Development Management Local Plan (Publication Version) and Site Allocation Local Plan (Publication Version) – Respondent Details

The highlighting of cells indicates which document respondents have made comments on:

	Development Management Local Plan
	Site Allocations Local Plan
	Development Management Local Plan/ Site Allocations Local Plan

Respondent ID	First Name	Surname	Organisation	On behalf of	Representations made on:
1	Nurcan	Demirel			Site Allocations Local Plan
2	Jose	Martin			Site Allocations Local Plan
3	Damien	Holdstock	AMEC	National Grid	Site Allocations Local Plan
4	Bob	Pennyfather	ARRIVA		Site Allocations Local Plan
5	Mandip	Sahota	Nicholas Taylor & Associates	Orland Ltd	Site Allocations Local Plan
6	John	Smith	CgMs	Mayor's office for Policing and Crime and Metropolitan Police	Development Management Local Plan/ Site Allocations Local Plan
7	Jim	Pool	DP9	Middlewater Trading and Investment Ltd	Development Management Local Plan/ Site Allocations Local Plan
8	Tim	Gaskell	CMA Planning	Peabody / The Benyon Trust	Site Allocations Local Plan
9	DP9		DP9	Bishopsgate Goods Yard Regeneration Ltd	Site Allocations Local Plan
10	Lewis	Claridge	City of London		Development Management Local Plan / Site Allocations Local Plan
11	Chris	Deeks	Turley Associates	Newmark Properties (SN) LLP	Site Allocations Local Plan
12	Tim	Gaskell	CMA Planning	N/A	Development Management Local Plan/ Site Allocations Local Plan
13	Amanda	Peck			Site Allocations Local Plan
14	Paul	Kesslar-Lyne	Montagu Evans	Plough Yard Developments Limited	Development Management Local Plan/ Site Allocations Local Plan
15	Paul	Kesslar-Lyne	Montagu Evans	HDG LTD	Development Management Local Plan/ Site Allocations Local Plan
16	Carmelle	Belle	Thames Water Utilities Ltd, Town Planning Team		Development Management Local Plan/ Site Allocations Local Plan
17	Claire	McLean	Canal & River Trust London		Development Management Local Plan/ Site Allocations Local Plan
18	Graham	Saunders	English Heritage		Development Management Local Plan/ Site Allocations Local Plan
19	Ruth	Beard	DP9	Sun Street Properties Limited	Development Management Local Plan/ Site Allocations Local Plan
20	David	Morris	DP9	Aspirations Limited	Development Management Local Plan/ Site Allocations Local Plan
21	Matt	Gore	DP9	Rocket Investment Ltd	Development Management Local Plan/ Site Allocations

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22	Keira	Murphy	Environment Agency		Development Management Local Plan/ Site Allocations Local Plan
23	Ciara	Whelehan	London Borough of Haringey - Planning and Sustainability		Development Management Local Plan/ Site Allocations Local Plan
24	Nia	Giffith	Gerald Eve LLP	Prairie Limited and Mount Anvil	Development Management Local Plan/ Site Allocations Local Plan
25	Rosalind	Price	Gerald Eve	British Land	Site Allocations Local Plan
26	Frieda	Schicker	London Gypsy and Traveller Unit		Site Allocations Local Plan
27	James	Waterhouse	Iceni Projects	Regal Homes	Development Management Local Plan/ Site Allocations Local Plan
28	Theresa	Gonet	Highways Agency		Development Management Local Plan/ Site Allocations Local Plan
29	S	Doherty	Civil Aviation Authority		Development Management Local Plan/ Site Allocations Local Plan
30	Ben	Johnson	London Borough of Islington Planning Policy		Development Management Local Plan/ Site Allocations Local Plan
31	Mandip	Sahota	Nicholas Taylor & Associates	Blue Chip Trading Ltd	Development Management Local Plan/ Site Allocations Local Plan
32	Jenny	Harding	The Office of the Archdeacon of Hackney		Development Management Local Plan/ Site Allocations Local Plan
33	David	Hammond	Natural England		Development Management Local Plan
34	Chris	Thomas	Chris Thomas Ltd Outdoor Advertising Consultants	British Sign and Graphics Association	Development Management Local Plan
35	Chris	Thomas	Chris Thomas Ltd Outdoor Advertising Consultants	Outdoor Media Centre	Development Management Local Plan
36	John	Mumby	cgms consulting	Tesco Stores	Development Management Local Plan
37	Benjamin	Counsel			Development Management Local Plan
38	Angela	Atkinson	marine management organisation		Development Management Local Plan
39	Rose	Freeman	The theatres Trust		Development Management Local Plan
40	Ginny	Hall	mobile operators association		Development Management Local Plan
41	Stephen	Wilkinson	Lee Valley Regional Park Authority		Development Management Local Plan
42	Anthony	Ferguson	Peacock and Smith Limited	Wm Morrison Supermarket Plc	Development Management Local Plan
43	Alison	McKenzie	Agudas Isreal Housing Association		Development Management Local Plan
44	Catherine	Williams	savills	Hanover	Development Management Local Plan
45	Ed	Brotton	Drivers Jonas Deloitte	iCity	Development Management Local Plan
46	Stewart	Murray	Greater London Authority		Development Management Local Plan/ Site Allocations Local Plan
47	Chris	Bead	DP9	Rothas Limited	Development Management

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48	Ben	Frodsham	Indigo Planning Limited	Messrs Sachida Prasad and Kazi Abdul	Development Management Local Plan
49	Andrea	Rawlings	Hackney Homes Disability Forum's		Development Management Local Plan
50	Vicky	Woollett	Drivers Jonas Deloitte	Geffrye Museum	Development Management Local Plan
51	James	Diamond	Sustainable Hackney		Development Management Local Plan
52	Mark	Harris	Barton Willmore LLP	HG Capital Investments Ltd	Development Management Local Plan
53	David	Hopkins	Timber Trade federation		Development Management Local Plan
54	Maria	Lesta	British Precast Concrete Federtion Ltd	Modern Masonary Alliance	Development Management Local Plan
55	Sarah	McCann-Bartlett	The British Constructional Steelwork Association Limited		Development Management Local Plan
56	Guy	Thompson	mpa The Concrete Centre		Development Management Local Plan
57	Tanya	Jordan	CgMs	Notting Hill Housing Trust	Site Allocations Local Plan
58	Alison	McKenzie	Agudas Israel Housing Association	AIHA	Site Allocations Local Plan
59	Bruce	McRobie	Sherrygreen Homes Ltd	Sherrygreen Homes Ltd	Site Allocations Local Plan
60			Turley Associates	Sainsburys Supermarkets Ltd	Site Allocations Local Plan
61	Henry	Velleman	Comprehensive Coachworks Ltd		Site Allocations Local Plan
62	Rosa	Babad			Site Allocations Local Plan
63	Jasper	Joffe			Site Allocations Local Plan
64	Douglas	Gilmore			Site Allocations Local Plan
65	Alicia	Roberts			Development Management Local Plan
66	Councillor Carole	Williams	Hackney		Development Management Local Plan
67	Anna	Mansfield			Development Management Local Plan
68	Michael	Bell	Tower Hamlets		Development Management Local Plan/ Site Allocations Local Plan
69	Ian	Dubber	Workspace Group PLC		Site Allocations Local Plan

Development Management Local Plan (Publication Version) – Consultation Spreadsheet

The following spreadsheet is ordered chronologically on the basis of the Chapter / Supporting Document.

Res ID	Org. / Respondent	On Behalf of:	Rep No.	Chapter or Supporting Document	Policy No.	Para No.	Respondent Comments / Specific Changes or Additions Sought	Officer Response	Recommended Change
6	CgMs	Mayor's office for Policing and Crime and Metropolitan Police	6.1	Chapter 3 Delivering Sustainable Growth	DM1		Spelling Mistake. Policy DM1, General, section (viii). Change '…secure by design to 'Secured by Design'.	Comment noted. Policy DM1, General, section (viii) will be amended to reflect the change.	Insert 'Secured by Design' in Policy DM1, General, section (viii).
6	CgMs	Mayor's office for Policing and Crime and Metropolitan Police	6.2	Chapter 3 Delivering Sustainable Growth	DM5	3.6.4	Organisation name change. Change 'Metropolitan Police Authority' to 'Mayor's Office for Policing and Crime (MOPAC)'.Change 'Safer Neighbourhood Bases' to 'Community Policing Facilities'.	Comments accepted.	Change "Metropolitan Policy Authority" to "Mayor's Office for Policing and Crime (MOPAC)" and "Safer Neighbourhood Bases" to "Community Policing Facilities" in the last bullet point of new paragraph 3.6.6.
6	CgMs	Mayor's office for Policing and Crime and Metropolitan Police	6.3	Chapter 3 Delivering Sustainable Growth	DM5		In order to ensure that new and replacement community facilities can be provided across the Borough, MOPAC think it is essential that the LPA allow, through policy, the net loss of such facilities in circumstances where adequate replacement provision is made. The MPS Estate Strategy seeks better and more accessible properties to serve community policing and replacing older properties which are no longer fit for purpose or inefficient to maintain. The potential disposal of certain sites for alternative uses comprises part of the Estate Strategy. It is considered by MPS that Policy DM5, as it currently stands, will restrict the replacement and renewal of policing facilities contrary to the policy support outlined above. As noted, a key aspect of the MOPAC/MPS Estate Strategy involves providing modern, new facilities, partly facilitated by the disposal of outmoded properties. MPS quotes paragraph 157 of NPPF requiring co-operation between public sector organisations for development and infrastructure planning. Change policy: The Council will protect existing social and community facilities by resisting their loss, unless a replacement facility that meets the needs of the community is provided, or the community facility is no longer required in its current use and it has been demonstrated that it is not suitable for any other community use for which there is a defined need in the locality. Where the latter is the case, evidence will be required to show that the loss would not create, or add to, a shortfall in the provision for the specific community use and demonstrate that there is no demand for any other suitable community use on the site.	Suggested change in policy wording of policy DM5 is accepted. A new paragraph - paragraph 3.6.10 and amended first paragraph will be inserted.	Insert new paragraph: 3.6.10 In particular instances for example, some Emergency Services, Health, MOPAC and Education 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. Amended Policy DM5: The Council will protect existing social and community facilities including places of worship and public houses by resisting their loss, unless a replacement facility that meets the needs of the community is provided, or the community facility is no longer required in its current use and it has been demonstrated that it is not suitable for any other community use for which there is a defined need in the locality. Where the latter is the case, evidence will be required to show that the loss would not create, or add to, a shortfall in provision for the specific community use and demonstrate that there is no demand for any other suitable community use on the site. The applicant will need to demonstrate that all reasonable efforts have been made to preserve the facility. Evidence should include but not be limited to 12 months of marketing evidence which follows the guidelines outlined in Appendix 4. Proposals for new and extended social and community facilities will be supported. Major developments should preferably be located in defined Growth Areas (Dalston Major Town Centre, Hackney Central District Town Centre, the Railway Corridors, South Shoreditch, New Communities in Woodberry Down and Hackney Wick) and Shopping Centres. Smaller scale proposals must demonstrate that the facility has good access by public transport, walking and cycling routes. Facilities must meet the requirements for end users, and meet current legislative or best practice standards where relevant, and must comply with other policies in this Plan, particularly in regard to design, amenity and highway safety. Exceptions to this last criteria will be considered where the proposals are part of the rationalisation of the estates of key public services, such as the Emergency Services, the City and Hackney PCT and the Learning Trust, and a net loss of floorspace can be considered.

7	DP9	Middlewater Trading and Investment Ltd	7.1	Chapter 3 Delivering Sustainable Growth	DM1		We object to part (ii) of draft Policy DM1. The reference to development respecting the established scale and massing of an area could be interpreted as not allowing taller development. This part of the policy seems to be at odds with part (v) which looks for development to be of a height and massing which responds to and is compatible with the streetscape and adjacent buildings, having regard to the particular circumstances of the site. A policy which appears to restrict building heights will have a significant impact on the ability to accommodate the necessary amount of floorspace to make a development viable. We object to part (iv) within the general section of Policy DM1 which states that the Borough's heritage assets should be preserved and enhanced. This is a very broad statement which does not reflect the detailed guidance which governs heritage assets within the NPPF. We would suggest that part (ii) should be amended to reflect the approach set out in part (v).	The Council does not accept that there is a conflict between Policy DM1, parts (ii) and (v). Part (ii) generally seeks to ensure proposals fit with the scale, massing and rhythm of buildings) and streetscene, which is a sound concept, and proposals of a greater scale, height etc are generally seen on sites with particular circumstances with the ability to take greater development, e.g. Bishopsgate Goods Yard. Part (v) really seeks to provide a link to height and massing of buildings taking into account the particular circumstances of the site with regard to Heritage Assets. Part (ii) will not be amended to reflect the approach set out in part (v) as it does not conflict with this part, which looks for development to be of a height and massing which responds to and is compatible with the Streetscene and adjacent buildings. However, part (iv) within the general section of Policy DM1 will be amended to reflect the language used in the NPPF.	No change to part (ii). However, amend part (iv) within the general section by deleting the word 'Preserve' and substituting it with the word 'Conserve' and add the words 'and settings' at the end of the sentence after the word 'assets'.
7	DP9	Middlewater Trading and Investment Ltd	7.2	Chapter 3 Delivering Sustainable Growth	DM2		We object to the second part of draft Policy DM2 which states that residential development should comply with the London Housing Design Guide. The document provides guidance, therefore a development would not need to meet all the various different points which the document covers in order to comply with it. The draft policy should be amended.	Comment is noted, and the relevant part of the supporting text will be amended.	Amend second sentence of paragraph 3.3.7 so as to read: "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." to reflect comment made.
7	DP9	Middlewater Trading and Investment Ltd	7.3	Chapter 3 Delivering Sustainable Growth	DM4	3.5.6	Paragraph 3.5.6 recognises 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. This statement should be included within draft Policy DM4 as it is an important consideration when assessing schemes against this policy.	Suggested change is accepted and policy wording will be amended to incorporate suggested comment.	Amend Policy DM4 so as to read: "The Council will require planning contributions, subject to the financial viability of the scheme and any other overriding positive planning benefits, to mitigate the site specific impacts of development to ensure that such developments are acceptable in planning terms. Planning contributions will also be subject to the criteria set out in CIL Regulations (2010) 122 and 123 (or any successors) which require any financial contributions or contributions in kind towards infrastructure to meet a number of criteria".
10	City of London		10.10	Chapter 3 Delivering Sustainable Growth	DM1		The Mayor's London View Management Framework has been revised since 2010 - the latest edition was adopted and published in March 2012. It might also be worth referring to the relevant 'River Prospects' that development in Hackney (particularly on the border with the City) that are potentially impacted upon. These include: - River Prospect 15b (waterloo bridge downstream) - River Prospect 16b (The South Bank at Gabriel's Wharf) - River Prospect 17b (Hungerford Bridge downstream) The policy relating to 'Strategic View Background Area' should include reference to the City of London's 'St Paul's Heights' policy. The City's Protected Views SPD (2012) states that in some of the views protected by St Paul's Heights tall buildings can be seen in juxtaposition to the Cathedral, compromising its dominance of the skyline. This includes development proposals in Hackney, close to the border with the City. The relationship of tall buildings to the Cathedral varies with the viewpoint. In some cases tall buildings can be seen behind the dome or western towers so that their outlines are impaired. From other viewpoints tall buildings appear above the roof of the Cathedral or crowd close to the Cathedral on the skyline. Views are compromised in these ways from the following locations: the south bank between New Globe Walk and Gabriel's Wharf, and adjacent to Waterloo Bridge, and from the Millennium Bridge, Blackfriars Bridge, the southern part of Waterloo Bridge, Hungerford Bridge, and from Fleet Street. Within these views, new development and the redevelopment of existing tall buildings should aim not to worsen and, where possible, to improve the backdrop to the views (Protected Views SPD Para.219). The policy relating to 'Strategic View Background Area' should include reference to the City of London's 'St Paul's Heights' policy.	The Policy relating to 'Strategic View Background' will be amended to reflect your comment.	Amend last section of the Policy so as to read "The Council will resist developments within the background consultation areas of Linear View 8 Westminster Pier to St Paul's Cathedral and 9 King Henry VIII's Mound, Richmond to St Paul's Cathedral, in accordance with the Mayor of London's London View Management Framework SPG (March 2012) and the City of London's 'St. Paul's Heights' Policy, which would have an adverse impact on the setting of the Cathedral or on the visual relationship between the Cathedral and the City's eastern cluster of tall buildings. Redevelopment of buildings, which currently adversely impact on the strategic views, will be required to aim not to detract from, and where possible to, improve the views and not infringe on any part of the defined background area" to reflect comment made.

10	City of London		10.11	Chapter 3 Delivering Sustainable Growth	DM1		In views from the south bank west of Blackfriars Bridge and from Waterloo Bridge the Cathedral is seen in relation to the City's eastern cluster of tall buildings. The cluster appears to the right of the Cathedral and does not intrude into its backdrop. There is a clear gap on the skyline between the Cathedral and the cluster, which it is important to retain. The height and massing of buildings in the cluster step upwards from this gap. This is important to the visual relationship between the Cathedral and the cluster, and so should be maintained (Protected Views SPD, Para 2.20). It is possible that proposed developments in Hackney, close to the border with the City could impact on the visual relationship between the Cathedral and the cluster, so should be acknowledged within the Hackney Development Management Local Plan to ensure consistency of approach.	The possibility that proposed developments in Hackney, close to the border with the City could impact on the visual relationship between the Cathedral and the City's eastern cluster of tall buildings will be acknowledged in the Hackney Development Management Plan by amending supporting text and Policy wording to reflect this.	Delete the last sentence of paragraph 3.2.7 and replace it with the following text so as to read "The proposed policy also contains requirements regarding the viewing corridor of St. Paul's Cathedral, contained within the Mayor of London's London View Management Framework SPG March 2012 and the City of London's 'St. Paul's Heights' Policy. When assessing the potential impact of proposed schemes especially on strategically important heritage assets and views, the guidance and policies of the relevant neighbouring authorities (for sites on Borough boundaries), and Hackney's Core Strategy Policy 24 "Design", and AAPs and SSSPD, need to be taken into consideration". See also amended policy wording set out above reflecting this acknowledgement.
12	CMA Planning	N/A	12.1	Chapter 3 Delivering Sustainable Growth	DM4		Is this Policy necessary – it simply seems to repeat the statutory requirements? This does not seem to be a matter Policy needs to cover.	The Policy is necessary to give a framework within which CIL and S106 contributions will be delivered.	Insert a new paragraph in the text as para 3.5.10 so as to read: "Planning contributions and CIL will operate in a complimentary way." More detail on how Policy DM4, the CIL Liability thresholds and the Planning Contributions will be implemented will be outlined in the Mayor of London's CIL Charging Schedule, the Hackney Council CIL Charging Schedule and the Planning Contributions SPD.
12	CMA Planning	N/A	12.2	Chapter 3 Delivering Sustainable Growth	DM5		In general, we would support this policy, except for the last paragraph which says, 'The Council will seek to ensure through legal agreement that community facilities provided through development are available for use to communities seeking to use them at a discounted rate'. Is this an area that needs to be controlled by the planning system? Is intervention needed? Is there any evidence that communities cannot afford to use the facilities available to them? For example, are planning officers going to be dictating to their colleagues in Leisure Services what prices the Council should be charging for hiring out a football pitch? This would seem to add in a layer of unnecessary control and would make the delivery of new facilities more complex, which could hinder proposals from coming forward.	The purpose of this section of the policy is to ensure that community uses re-provided remain affordable for community groups in perpetuity and they are bound over by S106 agreement to ensure they remain as such in perpetuity.	Add the following wording: "remain as such in perpetuity" at the end of the last paragraph of Policy DM5 to ensure that facilities bound over by S106 agreement remain as such in perpetuity.
14	Montagu Evans	Plough Yard Developments Limited	14.1	Chapter 3 Delivering Sustainable Growth	DM1		The policy needs to reflect all of the Development Plan for Hackney which includes areas for intensification, opportunity sites, and locations for tall buildings. (v) Be of a height and massing which responds to and is compatible with the streetscape and adjacent buildings, and have regard to the particular circumstances of the site where appropriate, with regard to regeneration objectives, policies and proposals set out in the development plan. It is proposed that within the 'Setting and Context' section of Policy DM1, (ii) and (v) be amended to read: (ii) Respect the visual integrity and established scale, massing and rhythm of the building, frontages, group of buildings or street scene (including characteristic building lines or plot widths), of which they form a part where appropriate, with regard to regeneration objectives, policies and proposals set out in the development plan	Comments are noted. However, your proposed amendment will not be effected because it would add nothing new to the thrust of the policy. There is always a general assumption that for each Development Management (DM) policy, a proposal also needs to be compliant with other DM policies, including 'regenerative objectives'. It is considered that there is no need to so expressly state this within the wording of this policy.	No change required.

