG, and to clarify the Council’s recognition of the role of the private rented sector in meeting housing needs.
CR70	Chapter 5 - Providing Better Homes	5.4.4 p69	NA	Additional text within paragraph “Proposals containing family housing (in this case 3 bedroom or more units) in excess of the above guidelines will be supported, provided that there are not high existing levels of family housing in an area, or there is a demonstrable need for such family housing in an area. There will be greater flexibility on the requirement for family units for proposals for retirement, sheltered or extra care housing.”	To explain when/why family housing above the guidelines will be supported, and that there will be greater flexibility for supported housing, in response to consultation..
CR71	Chapter 5, Providing Better Homes	P70	DM22	Deleted: “Where a developer has demonstrated that is not possible to provide family housing on-site, off-site solutions could be acceptable in the form of development of family homes elsewhere, or an in-lieu financial contribution for the provision of family housing.” Text added: “Where proposals are seeking to provide retirement, sheltered or extra care housing. the Council recognises there may be a need for greater flexibility with	Family housing is still encouraged on site. In response to consultation, the size mix may vary for retirement or sheltered homes.

				regard the mix of units to be provided within developments, particularly in achieving the provision of 3 bedroom units." Studio flat now referred to as a one person flat, and unit sizes should also meet the GLA's Housing SPG (November 2012) standards.	Policy for the unit sizes updated to the most recent; London Plan and Housing SPG 2012.
CR72	Chapter 5 - Providing Better Homes	5.5.3 70	NA	The end of the first sentence to end with "with access to private amenity space"	To reflect in policy DM23 which requires family sized housing to have direct access to a garden.
CR73	Chapter 5 - Providing Better Homes	p61-62	DM23	Text added into third paragraph "Dwelling and room sizes should meet the minimum standards contained within London Plan policy 3.5, and the GLA's Housing SPG."	Policy for the unit sizes updated to the most recent; London Plan and Housing SPG 2012
CR74	Chapter 5 - Providing Better Homes	5.6.3 p72	NA	Added text at paragraph 5.6.3 "New build student housing schemes have been prevalent in Shoreditch, with 7 approved schemes since 2006 providing approximately 2500 bedrooms. 5 of these are in Priority Employment Areas providing approximately 2113 bedrooms. 989 bedrooms of those approved have been constructed, and 1521 are under construction. Although having become more mixed use in nature, Shoreditch is predominately a commercial area, including and adjacent to the City Fringe and the Central Activities Zone, and containing large areas of designated employment land (Priority Employment Areas). As such any further consents for large student housing developments, particularly within PEAs, are likely to affect the character and function of the area. In addition to pressure on other important land uses, such developments can have adverse impacts on amenity, such as through noise levels and additional vehicular traffic particularly at the start and end of terms, and increased pressure on local services, including demand for evening economy uses (which the Council seeks to manage in Shoreditch for example)."	This paragraph highlights the issues that have arisen from developments in Shoreditch and Priority Employment Areas, which have had and present the potential to further affect the character and function of the area, adversely affect amenity and puts pressure on local services, these are key Council concerns.
CR75	Chapter 5,	5.6.7	NA	Added text to the end of the paragraph: "This information	In response to consultation response

	Providing Better Homes	p73		will be treated confidentially during the planning application process.”	which stated that student accommodation rental levels area commercially sensitive and cannot be issued within the public domain at the planning application stage.
CR76	Chapter 5, Providing Better Homes	5.6.9 p73	NA	New paragraph inserted at 5.6.9 “Student housing developments should be in compliance with the ANUK/Unipol Code of Standards for Larger Residential Developments for student accommodation managed and controlled by educational establishments or The National Code of Standards for Larger Developments for student accommodation not managed and controlled by educational establishments. The Codes enable housing suppliers and their student tenants to agree a set of undertakings about how they wish to do business with one another. They encourage good practice from good quality housing suppliers in the Borough”.	An explanation of the National Codes as stated in policy DM24 Student Housing.
CR77	Chapter 5, Providing Better Homes	p74	DM24	Added text: “(vi) Must be designed so that 10% of the units are wheelchair accessible or easily adaptable for residents who are wheelchair users.” “Where the accommodation is not secured for students, it will normally be subject to the requirements of affordable housing policy DM21.”	To encourage accessible student housing. To ensure that affordable housing provision applies for housing not allocated for students in line with London Plan policy.
CR78	Chapter 5, Providing Better Homes	5.7.2-5.7.8 p75-76	NA	Additional text in supporting text for Houses of Multiple Occupation (HMOs). A more detailed explanation of what a HMO is and the circumstances where some may be resisted.	To fully describe what is classified as a HMO and when one would not be supported by the Council.
CR79	Chapter 5, Providing Better Homes	5.8.1 p77	NA	Primary Care Trust (PCT) replaced with Clinical Commissioning Groups (CCGs) Deleted text: “different types of hostels (e.g. commercial facilities which can generally resemble budget hotels mainly catering for those on short breaks, centres for those with severe disabilities, to more secure residential facilities which are generally used by groups such as the homeless or those with some dependency addictions)”.	The PCTs were abolished on 31/3/13 and replaced with the CCGs Definition of hostels has been moved to new paragraph 5.8.3.

CR80	Chapter 5, Providing Better Homes	5.8.2- – 5.8.4 p77-78	NA	Two new paragraphs inserted at paragraphs 5.8.2 and 5.8.3: "Supported housing is a generic description of support that is combined with the provision of accommodation for people who require support in order to live independently. These services involve a person living in accommodation, on a temporary or long term/permanent basis, and receiving support in order to promote their independence. This support can be provided on site or on a visiting basis. Supported housing can be self-contained or shared. There are different types of hostels that are categorised under shared housing. (e.g. commercial facilities which can generally resemble budget hotels mainly catering for those on short breaks, centres for those with severe disabilities, or more secure residential facilities which are generally used by groups such as the homeless or those with some dependency addictions)." Paragraph 5.8.4 therefore becomes paragraph 5.8.6 and now precedes with "5.8.6 Hostels fall under the term 'shared housing' and are classified sui generis to the Use Classes Order, whereas housing that offers a significant element of care or supervision in the service provision would be a C2 (Residential Institutions) use. "	To define supported housing and hostels individually and to explain the use classes that they fall into.
CR81	Chapter 5 - Providing Better Homes	5.8.7 p78	NA	Former paragraph 5.8.5 has added text after the first sentence "Development proposals will be considered in relation to other applicable policies, including amenity and design."	To affirm that shared and supported housing schemes would still be assessed by factors including amenity and design.
CR82	Chapter 5 - Providing Better Homes	pg77	DM25	New points added: "(i) have a floorspace area, of more than 120 sq.m. including internal circulation;" and "(vi) will provide a good standard of accommodation, such as space standards, facilities, daylight and sunlight, aspect and amenity space." Second to last paragraph now says "Evidence of management arrangements and details of intended	To bring forward some of the points in policy HO14 of the UDP 1995 to in relation to the quality of the HMO and protection of smaller family houses in line with DM23. Change from 10 or more non-self contained rooms, to 7 or more occupants