14	Montagu Evans	Plough Yard Developments Limited	14.2	Chapter 3 Delivering Sustainable Growth	DM2		Policy DM2 does not take account of the need to balance competing considerations in making town planning decisions on the development of land in the public interest. In each occasion the amenity effects of a development must be balanced with the planning advantages of the proposal. At present DM2 does not allow for this balance to be taken into account. It is proposed that the first sentence of the Policy be amended to read:'Development proposals should be appropriate to their location and their effects should preserve, maintain or enhance the amenity of the area as a whole. The effects on occupiers and neighbours should be assessed and taken into account to ensure that adequate amenity is maintained.'	Comment is taken on board. Policy DM2 will be amended.	See amended Proposed Policy DM2 –" Development and AmenityDevelopment proposals should be appropriate to their location and should be designed to ensure that they will not result in significant adverse impacts on the amenity of occupiers and neighbours. The individual and cumulative impacts of development proposals on amenity will be considered in considering their acceptability. The consideration of the merits of development proposals will be balanced against the impact on amenity. Amenity considerations include the impacts of developments on:(i) Visual privacy and overlooking;(ii) Overshadowing and outlook;(iii) Sunlight and daylight, and artificial light, levels;(iv) Vibration, noise, fumes and odour, and other forms of pollution; (v) Microclimate conditions;(vi) Safety of highway users.Residential development should be well designed and not lead to substandard layouts, unit sizes, room sizes and awkward room shapes and private amenity space."
14	Montagu Evans	Plough Yard Developments Limited	14.3	Chapter 3 Delivering Sustainable Growth	DM3		Policy DM 3 must comply with CIL Regulations 122 and 123 (or any successors) which require any financial contribution or contributions in kind towards infrastructure to meet a series of tests. The Council should incorporate a reference in Policy DM3 to Policy DM4, which should address the issue of the above Regulations explicitly.	Suggestion accepted.	Please see Policy DM4. Second paragraph of DM4 amended to read: "The Council will require planning contributions, subject to the financial viability of the scheme and any other over-riding positive planning benefits, to mitigate the site-specific impacts of development to ensure that such developments are acceptable in planning terms. Such contributions will be secured through S106 legal agreements. Planning contributions will also be subject to the criteria set out in CIL Regulations (2010) 122 and 123 (or any successors) which require any financial contribution or contributions in kind towards infrastructure to meet a number of criteria."
14	Montagu Evans	Plough Yard Developments Limited	14.4	Chapter 3 Delivering Sustainable Growth	DM4		It is proposed that the second paragraph in Policy DM4 be amended to read: 'The Council will require planning contributions where required, account being taken of the criteria set out in CIL Regulations 122 and 123 (or any successors)...this provision applies to Policies DM3, DM5, DM6 and DM16' The criteria in Regulation 122 and 123 should be set out in full.	Suggested change is accepted and Policy wording of DM4 will be amended.	Amend second paragraph of Policy DM4 by inserting the following wording at the end of the paragraph: "Planning contributions will also be subject to the criteria set out in CIL Regulations (2010) 122 and 123 (or any successors) which require any financial contributions or contributions in kind towards infrastructure to meet a number of criteria"
14	Montagu Evans	Plough Yard Developments Limited	14.5	Chapter 3 Delivering Sustainable Growth	DM5		Include reference to Policy DM4	Suggestion accepted.	Reference to Policy DM4 inserted in the fourth paragraph of Policy DM4.
14	Montagu Evans	Plough Yard Developments Limited	14.6	Chapter 3 Delivering Sustainable Growth	DM6		Include reference to Policy DM4	Suggestion accepted.	Reference to Policy DM4 inserted in the fourth paragraph of Policy DM5.
15	Montagu Evans	HDG LTD	15.1	Chapter 3 Delivering Sustainable Growth	DM1		The policy needs to reflect all of the Development Plan for Hackney which includes areas for intensification, opportunity sites, and locations for tall buildings. It is proposed that within the 'Setting and Context' section of Policy DM1, (ii) and (v) be amended to read: (ii) Respect the visual integrity and established scale, massing and rhythm of the building, frontages, group of buildings or street scene (including characteristic building lines or plot widths), of which they for a part where appropriate, with regard to regeneration objectives, policies and proposals set out in the development plan(v) Be of a height and massing which responds to and is compatible with the streetscape and adjacent buildings, and have regard to the particular circumstances of the site where appropriate, with regard to regeneration objectives, policies and proposals set out in the development plan.	Comments are noted. However, the proposed amendment will not be effected because it would add nothing new to the thrust of the policy. There is always a general assumption that for each Development Management (DM) policy, a proposal also needs to be compliant with other DM policies, including 'regenerative objectives'. It is considered that there is no need to so expressly state this within the wording of this policy.	No change required.

15	Montagu Evans	HDG LTD	15.9	Chapter 3 Delivering Sustainable Growth	DM2		Policy DM2 does not take account of the need to balance competing considerations in making town planning decisions on the development of land in the public interest. In each occasion the amenity effects of a development must be balanced with the planning advantages of the proposal. At present DM2 does not allow for this balance to be taken into account. It is proposed that the first sentence of the Policy be amended to read: 'Development proposals should be appropriate to their location and their effects should preserve, maintain or enhance the amenity of the area as a whole. The effects on occupiers and neighbours should be assessed and taken into account to ensure that adequate amenity is maintained.'	Comment is taken on board. Policy DM2 will be amended.	See amended Proposed Policy DM2 - Development and Amenity “Development proposals should be appropriate to their location and should be designed to ensure that they will not result in significant adverse impacts on the amenity of occupiers and neighbours. The individual and cumulative impacts of development proposals on amenity will be considered in considering their acceptability. The consideration of the merits of development proposals will be balanced against the impact on amenity. Amenity considerations include the impacts of developments on: (i) Visual privacy and overlooking; (ii) Overshadowing and outlook; (iii) Sunlight and daylight, and artificial light, levels; (iv) Vibration, noise, fumes and odour, and other forms of pollution; (v) Microclimate conditions; (vi) Safety of highway users. Residential development should be well designed and not lead to substandard layouts, unit sizes, room sizes and awkward room shapes and private amenity space.”
15	Montagu Evans	HDG LTD	15.10	Chapter 3 Delivering Sustainable Growth	DM3		Policy DM 3 must comply with CIL Regulations 122 and 123 (or any successors) which require any financial contribution or contributions in kind towards infrastructure to meet a series of tests. The Council should incorporate a reference in Policy DM3 to Policy DM4, which should address the issue of the above Regulations explicitly.	Suggestion accepted.	Please see Policy DM4. Second paragraph of DM4 amended to read: "The Council will require planning contributions, subject to the financial viability of the scheme and any other over-riding positive planning benefits, to mitigate the site-specific impacts of development to ensure that such developments are acceptable in planning terms. Such contributions will be secured through S106 legal agreements. Planning contributions will also be subject to the criteria set out in CIL Regulations (2010) 122 and 123 (or any successors) which require any financial contribution or contributions in kind towards infrastructure to meet a number of criteria."
15	Montagu Evans	HDG LTD	15.11	Chapter 3 Delivering Sustainable Growth	DM4		It is proposed that the second paragraph in Policy DM4 be amended to read: 'The Council will require planning contributions where required, account being taken of the criteria set out in CIL Regulations 122 and 123 (or any successors)...this provision applies to Policies DM3, DM5, DM6 and DM16' The criteria in Regulation 122 and 123 should be set out in full.	Suggestion accepted.	Amend second paragraph of Policy DM4 by inserting the following wording at the end of the paragraph: "Planning contributions will also be subject to the criteria set out in CIL Regulations (2010) 122 and 123 (or any successors) which require any financial contributions or contributions in kind towards infrastructure to meet a number of criteria"
15	Montagu Evans	HDG LTD	15.12	Chapter 3 Delivering Sustainable Growth	DM5		Include reference to Policy DM4	Suggestion accepted.	Reference to Policy DM4 inserted in the fourth paragraph of Policy DM4.
15	Montagu Evans	HDG LTD	15.13	Chapter 3 Delivering Sustainable	DM6		Include reference to Policy DM4	Suggestion accepted.	Reference to Policy DM4 inserted in the fourth paragraph of Policy DM5.
16	Thames Water Utilities Ltd, Town Planning Team	N/A	16.3	Chapter 3 Delivering Sustainable Growth	DM1	N/A	Thames Water have limited powers under the Water Industry Act to prevent connections from new development and as such we seek supportive planning policies to ensure that any necessary upgrades to the existing water and wastewater infrastructure that are required to support development are provided ahead of the occupation of development. Such policies are consistent with Policies 5.14 and 5.15 of the London Plan which relate to wastewater infrastructure and water supply. In particular Policy 5.14 sets out that: “The Mayor will work in partnership with the boroughs, appropriate agencies within London and adjoining local planning authorities to: ensure that London has adequate and appropriate wastewater infrastructure to meet the requirements placed upon it by population growth and climate change”. Thames Water have limited powers under the Water Industry Act to prevent connections from new development and as such	Supportive planning policy to ensure that any necessary upgrades to the existing water and wastewater infrastructure that are required to support development are provided ahead of occupation will be included in the plan by inserting a new supporting text and amending relevant policy wording, Policy DM44, to reflect this. Insert new text cross referencing Core Strategy policy CS7 ‘Working Infrastructure Partners’ covers the issue of infrastructure. Furthermore, bullet point V of proposed Policy DM1 also addresses the need to address social and physical infrastructure including utilities.	Insert a new paragraph 3.2.6 to read "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 7.3.6,

							we seek supportive planning policies to ensure that any necessary upgrades to the existing water and wastewater infrastructure that are required to support development are provided ahead of the occupation of development.		7.8.14, 7.8.15, 7.8.16 and Policy DM44)".
16	Thames Water Utilities Ltd, Town Planning Team	N/A	16.4	Chapter 3 Delivering Sustainable Growth	DM1	N/A	This criterion requires development proposals to "*Ensure that development takes account of existing or planned social and physical infrastructure and contributes to additional infrastructure where necessary, so that development is adequately served by public transport, utilities, energy infrastructure, and a range of social and community facilities."* We support the requirement for development to take account of existing or planned utilities infrastructure. However, new developments in areas where there are currently no capacity issues could result in the existing water or wastewater infrastructure off-site becoming overloaded and requiring upgrades. It is considered that the following additional supporting text should be provided to clarify the requirements of criteria v with respect to water and wastewater infrastructure.	Comment is noted, and Policy DM44 will be amended to explicitly reference water and wastewater capacity. Bullet point V of proposed Policy DM1 addresses the need to address social and physical infrastructure including utilities. However, insert new text cross referencing Core Strategy policy CS7 'Working Infrastructure Partners' covers the issue of infrastructure	A new paragraph 3.2.6 is inserted to read as follows: " 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 7.3.6, 7.8.14, 7.8.15, 7.8.16 and Policy DM44)" to clarify the requirements of criterion (v) with regard to water and wastewater infrastructure.
16	Thames Water Utilities Ltd, Town Planning Team	N/A	16.5	Chapter 3 Delivering Sustainable Growth	DM1	N/A	Proposed Support Text for DM1: "The Council will seek to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve all new developments. Developers will be required to demonstrate that there is adequate capacity both on and off the 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 developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing infrastructure. Where there is a capacity problem and no improvements are programmed by Thames Water, the Council will require the developer to fund appropriate improvements which must be completed prior to occupation of the development."	Comments are noted. Proposed supporting text with some amendment will be effected as part of a new paragraph 3.2.6.	Insert a new paragraph 3.2.6 so as to read "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 7.3.6, 7.8.14, 7.8.15, 7.8.16 and Policy DM44)".
18	English Heritage	N/A	18.4	Chapter 3 Delivering Sustainable Growth	DM1		This policy does not currently appear to include any text to address tall buildings. In support of the plan-led approach to tall buildings established in the Core Strategy, and responding to English Heritage/CABE's Guidance on Tall Buildings (2007) the Development Management Local Plan should provide criteria for the management of tall buildings.	A text addressing tall buildings and their guidance will be inserted as a new paragraph 3.2.2.	Insert a new paragraph 3.2.2 so as read: "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)" referencing tall buildings and their guidance notes.

20	DP9	Aspirations	20.1	Chapter 3 Delivering Sustainable Growth	DM1		Object to part (ii) of draft policy DM1. The reference to development respecting the "established scale and massing of an area" could be interpreted as not allowing taller development. This appears to contradict part (v) which seeks development to be of a height and massing which responds to and is compatible with the streetscape and taller buildings. Part (ii) should be amended to reflect part (v).	The Council does not accept that there is a conflict between Policy DM1, parts (ii) and (v). Part (ii) generally seeks to ensure proposals fit with the scale, massing and rhythm of buildings) and streetscene, which is a sound concept, and proposals of a greater scale, height etc are generally seen on sites with particular circumstances with the ability to take greater development, e.g. Bishopsgate Goods Yard. Part (v) really seeks to provide a link to height and massing of buildings taking into account the particular circumstances of the site with regard to Heritage Assets. Part (ii) will not be amended to reflect the approach set out in part (v) as it does not conflict with this part, which looks for development to be of a height and massing which responds to and is compatible with the Streetscene and adjacent buildings.	No change required.
20	DP9	Aspirations	20.2	Chapter 3 Delivering Sustainable Growth	DM1		Part (iii) states that proposals for residential development should comply with the London Housing Design Guide. We object to this position, page 6 of LHDG clearly states that the document is not a piece of policy. Part (iii) should be updated to align with London Plan Policy 3.5.	Part (iii) will be updated to align with London Plan Policy 3.5 by inserting the latest relevant GLA policy document.	Delete the last sentence of "General (iii)" and replace it with "Proposals for residential development should comply with the London Plan (July 2011) and the GLA's Housing SPG (November 2012);" to align with the London Plan Policy 3.5 and the latest relevant GLA policy document.
20	DP9	Aspirations	20.3	Chapter 3 Delivering Sustainable Growth	DM1		Object to part (iv) which states that the Borough's heritage assets should be preserved and enhanced. Does not reflect NPPF.	Part (iv) within the general section of Policy DM1 will be amended to reflect the language used in the NPPF.	Amend part (iv) within the general section by deleting the word 'Preserve' and substituting it with the word 'Conserve' and add the words 'and settings' at the end of the sentence after the word 'assets' to reflect the language used in the NPPF.
20	DP9	Aspirations	20.4	Chapter 3 Delivering Sustainable Growth	DM1		Question the need for the final section which refers to the London View Management Framework. The wording of the policy should simply refer to the LVMF in its entirety rather than specifics.	Comment is noted. The supporting text refers to the entirety of the updated Mayor of London's London View Management Framework SPG, whilst the policy refers to the key view specific to Hackney.	No change required.
20	DP9	Aspirations	20.5	Chapter 3 Delivering Sustainable Growth	DM2		Should be merged with DM1.	The issue of amenity on occupiers and neighbours is considered to be a significant issue in Hackney to merit a separate policy.	No change required.
20	DP9	Aspirations	20.6	Chapter 3 Delivering Sustainable Growth	DM3		Council should clarify/confirm their interpretation of the following: 1. Part (i) refers to Designing out Crime principles, which is not recognised as a formal guide to new development and security. Reference should instead be made to the Secure by Design principles. 2. Reference is made in the 2nd para of the policy to large scale schemes. The Definition of a qualifying scheme should be clarified.	Suggestion accepted and policy wording amended to reflect the suggestions.	Policy wording in (1) is amended by the deletion of the words "designing out crime" and replacing them with "Secure by Design" after the word "meet". The definition of a qualifying scheme is clarified by deleting the words "very large-scale" and replacing them with the words "major schemes of 1000 sq m or 10 housing units or more"
20	DP9	Aspirations	20.7	Chapter 3 Delivering Sustainable Growth	DM4	3.5.6	Recognises 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. Statement should be included within DM4 as it is an important consideration when assessing schemes against this policy.	Suggested change is accepted and policy wording will be amended to incorporate suggested comment.	Amend Policy DM4 so as to read: "The Council will require planning contributions, subject to the financial viability of the scheme and any other overriding positive planning benefits, to mitigate the site specific impacts of development to ensure that such developments are acceptable in planning terms. Planning contributions will also be subject to the criteria set out in CIL Regulations (2010) 122 and 123 (or any successors) which require any financial contributions or contributions in kind towards infrastructure to meet a number of criteria".