				occupiers should be provided where the proposal would consist of non self-contained rooms for 7 (or more) occupants."	to reflect the change from use class C4 to sui generis when the number of occupants exceeds 6.
CR83	Chapter 5, Providing Better Homes	p66	DM26	Point (ii) amended to say "have good access to local shops, services, public transport and facilities appropriate to the needs of the intended occupiers;"	To ensure that Shared and supported housing have access to public transport as well as the other facilities previously listed.
CR84	Chapter 5 - Providing Better Homes	5.9.3, p80	DM27	Insert after final sentence "…, unless there are valid and appropriate reasons why such facilities should not be accessible to the public." Also added to second paragraph of policy DM27.	In response to consultation, a caveat to the provision of publicly accessible facilities.
CR85	Chapter 5 - Providing Better Homes	5.8.6 p78	NA	Added text to beginning of paragraph "Hostels fall under the term 'shared housing' and are classified sui generis to the Use Classes Order, whereas housing that offers a significant element of care or supervision in the service provision would be a C2 (Residential Institutions) use."	To explain what use class a hostel falls into and explain the difference for a property that is use class C2.
CR86	Chapter 5 - Providing Better Homes	5.9.1, p79	NA	Delete first half of paragraph.	Unnecessary detail in the supporting text, figure in relation to contribution to the Hackney economy is dated, reference to the hotel study is dated.
CR87	Chapter 5 - Providing Better Homes	5.9.4, p80	NA	Additional text: "In addition, short-term self-contained serviced apartments, sometimes called 'Apart-Hotels', also fall into this use class, provided they operate in the style of a hotel, rather than a permanent residential style use. Apart-hotels do provide a beneficial service potentially for longer term tourists or business people, however, the Council's preference is for hotels to be of the conventional type, particularly given established concerns that such uses are more akin to housing than a commercial use, and as such policies regulating housing delivery may not be able to be applied. As such, proposals for apart-hotels must demonstrate why a conventional hotel is not appropriate, and should not compromise the delivery of general housing, or have an	In response to consultation, to recognise the benefits of apart-hotels, but also to be specific about the concerns related to apart-hotels that are common to other planning authorities in relation to the potential residential rather than commercial nature of such uses.

				adverse impact on infrastructure provision. Evidence of management arrangements for apart-hotels need to be submitted to support a planning application. "	
CR88	Chapter 5 - Providing Better Homes	P81	DM27	Second paragraph of policy insert "….unless there are valid and appropriate reasons why such facilities should not be accessible to the public."	In response to consultation, a caveat to the provision of publicly accessible facilities.
CR89	Chapter 5 - Providing Better Homes	P81	DM27	Delete reference to London Plan space standards at 5th paragraph of policy.	In response to consultation, which highlighted that apart-hotels are not residential and should not be considered on this basis. The London Plan space standards are therefore not relevant for C1 use.
CR90	Chapter 6 – Cleaner, Greener Safer	p71 6.2.4	NA	Insert new paragraph into the supporting text: "The Council's priority is to conserve and enhance the Borough's historic environment and heritage assets. In exceptional circumstances, proposals that will lead to substantial harm to or total loss of significance of a designated heritage asset may be acceptable provided that it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefit. Alternatively, harm or loss may be acceptable if the applicant can demonstrate that it has met the criteria set out in paragraphs 133, 134 135 and 136 of the National Planning Policy Framework (March 2012). Due to the fact that heritage assets are irreplaceable, in Hackney the medium term for appropriate marketing would normally be at least 2 years and accord with Appendix 4 of this Plan. Where there is deliberate neglect of or damage to a heritage asset, the deteriorated state will not normally be taken into account, and the Council will endeavour to work with the owner(s) to restore the significance of the asset."	In response to consultation, regarding referencing paragraphs 133,134,135 and 136 of the NPPF about harm and total loss of heritage assets.
CR91	Chapter 6 – Cleaner, Greener Safer	p74	DM28	Amend title of the policy to "Managing the Historic Environment" Insert into Policy DM28 under new sub heading 'Harm to or total loss of a designated heritage asset.' "Where a proposal will lead to substantial harm to or total loss of	In response to consultation regarding referencing paragraphs 133,134,135 and 136 of the NPPF about harm and total loss of heritage assets.

				significance of a designated heritage asset it must be demonstrated that efforts to retain or restore the significance of the heritage asset have been explored and that the public benefits of redevelopment, including securing its optimum viable use, outweighs the adverse impact on the significance of the designated heritage asset (see appendix 4)."	
CR92	Chapter 6 – Cleaner, Greener Safer	p73	DM28	Amend fourth bullet point of third paragraph of Policy DM28 to read: " Proposals for alterations and extensions that would be highly visible should comply with the first section of this policy and the bullets two and three immediately above."	In response to consultation regarding the need to address roof extensions in conservation areas.
CR93	Chapter 6 – Cleaner, Greener Safer	p72 6.5.2	NA	Insert new paragraph into supporting text “Irrespective of whether or not a heritage asset is designated, its wider setting can greatly influence the significance and the experience of an asset beyond the visual context. When putting forward proposals which may affect historic setting, applicants should, therefore, identify the contribution made to the historic significance of a heritage asset by its setting, before determining any impacts on that significance arising from development in the setting. Therefore, a proposed development within the setting of a heritage asset should assess, consider and address any impact on the asset’s significance in accordance with English Heritage’s guidance and advice.”	In response to consultation regarding explicit reference to the setting of heritage assets.
CR94	Chapter 6 – Cleaner, Greener Safer	p75 6.7.1	NA	Insert new paragraph into the supporting text “Advertising hoardings and stand-alone boards can detract from the townscape quality of the Borough, and lead to a poor visual environment within their immediate vicinity. Poorly located advertising hoardings can be unsightly and an incongruous feature in areas where there is a unified architectural or landscape character. In particular, the amenity, character and quality of heritage assets and the wider historic environment can be adversely affected by advertisement hoardings.”	New text to ensure that advertisements should not be detrimental to the local environment in general and the historic environment in particular.
CR95	Chapter 6 – Cleaner,	p75 6.7.2	NA	Insert into the existing paragraph “If located on a public footpath, the Council will encourage applicants to ensure	In response to consultation to ensure that any proposal complies with the

	Greener Safer			the advertisement medium forms part of the street furniture serving other functions such as telecommunication equipment or bus shelters, rather than a stand-alone dedicated notice or advertising board. Advertisement proposals which do not comply with the requirements of Circular 03/2007, the NPPF, and the Town and Country Planning (Control of Advertisements) (England) regulations 2007 or their replacement will not be permitted."	appropriate regulations.
CR96	Chapter 6 – Cleaner, Greener Safer	p75	DM 29	Delete bullet point iv of Policy DM29 : " Where relevant relate to the business or premises which are advertising"	In response to consultation to ensure that any proposal complies with the appropriate regulations.
CR97	Chapter 6 – Cleaner, Greener Safer	p75	DM 29	Delete from Policy DM29 the sentence beginning "Large advertising hoardings area generally. not considered appropriate anywhere in the Borough"	In response to consultation to ensure that any proposal complies with the appropriate regulations.
CR98	Chapter 6 – Cleaner, Greener Safer	p75	DM 29	Insert into Policy DM29 "Advertisement proposals which do not comply with the requirements of Circular 03/2007, the NPPF and the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 or their replacement will not be permitted."	In response to consultation to ensure that any proposal complies with the appropriate regulations.
CR99	Chapter 6 – Cleaner, Greener Safer	p76	DM30	Delete from Policy DM30 "Telecommunications equipment is considered inappropriate on listed buildings and within consideration areas" Insert "If proposing development in a sensitive area, the development should not have an unacceptable effect on areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest. Telecommunications equipment on heritage assets and within conservation areas must comply with Core Strategy Policy 25 and proposed Policy DM28**."**	In response to consultation, that the former wording implies that there is a blanket ban on such development in conservation areas.
CR100	Chapter 6 – Cleaner, Greener Safer	p76	DM30	Delete from Policy DM30 "It must be demonstrated that proposals will not cause interference with existing broadcast and telecommunication services."	In response to consultation that this is unnecessary as it is covered by other legislation.

CR101	Chapter 6 – Cleaner, Greener Safer	p78 6.9.5	NA	Insert into paragraph 6.9.5 “For specialised housing types, such as supported housing schemes or student housing developments, the level of communal space in such schemes will be subject to negotiation, based on the location and individual circumstances”.	In response to consultation that student housing schemes are different from residential schemes in terms of on-site amenity and living roof space requirements.
CR102	Chapter 6 – Cleaner, Greener Safer	p78 6.9.6	NA	Insert into paragraph 6.9.6 “For new social and community facilities within the context of proposed Policy DM5 “Protection and Delivery of Social and Community Facilities”, the level of communal space in such schemes will be subject to negotiation, based on the location and individual circumstances.	Provide flexibility for social and community facilities in terms of communal open space requirement as advocated by proposed Policy DM31.
CR103	Chapter 6 – Cleaner, Greener Safer	p79	DM31	Delete from Policy DM31 “……and large student and shared accommodation schemes…” Insert into Policy DM31: “The above requirement for residential and commercial schemes will not be applicable to specialised housing types, such as supported housing schemes or student housing developments, and new social and community facilities. The level of communal space in such schemes will be subject to negotiation.”	In response to consultation and acknowledgment that not all development will be expected to provide the level of communal open space set out in the policy.
CR104	Chapter 6 – Cleaner, Greener Safer	P80 6.10.3	NA	Insert new text “Generally, proposals should not result in the loss of open space, and should be for small scale ancillary development of high quality design, and appropriate to the character of the open space. Further guidance regarding appropriate enhancement of such open space can be found in the Social Spaces: A Strategy for Parks in Hackney, Park Management Plans, Hackney’s Biodiversity Action Plan and Hackney Play Strategy at http://www.hackney.gov.uk/parks.htm, and the London Mayor’s “Shaping Neighbourhoods: Children and Young People’s Play and Informal Recreation SPG”. The policy below also provides a link between the Core Strategy Proposals Map and its proposed replacement,	Clarification that the policies in the DMLP should be read in conjunction with the Core Strategy policies and specifically CS26 ‘Open Space Network’. Also signpost to local guidance about the forms of enhancement that existing individual spaces may require.

				the Development Management Policies Map, in regard to the protection and retention of existing open space, given the current status of the Core Strategy Proposals Map. The policy should be read in conjunction with Core Strategy policy 26."	
CR105	Chapter 6 – Cleaner, Greener Safer	P80 6.10.3	NA	Insert new text "The Lee Valley Regional Park is a major area of interconnected open space within the Borough defined by its openness, heritage rich and biodiverse landscapes and the variety of sporting and recreational activities available to local residents and visitors http://www.leevalleypark.org.uk/. The Regional Park is statutorily designated for leisure, recreation, sport and nature conservation. Development coming forward in the Borough will provide opportunities to improve access into the Park from surrounding communities, enhance existing sporting and recreational opportunities and heritage assets and protect existing ecological sites. The Council's Park Strategy and individual management plans cover Hackney's section of the Regional Park. The Council will seek to work co-operatively with the Lee Valley Regional Park Authority (LVRP) and other stakeholders to deliver the Park Plan 2000 and the Park Development Framework Area Proposals to improve leisure and sporting opportunities for local communities, enhance access to open space and nature and help expand educational, volunteering and health related activities. The Authority adopted Area Proposals "The Three Marshes: Walthamstow, Leyton and Hackney" (October 2011) that include a large section of the Park area within Hackney. The development of Area Proposals for the remainder of the Park within Hackney is scheduled for mid 2013, including land within the Hackney Wick area."	In response to consultation that a higher profile should be given to the Lee Valley Regional Park Authority, it's Park Plan, Park Development Framework and Area Proposals.
CR106	Chapter 6 – Cleaner,	p80	DM32	Amend title of policy to "Protection and Enhancement of Existing Open Space and the Lee Valley Regional Park"	In response to consultation that a higher profile should be given to the Lee Valley