21	DP9	Rocket Investment Ltd	21.1	Chapter 3 Delivering Sustainable Growth	DM1		Object to part (ii) of draft policy DM1. The reference to development respecting the "established scale and massing of an area could be interpreted as not allowing taller development" This is not consistent with part (v) which seeks development to be of a height and massing which responds to and is compatible with the streetscape and taller buildings. Part (ii) should be amended to reflect part (v)	The Council does not believe that there is a conflict between Policy DM1, parts (ii) and (v) which could be interpreted as not allowing taller development. Part (ii) generally seeks to ensure proposals fit with the scale, massing and rhythm of buildings) and streetscene, which is a sound concept, and proposals of a greater scale, height etc are generally seen on sites with particular circumstances with the ability to take greater development, e.g. Bishopsgate Goods Yard. Part (v) really seeks to provide a link to height and massing of buildings taking into account the particular circumstances of the site with regard to Heritage Assets. Part (ii) will not be amended to reflect the approach set out in part (v) as it does not conflict with this part, which looks for development to be of a height and massing which responds to and is compatible with the Streetscene and adjacent buildings.	No change required.
21	DP9	Rocket Investment Ltd	21.2	Chapter 3 Delivering Sustainable Growth	DM4		Policy states the Council will require planning contributions to be secured through S106 agreements. Background text to this policy highlights that where applicants state financial viability prevents the delivery of planning contributions sought by the Council, a financial appraisal will need to be submitted to demonstrate this (para 3.5.6). We consider this text should be included within policy DM4.	Suggested change is accepted and policy wording will be amended to incorporate suggested comment.	Amend Policy DM4 so as to read: "The Council will require planning contributions, subject to the financial viability of the scheme and any other overriding positive planning benefits, to mitigate the site specific impacts of development to ensure that such developments are acceptable in planning terms. Planning contributions will also be subject to the criteria set out in CIL Regulations (2010) 122 and 123 (or any successors) which require any financial contributions or contributions in kind towards infrastructure to meet a number of criteria".
30	Islington Council	N/A	30.1	Chapter 3 Delivering Sustainable Growth	DM1		No objection - the policy is similar to Islington's design policies in the adopted Core Strategy and emerging DM Policies.	No objection noted.	No change required.
30	Islington Council	N/A	30.2	Chapter 3 Delivering Sustainable Growth	DM2		No objection	No objection welcomed.	No change required.
30	Islington Council	N/A	30.3	Chapter 3 Delivering Sustainable Growth	DM3		No objection	Welcomed.	No change required.
30	Islington Council	N/A	30.4	Chapter 3 Delivering Sustainable Growth	DM4		No objection	Welcomed.	No change required.
30	Islington Council	N/A	30.5	Chapter 3 Delivering Sustainable Growth	DM5		No objection	Welcomed.	No change required.
30	Islington Council	N/A	30.6	Chapter 3 Delivering Sustainable Growth	DM6		No objection	Welcomed.	No change required.
32	The Office of the Archdeacon of Hackney	N/A	32.2	Chapter 3 Delivering Sustainable Growth	DM3		Include mental health and spiritual well-being	Suggestion accepted.	The words "mental health and spiritual well-being" are inserted in the third paragraph of Policy DM3 after the word "being".

32	The Office of the Archdeacon of Hackney	N/A	32.3	Chapter 3 Delivering Sustainable Growth	DM5		We are also concerned more generally on the loss of the specific faith provision policy in the UDP and its replacement with a more generic policy in the DMLP. The previous policy was for there to be "….favourable consideration of churches, mosques, synagogues, gurudwaras, temples and other places of religious worship, subject to other policies in this plan…." This is replaced by policy DM5 which merely states that "….proposals for new and extended social and community facilities will be supported…" We fear that this represents a devaluing not just of faith organisations but also of community facilities generally. To simply group a wide range of multi-functional organisations together without any distinction as to what purpose they serve, what the emerging communities' needs are, what physical infrastructure is required and what role these organisations and buildings could play in the future, is to ignore a vital spectrum of civic society. It also seems to be a denial of the rich variety of people that will make up Hackney's population. These people will be expressing their needs by growing attendance at busy Churches, Mosques, Synagogues etc throughout the Borough, thus increasing their service to the community yet there seems to be little cognisance of this. These are statutory planning documents and we would hope that there would be a level of analysis and care as to how the spiritual as well as other social needs are to be met which is carried through into policy. Would like to engage with the Council about how to carry this forward.	Policy DM5 does not devalue faith organisations and places of worship. 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. Policy DM5 has now been re-titled "Protection and Delivery of Social and Community Facilities and Places of Worship".	New paragraph: 3.6.3 Many of the Borough's communities also require appropriate premises and facilities for the purpose of religious worship. The Council will support the retention of existing places of worship, and support the delivery of new facilities where they meet an identified need in the community, subject to other Plan policies. Amended Policy DM5 title: Protection and Delivery of Social and Community Facilities and Places of Worship
39	The theatres Trust	N/A	39.1	Chapter 3 Delivering Sustainable Growth	DM5		Support	Support welcomed.	No change required.
39	The theatres Trust	N/A	39.2	Chapter 3 Delivering Sustainable Growth	DM6		Support	Support welcomed.	No change required.
43	Agudas Isreal Housing Association	N/A	43.5	Chapter 3 Delivering Sustainable Growth	DM1		Encouragement of high quality design for all new developments is welcomed, but this is a subjective area and should not be sole reason for planning refusal in light of the pressing need for new housing. Note that many of the criteria given in DM1 for high quality are not met by many of the recent flagship development schemes which do not relate to neighbourhoods scale or pattern but introduce a new scale and language of materials.	Your welcome for encouragement of high quality design is noted. Whilst design may be a subjective area, there is no doubting of the fact that good high quality design improves the aesthetic appearance of a scheme as well as enables an improved quality of life and economic growth.	No change required.
43	Agudas Isreal Housing Association	N/A	43.7	Chapter 3 Delivering Sustainable Growth	DM4		Can special consideration be given to CIL for delivery of higher percentages of affordable housing? Can Hackney consider giving an exemption to RPs providing 100% affordable housing?	Comment welcomed. Affordable housing is already exempt from CIL however this as well as other uses exempt from CIL will be listed in the supporting text to give clarity for developers.	Insert three new paragraphs: "3.5.5 In Hackney there are two levels of CIL that are able to be charged – the Mayoral CIL and Hackney's Borough-level CIL. The Mayoral CIL came into effect on 1 April 2012. Hackney's CIL Charge is currently being developed. 3.5.6 There are exemptions to the Mayoral CIL, which mean that organisations or individuals would not be liable to pay Mayoral CIL for the development of such uses. The following types of development will normally be exempt from the payment of the Mayoral CIL: Health and Education uses; Social housing provided by a local housing authority, Registered Social Landlord or Registered Provider of Social Housing and Shared Ownership Housing, subject to the specific provisions of Regulation 49; Charities where the development will be used wholly, or mainly for charitable purposes; structures or buildings that people only enter for the purpose of inspecting or maintaining fixed plant or machinery. 3.5.7 Hackney's CIL will also have exemptions. The following types of development will normally be exempt from the payment of local CIL: affordable housing; and buildings with other charitable uses (if controlled by a charity). Hackney is also able to offer an exemption on proven viability grounds, which would be available for 12

									months, after which time viability of the scheme concerned would need to be reviewed."
46	GLA	N/A	46.1	Chapter 3 Delivering Sustainable Growth	DM1	3.25	References to the London View Management Framework should be to the updated version of the document (March 2012)	References to the London View Management Framework in the supporting text and Policy will be amended to the updated version of the document (March 2012).	Amend third sentence of paragraph 3.2.7 so as to read: "The proposed policy also contains requirements regarding the viewing corridor of St. Paul's Cathedral, contained within the Mayor of London's London View Management Framework SPG March 2012 and the City of London's 'St. Paul's Heights' Policy." Also amend Policy DM1 policy wording on the section relating to "Strategic View Background Area" so as to read: "The Council will resist developments within the background consultation areas of Linear View 8 Westminster Pier to St Paul's Cathedral and 9 King Henry VIII's Mound, Richmond to St Paul's Cathedral, in accordance with the Mayor of London's London View Management Framework SPG (March 2012) and the City of London's 'St. Paul's Heights' Policy, which would have an adverse impact on the setting of the Cathedral or on the visual relationship between the Cathedral and the City's eastern cluster of tall buildings. Redevelopment of buildings, which currently adversely impact on the strategic views, will be required to aim not to detract from, and where possible to, improve the views and not infringe on any part of the defined background area". Both amendments to reflect the updated version of the LVMF document (March 2012).
47	DP9	Rothas Limited	47.1	Chapter 3 Delivering Sustainable Growth	DM1		Object to part (ii) DM1, the reference to development respecting the established scale and massing of an area could be interpreted as not allowing taller development. This part of the policy seems to be at odds with part (v). Part (ii) should be amended to reflect part (v)	The Council does not believe that there is a conflict between Policy DM1, parts (ii) and (v) which could be interpreted as not allowing taller development. Part (ii) generally seeks to ensure proposals fit with the scale, massing and rhythm of buildings) and streetscene, which is a sound concept, and proposals of a greater scale, height etc are generally seen on sites with particular circumstances with the ability to take greater development, e.g. Bishopsgate Goods Yard. Part (v) really seeks to provide a link to height and massing of buildings taking into account the particular circumstances of the site with regard to Heritage Assets. Part (ii) will not be amended to reflect the approach set out in part (v) as it does not conflict with this part, which looks for development to be of a height and massing which responds to and is compatible with the Streetscene and adjacent buildings.	No change required.
47	DP9	Rothas Limited	47.2	Chapter 3 Delivering Sustainable Growth	DM1		Object to part (iv) within the general section of policy DM1 which states that the Borough's heritage assets should be preserved and enhanced. This is a very broad statement which does not reflect the NPPF guidance	Comment is noted. Part (iv) within the general section of Policy DM1 will be amended to reflect the language used in the NPPF.	Amend part (iv) within the general section by deleting the word 'Preserve' and substituting it with the word 'Conserve' and add the words 'and settings' at the end of the sentence after the word 'assets'.
47	DP9	Rothas Limited	47.3	Chapter 3 Delivering Sustainable Growth	DM4		Need 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. Statement should be included within DM4 as it is an important consideration when assessing schemes against this policy.	Suggested change is accepted and policy wording will be amended to incorporate suggested comment.	Amend Policy DM4 so as to read: "The Council will require planning contributions, subject to the financial viability of the scheme and any other overriding positive planning benefits, to mitigate the site specific impacts of development to ensure that such developments are acceptable in planning terms. Planning contributions will also be subject to the criteria set out in CIL Regulations (2010) 122 and 123 (or any successors) which require any financial contributions or contributions in kind towards infrastructure to meet a number of criteria".
50	Drivers Jonas Deloitte	Geffrye Museum	50.1	Chapter 3 Delivering Sustainable Growth	DM1		The Museum supports policies which encourage high quality design in new development. Policy DM1 sets out detailed design guidance relating to setting, context and general design principles. The Museum supports the provision of the detailed criteria to support the delivery of high quality design in the Borough but request that these criteria are applied flexibly on a site by site basis in order to account for specific site constraints and opportunities.	Support for policies which encourage high quality design in new development is welcomed. Request that the detailed criteria are applied flexibly on a site by site basis in order to take account for specific site constraints and opportunities point will be reflected by amending the supporting text of this policy.	Insert "The policy will be applied to the individual circumstances of each development proposal" as a third sentence in new paragraph 3.2.5 to reflect comment made.
50	Drivers Jonas Deloitte	Geffrye Museum	50.2	Chapter 3 Delivering Sustainable Growth	DM2		The Museum supports policy DM2 which seeks to ensure that development proposals and uses are appropriate to their location and will not result in adverse impact on the amenity of occupiers and neighbours.	Support is welcomed.	No change required.

50	Drivers Jonas Deloitte	Geffrye Museum	50.3	Chapter 3 Delivering Sustainable Growth	DM6		The Museum agrees that the contribution of arts, culture and entertainment is significant to Hackney's community needs, economic development, vitality and regeneration. The Museum is pleased to be mentioned as one of these contributing Museums. With this in mind, the Museum supports Policy DM6 which seeks to protect arts, culture and entertainment facilities in the Borough. The Museum understands that proposals for large arts and culture facilities should be preferably located in the Borough's Growth Areas and request confirmation that this includes the designated Railway Corridors, within which the Geffrye Museum is located.	The Borough's places for growth includes the Railway Corridors as per paragraph 4.6 of the Core Strategy. Map 4.1 Key diagram and Core Strategy Policy 2.	Paragraph two of Policy DM6 is amended as follows: "Proposals for large arts, culture and entertainment facilities, and public art installations should preferably be located within the Borough's Growth Areas and Shopping Centres (Dalston Major Town Centre, Hackney Central District Town Centre, the Railway Corridors, South Shoreditch, New Communities in Woodberry Down and Hackney Wick) where public transport accessibility is strong and there is a concentration of existing services. Proposals outside of the Borough's 'shopping centres' must meet the sequential approach."
51	Sustainable Hackney	N/A	51.1	Chapter 3 Delivering Sustainable Growth	DM1		Concerned that there is token consultation on too many developments and that too little notice is taken of the comments made by those who respond. The Local Plan to require developers to provide proper consultation and to take more note of what they are told.	Comment is noted. The Council's policy on consultation requirements for both the development plan preparation and for developers is out in its Statement of Community Involvement. It is not a matter for the Local Plan to require developers to provide proper consultation and to take more note of what they are told.	No change required.
51	Sustainable Hackney	N/A	51.4	Chapter 3 Delivering Sustainable Growth	DM2		Concerns about development that might swamp or overdevelop an area. Believe that the standards set in the London Housing Design guide are the bare minimum for new homes to be sustainable. In particular we believe that a floor area of 37m2 set as the minimum for new homes is barely adequate. The development plan should clearly oppose the development of so called "pocket housing" built to 20% reduced space standards. Even when these are designed for single person use the Council has no control over them once built. Too many eventually house couples and families yet they are totally inadequate for such use.	Comments are noted. The development plan supporting text will be amended to underscore the Council's clear opposition to the development of "pocket housing". However, it should be noted that the Plan needs to comply with London Plan Policies and Standards, so the 37sq.m for a one person flat still applies. Only in exceptional circumstances will units of small size be allowed.	Amend the last sentence of paragraph 3.3.7 so as to read "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" to underscore the Council's clear opposition to "pocket housing" development.
51	Sustainable Hackney	N/A	51.5	Chapter 3 Delivering Sustainable Growth	DM4		Since Hackney is under intense development pressure we support the Council's intentions to make developers fund public realm improvements whish will secure the long term sustainability of new developments. In particular we are concerned that new public spaces should be safe by design, include adequate 24 hour toilet provision and be supervised to prevent anti-social behaviour. These aspects of design should be considered for all new developments and in the use of the Community Infrastructure Levy.	Under CIL Regulations 123 the Council will set out the general areas it will spend CIL money on.	No change required.
55	The British Constructional Steelwork Association Limited	N/A	55.2	Chapter 3 Delivering Sustainable Growth	DM1	N/A	The ambition to achieve the right balance in promoting and delivering sustainable growth by the use of high quality sustainable design policies is welcomed by the BCSA. The Council's challenge to developers to meet and exceed recognised 'best-practice' standards is recognised as necessary to develop a practice of continuous improvement.	Supported is welcome.	No change required.
55	The British Constructional Steelwork Association Limited	N/A	55.3	Chapter 3 Delivering Sustainable Growth	DM1	N/A	The emphasis on high quality design in the plan is to be applauded. The statement proposing a policy which ensures that development proposals incorporate sustainable design and construction measures and materials, demonstrating how sustainable development principles and resilient measures to climate change have been incorporated is commended. However it is important that the Council retains sufficient experience and expertise to ensure that effective judgements can be made in this area.	Support is welcome, the ability to retain employees of sufficient experience and expertise is beyond the remit of planning.	No change required.
55	The British Constructional Steelwork Association Limited	N/A	55.4	Chapter 3 Delivering Sustainable Growth	DM1	N/A	The ambition that developments should be designed and use building materials and systems that minimise building operation and maintenance costs, and environmental impact, for the lifetime of the development is also welcomed and demonstrates that the Council is looking at the impacts of buildings through their life and not only during the construction process.	Support is welcomed.	No change required.
65	A Roberts		65.11	Chapter 3 Delivering Sustainable Growth	DM1		Encouraging developments which 'design out crime' should not result in there being no communal areas, public seating, etc.	Comment is noted. Encouraging developments which 'design out crime' would not result in there being no communal areas, public seating, etc.	No change required.

65	A Roberts	N/A	65.2	Chapter 3 Delivering Sustainable Growth	DM1		Too many new buildings in Hackney already look terrible just five or so years after they have been built and don't fit the local area at all.	Comment is noted. It is in order to avert the ugly effect of mediocre design that the requirement for high quality, sustainable design and exemplar development is now being sought after.	No change required.
67	A Mansfield		67.2	Chapter 3 Delivering Sustainable Growth	DM1		The Council should enforce this policy to make sure that illegal developments are discouraged and details and materials are of an appropriate standard.	The Council usually enforces illegal developments by requiring them to be removed by their owners or by itself removing them at the owner's expense.	No change required.
67	A Mansfield	N/A	67.7	Chapter 3 Delivering Sustainable Growth	DM1		The Council should encourage developments which 'design out crime' by reducing the potential for anti-social behaviour and criminality. This also extends to land use - a good mix brings more lively overlooked streets.	The Council encourages developments which 'design out crime' in order to reduce the potential for anti-social behaviour.	No change required.
67	A Mansfield	N/A	67.1	Chapter 3 Delivering Sustainable Growth	DM2		Buildings must be a suitable scale and not overwhelm existing communities. Existing amenities and assets should be enhanced.	Comment is noted, the policies proposed are designed to consider both the physical impact of development on the environment, and impact of infrastructure and other resources.	No change required.
67	A Mansfield	N/A	67.8	Chapter 3 Delivering Sustainable Growth	DM3		The Council should ensure that developments are designed to encourage and promote healthy lifestyles and wellbeing, however, Not as important as ensuring good design quality - being much stricter. Also being rigorous in protecting amenity with the application of new BRE guidelines for Daylight/Sunlight.	Comments Noted	No change required.
16	Thames Water Utilities Ltd, Town Planning Team	N/A	16.1	Chapter 3 Delivering Sustainable Growth, Chapter 7 Climate Change and Sustainability	DM4, DM44	N/A	As set out in our comments on the Core Strategy and various Area Action Plans policies are required in relation to water and wastewater infrastructure to ensure that any necessary upgrades to the water and wastewater infrastructure required to support development are provided ahead of the occupation of development. Failure to provide the necessary infrastructure to support development could result in adverse impacts on the environment and the amenity of residents including sewer flooding and problems or low/no water pressure. The draft policies within the Development Management Local Plan have not taken on board these previous comments.	Noted. Additional wording will be included in the supporting text of DM44 along with specific policy additions (1.9 and 1.10) to address sewer flooding and water and waste infrastructure.	Additional supporting text on sewer flooding and water and wastewater infrastructure has been included in paragraphs 7.8.14 - 7.8.16 along with additional policy wording to DM44:- 1.9 The 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
16	Thames Water Utilities Ltd, Town Planning Team	N/A	16.1	Chapter 3 Delivering Sustainable Growth, Chapter 7 Climate Change and Sustainability	DM4, DM44	N/A	As set out in our comments on the Core Strategy and various Area Action Plans policies are required in relation to water and wastewater infrastructure to ensure that any necessary upgrades to the water and wastewater infrastructure required to support development are provided ahead of the occupation of development. Failure to provide the necessary infrastructure to support development could result in adverse impacts on the environment and the amenity of residents including sewer flooding and problems or low/no water pressure. The draft policies within the Development Management Local Plan have not taken on board these previous comments.	Noted. Additional wording will be included in the supporting text of DM44 along with specific policy additions (1.9 and 1.10) to address sewer flooding and water and waste infrastructure.	Additional supporting text on sewer flooding and water and wastewater infrastructure has been included in paragraphs 7.8.14 - 7.8.16 along with additional policy wording to DM44:-1.9 The 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. Development 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.
16	Thames Water Utilities Ltd, Town Planning Team	N/A	16.2	Chapter 3 Delivering Sustainable Growth, Chapter 7 Climate Change and Sustainability	DM4, DM44	N/A	The need for policies on wastewater infrastructure is highlighted by section 9.32 of the Core Strategy which states that: "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."	Noted. Additional wording will be included in the supporting text of DM44 along with specific policy additions (1.9 and 1.10) to address sewer flooding and water and waste infrastructure.	Additional supporting text on sewer flooding and water and wastewater infrastructure has been included in paragraphs 7.8.14 - 7.8.16 along with additional policy wording to DM44:- 1.9 The 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.

16	Thames Water Utilities Ltd, Town Planning Team	N/A	16.2	Chapter 3 Delivering Sustainable Growth, Chapter 7 Climate Change and Sustainability	DM4, DM44	N/A	The need for policies on wastewater infrastructure is highlighted by section 9.32 of the Core Strategy which states that: "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."	Noted. Additional wording will be included in the supporting text of DM44 along with specific policy additions (1.9 and 1.10) to address sewer flooding and water and waste infrastructure.	Additional supporting text on sewer flooding and water and wastewater infrastructure has been included in paragraphs 7.8.14 - 7.8.16 along with additional policy wording to DM44:- 1.9 The 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. Development 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.
6	CgMs	Mayor's office for Policing and Crime and Metropolitan Police	6.5	Chapter 4 A Dynamic and Creative Economy	DM14		The MOPAC Estate Strategy highlights the importance of utilising surplus employment or industrial land for policing uses, in particular patrol bases, custody centres and relevant pan-London policing facilities. This approach is supported by the London Plan within paragraph 2.84 of policy 2.17 (Strategic Industrial Locations) states that 'policing and other community safety infrastructure may be appropriate uses in Preferred Industrial Locations'. Reference should be made within policies DM14 and DM17 to the provision of employment generating uses such as policing, as appropriate alternative uses on employment sites. The following amendments to policy DM14 are requested: The loss of employment land and floorspace will be restricted unless compelling 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 commercial or other alternative employment generating use (such as policing) has been fully explored.	There is no need to repeat London Plan policy given the London Plan is part of Hackney's development plan. Also the policies deal with use classes not specific types of use. Therefore, it is inappropriate to single out one type of alternative employment generating use such as police facilities. Policies DM14 and DM17 both allow alternative employment generating uses, be they Sui Generis or otherwise, on employment land subject to certain requirements. Clarification around what is meant by 'alternative employment generating use' will be added to supporting text.	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 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."
6	CgMs	Mayor's office for Policing and Crime and Metropolitan Police	6.6	Chapter 4 A Dynamic and Creative Economy	DM17		The MOPAC Estate Strategy highlights the importance of utilising surplus employment or industrial land for policing uses, in particular patrol bases, custody centres and relevant pan-London policing facilities. This approach is supported by the London Plan within paragraph 2.84 of policy 2.17 (Strategic Industrial Locations) states that 'policing and other community safety infrastructure may be appropriate uses in Preferred Industrial Locations'. Reference should be made within policies DM14 and DM17 to the provision of employment generating uses such as policing, as appropriate alternative uses on employment sites. The following amendment to policy DM17 is recommended:B1, B2, B8 and employment generating community uses such as policing uses are considered appropriate uses within PEAs. A1, C1, C3 and D1 are considered acceptable within the PEAs, subject to the following criteria...	There is no need to repeat London Plan policy given the London Plan is part of Hackney's development plan. Also the policies deal with Use Classes not specific types of use. Therefore, it is inappropriate to single out one type of alternative employment generating use such as police facilities. Policies DM14 and DM17 both allow alternative employment generating use, be it Sui Generis or otherwise, on employment land subject to certain requirements. Clarification around what is meant by 'alternative employment generating use' has already been defined and include in paragraph 4.7.2 of Policy DM14. There is no need to repeat it here given that Policy DM14 is referenced in Policy DM17.	No change required.
6	CgMs	Mayor's office for Policing and Crime and Metropolitan Police	6.4	Chapter 4 A Dynamic and Creative Economy	DM9		There is a strong policy base to support policing and a key part of the MOPAC Estate Strategy involves the use of front counter facilities in publicly accessible locations such as high streets and town centres. These facilities provide a valuable service to residents and shoppers alike. The front counter facilities are similar in function and appearance to traditional town centre units, provide an active frontage and do not damage the vitality and viability of the town centre. Their purpose is to serve as a point of contact with the police at which crime can be reported for example. Their presence may deter crime whilst helping increase feelings of safety. They propose an addition to the end of DM Policy 9. Add to end of Policy 9: 'In all retail areas, change of use to a police facility will be allowed where it would contribute to the safety and security of	The proposed amendment would effectively give Police facilities permitted development rights which is not considered appropriate. The focus of town centres is retail use. Policy DM9 allows other uses in shopping frontages as long as a minimum threshold of units remain in A1 use. This is considered to enable sufficient scope for non retail uses such as Police facilities to establish in town centres without impacting on their retail vitality and viability. However, the supporting text of paragraph 4.3.10 is amended to read "Other uses such as Police Shops 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", giving	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."

							the area'.	support to Police facilities in town centres.	
7	DP9	Middlewater Trading and Investment Ltd	7.4	Chapter 4 A Dynamic and Creative Economy	DM16	4.9.2	Paragraph 4.9.2 recognises that the proportion of small/affordable floorspace to be included within specific schemes will be addressed on a site specific, case by case basis. This important consideration is not reflected in the draft policy. The wording of the draft policy should be amended to reflect paragraph 4.9.2.	Your comment is noted. The wording of Policy DM16 will be amended to reflect the fact that provision of affordable workspace will be subject to scheme viability.	Amend Policy 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 lease arrangements and the desire of existing businesses to remain on site."
10	City of London	N/A	10.4	Chapter 4 A Dynamic and Creative Economy	DM11		Why is assembly and leisure (d2) included as a night-time use? Could night-time uses be justified further in the supporting text. Have A5 and Sui Generis uses been considered as night-time uses in the context of this policy?	Examples of the wide range of uses which constituent the night time economy are outlined in 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. The supporting text will be amended to further reflect these facts.	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."
10	City of London	N/A	10.6	Chapter 4 A Dynamic and Creative Economy	DM16	4.9	Under paragraph 4.9.1 where it states 'Research undertaken by the Council', does this related to the Hackney Employment Growth Options Study (2006) or some other evidence? This needs to be made clear.	Comment noted. The "Research undertaken by the Council " will be made clear by amending the relevant sentence of paragraph 4.9.1.	The amended sentence of paragraph 4.9.1 now reads: "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".
10	City of London	N/A	10.5	Chapter 4 A Dynamic and Creative Economy	DM8		A footnote has defined small or independent commercial enterprises (at the bottom of page 46). What is the source of this definition?	On-going secondary evidence, as explained at meeting with respondent including the 'GLA's London Small Shops Study June 2010.' Footnote will be amended to reference source.	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".
10	City of London	N/A	10.2	Chapter 4 A Dynamic and Creative Economy		4.5.1	Typo on line 9 - supported encouraged	Proposed change is accepted. The word "encouraged" will be deleted in paragraph 4.5.1.	The word 'encouraged' has been removed in line 9 of paragraph 4.5.1.

12	CMA Planning	N/A	12.3	Chapter 4 A Dynamic and Creative Economy	DM16		This policy seems to be poorly considered in many ways. The 10% of the floorspace within new major commercial development schemes would not seem to work. There are many schemes that deliver around 1000sqm of commercial space, and each of these could see 100 sqm of affordable workspace. This would seem problematic at many levels, with many affordable workspace sites spread out, being hard to manage and oversee, and also lacking the cluster benefits that end users appreciate. The policy says the space should be leased to an approved workspace provider, but no details are given as to who these would be. It is not set out in the glossary for example. The policy then outlines that applicant should submit evidence of agreement to lease the workspace at less than 80% of comparable local market rate for at least 10 years. This also seems flawed. There is no point in offering a business an 80% reduction on rent levels for 10 years, then allowing them to double or triple overnight after the period ends. A better approach, for example, would be a staggered one, where a firm may get an 80% reduction in year one, 70% reduction in year 2, etc. A better approach, for example, would be a staggered one, where a firm may get an 80% reduction in year one, 70% reduction in year 2, etc.	Your comments are noted. The wording of the policy will be amended to reflect a staggered reduction in rents over the 10 year period and the source to obtain the list of approved workspace providers given. What is not accepted is that small quantum of affordable workspace in larger schemes is inappropriate in terms of difficulties of management and lack of co-location benefits. The principle of the policy is to allow smaller businesses to remain in the Borough and grow as well as attract new start ups. Having them co-located with larger more established businesses also has economic benefits in terms of creating business relationships and potential for sub contracting with larger partners.	Amend Policy 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 lease arrangements and the desire of existing businesses to remain on site.”
12	CMA Planning	N/A	12.4	Chapter 4 A Dynamic and Creative Economy	DM17		We understand the reasoning behind this policy but question if this is the approach the Borough wish to take. The regeneration of many PEAs within the Borough has been achieved by allowing mixed use schemes, but generally those which are residential led in floorspace terms, or comprise say a hotel. These schemes generally have improved the employment offer of the Borough, both in terms of actual sqm and also quality, providing many new jobs. We consider that requiring schemes to have the majority of their floorspace in commercial use would prevent many proposals from coming forward and stop development.	PEAs are the Borough's core reservoir of employment land which are needed to support the projected demand in local employment to 2025. It should also be noted that PEAs only cover roughly 6% of the Borough's total land area meaning they are extremely tightly drawn clusters of employment generating land and floorspace. For this reason, as underpinned by evidence, it's important they are protected. It's for this reason that Policy DM17 requires development as a starting point to be employment led. Policy CS 17 and now supported by Policy DM17 allow other supporting uses such as hotels, leisure and retail to be considered where appropriate. Policy DM17 also enables consideration of other employment generation uses such as D2 and sui generis where the other PEA uses are evidenced as not being appropriate. This is considered to provide another layer of flexibility in PEAs. Finally Policy DM17 should also be read in conjunction with Policy DM14 which clearly outlines the limited number of instances where a loss of employment land will be deemed acceptable in policy terms. However, the supporting text of Policy DM17 at paragraph 4.10.2 will be amended to reference its link to Policy DM14.	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."

12	CMA Planning	N/A	12.3	Chapter 4 A Dynamic and Creative Economy			We consider that the Lesney Toys/ Matchmakers Wharf model should be looked at more closely. Here the affordable workspace is provided in perpetuity, so there is no issue about timeframe. A significant volume of space is provided (49 units), which makes it easier to manage and allows for the clustering benefits as well. Importantly, the space was provided in stead of having higher level overall of commercial floorspace, so there were clear benefits in for the developer in providing affordable workspace. In summary, this is a complex issue, and this policy does not seem to understand the areas that need to be overcome.	Your comment is noted. However, it should be noted that the planning policy framework and economic climate under which the Lesney Toy model of affordable workspaces were provided are different from the ones in operation now. Seeking provision of affordable workspace in perpetuity now may not go down well with developers at this period of economic stringency and recession. Adopted CS Policies 17 and 18, further supported by Policies DM14 and DM17 make it clear that protecting the supply of employment floorspace is the primary concern within PEAs and other employment sites. The Affordable Workspace policy is to be applied complimentary to these policies and is consistent with London Plan Policy 4.1 which identifies the need to ensure a good supply of workspace in terms of type, size and cost among other things.	No change required.
12	CMA Planning	N/A	12.3	Chapter 4 A Dynamic and Creative Economy			The Policy does not seem to address who might be entitled to take affordable workspace either, another key question. It is important that such space is offered to those who might not otherwise be able to afford accommodation. However, the policy would seem to allow any small business (i.e. a local planning consultancy) the opportunity to benefit from cheap space. There are occasions where developers wish to provide B1 commercial space in its own right (i.e. Crown Place or 141-145 Curtain Road) and benefits in helping these proposals to come forward. They are not common and can be margin, and it is important to ensure they are not hindered by having too many financial burdens. Equally, much of the commercial space that is delivered in areas of the Borough away from Shoreditch tends to be 'affordable' anyway, just by virtue of the low price such space has. For example, there is new space openly available in Dalston (Arcola Street) at £12 per sqft. In Homerton or Hackney Wick, it can get even cheaper. It is important that the planning system does not try to unduly disrupt market forces and just add bureaucracy to the process.	Many of the points made are agreed in principle and have been encapsulated in the amended Policy DM16. For instance, the provision of affordable workspace being subject to economic viability has been made clearer. While it is agreed that much of the employment floorspace outside of Shoreditch is currently affordable it must be remembered that the DMLP is a 15 year plan. Over this period it is expected that the growth seen in Tech City mainly in Shoreditch will grow further northwards into areas such as Dalston and Hackney Central having a resultant increase in rental levels in these locations - this is already happening. This premise has effectively been agreed by the Government in Hackney being successful in its Category A Exemption Bid from the change of pd rights from vacant offices to residential covering Shoreditch and the employment corridors stretching northwards to Dalston and Hackney Central. Therefore, it is considered appropriate to continue seeking Affordable Workspace so that existing businesses are able to remain in the Borough and grow along with attracting new SME businesses.	Amend Policy 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 lease arrangements and the desire of existing businesses to remain on site.

14	Montagu Evans	Plough Yard Developments Limited	14.8	Chapter 4 A Dynamic and Creative Economy	DM11		If Shoreditch is considered to be a suitable location for evening and night time economy uses, the tests set out in Policy DM11 should be applied to this location as in other locations identified in Policy DM11. There is therefore no need for the phrase 'with a limited number' as the location is clearly one where such uses are regarded as acceptable.	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. Paragraph 4.4.2 will be amended to reference the SPA and indicate that the boundary of the area will be shown on the Policies Map.	Insert a new paragraph 4.4.4 the following text reading: "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 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." 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."
14	Montagu Evans	Plough Yard Developments Limited	14.9	Chapter 4 A Dynamic and Creative Economy	DM15		It is not appropriate to restrict the application of this policy to circumstances where an end user has not been identified, as proposed. The developer of large office floorplate buildings will not implement a planning permission for such developments unless an occupier has been identified. There is therefore no planning risk associated with the creation of buildings which once constructed are un-let and inflexible in terms of letting. It is proposed that Policy DM15 be amended to read:'Unless a building is intended to meet a particular floorspace requirement and development proposals involve or require the provision of new business floorspace (B1) floorspace, either in commercial or mixed-use schemes, the Council will require the provision of well designed, high quality buildings.....'.	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 Policy DM15 is to be amended to remove specific reference to where "an end-user has not been identified" and to make clearer reference to the need for a marketing strategy in accordance with Appendix 4.	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."
14	Montagu Evans	Plough Yard Developments Limited	14.10	Chapter 4 A Dynamic and Creative Economy	DM16		Include reference to Policy DM4.	Your comment is noted. Policy DM4 relates to the majority of development and is to be read in conjunction with the other DM policies. It is not considered necessary to make specific mention in Policy DM16 as it will apply anyway, where applicable.	No change required.

14	Montagu Evans	Plough Yard Developments Limited	14.11	Chapter 4 A Dynamic and Creative Economy	DM17	4.10.9	Conflict between London Plan Policy 2.11 (a) and second sentence in paragraph 4.10.9 of the DMLP. While supporting the general direction of the policy, the primary purpose of development in PEAs should be to achieve an increase in employment floorspace on development sites along with complying with the above London Plan policy with respect to a mix of uses (please see comment re Policy DM17).	The Council does not consider that a conflict exists between London Plan Policy 2.11 (a) and second sentence in paragraph 4.10. 9 of the DMLP. The starting point for PEAs, which represent only 6% of the Borough's total floorspace, is for mixed use development to be employment led. Policy DM17 enables mixed use development consisting of one or a combination of uses along with B1 such as C1, C3, A1, D1 and some instances where these other PEA uses are not appropriate D2 and sui generis. This is considered to offer a balanced and flexible approach. Finally, Policy DM17 should also be read in conjunction with Policy DM14 which clearly outlines the limited number of instances where a loss of employment land will be deemed acceptable in policy terms. As reported in the Council's 2011/2012 Annual Monitoring Report PEAs have delivered both housing growth and new better quality employment floorspace between 2008 to 2012.	No change required.
14	Montagu Evans	Plough Yard Developments Limited	14.12	Chapter 4 A Dynamic and Creative Economy	DM17		We support the flexibility in the application of Policy DM17 with respect to the provision of C1 and C3 uses, for the reasons set out above.	Support welcomed	No change required.
14	Montagu Evans	Plough Yard Developments Limited	14.13	Chapter 4 A Dynamic and Creative Economy	DM18		Policy DM18 should cross-refer to Policy DM11, where the railway arches are in Shoreditch.	All relevant policies are applicable when assessing planning applications against the DMLP policies. This is mentioned in the last sentence of paragraph 4.11.2. Similar wording should be added to Policy 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.'
14	Montagu Evans	Plough Yard Developments Limited	14.7	Chapter 4 A Dynamic and Creative Economy	DM7		The policy does not give reasons for restricting retail use within the CAZ, as defined in the London Plan. Within the defined CAZ, it is inappropriate to treat retail proposals as edge or out of centre retail development which must meet the requirements set out in the NPPF for a sequential assessment.	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.	Add an additional sentence to the end of paragraph 4.2.2 to read: 'While it is 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". 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". 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."
15	Montagu Evans	HDG LTD	15.15	Chapter 4 A Dynamic and Creative Economy	DM11		If Shoreditch is considered to be a suitable location for evening and night time economy uses, the tests set out in Policy DM11 should be applied to this location as a in others identified in Policy DM11. There is therefore no need for the phrase 'with a limited number' as the location is clearly one where such uses are regarded as acceptable.	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. Paragraph 4.4.2 will be amended to reference the SPA and indicate that the boundary of the area will be shown on the Policies Map.	Insert a new paragraph 4.4.4 the following text reading: "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 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." 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."
15	Montagu Evans	HDG LTD	15.16	Chapter 4 A Dynamic and Creative Economy	DM15		It is not appropriate to restrict the application of this policy to circumstances where an end user has not been identified, as proposed. The developer of large office floorplate buildings will not implement a planning permission for such developments unless an occupier has been identified. There is therefore no planning risk associated with the creation of buildings which once constructed are un-let and inflexible in terms of letting. It is proposed that Policy DM15 be amended to read: 'Unless a building is intended to meet a particular floorspace requirement and development proposals involve or require the provision of new business floorspace (B!) floorspace, either in commercial or mixed-use schemes, the Council will require the provision of well designed, high quality buildings.....'.	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 Policy DM15 is to be amended to remove specific reference to where "an end-user has not been identified" and to make clearer reference to the need for a marketing strategy in accordance with Appendix 4.	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."
15	Montagu Evans	HDG LTD	15.2	Chapter 4 A Dynamic and Creative Economy	DM16		Include reference to Policy DM4	Your comment is noted. Policy DM4 relates to the majority of development and is to be read in conjunction with the other DM policies. It is not considered necessary to make specific mention in DM16 as it will apply anyway, where applicable.	No change required.