	Greener Safer			Insert into Policy DM32 “The Council supports in principle the Lee Valley Park Authority’s Park Plan and Park Development Framework (PDF) adopted Area Proposals schedule for the area of the Park within Hackney.	Regional Park Authority, it’s Park Plan, Park Development Framework and Area Proposals.
CR107	Chapter 6 – Cleaner, Greener Safer	p 85 6.13.5	NA	Insert text into paragraph 6.13.5 “If applicable development proposals will be expected to conform to the British Standard 5837:2012 or any subsequent amendments regarding pre-and post planning consent work in relation to design, protection and planting of trees. Root Protection Areas (RPAs) will always be respected.”	In response to consultation that that the Policy needs to explicitly reference British Standards 5837:2012 in relation to trees and Root Protection Areas.
CR108	Chapter 6 – Cleaner, Greener Safer	p86 6.14.2 /3	NA	Insert new paragraph “Whilst the Council recognises the need for increasing the number of residential moorings to cater for any existing demand, it is anxious to ensure that residential moorings do not conflict with the navigation and recreational uses of the waterways, and/or have detrimental impact on the amenity, water quality, character and appearance, and biodiversity and nature conservation value, of the waterways and adjoining areas, and that they comply with the London Plan (July 2011) Policy 7.27. In considering applications for residential moorings (and any other types of moorings) the Council will have regard to the Park Plan of the Lee Valley Regional Authority and the need to safeguard and protect the openness and amenity of much of the waterways within the Park in Hackney, i.e. the Lea Navigation/River Lea which are designated as Metropolitan Open Land and as Sites of Importance for Nature Conservation. Any application for residential moorings will therefore be carefully assessed for the impact it could have on the openness and amenity of the Lee Valley.”	In response to consultation that residential moorings is inappropriate within the Lee Valley Regional Park, and should normally be off-line from main navigation routes i.e. in basins or docks.
CR109	Chapter 6 – Cleaner, Greener Safer	p86	DM36	Amend beginning of policy to read “Proposals for residential moorings will be supported by the Council, provided supporting uses and facilities are or will be in place, and they comply with the Park Plan and Area Proposals of the Lee Valley Park Authority…..”	In response to consultation that residential moorings is inappropriate within the Lee Valley Regional Park, and should normally be off-line from main navigation routes i.e. in basins or docks.
CR110	Chapter 7 –	7.1.2,	NA	Insert as new paragraph, “Further details and guidance on	To clearly articulate the relationship of

	Climate Change and Environmental Sustainability	p104		the implementation of the policies and information contained within this chapter of the Development Management Local Plan will be available within the emerging Sustainable Design and Construction Supplementary Planning Document (SPD) and its associated Appendices. The SPD should be used in conjunction with Hackney's DMLP and Core Strategy and the latest iteration of the London Plan to aid in designing the most sustainable developments."	policies in the DMLP with the emerging Sustainable Construction Design Supplementary Planning Guidance.
CR111	Chapter 7 – Climate Change and Environmental Sustainability	7.1.5, p102	NA	Insert as new paragraph, "The North London Waste Plan is currently being prepared and will set out the planning framework for waste management in the Hackney and the London boroughs of Barnet, Camden, Enfield, Haringey, Islington and Waltham Forest for the next 15 years up to 2027. It will also identify sites for waste management use and set out policies for determining waste planning applications."	In response to consultation, to highlight that waste sites/ policies for determining waste applications will be set out in the NLWP. .
CR112	Chapter 7 – Climate Change and Environmental Sustainability	7.2.1, p105	NA	Insert "In light of this, the Council has set a range of goals for CO_2 reduction in different parts of the Borough. In its growth areas, which include its town centres of Dalston, viewed as an Area of Intensification in the London Plan, and Hackney Central, the Council anticipates a higher level of development, and therefore considers that these areas should make the greatest contribution to reducing CO_2. In these town centres the Council has set an aspirational goal of requiring all new residential development over 5 units or 500sqm floorspace to achieve a minimum of Code for Sustainable Homes (CSH) Level 4 from 2010, with a stepped increase to Level 5 from 2013 and Level 6 from 2016, unless it can be demonstrated that it is not technically feasible to do so."	In response to consultation, to explain why differing standards are sought for different parts of the Borough.
CR113	Chapter 7 – Climate Change and Environmental Sustainability	7.3.6, p106	NA	Insert "With reference to water efficiency, improving this is a priority for Hackney, especially given that the Borough sits within an area of 'serious' water stress, which means that with its high population there are high water demands against a limited water availability. Average water consumption in Hackney in 2010 -11 was 166.5 litres per	In response to consultation, to provide context to support the additional policy requirement included under DM37 (see CR114).

				person per day which is well above the England and Wales average of 148l/h/d or the London Plan target of 105 litres or less per head per day required from residential developments. In light of the foregoing, the Council will require all developments to achieve water target efficiency set by the London Plan in order both to achieve water efficiency but also to reduce carbon emissions."	
CR114	Chapter 7 – Climate Change and Environmental Sustainability	p107	DM37	Insert "All development will be required to minimise the use of mains water by incorporating saving measures in order to achieve set water use targets in the London Plan."	In response to consultation, additional policy section included under DM 37 to ensure development complies with the water efficiency standards set out in the London Plan.
CR115	Chapter 7 – Climate Change and Environmental Sustainability	7.3.11 and 7.4.4, p107 and p109	NA	Insert "…Measures to achieve these carbon dioxide emissions targets should reflect the context of each proposal, taking account of its size, nature, location, accessibility and expected operation."	In response to consultation, to highlight that measures to achieve the targets outlined in DM37 should take into consideration such factors as ease of practicality of connection to existing networks, context, size, nature, location, accessibility and expected operation.
CR116	Chapter 7 – Climate Change and Environmental Sustainability	7.3.12, p107	NA	Insert "Planning conditions will require that post-construction, BREEAM and CSH certificates are provided to the Council within three months of on site completion."	To ensure that the developments, as built, meet the standards as set out when planning permission was granted.
CR117	Chapter 7 – Climate Change and Environmental Sustainability	Various sections through out Chapter 7, p104-109	DM 37	Replace "EcoHomes" with "BREEAM Domestic Refurbishment".	BREEAM Domestic Refurbishment (BDR) was launched on 11th June 2012 as a replacement for EcoHomes. Text amended throughout this chapter to reflect this change.
CR118	Chapter 7 – Climate Change and Environmental	p108	DM38	Amend DM 38 to read "Proposals for minor new residential development of 1-9 units (or with a site area of less than 1,000 sq m) must be built to at least Code for Sustainable Homes Level 4 in line with the GLA's London	Policy amended to require all new minor residential development to achieve CSH 4 for minor residential development in line with the London Plan and the GLA's