15	Montagu Evans	HDG LTD	15.3	Chapter 4 A Dynamic and Creative Economy	DM17	4.10.9	Conflict between London Plan Policy 2.11 (a) and second sentence in paragraph 4.10.9 of the DMLP. While supporting the general direction of the policy, the primary purpose of development in PEAs should be to achieve an increase in employment floorspace on development sites along with complying with the above London Plan policy with respect to a mix of uses (please see comment re Policy DM17).	The Council does not consider that a conflict exists between London Plan Policy 2.11 (a) and second sentence in paragraph 4.10. 9 of the DMLP. The starting point for PEAs, which represent only 6% of the Borough's total floorspace, is for mixed use development to be employment led. Policy DM17 enables mixed use development consisting of one or a combination of uses along with B1 such as C1, C3, A1, D1 and some instances where these other PEA uses are not appropriate D2 and sui generis. This is considered to offer a balanced and flexibility approach. Finally Policy DM17 should also be read in conjunction with Policy DM14 which clearly outlines the limited number of instances where a loss of employment land will be deemed acceptable in policy terms. As reported in the Council's 2011/2012 Annual Monitoring Report PEAs have delivered both housing growth and new better quality employment floorspace between 2008 to 2012.	No change required.
15	Montagu Evans	HDG LTD	15.4	Chapter 4 A Dynamic and Creative Economy	DM17		We support the flexibility in the application of Policy DM17 with respect to the provision of C1 and C3 uses, for the reasons set out above.	Support welcomed	No change required.
15	Montagu Evans	HDG LTD	15.5	Chapter 4 A Dynamic and Creative Economy	DM18		Policy DM18 should cross-refer to Policy DM11, where the railway arches are in Shoreditch.	All relevant policies are applicable when assessing planning applications against the DMLP policies. This is mentioned in the last sentence of paragraph 4.11.2. Similar wording should be added to Policy 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.'
15	Montagu Evans	HDG LTD	15.14	Chapter 4 A Dynamic and Creative Economy	DM7		The policy does not give reasons for restricting retail use within the CAZ, as defined in the London Plan. Within the defined CAZ, it is inappropriate to treat retail proposals as edge or out of centre retail development which must meet the requirements set out in the NPPF for a sequential assessment.	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.	Add an additional sentence to the end of paragraph 4.2.2 to read: 'While it is 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". Amend second sentence of paragraph 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". 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."
19	DP9	Sun Street Properties Limited	19.1	Chapter 4 A Dynamic and Creative Economy	DM16		SSPL objects to the requirements to provide 10% affordable workspace within major schemes within the borough and also the requirement for a contribution to be provided if on site provision is not possible. These requirements are overly restrictive and are likely to have a significant impact on the viability of proposed developments, particularly in the current economic climate and with the introduction of CIL at regional and local level.	The Hackney Employment Growth Options Study (2006) indicates that suitable and affordable workspace is a key concern for small businesses in Hackney, and that this need should be provided and preserved as there is a market failure in its provision. In light of this finding and in conformity with the Mayor of London's Plan policy on developing the London economy, the Council considers that there is need for the provision of affordable workspace for small businesses in the Borough. And that this provision can partly be secured from major developments by requiring a proportion of affordable workspace - the proportion being required addressed on a site specific, case-by-case basis and partly through planning contributions. The Council recognises that this requirement may impact on the viability of schemes, and reflected this recognition in seeking this provision on a case-by-case basis.	No change required.
19	DP9	Sun Street Properties Limited	19.2	Chapter 4 A Dynamic and Creative Economy	DM17		DM17 states that A1, C1, C3 and D1 uses are in principle acceptable within PEAs subject to a number of criteria and this is welcomed. Criteria (iv) states that proposals for development in the CAZ to redevelop office floorspace must re-provide, and should result in an increase in the amount of existing office floorspace. SSPL objects to the inclusion of the requirement to increase the amount of office floorspace on such sites. Policy 4.3 and Policy 2.11 of the London Plan specifically require the inclusion of residential floorspace within the CAZ. In addition, some CAZ sites such as One Crown Place also lie within the City Fringe Opportunity Area, where the London Plan requires residential uses to be optimised. As such, the requirement to increase office floorspace within the CAZ is overly restrictive and not in accordance with the aims of the London Plan and should therefore be deleted.	The Council does not accept that the requirement to increase office floorspace within CAZ is overtly restrictive and not in accordance with the aims of the London Plan Policy 4.3 and Policy 2.11. Both London Plan policies make clear that proposals for increase in office floorspace should provide for mix uses including residential. It does not state that proposals in CAZ should optimise residential use to the detriment of the provision of office floorspace which enhances and promotes the unique international, national and London wide roles of the CAZ. The Council is therefore correct in seeking increase in office floorspace to ensure sustenance of these roles. Further, the policy is not excluding other uses. It just requires employment-led development. The GLA have not objected to this policy - the principles for the City Fringe in Annex 1 of the London Plan are 'particular scope to support London's mass of financial and business services, and clusters of other economic activity, such as creative industries' - pointing towards office/B1 floorspace. It should also be noted that large parts of Shoreditch and Wenlock PEAs along with the CAZ are identified in Table 8.1 of the Core Strategy as Tall Building Opportunity Areas. This along with increasing land values is attracting much higher density redevelopment compared to what exists currently. Given this significant amount of development uplift, coupled with PEAs only covering 6% of the Borough's total land mass, it not considered unreasonable to expect an uplift of employment floorspace. CAZ is also the driving force of the London economy and while residential and a mix of other uses is supported its economic functions needs to be protected also. Policy DM17 supports this balanced approach.	No change required.
20	DP9	Aspirations	20.8	Chapter 4 A Dynamic and Creative Economy	DM14		Draft policy should be reconsidered to clarify the definition of employment land	Generally employment land falls into either of 2 categories. Designated employment land such as Priority Employment Areas and Locally Significant Industrial Sites both of which are defined in the Core Strategy Glossary and outlined on the Proposals Map. The second category relates to non designated employment land that contains employment generating uses. Employment generating uses are also defined in the Core	No change

								Strategy glossary.	
20	DP9	Aspirations	20.9	Chapter 4 A Dynamic and Creative Economy	DM16		Object to principle of the draft policy. A mandatory requirement for the provision of affordable workspace in commercial and/or mixed use development is inconsistent with national and strategic planning policy. Will add a further layer of financial pressure to new development proposals in Hackney and risks mothballing key regeneration sites.	Your comment is noted. But the Council does not accept that requiring some provision of affordable workspace on a case-by-case basis, where it does not undermine the viability of a scheme risks mothballing key regeneration sites and that it is contrary to national and strategic planning policy. On the contrary, the Council considers that its policy conforms with paragraph 4.8 of the London Plan Policy 4.1 - Developing London's Economy - which recognises the need for suitable and affordable workspace to encourage all kinds and sizes of enterprise, and particularly in the CAZ region (of which Shoreditch is part) which is recognised as having significant constraints that need addressing.	No change required.
20	DP9	Aspirations	20.1	Chapter 4 A Dynamic and Creative Economy	DM17		Welcome the recognition that hotels can play in the employment profile of the borough's PEAs and that they count towards employment space. The Council should consider revising the second arm of the draft policy to note that Shoreditch is an area where the amount of hotel floorspace may exceed commercial floorspace if meeting the seconded bullet criteria.	The case for this can be made under the second paragraph which notes 'exceptional circumstances' of Policy DM17. While only Dalston is mentioned it's possible that similar planning reasons may exist in high PTAL areas such as Shoreditch. However, given that much of Shoreditch is in the CAZ which is a focus for offices, and that higher density development is coming forward it is expected that redevelopment in Shoreditch will, at least, re-provide and ideally result in an increase in office floorspace as outlined in (iv).	No change required.
21	DP9	Rocket Investment Ltd	21.3	Chapter 4 A Dynamic and Creative Economy	DM11		Promotes A3 and A4 use within designated town/district centres subject to impact on amenity of residents and cumulative impacts. The policy should also recognise that such uses are appropriate within the Central Activities Zone and can provide a valuable and active use as part of major mixed use developments within the CAZ.	It should be noted that the CAZ lies within Shoreditch which has a significant part of it covered by the Special Policy Area (SPA) status aimed at managing the impact of night-time economy due to issues of saturation. Only a small part of Shoreditch lies outside the SPA boundary offering opportunity for the location of a limited number of night-time economy uses. Hackney's Statement of Licensing Policy dealing with the SPA outlines a presumption against granting any new licence or planning permission. Additionally any application for the intensification of use such as to increase either the capacity of a premise or the hours of use within the SPA, the onus is upon the applicant to demonstrate the new proposal will not add to the cumulative impact already being felt in the area. The Borough's designated Town Centres are the priority areas to focus A3 and A4 uses.	No change
21	DP9	Rocket Investment Ltd	21.4	Chapter 4 A Dynamic and Creative Economy	DM16	4.9.2	Recognises that the proportion of small/affordable floorspace will be addressed on a case-by-case basis. This is not reflected in the policy DM16. Policy should be amended to reflect para 4.9.2	Your comment is noted. The wording of Policy DM16 will be amended to reflect the fact that the provision of affordable workspace will be subject to scheme viability.	Amend Policy 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 lease arrangements and the desire of existing businesses to remain on site.
21	DP9	Rocket Investment Ltd	21.5	Chapter 4 A Dynamic and Creative Economy	DM17		Part (ii) highlights that residential floorspace may exceed commercial floorspace within PEAs in exceptional circumstances - we agree with this. Part (iv) states proposals to redevelop office floorspace in Shoreditch and Wenlock PEAs and CAZ must re-provide and should result in an increase in the amount of floorspace. The policy should not be based solely on the level of office floorspace proposed and should take into consideration other factors such as that proposed redevelopment can result in improved office floorspace compared to the existing offer.	This is reflected in Policies DM14 and DM15 which both support CS Policy18. Together these policies support uplift as the starting position. Re-provision or in some case some net loss will be possible if supported by marketing evidence and demonstrated (primarily through a marketing strategy) that the new floorspace is of a better quality, will support equal or higher employment densities and, is therefore more marketable and likely to be let. The submission of marketing evidence and a marketing strategy enables the policies to be flexible in light of individual site characteristics as well as adhere to market signals. Re-provision or net uplift is generally possible in Shoreditch given it is a strengthening office location consistent with its CAZ designation, and is a tall building search area which attracts higher density development.	No change required.
21	DP9	Rocket Investment Ltd	21.6	Chapter 4 A Dynamic and Creative Economy	DM17		We consider the A class uses appropriate within PEAs should be extended within this policy from A1 to Class A1-A4. Such uses provide employment and positive design through incorporation of active frontages, especially in mixed use schemes where such uses can serve employment, workers and residents.	A class uses and other town centre uses should be concentrated in designated town centres as per CS13. However A class 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.	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:'
24	Gerald Eve LLP	Prairie Limited and Mount Anvil	24.1	Chapter 4 A Dynamic and Creative Economy	DM17		It is not considered that the employment element of any scheme should be based solely on floor space but instead should be based on the number of jobs likely to be created as well as the viability and deliverability of the scheme. Notwithstanding the above, we agree with the exceptional circumstances test albeit, again, this should not only refer to the amount of 'floorspace' but also the number of jobs. We consider that the overall mix of residential and employment floorspace should depend on the site specifics, including the existing levels of employment on site, as well as the additional benefits offered by any scheme. We consider that the detailed wording of proposed policy DM17 - development proposals in PEAs should be amended to encourage 'mixed use development with a strong viable employment component that meets the identified needs of the area' in accordance with Core Strategy Policy 17.	Policy DM14 introduces employment density as one of the mechanisms that may enable a loss of employment floorspace in certain instances. Policy DM15 in support of CS Policy18 addresses the quality of employment floorspace. While these policies enable flexibility based on individual circumstances it must be acknowledged that PEAs are the Borough's core clusters of employment land, and only represent 6% of the Borough's total land mass. It is therefore critically important that Policy DM17 is clear as to what the Council's expectations are as a starting point. This will only be considered for relaxation through the submission of robust marketing evidence, employment density uplift (Policy DM14) and where significant quality enhancements (Policy DM15) are demonstrated.	No change required.
27	Iceni Projects	Regal Homes	27.2	Chapter 4 A Dynamic and Creative Economy	DM14 - DM17	N/A	Focus of this representation is on the subject site's designation within the Shoreditch Primary Employment Area (PEA). It is respectfully requested that the subject property is removed from this South Shoreditch Employment Area to reflect its surrounding environment, which is now quasi-residential in character, and to reflect the site's public transport accessibility, which is excellent (PTAL 6a).	Employment uses such as offices, hotels etc require high levels of public transport accessibility to function effectively. Shoreditch is an extremely important employment area in London and also has national significance both in terms of office provision as well as for the creative and technology related businesses. The evidence base which supports the CS and DM supports this areas designation as an employment area. The CS17, 18 and DM 14 & 17 allows other uses in PEAs such as residential provided the site's employment function is protected having regard to market signals.	No change required.

27	Iceni Projects	Regal Homes	27.3	Chapter 4 A Dynamic and Creative Economy	DM14 - DM17	N/A	Changing Character of the Area - The Character of the Shoreditch PEA has changed significantly since the adoption of the Hackney UDP in 1995 which identified the area for predominately general industrial uses. The fact that the area has evolved from general industrial uses was partly recognised in the Hackney UDP Saved Policies (2007) which retained the premise of employment led schemes in the area, with an increased focus on Small and Medium Sized Enterprises. It is considered that the emerging Local Development Framework must acknowledge the significant changes that have occurred in the area, in particular the impact of new public transport infrastructure. The Shoreditch area is no longer a primarily industrial area but rather is a location where people wish to live, work and visit. The emerging planning framework needs to reflect this change and plan positively for the future.	The point is well made and is considered to have been taken into account in the evidence base study which underpins the designation of Shoreditch as a Priority Employment Area as well as when the Core Strategy Policies 17 and 18 and the supporting DMLP policies DM14 and DM17 were being formulated. Policy DM17, in particular, enables mixed use development in PEAs where appropriate provided a site's employment function is protected. Specifically retail, hotel and leisure uses are permitted along side employment floorspace. The flexibility in the policy is introduced through the need for marketing evidence and a marketing strategy to ensure schemes are responding to market signals and the requirements of future occupiers.	No change required.
27	Iceni Projects	Regal Homes	27.4	Chapter 4 A Dynamic and Creative Economy	DM14 - DM17	N/A	Changing Character of the Area - The subject site has significant potential for land use change in view of the current limited numbers employed on the site, the environmental state of the site, the residential character of the surrounding uses and suitably of the landholding for residential given its proximity to Hoxton Station with a PTAL Level of 6a. This is acknowledged in the Hackney Road Conservation Appraisal which identifies Sites A and B as Opportunity Sites for Redevelopment and also that states that: 'The arrival of a new station in Cremer Street will accelerate the pressure for new development and encourage future investment in Hackney'.	Your comment is noted. However, it should be noted that the point being made was taken into account when the evidence based study which underpinned the designation of the area as a Priority Employment Area was made as well as when the Core Strategy Policies 17 and 18 and the supporting DMLP policies DM14 and DM17 were being formulated. Policy DM17, in particular, enables mixed use development in PEAs provided a site's employment function is protected. Specifically retail, hotel and leisure uses are permitted along side employment floorspace. The flexibility in the policy is introduced through the need for marketing evidence and a marketing strategy to ensure schemes are responding to market signals and the requirements of future occupiers. In Shoreditch, in particular, many sites come forward at a much greater density to existing development which generally enables employment land to be reprovided along with other uses such as residential. The Council's recently published AMR 2011/12 demonstrates that both new housing and upgraded 'market ready' employment space has been delivered in PEAs between 2008 and 2012 as part of mixed use development.	No change required.
27	Iceni Projects	Regal Homes	27.5	Chapter 4 A Dynamic and Creative Economy	DM14 - DM17	N/A	Changing Character of the Area - Regal Homes intends to progress with the development of this site in the short to medium term, which will represent a major investment in Hackney. Thus, there is an onus to development this site for an attractive and sustainable mix of uses which will still generate a significant quantum of jobs, in addition to residential units. A focus on the number of jobs created rather than the quantum of employment floorspace accords with the approach adopted in the London Plan, which supports mixed use developments particularly on brownfield sites (Policy 3.3).	Your comment is noted. However, it should be noted that the point being made was taken into account when the evidence based study which underpinned the designation of the area as a Priority Employment Area was made as well as when the Core Strategy Policies 17 and 18 and the supporting DMLP policies DM14 and DM17 were being formulated. Policy DM17, in particular, enables mixed use development in PEAs where appropriate provided a site's employment function is protected. Specifically retail, hotel and leisure uses are permitted along side employment floorspace in a supporting capacity. The flexibility in the policy is introduced through the need for marketing evidence and a marketing strategy to ensure schemes are responding to market signals and the requirements of future occupiers. In Shoreditch in particular many sites come forward at a much greater density to existing development which generally enables employment land to be reprovided along with other uses such as residential. The Council's recently published AMR 2011/12 demonstrates that both new housing and upgraded 'market ready' employment space has been delivered in PEAs between 2008 and 2012 as part of mixed use development.	No change required.

27	Iceni Projects	Regal Homes	27.6	Chapter 4 A Dynamic and Creative Economy	DM14 - DM17	N/A	Public Transport Infrastructure - The subject site lies adjacent to Hoxton Station which comprises of one of the recently constructed East London stations. The Core Strategy details the Council's spatial vision for 2025 and states at paragraph 3.6 that: 'The new East London line stations between Shoreditch and Dalston have provided the impetus for change along this section of the A10 corridor with housing, retail and leisure development, particularly around the stations'.	Your comment is noted. However, it should be noted that the point being made was taken into account when the employment land evidence based study which underpinned the designation of the area as a Priority Employment Area (PEA) was made as well as when the Core Strategy Policies 17 and 18 and the supporting DMLP policies DM14 and DM17 were being formulated. Policy DM17, in particular, enables mixed use development in PEAs provided a site's employment function is protected. Specifically retail, hotel and leisure uses are permitted alongside employment floorspace. The flexibility in the policy is introduced through the need for marketing evidence and a marketing strategy to ensure schemes are responding to market signals and the requirements of future occupiers. In Shoreditch, in particular, many sites come forward at a much greater density to existing development which generally enables employment land to be reprovided along with other uses such as residential. The Council's recently published AMR 2011/12 demonstrates that both new housing and upgraded 'market ready' employment space has been delivered in PEAs between 2008 and 2012 as part of mixed use development.	No change required.
27	Iceni Projects	Regal Homes	27.7	Chapter 4 A Dynamic and Creative Economy	DM14 - DM17	N/A	The Core Strategy identifies that there is a need for change in the vicinity of these stations to take advantage of public transport with a focus on housing and commercial uses. The Core Strategy identifies that the extension of the East London Line (London Overground) is a huge boost to regeneration and connectivity. Core Strategy Policy 2 - Improved Railway Corridors encourages residential use at such locations, states that: 'The Council will encourage intensification of **residential, employment and commercial uses,** including mixed use, around Shoreditch High Street, **Hoxton** and Haggerston stations, and along the Kingsland Road. Major housing redevelopment is programmed at the Haggerston West and Kingsland Estates. Overall approximately 630 net additional dwellings new homes will be provided in the improved railway corridors. The Council will support improvements to the public realm including walking and cycling routes to the stations' (our emphasis). The public transport in addition to the established residential use in the area makes the subject site an ideal location in which to locate well designed housing. The site has the potential to promote employment opportunities whilst protecting the amenity of the existing residents.	Core Strategy Policy 2 and DMLP Policy DM 14 enable mixed use development in the Improved Railway Corridors as long as the site's employment functions are protected having regard to market signals. Refer to responses given above for further justification of current policy approach.	No change required.
27	Iceni Projects	Regal Homes	27.8	Chapter 4 A Dynamic and Creative Economy	DM14 - DM17	N/A	Employment Policy - The Council's employment policies contained in the DM LP seek to protect employment generating activities anywhere in the Borough as detailed in Proposed Policy DM14 - Retention of Employment Land and Floorspace. Policy DM14 resists the loss of employment land unless there is compelling evidence that there is no longer any demand for this use. The policy acknowledges the benefits of redevelopment schemes and requires that the commercial floorspace being replaced provides higher employment density than the existing scheme.	Core Strategy Policy 2 and DMLP Policy DM 14 enable mixed use development in the Improved Railway Corridors as long as the site's employment functions are protected having regard to market signals. Refer to responses given above for further justification of current policy approach.	No change required.

27	Iceni Projects	Regal Homes	27.9	Chapter 4 A Dynamic and Creative Economy	DM14 - DM17	N/A	Regal Homes generally supports the principles of Policy DM14 which help to ensure viable employment generating uses are developed. Accordingly, the Shoreditch PEA and Proposed Policy DM17 are considered superfluous, as the employment objectives for this site can be met through Policy DM14. Accordingly, the inclusion of the subject site within the Shoreditch PEA is unnecessary and will only serve to restrict the potential of a holistic redevelopment of this strategic landholding.	Policy DM14 relates to all employment land while Policy DM17 deals specifically with sites located within designated PEAs. Policy DM14 requires applicants to have regard to market signals through the submission of marketing evidence in terms of the amount of floorspace they provide as well as submission of a marketing strategy to demonstrate any new floorspace is fit for purpose and well designed in accordance with Policy CS18 and Policy DM15 and therefore has a strong likelihood of being occupied. Policy DM17 adds further detail regarding what range of supporting land uses in addition to B1 are considered acceptable. Specific provisions are also outlined relating to Dalston and the Shoreditch and Wenlock PEAs in response to their specific characteristics and the likely scale of development that may come forward.	No change required.
27	Iceni Projects	Regal Homes	27.1	Chapter 4 A Dynamic and Creative Economy	N/A	N/A	Note: Regal Homes have assembled a major landholding on the southern edge of Hackney between Hackney Road and Hoxton Overground Station. Overall site area is 0.59 ha. The purpose of this representation is to ensure that the emerging policy facilitates the redevelopment of this strategic site and encourages future investment in the Borough. Regal homes have indicative proposals for the subject site involving the comprehensive redevelopment for a residential-led mixed use scheme.	Any subsequent application that comes forward will need to comply with the Core Strategy and any relevant DMLP policies once adopted. It is likely, based on the description provided, that the site might be designated PEA. If this is the case the site should first be marketed as an employment led site which will then guide the appropriate quantum of employment floorspace on the site as part of any planning application.	No change required.
30	Islington Council	N/A	30,10	Chapter 4 A Dynamic and Creative Economy	DM10		No objection	No objection noted.	No change required.
30	Islington Council	N/A	30.11	Chapter 4 A Dynamic and Creative Economy	DM11		No objection	No objection noted.	No change required.
30	Islington Council	N/A	30.12	Chapter 4 A Dynamic and Creative Economy	DM12		No objection	No objection noted.	No change required.
30	Islington Council	N/A	30.13	Chapter 4 A Dynamic and Creative Economy	DM13		No objection	No objection noted.	No change required.
30	Islington Council	N/A	30.14	Chapter 4 A Dynamic and Creative Economy	DM14		No objection	No objection noted.	No change required.
30	Islington Council	N/A	30.15	Chapter 4 A Dynamic and Creative Economy	DM15		No objection	No objection noted.	No change required.
30	Islington Council	N/A	30.16	Chapter 4 A Dynamic and Creative Economy	DM16		No objection	No objection noted.	No change required.
30	Islington Council	N/A	30.17	Chapter 4 A Dynamic and Creative Economy	DM17		No objection	No objection noted.	No change required.
30	Islington Council	N/A	30.18	Chapter 4 A Dynamic and Creative Economy	DM18		No objection	No objection noted.	No change required.
30	Islington Council	N/A	30.7	Chapter 4 A Dynamic and Creative Economy	DM7		No objection - proposed policy should enable the sustainable development of Dalston Town Centre without compromising any of Islington's emerging and adopted policies, specifically retail policies given the close proximity of a local shopping area on Balls Pond Road.	No objection noted. Supporting text makes reference to there being no adverse impact to adjoining town centres.	No change required.

30	Islington Council	N/A	30.8	Chapter 4 A Dynamic and Creative Economy	DM8		No objection	No objection noted.	No change required.
30	Islington Council	N/A	30.9	Chapter 4 A Dynamic and Creative Economy	DM9		No objection	No objection noted.	No change required.
32	The Office of the Archdeacon of Hackney	N/A	32.4	Chapter 4 A Dynamic and Creative Economy	DM9	4.3.9	Para 4.3.9 include "churches"	Commented noted. Given that the relevant paragraph is talking about uses directly relating to a shopping trip, it is not considered necessary to include the proposed amendment. CS Policy 13 already states that community uses are appropriate within town centres.	No change required.
36	cgms consulting	Tesco Stores	36.1	Chapter 4 A Dynamic and Creative Economy	DM7	4.2.3	Paragraph 4.2.3 of the draft plan refers to impact statements for edge of centre and out of centre retail development. The NPPF published in March 2012 however states that, outside of town centres, retail development should require an impact assessment if the floorspace threshold is 2,500 sqm or larger, unless there is a locally set threshold. There is no locally set threshold in the draft Plan. Given that no floorspace figure is defined within either the Policy itself or the accompanying text, it is unclear as to the criteria the LPA would use to justify whether an impact assessment is required or not for any in centre, edge of centre or out of centre retail development. On this basis, Tesco object to DM7 and recommend that the 2,500 sqm threshold for impact assessments be inserted into the draft Local Plan to ensure accordance with the NPPF. Such a threshold figure of 2,500sqm for impact assessments should be included in the policy itself and not solely included in the supporting text. The draft policy would thus be 'sound' when considered against para. 26 of the NPPF.	As outlined above the Council will be amending the supporting text of paragraph 4.2.4 to justify a local threshold of 200sqm and a requirement for both the sequential test and a retail impact assessment. This threshold is based on Hackney's town centres being characterised by small sized shop units. Proposals above this threshold could have adverse effects on existing shopping centres, unless proven otherwise. Also the CMC is not identified for retail and is not in a town centre.	Add an additional sentence to the end of paragraph 4.2.2 to read: 'While it is 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". Amend second sentence of paragraph 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". 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."

45	Drivers Jonas Deloitte	iCity	45.2	Chapter 4 A Dynamic and Creative Economy	DM16		The vision for iCity proposal includes the provision of significant areas of space to operators which will contribute to the dynamic nature of the place but will not be financially viable in their own right. Potential operators include a leading higher education institution and a charitable organisation that provides affordable artist studios. The precise area to be taken up by these uses is not yet known, but it is likely to be less than 10% of the area within buildings of the scale of the IBC/MPC. We therefore proposed that DM16 is amended to place a cap of 1000sqm on the provision of affordable workspace as part of any single development. The suggested amendment would also help to deliver a greater variety and choice of affordable workspace across the Borough, would avoid circumstances where a very onerous policy requirement could lead to important developments not taking place.	The suggested change is not supported. A cap is not considered appropriate as it would limit the flexibility of the policy. Applicants might also be minded to reduce the amount of employment floorspace they provide under this threshold so as not to have to provide affordable workspace.	No change required.
45	Drivers Jonas Deloitte	iCity	45.1	Chapter 4 A Dynamic and Creative Economy	DM7		While we recognise the general need for retail proposals to meet the sequential test, we consider that the policy should be amended to be consistent with the NPPF by confirming that it is not necessary to apply the sequential test to retail proposals outside existing centres that are in accordance with an up to date Local Plan. In the case of the IBC/MPC, the site forms part of the proposed 'Creative Media City' as proposed in the Hackney Wick AAP. The retail floorspace that forms part of the iCity project vision will be complementary to the business uses of the main buildings and is likely to include a significant element of class A3-A5 units. Even without our proposed change to Policy DM7, we would suggest that the sequential test should not have to be applied to retail floorspace that is specifically aimed at serving the day to day needs of workers and residents at new and existing focal points of activity, such as the IBC/MPC. We propose the wording of DM7 to be amended as follows: 'Proposals for new or extension to existing edge or out-of-centre retail or leisure development in excess of 200 sq.m gross floorspace which are not in accordance with an up to date Local Plan will not be granted planning permission unless they meet the sequential assessment requirements as set out in the NPPF'.	The suggested change is not supported. CMC is not really meant for retail other than for supporting uses, so a proposal above 200sq.m would need a sequential test and a retail impact assessment. In any case, the LLDC may develop a different policy as they are now the planning authority for this area. See comments above for further details.	No change required.
46	GLA	N/A	46.4	Chapter 4 A Dynamic and Creative Economy	DM8		Lack of reference to independent and small shops, as well as markets, as referred to in London plan policies 4.8 and 4.9. Consideration should be given to explicitly providing and protecting these through the development management process.	Policy DM9 focuses specifically on small and independent shops. No change is to be made.	No change required.
46	GLA	N/A	46.3	Chapter 4 A Dynamic and Creative Economy			Welcome the policies relating to retail and town centres. These accord with London Plan policy 4.7	Welcome noted.	No change required.

48	Indigo Planning Limited	N/A	48.1	Chapter 4 A Dynamic and Creative Economy	DM14	DM15-17	Policies set stringent criteria in respect of the development of land within PEAs. Collectively, and taking into account the various obligations expected from new development proposals under the Council's Planning Obligations SPD the effect of these proposed policies could seriously undermine the viability of potential redevelopment proposals that would substantially improve efficient use of brownfield sites and deliver sustainable growth.	The DMLP's employment policies are underpinned by an evidence base which concluded that the borough's employment needs over a 15 year period is best served by designating a core portfolio of employment land. This evidence base and the designation of PEAs was found sound as part of adopting the Core Strategy (CS). Policies DM15-17 further support CS policies in terms of assessing planning applications. They do not add additional requirements. Rather DM17 provides clarity on what an acceptable 'policy compliant' mix of uses is within PEAs and as such the value of sites will be aligned accordingly and the viability of commercial schemes will improve. These policies and the related CS policy 17 and 18 are flexible in that they allow mixed use development including residential to help cross subsidise improving the quality of existing employment land either through refurbishment or rebuild. It should also be noted that Priority Employment Areas represent only 6% of the borough's total land mass and that the Council generally exceeds its GLA set housing delivery targets.	No change required.
51	Sustainable Hackney	N/A	51.7	Chapter 4 A Dynamic and Creative Economy	DM10		Non viable shops should be put to productive use but conversion to residential use is often done so poorly that it detracts from the local environment. Often there is no storage space for waste bins and entrances are hidden away and unsafe. The Council should develop area specific design guidance for conversions of former shops in consultation with local residents to ensure such conversions enhance the locality.	The Council does not intend to produce area specific design guidance for conversion of former shops to residential units. The Council does have in place a Shopfront Design Guide. The Council does not intend to encourage conversions of shops to residential uses. However, the Council has a supplementary planning guidance on residential conversion which sets out guidance to ensure conversions are carried out to suitable standards. Policies CS24 and DM1 also establish criteria requiring high design quality. Further, both Policies CS32 and DM1 require appropriate waste and recycling storage facilities on site.	No change required.
51	Sustainable Hackney	N/A	51.8	Chapter 4 A Dynamic and Creative Economy	DM14		Concerned that too many developers simply flaunt local plans to retain employment (and other) uses by pretending they cannot re-let such properties when they have not really tried in practise. Welcome the requirement for developers seeking change of use to submit evidence that the site has been actively marketed set out in Appendix 4 but believe developers are able to meet its requirements without genuinely seeking to encourage designated or closely related uses. Any application for change of use (from employment, amenity and cultural uses) is not delegated to Officers but referred to full planning committee to allow local residents and business to challenge false evidence.	Your support of the requirement for developers seeking change of use to submit evidence that the site has been actively marketed is noted. The DM employment policies are considered stringent and, once adopted, will be used to seek further information from developers when they submit planning applications for their proposals. Where required information is not forthcoming consistent with the requirements set in Appendix 4 the applications for a change of use will be refused. Policy DM14 requires marketing evidence when trying to justify release of employment land as well as a marketing strategy to demonstrate the design of new employment floorspace meets the needs of the market and is likely to be let. This multi faceted approach is considered thorough and will ensure the policies are responsive to market signals whilst ensuring the applicant is clear in demonstrating compliance with policy. Local residents are normally given the opportunity to make their views known on submitted planning applications and can attend Planning Committee meetings to voice their concerns.	No change required.

51	Sustainable Hackney	N/A	51.6	Chapter 4 A Dynamic and Creative Economy	DM8		Welcome Hackney's continued commitment to support small and local businesses but would also like more Hackney shopping to be done in Hackney so as to reduce travel distances and increase local employment. Hackney should analyse what is missing from local shops and survey the firms that might fill the gaps to ask what premises they need.	The DMLP retail strategy is concerned with protecting retail use and directly trying to reduce spend leakage in the Borough. The DM policies require a minimum proportion of uses in shopping frontages to be in A1 use while protecting and building upon existing small and independent shops. The AAPs for Dalston, Hackney Central and Manor House develop specific retail strategies for these town centres in support of the DMLP's more strategic policies. The Council's Regeneration Delivery team are in regular contact with existing and prospective retailers looking to locate and/or grow within the Borough.	No change required.
52	Barton willmore	HG Capital Investments Ltd	52.2	Chapter 4 A Dynamic and Creative Economy	DM14		Promoting Employment Land - providing less than the 'maximum amount' should be permitted where it can be demonstrated via a planning application that a redevelopment scheme will offer site / scheme specific and wider local economic benefits. Similarly it may also not always be possible to provide a higher employment density than previously existed. Due to the complexity of development and local labour markets, employment density can sometimes be a blunt tool when measuring economic benefit. To provide the policy with adequate flexibility, the second and third paragraphs should allow for a range of economic benefits when judging whether a quantitative loss of employment floorspace may be acceptable. Consistent with Core Strategy Policy 18, these could include improving business function and the attractiveness and specification of employment floorspace. These can then be judged with all other scheme benefits when weighing up the acceptability of a particular proposal. Policy DM14: amend the first sentence and paragraph of the policy to refer to the complete loss of employment land and floorspace. Appendix 4 should also be amended accordingly.The second and third paragraphs of Policy DM14 should acknowledge that it is often not economically feasible to provide the maximum amount of employment floorspace in a redevelopment scheme. Provided a scheme delivers other economic benefits (consistent with Core Strategy Policy 18).	Your comments are noted. Whilst it is acknowledged that it may "often not be economically feasible to provide the maximum amount of employment floorspace in a redevelopment scheme", it is always the case that the maximum economically feasible amount of employment floorspace possible can be provided and incorporated in any redevelopment scheme. In light of this Policy DM14 will be amended to clarify this position. 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 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.	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 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 accordance with Policy CS18 and Policy DM15); and• It is demonstrated that the new commercial floorspace being provided has a strong likelihood of being occupied through the submission of a detailed marketing strategy (refer to Appendix 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 inthe loss of employment land, the Council will seek a planning contribution to the Council's Sustainable Training and Employment Scheme."
52	Barton willmore	HG Capital Investments Ltd	52.3	Chapter 4 A Dynamic and Creative Economy	DM16		Acknowledge the importance of providing flexible accommodation which can allow occupation by small or independent commercial enterprises. This is recognised as being of relevance to the Hackney area given the nature of its local economy. To ensure occupation, such accommodation is by its very nature 'affordable' against prevailing market rents. To provide accommodation at higher than a market level and in accommodation that is not adequately flexible would threaten the ability to achieve the necessary level of pre-lets and consequently the ability to develop a scheme. The proposed policy represents a significant barrier on the ability to provide viable and attractive workspace as part of a redevelopment scheme due to the requirement to provide at least 10% of the floorspace at less than 80% of comparable market rates over a period of 10 years. Such a floorspace proportion, market rate level and time period has no basis in national or regional guidance and should be removed due to the barrier it represents for delivering economic development. The evidence base upon which the policy relies (Hackney Employment Growth Options Study 2006) is also now significantly dated due to the change in economic conditions since its publication and cannot be realistically relied upon. This policy objective is instead more than adequately capable of being addressed by providing flexible and attractive accommodation for small and medium-sized enterprises. This is covered under the requirements of Policy DM15. Delete Proposed Policy DM16.	Your comments are noted. However, the Council does not accept that requiring some provision of affordable workspace on a case-by-case basis, where it does not undermine the viability of a scheme is a significant barrier on the ability to provide viable and attractive workspace as part of a redevelopment scheme. It is also felt that such a floorspace provision, market rate level and time period is not contrary to national or strategic planning policy. The need for and relevance of providing affordable workspace in Hackney is recognised and documented. It should be noted that 2006 Hackney Employment Growth Options Study which underpinned its Core Strategy and found sound by the Planning Inspector was refreshed in 2010, when the current economic austerity climate was well underway. The refreshed study did not invalidate its original findings in 2006. The Council, on the contrary, considers that its policy conforms with paragraph 4.8 of the London Plan Policy 4.1 - Developing London's Economy - which recognises the need for suitable and affordable workspace to encourage all kinds and sizes of enterprise, and particularly in the CAZ region (of which Shoreditch is part) which is recognised as having significant constraints that need addressing. Policy DM16 will not be deleted.	No change required.