	Sustainability			Housing Strategy. From 2013 stepped increases of the required rating will be in line with national policy."	London Housing Strategy. Policy provisions have also been included to ensure that stepped increases are introduced in line with National policy.
CR119	Chapter 7 – Climate Change and Environmental Sustainability	7.4.3, p109	NA	Insert "Also as non-residential developments consume significant amounts of water, accounting for 29 per cent of water consumption in London, they offer scope where further water and carbon saving can be made. The Council will therefore require that new non-household developments including refurbishments, achieve a water efficiency standard, such as BREEAM "Excellent", and where possible, achieve the maximum number of water credits."	In response to consultation, to provide context to the proposed policy amendment to DM39 (see below).
CR120	Chapter 7 – Climate Change and Environmental Sustainability	p109	DM 39	Amend DM39 to read "Major non-residential developments, including refurbishments and mixed use schemes with a site area of 1000 sq m or more must achieve the BREEAM "Excellent" standard (or equivalent ratings under any other system which may be introduced) and where possible, achieve the maximum number of water credits, and must be built to the following standards, in-line with the current Government programme.	In response to consultation, as evidenced by the representation from the EA, non-residential developments consume significant amounts of water and therefore this policy was amended to require where possible, that these developments achieve the maximum number of 'water credits' to realise further carbon savings.
CR121	Chapter 7 – Climate Change and Environmental Sustainability	7.5.3, p110	NA	Insert "…In these areas, the Council will require that development proposals be designed to connect to existing or proposed district heat networks and where none exists to commit to future proofing".	In response to consultation, the GLA requested a bespoke DE policy which stipulates the requirement to connect to existing or proposed district heat networks and where none exist to commit to future proofing should also be included along with the requirement to commit to onsite heat networks where direct connection to District heating is not viable.
CR122	Chapter 7 – Climate Change and Environmental Sustainability	p111	DM41	Amend DM41 to read "... Major developments must demonstrate that the heating, cooling and power systems have been selected to minimise carbon dioxide emissions, in line with the London Plan targets. They should be designed to connect to existing or proposed decentralised heat and energy networks and where none exists commit to future proofing.	In response to consultation, DM41 has been amended to ensure major and minor development is designed to connect to existing or proposed decentralised energy networks. For major development, the policy has amended to require where no network exists, that the development

				Minor developments should, where technically possible, similarly be designed to connect to existing or planned decentralised energy networks…”	commit to future proofing.
CR123	Chapter 7 – Climate Change and Environmental Sustainability	7.6.3, p112	NA	Amend paragraph 7.6.3 to read “As regulator, landowner and planning authority, Hackney Council is responsible for ensuring that land is suitable for its current use, and is made suitable for any new use and environmental setting. Any land recognised as being "contaminated", or with potential to cause environmental damage or soils and groundwater that may be affected by contamination, needs to be initially assessed by the applicant as part of the planning application process to determine if contamination is present, the extent of the contamination and whether it is significant. The Council will therefore require an initial desk study report from applicants which must include an appropriate level of historical and environmental information for the site and surrounding area, development of a conceptual model, a risk assessment, proposals for site investigations, and where necessary, details of remedial options and measures.”	In response to consultation, the EA suggested that DM42 could be further strengthened by setting out the minimum information that would be required by an applicant for sites potentially affected by contamination. The supporting text for DM42 has been amended in response to this.
CR124	Chapter 7 – Climate Change and Environmental Sustainability	7.6.4, p112	NA	Amend paragraph 7.6.4 to read “Where contamination and/or a contaminated (or potentially contaminated) area is identified on or near to a development site and/or a proposed development, or a nearby use may be sensitive to contamination, and the initial assessment does not demonstrate that the risks are acceptable, the Council will require the applicant to provide more detailed investigations to characterise contamination and fully assess the risks. This includes whether risks can be successfully addressed through a remediation and management strategy without causing adverse environmental impacts during the construction and operation of the development”.	In response to consultation, the EA suggested that DM42 could be further strengthened by setting out the minimum information that would be required by an applicant for sites potentially affected by contamination. The supporting text for DM42 has been amended in response to this.
CR125	Chapter 7 – Climate Change and	7.6.5, p112	NA	Insert “…Applicants must also consider any circumstances where blight may occur from sensitive development being on or near a contaminated or	In response to consultation, the EA suggested that DM42 could be further strengthened by setting out the minimum

	Environmental Sustainability			potentially contaminated area, including situations where people are unlikely to come in to direct contact with soil or water. In practice, some level of information will need to be provided for most developments that require significant disturbance of the ground."	information that would be required by an applicant for sites potentially affected by contamination. The supporting text for DM42 has been amended in response to this.
CR126	Chapter 7 – Climate Change and Environmental Sustainability	7.6.6, p113	NA	Insert "Where development works may result in potentially contaminated materials being imported on to, deposited or reused on site (such as in soil or fills or with chemicals and fuels used or stored on site), applicants must identify at the planning application stage how site works will be controlled and/or soils and fills verified to ensure they are suitable for use."	In response to consultation, the EA suggested that DM42 could be further strengthened by setting out the minimum information that would be required by an applicant for sites potentially affected by contamination. The supporting text for DM42 has been amended in response to this.
CR127	Chapter 7 – Climate Change and Environmental Sustainability	p113	DM42	Amend DM42 to read "The Council will refuse the grant of planning permission to development proposals on potentially contaminated land that do not demonstrate that sufficient and economic decontamination can be achieved and where the appropriate level of desk study information has not been submitted. Desk study information must include an appropriate level of historical and environmental information for the site and surrounding area, development of a conceptual model, a risk assessment, proposals for site investigation and, where necessary, details of remedial options and measures. Where contamination is, or may be, present and there exists the potential for significant harm to be caused to health, ecological systems, the quality of surface and ground water, and property, the Council will refuse the grant of planning permission until an appropriate level of site investigation information and a satisfactory remediation strategy have been submitted to and approved by the Council and other appropriate authorities. The remediation strategy should include, where necessary, measures for future management and monitoring activities.	In response to consultation, the EA suggested that DM42 could be further strengthened by setting out the minimum information that would be required by an applicant for sites potentially affected by contamination. DM 42 has been amended to clearly outline what information should be submitted for applications on contaminated land.

				Where necessary, applicants will be required to enter into planning obligations to ensure that the approved remediation strategy is fully complied with."	
CR128	Chapter 7 – Climate Change and Environmental Sustainability	7.7.4, p115	NA	Insert " Any air quality assessments and other air quality related work should be undertaken by a competent person/company in line with best practice guidance and any published supplementary planning guidance. This will include publications by bodies such as the Department for Environment, Food and Rural Affairs (DEFRA), the Environment Agency, British Standards Institute, Buildings Research Establishment, the Construction Industry Research and Information Association (CIRIA), Hackney Council, Environmental Protection UK, The Institute of Air Quality Management or the Greater London Authority."	To further strengthen DM43 by setting out the requirements for air quality assessments.
CR129	Chapter 7 – Climate Change and Environmental Sustainability	7.7.18, p117	NA	Insert new paragraph, "Pollution of controlled waters poses a risk to the health and well being of Hackney residents and wildlife, and should therefore be minimised through the planning process. The Council will therefore resist developments that pose unacceptable risk to water quality, and will require development proposals to consider risks to water quality, and where appropriate, to reduce the risks to the water environment and aim to protect and improve the water quality of both surface water and ground water.	In response to consultation, to provide context to the proposed policy addition to DM43 (see CR133) that will require development proposals to consider risks arising from development on water quality and where appropriate, to reduce the risk to the water environment and aim to protect and improve the water quality of surface water and ground water.
CR130	Chapter 7 – Climate Change and Environmental Sustainability	7.7.19, p117	NA	Insert new paragraph, "Improving water quality meets a number of key objectives: it increases the potential for the recreational use of Hackney's water resources; it provides a better quality environment for and opportunities to enhance biodiversity; it also helps to maintain a good quality supply of drinking water. Measures to improve water quality such as SuDS also provide other cross benefits such as reducing/managing flood risk. This is discussed in more detail in the section on Flood Risk (see Policy DM 44: Flood and Flood Risk)."	In response to consultation, to provide context to the proposed policy addition to DM43 (see CR133) that will require development proposals to consider risks arising from development on water quality and where appropriate, to reduce the risk to the water environment and aim to protect and improve the water quality of surface water and ground water.
CR131	Chapter 7 – Climate Change and	7.7.20, p117	NA	Insert new paragraph, "The European Water Framework Directive provides clear objectives for protecting and enhancing water quality, both surface and ground water,	In response to consultation, to provide context to the proposed policy addition to DM43 (see CR133) that will require