52	Barton willmore	HG Capital Investments Ltd	52.4	Chapter 4 A Dynamic and Creative Economy	DM17		Welcomes the flexibility that the proposed policy offers in allowing the inclusion of non B class floorspace in mixed-use schemes in PEAs. Student accommodation does not fall within Use Class C3 and is generally acknowledged as being Sui Generis due to the nature of the use. Like residential accommodation, the use does offer local economic benefits and can assist in the delivery of enhanced B class floorspace as part of a mixed use scheme. This is recognised in paragraph 4.10.6 of the Plan. Provided the replacement scheme offers an economic benefit then the supply of B class land and floorspace together with its quality can be maintained and enhanced. Accordingly, purpose-built student accommodation should be included within the list of non B class uses acceptable within PEAs provided it complies with other policies in the Plan including proposed Policy DM24 – Student Housing. This policy provides flexibility in allowing the amount of C1 and C3 floorspace to exceed the amount of commercial floorspace. Such a degree of flexibility is welcomed. This should include such flexibility for student accommodation. It is contradictory to expect the amount of commercial floorspace to match the existing or result in an uplift. If it is not possible to achieve such increase, then as a minimum an applicant should be allowed to demonstrate why it is not feasible to match existing levels or provide an increased amount of floorspace.	The inclusion of student housing is not supported in PEAs as a supporting use similar to A-class, C1, C3 and D1. These uses, unlike Student Housing, either provide much needed housing delivery or are employment generating and, therefore are considered suitable subject to appropriate quanta within PEAs. This is not to say Student Housing can not be considered appropriate in certain instances as provided for under Policy DM17(iii) and in accordance with Policy DM24. See responses provided above as well.	No change required.
57	CgMs	Notting Hill Housing Trust	57.1	Chapter 4 A Dynamic and Creative Economy	DM14		Proposed Policy DM14 – Retention of Employment Land and Floorspace Policy DM14 sets out criteria against which the loss of employment land and floorspace may be considered acceptable. The first part of Policy DM14 indicates that the loss of employment land and floorspace will be resisted unless compelling evidence is submitted.		No change required.
57	CgMs	Notting Hill Housing Trust	57.3	Chapter 4 A Dynamic and Creative Economy	DM14		The second paragraph of Policy DM14 indicates that the quantitative loss of employment floorspace may be acceptable subject to certain criteria. In such circumstances it is assumed that marketing evidence as outlined within Appendix 4 is not required. The Policy should include this clarification in order to avoid ambiguity. The third paragraph of Policy DM14 notes that development proposals must provide higher employment density than previously existed. It is considered that providing a higher employment density is not always an applicable test against which redevelopment proposals should be considered. There will be some circumstances where the redevelopment of employment floorspace may generate a lower employment density but actually provides floorspace which is appropriate to a particular commercial need within a specific area. The Policy in this regard is therefore too restrictive and does incorporate sufficient flexibility to respond to particular site circumstances.	Marketing evidence is required in all instances where a loss of employment floorspace is proposed. The policy will be amended to make this clear. In conjunction with marketing evidence a higher employment density is considered the most definitive and quantifiable way in demonstrating that a site's employment function is being protected. Where other employment sectors are proposed which maybe of a lower density the applicant will be able to evidence the appropriateness of these uses through the submission of a marketing strategy in accordance with Appendix 4.	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 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 accordance with Policy CS18 and Policy DM15); and• It is demonstrated that the new commercial floorspace being provided has a strong likelihood of being occupied through the submission of a detailed marketing strategy (refer to Appendix 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.”
57	CgMs	Notting Hill Housing Trust	57.5	Chapter 4 A Dynamic and Creative Economy	DM14		The final paragraph of Policy DM14 notes that where development results in the loss of employment floorspace, the Council will seek financial contributions towards their Sustainable Training and Employment Scheme. It is considered that the policy should acknowledge that financial contributions will need to be considered as part of the overall scheme viability.	Your comment is noted but it is not considered necessary to make a specific amendment where indicated as s106 negotiations are always subject to viability. However Policy DM14 is to be amended to specifically reference "the maximum economically feasible amount of employment land and floorspace"	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 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 accordance with Policy CS18 and Policy DM15); and • It is demonstrated that the new commercial floorspace being provided has a strong likelihood of being occupied through the submission of a detailed marketing strategy (refer to Appendix 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."
57	CgMs	Notting Hill Housing Trust	57.6	Chapter 4 A Dynamic and Creative Economy	DM15		Proposed Policy DM15 – New Business Floorspace Policy DM15 requires new business floorspace to have good natural light. It is considered that this is test is overly restrictive and does not take into account specific site circumstances. Although we are fully supportive of well-designed and high quality buildings and floorspace, due to the complexities and configurations of particular sites a high level of natural light will not always be possible. This does not, however, mean that the business space is inadequate and indeed there are many business which do not require high levels of natural light throughout their premises e.g. photographic studios. It is considered that the Policy should allow exceptions on a site by site and use basis where good natural light may not be necessary.	The aim of Policy DM15 and the associated more detailed criteria outlined in paragraph 4.8.1 are what the Council considers to constitute best practice when designing new business floorspace in the majority of cases. Obviously, there will be site specific cases where certain criteria may not be achievable and/or other innovative solutions are proposed. In these cases the wider benefits of the scheme will still be relevant in making a final determination as to the scheme's acceptability. Regardless, maximising access to natural light is considered a key design parameter in achieving high quality business floorspace and should therefore remain in the policy and supporting text.	No change required.
57	CgMs	Notting Hill Housing Trust	57.7	Chapter 4 A Dynamic and Creative Economy	DM16		Proposed Policy DM16 – Affordable Workspace Policy DM16 requires at least 10% of the floorspace within new major commercial developments to be affordable workspace. However, supporting para. 4.9.2 notes that the proportion of affordable floorspace being provided within specific schemes will be addressed on a site specific, case-by-case basis. Given the supporting text acknowledges that cases will be considered on an individual basis, it is surprising that the Policy has fixed a percentage of at least 10%. The requirement for at least 10% affordable workspace does not allow sufficient flexibility for individual site circumstances. It is considered that in accordance with supporting para. 4.9.2 reference to at least 10% should be removed and the Policy should instead acknowledge that the proportion of affordable floorspace will be addressed on a site specific basis. Furthermore, the requirement for affordable floorspace within new major commercial development schemes should only be provided it if would not render the scheme unviable (as the Policy acknowledges for redevelopment proposals). The second part of Policy DM16 requires evidence of agreement to lease at less than 80% of comparable local market value for at least 10 years from an approved Workspace Provider. It is considered that this requirement in particular is extremely onerous, will fetter the ability to deliver speculative commercial floorspace and does not acknowledge that market conditions can change considerably over a 10 year period. In a similar vein to the comments on the affordable floorspace, we consider that requirements for lease agreements should be considered on a site by site basis, taking into account specific site circumstance and viability. We are also unclear as to what is meant by an "approved Workspace Provider." We cannot source a definition for this term within the Plan and require clarity on this issue. If the Policy is restricting the ability to lease the shell and core to	Your comments are noted. The wording of Policy DM16 will be amended to reflect the fact that provision of affordable workspace will be subject to scheme viability.	Amend Policy 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 lease arrangements and the desire of existing businesses to remain on site.

							only an approved list of providers then this is considered to be wholly unacceptable as it would comprise the ability to deliver a range of new developments. This requirement is considered to be consistent with the Government's current agenda to promote business initiatives and support enterprise. It is often unknown at the planning application stage who will be the eventual management company or tenant and therefore a requirement at this stage would be unworkable for many developments and as such should be removed from the Policy.		
57	CgMs	Notting Hill Housing Trust	57.8	Chapter 4 A Dynamic and Creative Economy	DM17		Proposed Policy DM17 – Development Proposals in Priority Employment Areas (PEAs) Policy DM17 notes that as part of an employment-led mixed use development proposals must ensure that commercial use is the primary use, in that the majority of floorspace should be for such use. The Policy notes that only in exceptional circumstances, where there are strong planning reasons or other material considerations, should the amount of residential (or other) floorspace exceed the commercial floorspace. The supporting text to Policy DM17 notes that the introduction of other uses within a PEA should not undermine the overall function of the PEA and on-going operations of adjacent businesses. Although we support this overall objective it does not necessarily follow that by introducing a greater quantum of floorspace in other uses, the functionality of the PEA will be undermined. Redevelopment proposals in PEAs could lead to the overall significant uplift in commercial floorspace and the delivery of a range of high quality units to cater for an identified need. By introducing residential floorspace on a number of upper floors (thereby creating a higher density and higher quality development in accordance with the Council's other objectives) does not mean that the overall function of the PEA will be comprised. Indeed the overall employment focus and provision in the PEA will improve. It is therefore considered that to measure the functionality of the PEA by the quantum of floorspace provided is not an appropriate or realistic test and should be removed from the Policy.	See responses provided above. Together CS Policy 17, CS Policy18 and Policies DM14, DM15 and DM17 bring together the interconnected issues around floorspace quantum, design and employment density. Therefore protecting the overall employment function of PEAs is considered a valid and relevant material consideration.	No change required.
61	Comprehensive Coachworks Ltd	Comprehensive Coachworks	61.1	Chapter 4 A Dynamic and Creative Economy	DM14		Disagree that the Council should ensure that there is no loss of employment land to other uses and that employment activities should be located within specific areas. The Council are unable to force employers to locate within LBH and simply creating employment sites doesn't ensure employment opportunities.	National Planning Policy Framework advises boroughs to help achieve economic growth by planning proactively to meet the development needs of business and support an economy fit for the 21st century. One way they can do this is through the identification of sites for local and inward investment to match their strategy and to meet the anticipated needs of businesses over the plan period. Whilst you are of the view that "simply creating employment sites doesn't ensure employment opportunities", it is nonetheless a fact that identifying and safeguarding employment sites offers opportunities for local and inward investment for new and expanding businesses. Further, it should be noted that the DMLP employment policies are supported by an evidence based which concludes that the borough's core portfolio of employment land should be protected. The Core Strategy (CS) which the Development Management Local Plan (DMLP) policies support are concerned with ensuring the Borough has sufficient employment land to meet the needs of businesses over a 15 year period. The CS and supporting evidence has been found sound following an examination in public. The DM policies enable mixed use development in PEAs as long as a site's employment functions are protected having regard to market signals. Designated Employment Areas represent only 6% of the Council's total land mass which can hardly be argued as being restrictive particularly as mixed development is also permissible in these areas.	No change required.

61	Comprehensive Coachworks Ltd	Comprehensive Coachworks	61.2	Chapter 4 A Dynamic and Creative Economy			Investors will only invest in LBH if the Council provides an attractive and realistic environment. Creating unrealistic economic barriers does not in anyway help the residents of Hackney and will not provide them with long term employment.	The Council considers that its policies strike the right balance between the delivery of quality new homes and the protection of a core reservoir of employment land to strengthen the local economy. The Council currently exceeds its housing targets set by the London Plan, and is currently improving its stock of employment land via permitting mixed use redevelopment in PEAs as outlined in the AMR 2011/12. It should also be noted that the Council's PEAs cover only 6% of the Borough's total land area.	No change required.
65	A Roberts	N/A	65.8	Chapter 4 A Dynamic and Creative Economy	DM11		There are too many bars on Kingsland Road at the moment, I would hate to live there. However pubs, etc should not be allowed to sit empty if they have been abandoned.	Note concern. Issues around the Night Time Economy in Dalston are currently being further investigated by the Council. Policy DM11 is designed to provide a policy framework to prevent concentration of such uses and to ensure that they are well managed to mitigate against their adverse impacts. Policy DM11 focuses nightime uses to certain locations where any impacts can be better managed such as in its larger town centres. Potential cumulative impact around Shoreditch and Dalston are noted - Shoreditch is currently part covered by a Special Policy Area aimed at managing the cumulative impacts of Night Time Uses. With regard to not allowing pubs to sit empty if they have been abandoned, it should be noted that the supporting text of Policy DM11, see paragraph 4.4.4, encourages a wide range of other complementary night-time uses, not just those that primarily sell alcohol. Empty pubs may be allowed to change to any of these uses, subject to the proposal meeting other policy objectives.	No change required.
65	A Roberts	N/A	65.12	Chapter 4 A Dynamic and Creative Economy	DM12		Please stop the takeaway shops. There are far too many.	Although there is concern about too many take-away shops the Council cannot prevent all new take away outlets but can control them to some degree. For instance the Council can control where they are permitted to locate. Policy DM12 aims at addressing the issue of proliferation of hot food takeaways in the Borough. Cooking practices and proximity to schools are now included as key considerations when assessing planning applications.	No change required.
65	A Roberts	N/A	65.7	Chapter 4 A Dynamic and Creative Economy	DM14		I think it is important that if a shop or office building has been empty for a while it should be able to be turned into private housing because there is such a shortage at the moment. I don't think we will ever need more shops.	Policies DM14 and DM17 allow mixed use development, including residential on employment land provided employment policy objectives and criteria are met. The borough's resident and working population are predicted to grow over the next 15 years so it is important that enough employment land or a decent quality is available to support a viable local economy. DM14 enables market signals such as demand and vacancy rates to be considered as part of determining planning applications. Further, under Policy DM10 a shop unit which has been empty and have been seriously marketed for the stated period may be allowed to turn into residential use, subject to other policy objectives being met.	No change required.
65	A Roberts	N/A	65.14	Chapter 4 A Dynamic and Creative Economy	DM16		Agree - otherwise Hackney will become an identikit town	Support welcomed. Providing affordable workspace in the Borough is important for 2 reasons: 1) it allows existing businesses of redevelopment floorspace to be housed in the new development on comparable rents to their existing terms and 2) it enables start up and smaller businesses to establish in the Borough and hopefully grow into larger and more profitable businesses. The reference to 'identikit' is not made clear. Regardless this is not considered an issue as affordable workspace will still need to meet minimum design requirement such as those outlined in Policy DM15.	No change required.

65	A Roberts	N/A	65.13	Chapter 4 A Dynamic and Creative Economy	DM8		Agree - otherwise Hackney will become an identikit town	Support welcomed.	No change required.
66	Cllr C Williams	N/A	66.3	Chapter 4 A Dynamic and Creative Economy	DM13		Hoxton Street market has gone down hill and even more effort needs to be put into it to promote and protect it so that it flourishes.	Comment noted. However, it must be stressed that both the supporting text and Policy DM13 underlines the Council's commitment in seeking to promote and secure improvements to a street market's environment and management, including Hoxton Street market.	No change required.
66	Cllr C Williams	N/A	66.2	Chapter 4 A Dynamic and Creative Economy			The council should take every opportunity available to discourage more pound shops in the borough and encourage good quality affordable shops catering to local needs	The Planning system is bound by the Use Classes Order (UCO) and cannot discriminate between particular types of companies. The retail Policies DM8 and DM9 further support the Core Strategy by promoting small and independent shops and ensuring designated shopping areas provide a core of A1 uses which essential means local shops.	No change required.
67	A Mansfield		67.5	Chapter 4 A Dynamic and Creative Economy	DM11		Agree that the Council should encourage and manage expansion of Hackney's visitor and night-time activities in Hackney Central and Dalston while taking into account negative impacts of such activity. For example Mare Street/Well Street junction is an entrance point to London Fields and has a number of popular late night pubs and bars. However it is also an area where too many hostels, betting shops and drugs services have been co-located meaning that young people from across London arrive in this part of Hackney and are often confronted by aggressive beggars and other types of anti-social behaviour.	Comment noted. DM11 is designed to control the number of late night uses and ensure they are well managed. In addition Policy DM1 incorporates the principles of designing out crime. Further, the supporting text of Policy DM11, see paragraph 4.4.5, makes reference to the Council applying appropriate conditions and obligations to help ensure that such uses operate appropriately, including working closely with other stakeholders to ensure strategic management issues, such as the anti-social behaviour you refer to, are co-ordinated and dealt with. Where appropriate, the Council also conditions approvals incorporating A2 floorspace to ensure that the use of the unit for a betting shop is avoided.	No change required.
67	A Mansfield	N/A	67.4	Chapter 4 A Dynamic and Creative Economy	DM14		Perhaps employment activities should not be located within specific areas but balanced across a wider area. Sites that are no longer viable for employment might make good sites for residential and vice versa.	Historically commercial land uses have predominately occupied specific areas of the Borough and these coherent areas are given the strongest protection by their inclusion within PEAs and other employment land designation types. These are suited for continued employment use and possible future redevelopment. Elsewhere in the Borough firms are found scattered through towns and residential areas. These firms provide valuable local employment for those who need to work near to home and are also protected. The employment areas are supported by an evidence based study which concludes that they should protected. This is to ensure that the Borough has sufficient employment land to meet the needs of businesses over a 15 year period. The Core Strategy employment policies and the supporting evidence which underpin them have been found sound following an examination in public. It should also be noted that businesses generally benefit from certain location characteristic such as ready access to major roads for heavy vehicle access or from agglomeration benefits by being located nearby to similar or related businesses. This is why a designation approach to employment land is preferred and is consistent with the London Plan. Following employment land reviews sites that are no longer viable for employment are released for other uses, including residential.	No change required.

7	DP9	Middlewater Trading and Investment Ltd	7.5	Chapter 5 Providing Better Homes	DM21	5.3.7	Paragraph 5.3.7 highlights that where affordable housing policy requirements cannot be achieved, the applicant must demonstrate through an 'open book' development appraisal why on-site provision cannot be delivered.	Your comment is noted. Paragraph 5.3.7 will be amended to refer to the wording of Core Strategy policy 20, which sets out that the GLA's Affordable Housing Toolkit Assessment or similar appraisal model should be used in presenting the viability of a scheme. This policy is referenced in DM21, as such there is no need to make this change to the policy. Regarding the second point, affordable housing is a policy requirement, as such we would rarely consider a situation where no affordable housing provision or contribution at least is provided, an application is likely to be refused unless demonstrated otherwise in terms of viability (reference to policy CS20 contained in DM21).	Paragraph 5.3.7 is amended by adding at the end of the paragraph a sentence which reads "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." No change to actual policy DM21 required.
7	DP9	Middlewater Trading and Investment Ltd	7.6	Chapter 5 Providing Better Homes	DM22		We object to part three of the draft policy which requires a developer to provide off-site solutions for family accommodation where it is not possible to provide it on site, or an in-lieu financial payment. The majority of developers will not have an off-site location to provide additional family accommodation. As such this draft policy will result in a significant planning burden which a developer is unlikely to be able to meet. We also object to requirement to make a financial contribution in lieu of on-site provision. At a time when development finance is constrained, the introduction of a further potential financial burden will only serve to make development more difficult. This part of the policy also does not take into account the significant planning benefits which the development would bring in terms of delivering additional residential units. This part of the policy should be removed.	Family housing is a strategic priority as set out in policies 3.8 and 3.11 of the London Plan, and in the Housing SPG, and the expectation is that such provision is made in all schemes. Paragraphs 5.4.2-5.4.4 seeks family housing on a third of dwellings. The part of the policy which requires off-site solutions or in-lieu contributions has been removed from the policy.	This part of the policy has been removed.
7	DP9	Middlewater Trading and Investment Ltd	7.7	Chapter 5 Providing Better Homes	DM24	5.6.5	The rental levels which a development can charge is determined by the student accommodation market, and is not something which should form part of policy. In addition, this information is commercially sensitive and cannot be issued within the public domain at the planning application stage. Reference to providing student accommodation rental levels within a planning application should be removed.	In order to assess if tenancies are affordable the Council needs to know how much the rental levels would be. Such information will be treated confidentially. The Council wants to ensure that student housing is affordable to UK students in particular, and it is considered appropriate to request this information, in the same way that other financial information is requested for other uses, e.g. affordable housing. In any event, the policy does not insist on affordable tenancies, rather it is seeking such in negotiation with developers.	Additional text to the end of supporting paragraph 5.6.7 which will say "This information will be treated confidentially during the planning application process"
12	CMA Planning	N/A	12.5	Chapter 5 Providing Better Homes	DM21		The policy needs more clarity. It should separate out someone adding extra units a month after the building has been completed compared to someone doing the same 10 years after completion. The policy should have a time reference.	Your point being made is accepted. Given recent Government changes effectively adding a year to the life of a planning permission, it would make sense to clarify in the policy that this should apply for a four year period to match this. Policy DM21 will be amended to reflect this fact.	The second to last paragraph of Policy DM21 is amended to clarify that additional units created on a scheme previously below the affordable housing threshold will be required to make provision for affordable housing if within four years of the commencement of the planning permission for that site. This paragraph now reads "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."
18	English Heritage	N/A	18.5	Chapter 5 Providing Better Homes	DM27		There should be reference to the fact that the Kingsland Corridor is the Kingsland Conservation Area. Furthermore, there are conservation areas in Dalston and Hackney Central. Proposals for hotels in Conservation Areas should be designed so as not to harm the character and appearance of these areas.	The impact of development proposals on conservation areas is covered by policy DM28 in relation to Heritage Assets, as such it is not considered appropriate to make this point specifically in relation to hotels here.	No change needed to DMLP.