	Environmental Sustainability			and provides the Council with the opportunities to work in partnership with other organisations to improve the water environment for the benefit of Hackney people and wildlife. The Environment Agency (EA) has published a Thames River Basin Management Plan which identifies areas of poor water quality in Hackney and a programme of measures to improve the condition of the waterways. The Council will, therefore, support this initiative by the Environment Agency and other partners in the Thames River Basin Management Plan to prevent ground water pollution and improve surface water quality."	development proposals to consider risks arising from development on water quality and where appropriate, to reduce the risk to the water environment and aim to protect and improve the water quality of surface water and ground water.
CR132	Chapter 7 – Climate Change and Environmental Sustainability	7.7.21, p117	NA	Insert new paragraph, "The Environment Agency has identified a number of Source Protection Zones (SPZ) and aquifers in the Borough where the risk to ground water and public water supply may need to be considered. In these areas the Environment Agency seeks to restrict certain contamination activities in order to protect groundwater quality and public water supply. The Environment Agency is the statutory body responsible for the protection and management of groundwater resources, and have produced a 'Groundwater Protection: Policy and Practice (GP3) setting out their approach for a wide range of activities and developments that may affect groundwater quality."	In response to consultation, to provide context to the proposed policy addition to DM43 (see CR133) that will require development proposals to consider risks arising from development on water quality and where appropriate, to reduce the risk to the water environment and aim to protect and improve the water quality of surface water and ground water.
CR133	Chapter 7 – Climate Change and Environmental Sustainability	p118	DM43	Amend DM43 to read " (a) General Detailed survey and assessment information will be required as appropriate in order for the Council to consider any possible pollution impact linked to development proposals. Necessary mitigation measures will be secured through negotiation on a scheme, or via the use of planning conditions or planning obligations where appropriate. Permission may be refused for proposals that cannot provide adequate mitigation.	In response to consultation: Policy section a) General included to clearly outline what information should be submitted with applications where this DM 43 applies. Policy c) Air Quality has been amended to outline what an applicant must address with regards to air quality. Policy d) Water Quality added to require development proposals to consider risks

				b) Pollution Development proposals should include measures to reduce adverse noise, vibration, and/or odour impacts and minimise unnecessary light pollution, particularly close to light and noise sensitive areas, the public realm and open space. c) Air Quality The Council will refuse the grant of planning permission, in the most polluted areas of the Borough, until the applicant has satisfactorily demonstrated how emissions from the construction process of the proposed development will be minimised and controlled, so that the Council's air quality objectives are not exceeded or further exceeded, and the ongoing use of the development will not contribute to a worsening of air quality and be minimised as far as practicably possible. All development should be designed to mitigate its impact on air quality both during the construction process and lifetime of the completed development. Individually or cumulatively, development proposals should not worsen air quality. d) Water Quality In consultation with the Council and where necessary the Environment Agency, the applicant must consider the risks arising from development (including design, construction, and operation) to water quality, and where appropriate include measures to reduce the risk to the water environment and aim to protect and improve the water quality of surface water and groundwater. Planning permission may be refused if adequate mitigation measures are not provided."	arising from development on water quality and where appropriate, to reduce the risk to the water environment and aim to protect and improve the water quality of surface water and ground water.
CR134	Chapter 7 – Climate Change and Environmental Sustainability	7.8.5, p119	NA	Insert into paragraph 7.8.5 "SuDS can also provide opportunities to create or improve habitats, biodiversity and open space which help to alleviate issues of heat island effects and contribute to energy efficient buildings, whilst also providing leisure and amenity opportunities as	In response to consultation, to highlight the multiple benefits of SuDs and to link this Chapter with policies contained in Chapter 6.

				well as flood storage opportunities (see Chapter 6 - Cleaner Safer Greener)."	
CR135	Chapter 7 – Climate Change and Environmental Sustainability	7.8.14, p121	NA	Insert "Sewer flooding poses another potential danger. Many urbanised areas, such as Greater London, are served by 'combined' sewerage systems which carry both foul sewage and surface water run-off. When storm water exceeds the system's capacity, sewage can overflow into rivers, out of external drains and manholes and can even enter homes. Population growth, housing development and impacts of climate change are placing increasing pressure on the existing sewer network."	In response to consultation, to provide context to the proposed policy additions in DM44 in response to comments made by Thames Water on water and wastewater infrastructure and sewer flooding.
CR136	Chapter 7 – Climate Change and Environmental Sustainability	7.8.15, p 121	NA	Insert new paragraph, "The Council will continue to work with Thames Water Utilities Ltd (statutory water and sewerage undertakers) and the Environment Agency (EA), as appropriate, to ensure that adequate water supply, surface water drainage, foul drainage and sewerage treatment capacity is in place to serve new development throughout the Borough.	In response to consultation, to provide context to the proposed policy additions in DM44 in response to comments made by Thames Water on water and wastewater infrastructure and sewer flooding.
CR137	Chapter 7 – Climate Change and Environmental Sustainability	7.8.15, p121	NA	Insert new paragraph, "Applicants should liaise with Thames Water in order to demonstrate that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity both on and off site to serve the development and that it would not lead to problems for existing users. In some circumstances, this may make it necessary for applicants to carry out appropriate studies to ascertain whether the proposed development would lead to overloading of existing infrastructure.	In response to consultation, to provide context to the proposed policy additions in DM44 in response to comments made by Thames Water on water and wastewater infrastructure and sewer flooding.
CR138	Chapter 7 – Climate Change and Environmental Sustainability	p122	DM44	Amend 1.2 and 13 of DM44 to read: "1.2 All development should utilise Sustainable Drainage Systems 'SuDS', unless there are practical reasons for not doing so, and manage surface water run-off as close to source as possible. Where there will be a net increase in impermeable area, development must include at least one 'at source' SuDS measure (e.g. waterbutt, rainwater harvesting tank, bioretention planter box etc) resulting in a net improvement in water quantity or quality discharging to a sewer.	In response to consultation, to require surface water to be managed as close to the source as possible. Section 1.3 has also been amended to apply to all developments and to require that both the volume and rate of run-off is reduced by at least 50% in accordance with the Mayor's Supplementary Planning Guidance for Sustainable Design and

				1.3 All developments should reduce both the volume and rate of existing run-off from site by at least 50% where reasonably practicable through the appropriate incorporation of SuDS".	Construction.
CR139	Chapter 7 – Climate Change and Environmental Sustainability	p122	DM44	Delete: "1.4 All minor developments should reduce the existing run-off rate as far as possible, and as a minimum maintain the existing run-off rate through the appropriate incorporation of SUDs."	In response to consultation, no longer required as Section 1.3 has been amended to apply to all developments (see above CR138).
CR140	Chapter 7 – Climate Change and Environmental Sustainability	p123	DM44	Insert 1.9 and 1.10 "1.9 Council in liaison with Thames Water will 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. 1.10 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."	In response to consultation, to address sewer flooding and water and waste infrastructure.
CR141	Chapter 8 – Transport	8.1 to 8.1.11, p124	DM45	The supporting text has been amended and added to, to provide further evidence to support the movement hierarchy listed in policy DM45. This includes evidence on falling car ownership levels and an increase in cycling levels.	The supporting text has been added to, to provide further evidence to support policy DM45.
CR142	Chapter 8 – Transport	8.2.3, p127	NA	A new line has been inserted at the end of paragraph 8.2.3 to read: "Wherever development is likely to impact upon the Transport for London Road Network (TLRN) or Strategic Road Network (SRN) or the Public Transport System, Transport for London (TfL) will also be consulted."	In response to consultation. TfL will also need to assess the possible impact on any TLRN or SRN and the Public Transport System.

CR143	Chapter 8 – Transport	8.2.3, 8.2.4 and 8.2.5, p127-128	NA	The supporting text has been amended to elaborate on and provide amended thresholds for the requirements to provide Transport Assessments and Travel Plans when assessing the impacts of new development.	The text has been amended for clarity purposes.
CR144	Chapter 8 - Transport	p128	DM46	The wording of Policy DM46 and its supporting text has been amended to make reference to the need for development proposals to be accompanied by a Construction and Logistics Plan (CLP) and Delivery and Servicing Plan (DSP).	In response to consultation. There was a need for the policy to include reference to the need for development proposals to be accompanied by a Construction and Logistic Plan (CLP) and Delivery and Servicing Plan (DSP).
CR145	Chapter 8 – Transport	8.2.10, p128	NA	A new paragraph has been inserted in the supporting text to make reference to the requirement for the Council to collect contributions from developers towards the construction of Crossrail on behalf of the Mayor.	In response to consultation. There was no reference to the requirement for the Council to collect contributions from developers towards the construction of Crossrail on behalf of the Mayor.
CR146	Chapter 8 – Transport	8.2.12, p128	NA	Paragraph 8.2.12 has been amended to read: “The Council will expect development which is considered to generate a significant movement of goods or materials through the use of goods vehicles, particularly heavy goods vehicles, and involves several journeys to and from the development site resulting in disruption of traffic movement and congestion."	In response to consultation, to define the ‘significant movement’ of goods.
CR147	Chapter 8 – Transport	8.2.13, p129	NA	A new paragraph has been inserted in the supporting text regarding pedestrian and cycle safety during the construction stage of new developments.	The text has been amended to provide guidance and safety for pedestrians and cyclists.
CR148	Chapter 8 - Transport	p130	DM46	A new paragraph has been added at the end of the policy to read: “The Council will assess each application on its individual merits and will only refuse planning permission on transport grounds where the residual cumulative impact of a development is severe."	In response to consultation, to reflect the content of the NPPF.
CR149	Chapter 8 – Transport	p130	DM46	A new paragraph has been inserted at the beginning of Policy DM46 to read: "The Council seeks through this policy to encourage the closer integration of transport and development in order to reduce the need to travel and to achieve sustainable development."	In response to consultation. There was a need for the policy to explain the need to integrate land use with transport networks.

CR150	Chapter 8 – Transport	p130	DM46	The fourth bullet point of the second paragraph of Policy DM46 has been amended to read: "Developments should make suitable provision for encouraging the use of public transport, walking and cycling. The Council will require the provision of or financial contributions towards the following, as appropriate: infrastructure and funding for the expansion of the Mayor of London's Cycle Hire Scheme in Hackney;"	In response to consultation. No reference was made to the Mayor's Cycle Hire Scheme.
CR151	Chapter 8 – Transport	p131	DM46	The second to last paragraph of DM46, point (i) has been amended to read: "Be located with easy access to TfL's Road Network, the Strategic Road Network or other Major Roads;"	In response to consultation, to define what 'close' to TfL Road Network means.
CR152	Chapter 8 - Transport	p131	DM46	Point (ii) of Policy DM46 has been removed.	In response to consultation. There was no substantial evidence to support the use of 7.5 tonne vehicles as the threshold for movements of vehicles in residential areas.
CR153	Chapter 8 - Transport	8.3.3, p132	NA	A new paragraph has been inserted in the supporting text of DM47 to support the further development of parallel routes in particularly congested stretches of towpath.	In response to consultation. Towpaths are particularly congested and further development of parallel routes is considered necessary.
CR154	Chapter 8 – Transport	p132	DM47	Policy DM47 has been amended to reference the London Plan Revised Early Minor Alterations June 2012 Cycle Parking Standards.	In response to consultation. The policy should have regard to the London Plan Revised Early Minor Alterations (June 2012) standards.
CR155	Chapter 8 - Transport	8.4.1 to 8.4.21, p132-136	NA	The supporting text has been amended and added to, to provide further guidance on the car parking in the Borough, and to provide further justification text to support policy DM48.	The text has been amended to elaborate on the Council requirements for car parking in the Borough.
CR156	Chapter 8 - Transport	p137	DM48	Section C of policy DM48 has been amended to make reference to the London Plan and future Hackney car parking standards.	In response to consultation. Reference should be made to the London Plan and Hackney car parking standards.
CR157	Glossary	P140	NA	Added a new definition for car-free development as follows: **"Car-free development -** No parking provision will be allowed on site and the occupiers will have no ability to obtain car parking permits, except for parking needed to	Definition supports terminology use in DM policy and supporting text.

				meet the needs of disabled people."	
CR158	Glossary	P140	NA	Added a new definition for car-capped development as follows: **"Car-capped developments -** Limited amount of on-site car parking, but no access to on-street parking permits in order to avoid any impact on on-street parking."	Definition supports terminology use in DM policy and supporting text.
CR159	Appendix 4 – Marketing Evidence and Marketing Strategy	1.1	NA	Paragraph 1.1 has been amended to include the need for viability evidence in addition to marketing evidence for the policies stated. DM18 – Railway Arches; and DM28 – Managing the Historic Environment have also been included as policies requiring viability and marketing evidence.	References the need for viability information in addition to marketing evidence and adds policies DM18 and DM28 to this requirement.
CR160	Appendix 4 – Marketing Evidence and Marketing Strategy	1.2	NA	Amend paragraph 1.2 to read: "Marketing evidence is required at submission of a planning application for three main purposes. Firstly, to justify the quantum of employment land/floorspace provided within a scheme, particularly where mixed use, is the maximum economically feasible amount possible for a site as part of any redevelopment. Secondly, where a loss of either employment, retail or community land/floorspace is proposed as part of a development proposal marketing evidence is required to demonstrate there is no realistic prospect of the land/floorspace being used/re-used for its existing purposes, or for continued operation in its current lawful use. Thirdly, to justify the loss of a designated heritage asset."	Provides added context for why marketing evidence is required in relation to specific land uses and heritage assets.
CR161	Appendix 4 – Marketing Evidence and Marketing Strategy	1.3 and 1.4	NA	Add two new paragraphs at 1.3 and 1.4 as follows: "1.3 For employment land and floorspace located within a PEA, and where a scheme is not proposed as being employment led in accordance with relevant policies, applicants will need to provide marketing evidence demonstrating that an employment led scheme is not viable for the subject site and that what is proposed is the maximum economically feasible quantum of land/floorspace the site can possibly accommodate. For	Further elaborates on the marketing evidence requirements specific to employment land and buildings.

				other employment sites outside of PEAs marketing evidence should again demonstrate that the quantum of employment floorspace proposed is the maximum economically feasible amount the site can possibly viably deliver. 1.4 For all schemes affecting employment land and floorspace it will be expected, in addition to the marketing evidence specified under paragraphs 1.8 to 1.10 below, that evidence is provided which demonstrates that the site has been marketed for policy compliant uses in the first instance and if found not to be possible then for alternative generating employment uses (refer to Policy DM14 and Policy DM17). A site's 'existing use value' should accurately reflect the site's existing use so as to assist the Council in the robust assessment of financial viability information submitted (as required by Core Strategy Policy 17 and Policy DM 14 and Policy DM17). For instance, the purchase of an employment site based on generally higher non employment values will not be considered adequate justification to reduce employment land and floorspace within any proposed development. Furthermore, applicants are required to demonstrate market testing of a number of policy compliant land use scenarios (i.e. looking at a range of commercial uses) as part of clearly demonstrating that the proposed land use mix incorporates the maximum economically feasible amount of employment land/floorspace possible on a site. Where the above cannot be demonstrated, proposed schemes will not be considered to have met Policy DM14 and Policy DM17."	
CR162	Appendix 4 – Marketing Evidence and Marketing Strategy	1.5	NA	Renumber paragraph 1.2 as 1.5 and amend to read: "For all employment land/floorspace, it must also be shown that the land/floorspace has been both adequately marketed through a commercial agent at a price that reflects market value for employment use for a minimum of two years, with no realistic prospect of employment	Use of consistent terminology with relevant DM policies and supporting text. Also the vacancy test has been removed.

				generating use/re-use, including provision for smaller flexible units or alternative smaller flexible employment generating use.”	
CR163	Appendix 4 – Marketing Evidence and Marketing Strategy	1.6	NA	Replace previous paragraphs 1.3 and 1.4 with a new paragraph 1.6 which reads: **“Retail, social and community land and floorspace** 1.6 For all retail, social and community land and floorspace, it must also be shown that the land/floorspace has been both adequately marketed through a commercial agent at a price that reflects market value for either the retail, social and/or community use. In these instances, there is a reduced marketing period of one year. Marketing evidence is to be in accordance with paragraphs 1.8 to 1.10.”	Further elaborates on the marketing evidence requirements specific to retail, social and community land and floorspace. Also the vacancy test has been removed..
CR164	Appendix 4 – Marketing Evidence and Marketing Strategy	1.7	NA	Insert a new paragraph as 1.7 dealing with Designated Heritage Assets which reads: **“Designated heritage assets** 1.7 Any application involving significant alterations to, or the partial or full loss of, a designated heritage asset must be supported by robust evidence. Firstly, that the cost of retaining or restoring the heritage asset, or reusing it for other purposes/uses, is unviable Where it is considered that a heritage asset is redundant and can not be re-used or restored and retained viably, this must be substantiated by a suitably qualified person. The site should also be marketed for a minimum of two years demonstrating that there is no realistic prospect of the asset being re-used following any necessary remedial work. Sites should not be allowed to fall into a state of disrepair and then marketed in this condition as they are obviously unlikely to be let. Marketing evidence is to be in accordance with	A new section which details the marketing evidence requirements specific to designated heritage assets.

				paragraphs 1.8 to 1.10, together with technical details on the works required and the costs involved in restoring, retaining and reusing the asset.”	
CR165	Appendix 4 – Marketing Evidence and Marketing Strategy	1.8	NA	Insert a new paragraph as 1.8 which reads: **“Components of Active Marketing** 1.8 The following requirements for marketing evidence are applicable to all employment land/floorspace, retail, social and community land and floorspace as well as designated heritage assets as described above. It must be shown to the Council’s satisfaction that marketing has been unsuccessful for all relevant land/floorspace proposed to be lost through redevelopment or change of use.”	Provides added context to the evidence requirements needed to demonstrate active marketing
CR166	Appendix 4 – Marketing Evidence and Marketing Strategy	1.10	NA	Add a new sentence to the end of bullet 8 which reads: “For heritage assets, particularly those in need of remedial work, the market price may need to be low or even zero.”	Adds specific reference to heritage assets.
CR167	Appendix 4 – Marketing Evidence and Marketing Strategy	1.10	NA	Reference to “community groups (where relating to social and community facilities)” has been added to bullet 9.	Adds specific reference to community groups (where relating to social and community facilities).
CR168	Appendix 4 – Marketing Evidence and Marketing Strategy	1.10	NA	Reference to “lawful land use of the property” has been added to bullet 11.	Adds reference to lawful land use of the property.

CR169	Appendix 4 – Marketing Evidence and Marketing Strategy	2.1	NA	Add a new paragraph as 2.1 which reads: “2.1 A marketing strategy is required in support of proposed Policy DM7 – New Retail Development, Policy DM14 – Retention of Employment Land and Floorspace, Policy DM15 – New Business Floorspace and Policy DM17 – Development Proposals in Priority Employment Areas.”	Provide clarification as to what DM policies the need for a marketing strategy applies to.