20	DP9	Aspirations	20.11	Chapter 5 Providing Better Homes	DM21		Draft policy DM21 should refer to other site specific circumstances as exceptional circumstances where off-site affordable housing may be acceptable to the Local planning Authority. This will allow the policy to respond more effectively to the specifics of each case.	The references reflect the London Plan (July 2011) and the GLA Housing SPG exceptional circumstances. Specific reference to exceptional circumstances has been removed from the policy itself to avoid repeating regional policy. It is difficult to consider what other circumstances would be applicable. The last sentence of paragraph 5.3.5 will be amended to refer to the GLA's Housing SPG's 'exceptional circumstances' and a new paragraph 5.3.6 is added to clarify that off-site provision should "preferably be in the 'vicinity' of the main application site ".	The supporting text at paragraph 5.3.5 is amended by adding the following text so as to read "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.", and a new paragraph 5.3.6 is added so as to read "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. 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 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." Thus clarifying that off-site provision should be on alternative sites within the vicinity of the site. In place of setting out exceptional circumstances in policy DM21, the following has been inserted – "On-site provision of affordable housing is required, subject to the content of paragraphs 5.3.5 and 5.3.6 above", providing a link to the above paras.
20	DP9	Aspirations	20.12	Chapter 5 Providing Better Homes	DM21		DM 21 does not address a scenario where a development is not able to provide affordable housing on site or make a payment in lieu	Your comment is noted. Paragraph 5.3.7 will be amended to refer to the wording of Core Strategy policy 20, which sets out that the GLA's Affordable Housing Toolkit Assessment or similar appraisal model should be used in presenting the viability of a scheme. This policy is referenced in DM21, as such there is no need to make this change to the policy. Affordable housing is a policy requirement, as such we would rarely consider a situation where no affordable housing provision or contribution at least is provided, an application is likely to be refused unless demonstrated otherwise in terms of viability (reference to policy CS20 contained in DM21).	Paragraph 5.3.7 is amended by adding at the end of the paragraph a sentence which reads "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." No change to actual policy DM21 required.
20	DP9	Aspirations	20.13	Chapter 5 Providing Better Homes	DM21	5.37	Highlights where affordable housing policy requirement cannot be achieved the applicant must demonstrate through an 'open book' appraisal why on-site provision cannot be delivered. This should be included within DM21.	Your comment is noted. Core Strategy Policy 20, which sets out that the GLA's Affordable Housing Toolkit Assessment or similar appraisal model should be used in presenting the viability of a scheme, is referenced in Policy DM21.	No change required.
20	DP9	Aspirations	20.14	Chapter 5 Providing Better Homes	DM22		Object to part 3 of the draft policy which requires a developer to provide off-site solutions for family accommodation where it is not possible to provide it on-site, or an in-lieu financial payment. The majority of developers will not have an off-site location to provide family accommodation.	This part of the policy has since been removed.	This part of the policy has been removed.
20	DP9	Aspirations	20.15	Chapter 5 Providing Better Homes	DM22		Object to the requirement to make a financial contribution in lieu of on-site provision. At a time when development finance is constrained the introduction of a further potential burden will only serve to make development more difficult. This part of the policy should be removed.	This part of the policy has since been removed.	This part of the policy has been removed.

20	DP9	Aspirations	20.16	Chapter 5 Providing Better Homes	DM27		Planning policy should not place an onerous burden on the operation of ancillary hotel functions. More often than not these functions are publicly available. In certain circumstances there may be valid and appropriate reasons why such functions are only accessible to hotel residents and this should be noted in the draft policy	The point being made is understood, but the Council also would like to retain the opportunity for Hackney residents to access ancillary facilities. Criteria to consider exceptions have been inserted into the policy.	Second paragraph of DM27 now states "Ancillary facilities such as conference rooms, restaurants or gymnasiums should be accessible to the public, unless there are valid and appropriate reasons that such facilities should not be accessible to the public." Supporting paragraph 5.9.3 also refers to ancillary facilities.
20	DP9	Aspirations	20.17	Chapter 5 Providing Better Homes	DM27		The draft policy does not recognise the difference of benefits that flow from an apart-hotel use. This type of accommodation is an important component to supporting longer stay guests who typically travel with business. The nature and character of the space means that guests will utilise the hotel facilities but benefit from the separate sitting/dining area given the duration of the stay. Aparthotels are not residential and should not be considered on this basis, reference to the London Housing Design Guide should be removed.	Agree, amend para 5.9.4 to recognise the benefits of aparthotels, but also to be specific about the concerns related to aparthotels that are common to other planning authorities in relation to the potential residential rather than commercial nature of such uses. Remove reference to London Housing Design Guide in policy.	Amend paragraph 5.9.4 to state " Aparthotels 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 adverse impact on infrastructure provision. Evidence of management arrangements for apart-hotels need to be submitted to support a planning application." Also delete reference to London Plan space standards in the 5th paragraph of the policy.
21	DP9	Rocket Investment Ltd	21.7	Chapter 5 Providing Better Homes	DM22		Pleased that the policy provides scope for a range of different unit mixes across the Borough & recognises that certain locations are not suitable for a large amount of family housing (e.g. high density development on a busy road, viability reasons etc).	Comment noted	No change required.
30	Islington Council	N/A	30.20	Chapter 5 Providing Better Homes	DM20		No objection.	No objection noted.	No change required.
30	Islington Council	N/A	30.21	Chapter 5 Providing Better Homes	DM21		No objection.	No objection noted.	No change required.
30	Islington Council	N/A	30.22	Chapter 5 Providing Better Homes	DM22		No objection.	No objection noted.	No change required.
30	Islington Council	N/A	30.23	Chapter 5 Providing Better Homes	DM23		No objection.	No objection noted.	No change required.
30	Islington Council	N/A	30.24	Chapter 5 Providing Better Homes	DM24		No objection.	No objection noted.	No change required.
30	Islington Council	N/A	30.25	Chapter 5 Providing Better Homes	DM25		No objection.	No objection noted.	No change required.
30	Islington Council	N/A	30.26	Chapter 5 Providing Better Homes	DM26		No objection.	No objection noted.	No change required.
30	Islington Council	N/A	30.27	Chapter 5 Providing Better Homes	DM27		No objection.	No objection noted.	No change required.
43	Agudas Isreal Housing Association	N/A	43.10	Chapter 5 Providing Better Homes	DM20		AIHA welcomes the flexibility contained in this paragraph and in Policy DM 20 where schools occupying residential properties may be allowed to remain where demonstrated need for the use exists and suitable alternative accommodation is not available.	Welcome noted.	No change required.
43	Agudas Isreal Housing	N/A	43.11	Chapter 5 Providing Better Homes	DM21		On what basis is less than 50% provision of affordable housing negotiated? Core Policy 20 states 'exceptional reasons'. To ensure continued supply of affordable housing any reduction	Core Strategy policy 20 sets out that new housing should seek to meet a borough wide affordable housing target of 50% of all units subject to site	The policy has been changed to refer to the GLA's Housing SPG's 'exceptional circumstances' in the supporting text at paragraph 5.3.5, and clarification that off-site provision should

	Association						below 50% or off site provision should be an exception, clearly defined. Concern that the obligation to provide affordable housing will be resisted by private developers by means of the 4 considerations stated in DM21 and that commuted sums may be paid rather that on-site provision resulting in less affordable housing provision. To ensure continued supply of affordable housing any reduction below 50% or offsite provision should be an exception, clearly defined.	characteristics, location and overall scheme viability. Thus, applicants should strive to deliver as close to 50% affordable housing subject to these criteria. In most cases it is not possible to deliver 50% and it would be unreasonable to insist on this level of delivery otherwise schemes may well be unviable. The criteria are applied rigorously to ensure as high a level of affordable housing as possible, and DM21 is designed to ensure that the Borough is capturing as much affordable housing as possible. The exceptional circumstances are detailed in CS Policy 20 and the Housing SPG. The four points i-iv in DM21 which listed some considerations that could be exceptional have been removed.	be on alternative sites 'within the vicinity of the site' in paragraph 5.3.6. The exceptional circumstances are detailed in CS Policy 20 and the Housing SPG. The four points i-iv in DM21 which listed some considerations that could be exceptional have been removed.
43	Agudas Isreal Housing Association	N/A	43.12	Chapter 5 Providing Better Homes	DM21		Provision of 25% social rented housing is not viable within current AHP funding regime.	The Council's evidence base is that 25% social rent is viable, but this is negotiable with the Council in consideration of viability. No significant changes are considered necessary.	No change required.
43	Agudas Isreal Housing Association	N/A	43.13	Chapter 5 Providing Better Homes	DM22		Provision of 36% family housing is welcomed. AIHA provides 50-80% family housing to meet housing need of its community. Flexibility to provide in excess of target must be given.	Agree, the Borough has a strong need for family housing, if a scheme is in excess of the size mix guidelines in Table 1 this could be supported, provided there are not existing high levels of family housing in an area, or the demographic evidence shows a need for high level of provision of family housing.	Amendment to paragraphs 5.4.3-5.4.4 to reflect this.
43	Agudas Isreal Housing Association	N/A	43.14	Chapter 5 Providing Better Homes	DM22		Family housing: AIHA supports Hackney's aim to provide higher percentages of family housing. To encourage delivery of higher proportions of family housing which is less financially viable for developers/RPs some reduced levy should be considered.	Point noted, but family housing puts much strain on infrastructure, particularly education, therefore the full CIL charge would be required to facilitate this.	No change required.
43	Agudas Isreal Housing Association	N/A	43.15	Chapter 5 Providing Better Homes	DM23		This policy should include conversion of smaller family homes into larger homes via loft conversions and rear extensions in addition to conversion of larger houses into flats as per comments at 5.2.1 above.	The focus of the policy is conversion from houses to flats. The point is noted in that there is a need to address the need to accommodate large families in the Borough, particularly amongst the Orthodox Jewish community, however, the comments raised on DM23 relate more to the Council's policies on residential extensions, in particular the Residential Extensions and Alterations SPD (2009), and as such a change is not appropriate to DM23.	No change required.
44	Savills	Hanover	44.1	Chapter 5 Providing Better Homes	DM22		Policy fails to recognise the flexibility that is required for over 55s housing. The proposed policy neglects to recognise the value that housing for older people provides in terms of releasing family size units back into the system. Suggest the following wording be inserted into the policy which demonstrates that flexibility will be shown when assessing development for accommodation for the over 55s "In the case of retirement, sheltered or extra care housing the council recognises that they will need to exercise flexibility with regard the mix of units to be provided within developments, particularly in achieving the provision of 3 bedroom units. "	Agree with the change.	The following wording was added to DM22: "Where proposals are seeking to provide retirement, sheltered or extra care housing. the Council recognises there may be a need for greater flexibility with regard the mix of units to be provided within developments, particularly in achieving the provision of 3 bedroom units."
44	Savills	Hanover	44.2	Chapter 5 Providing Better Homes	DM26		In light of the varied nature of over 55s developments, I consider the policy should simply state that the Council will support proposals for development of accommodation for the over 55s.	Possibly, if such housing meets part (i) of the policy re housing needs. Paragraph 2 of Policy DM26 also states "The Council will support the development of additional hostels and accommodation for older people which combine independent living with the availability of support and nursing care."	No change required.
44	Savills	Hanover	44.3	Chapter 5 Providing Better Homes	DM26		We consider that in light of the positive contribution that housing development for the over 55s makes in terms of returning family units to the housing stock, developments for the over 55s should be exempt from having to provide family sized accommodation and from having to pay a financial contribution in lieu of that provision	If a proposal is for a specific group such as this then an amendment to policy DM22 should be made.	Policy DM22 amended to include "Where proposals are seeking to provide retirement, sheltered or extra care housing. the Council recognises there may be a need for greater flexibility with regard the mix of units to be provided within developments, particularly in achieving the provision of 3 bedroom units." No change to Policy DM26 made.

46	GLA	N/A	46.11	Chapter 5 Providing Better Homes	DM21	5.3.14	Para 5.3.14 is unhelpfully ambiguous. It is not made clear what the document is suggesting that decision makers would do if a development came forward which did not take account of the affordability guidelines, and as such it is unacceptable in terms of NPPF paragraph 154.	The Council's Position Statement on the Affordable Homes Programme 2011-15 provides guidelines for the GLA's Investment Partners operating in Hackney, to help shape the local outcomes the Council would like to see from the future programme of new affordable homes in the Borough, having regard to local priorities. Affordable rent levels are not contained within the policy itself, they are referenced in the supporting text as guidelines which form the basis for information for developers and RSLs and for negotiation between the Council and such parties.	Slight amendment to para 5.3.14 for clarity.
46	GLA	N/A	46.12	Chapter 5 Providing Better Homes	DM21	5.3.14	As a practical matter, the borough's overall approach, in terms of setting rent level caps and rigid percentages of the two products intended to meet the housing need hitherto addressed by social rent alone could well leave the authority in some difficulty should priorities change in future investment rounds. A more flexible approach would not only help with the policy issues highlighted above, but avoid the necessity to go through formal alteration processes in the event of changing policy or investment priorities	The AHN document does not set 'rent caps' in any way, but it provides information as to the likely maximum percentage of market rent that would be affordable to current social tenants and those figures were based on dialogue between Registered Providers (RPs) and Hackney's Housing Strategy team. Affordability of rents is a housing-needs related issue. The Council's Position Statement on the Affordable Homes Programme is a flexible guideline to form the basis for the negotiation part of the housing strategy and as such can be updated without the need to update the Local Plan if changes are made.	Slight amendment to para 5.3.14 for clarity.
46	GLA	N/A	46.7	Chapter 5 Providing Better Homes	DM21	5.3.1 to 5.3.14	In line with the London Plan, the Core Strategy indicates that 60% Affordable Housing should be social rent and 40% Intermediate. Supporting text should include a reference to this extent.	The Council's current policy position is to seek 60% of affordable housing as social rent and 40% intermediate. This is already referenced in para 5.3.3 which also references the Mayor of London's position on this.	No change to the DMLP
46	GLA	N/A	46,10	Chapter 5 Providing Better Homes	DM21	5.3.14	Feel that the wording "Hackney currently seeks a breakdown of 25% Social rent and 75% Affordable Rent in the Borough's affordable rented programme" will constrain delivery.	Please see comment above, the reference is to flexible guidelines to form the basis for negotiation part of the housing strategy and as such can be updated without the need to update the Local Plan if changes are made. The Council's evidence base is that 25% social rent is viable.	Slight amendment to para 5.3.14 for clarity.
46	GLA	N/A	46.13	Chapter 5 Providing Better Homes	DM24		This policy raises tensions with 4.4 of the London Plan, which requires boroughs to take account of the potential for surplus employment land to help meet strategic and local requirements for other uses.	The policy seeks to protect designated employment land in the Borough, which consist of only approx 6% of the Borough land area. As such, it is not considered that the Borough has surplus employment land designations. The Council's key local requirements are general-needs housing and employment uses rather than student housing. Clarify in policy that the policy relates to employment designations rather than employment land Borough-wide.	Policy amended to removed criteria (iii), and to include as criteria (i) the following text, "(i) Will not be granted planning permission on designated employment land, or sites allocated or suitable for general housing provision, or for any other allocated use." To clarify that the policy relates to employment land designations rather than all employment land across the Borough.
46	GLA	N/A	46.16	Chapter 5 Providing Better Homes	DM24		Need for reference to 10% wheelchair housing in line with London Plan policies 7.2 & 4.5	Accepted.	Change made to policy to reference 10% of such schemes to be designed to be wheelchair accessible.
46	GLA	N/A	46.15	Chapter 5 Providing Better Homes	DM27		Need for reference to 10% wheelchair housing in line with London Plan policies 7.2 & 4.5	Accepted.	Change made to policy to reference 10% of such schemes to be designed to be wheelchair accessible.
47	DP9	Rothas Limited	47.4	Chapter 5 Providing Better Homes	DM21		DM 21 does not address a scenario where a development is not able to provide affordable housing on site or make a payment in lieu. This scenario should be reflected in the draft policy.	Affordable housing is a policy requirement, as such we would rarely consider a situation where no affordable housing provision or contribution at least is provided, an application is likely to be refused unless demonstrated otherwise in terms of viability (reference to policy CS20 contained in DM21).	No change required.

47	DP9	Rothas Limited	47.5	Chapter 5 Providing Better Homes	DM21	5.3.7	Highlights that where affordable housing policy requirements cannot be achieved, the applicant must demonstrate through an 'open book' development appraisal why on-site provision cannot be delivered. This important reference should be included within draft DM21 - it represents a fundamental consideration in assessing the ability of a site to deliver affordable housing as required by the London Plan. Reference to an `open book' policy should be included in Policy DM21.	Your comment is noted. Paragraph 5.3.7 will be amended to refer to the wording of Core Strategy policy 20, which sets out that the GLA's Affordable Housing Toolkit Assessment or similar appraisal model should be used in presenting the viability of a scheme. This policy is referenced in DM21, as such there is no need to make this change to the policy. Regarding the second point, affordable housing is a policy requirement, as such we would rarely consider a situation where no affordable housing provision or contribution at least is provided, an application is likely to be refused unless demonstrated otherwise in terms of viability (reference to policy CS20 contained in DM21).	Paragraph 5.3.7 is amended by adding at the end of the paragraph a sentence which reads "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." No change to actual policy DM21 required.
47	DP9	Rothas Limited	47.6	Chapter 5 Providing Better Homes	DM22		Object to the requirement to make off-site solutions for family accommodation in lieu of on-site provision. This will result in the introduction of a further burden which a developer is unlikely to be able to meet. Also object to the requirement to make a financial contribution in lieu of on-site provision.	Agree that the requirement for off-sire provision or in-lieu contributions should not be required instead of providing on site family accommodation.	Requirement has been removed from DM22.
51	Sustainable Hackney	N/A	51.10	Chapter 5 Providing Better Homes	DM21		The current supply of affordable housing is inadequate to meet local need. We do not believe that "affordable rents" set at 80% of market rents are acceptable to residents. To avoid challenge we would like the Local Plan to state that the targets of 50% affordable and intermediate housing set by policy 20 in the core document remain in place even if "affordable rent" housing now has to be treated as a substitute for intermediate housing. And we think that if more homes are built in Hackney than set out in the London Plan then the proportion that are affordable should remain the same. Council should review public holdings of land in the Borough with a view to ensuring they are used to produce genuinely affordable homes.	Para 5.3.14 references the Council's Position Statement on the Affordable Homes Programme, which sets out the rents that the Council considers are affordable in the Borough, and the guideline to developers that the Council would like provision of a proportion of social rented properties, as the basis for negotiation with applicants. The Council need to reference the affordable rent product as set out in the NPPF, however, this is not an intermediate product. The target of 50% will remain the same, factoring in affordable rent. The Council is currently looking at its estate and housing strategy to consider how the stock of social rented properties can be increased.	No change required.

52	Barton willmore	HG Capital Investments Ltd	52.1	Chapter 4 A Dynamic and Creative Economy	DM14		Welcome the terms of this policy which provides a basis for justifying the loss of employment land and floorspace as part of a redevelopment or mixed use scheme. However object to certain elements of the policy which are insufficiently flexible and do not conform to the objectives of the NPPF in supporting sustainable economic growth. The NPPF provides a clear basis for using the planning system to encourage and not act as an impediment to sustainable growth (see NPPF, paragraphs 19-22). To ensure conformity with these objectives, we recommend the following changes to the policy: • Marketing evidence should only be submitted in support of development that involves the total loss of Employment Land or Floorspace where a complete loss of B class use / land is involved and the entire site is being removed from the local Employment land supply. This will allow for the positive consideration of applications which retain Employment use / land and introduce alternative uses with economic and other local benefits. This will avoid the requirement for marketing in support of schemes which re-provide employment floorspace as such exercises can often place an additional and unwelcome barrier on promoting viable economic development and investment. Insert the word "complete" into the first line between "The" and "loss of …"	Comment is noted. The Council does not accept that certain elements of its Policy DM14 are "insufficiently flexible and do not conform to the objectives of the NPPF in supporting economic growth" as alleged. In the first instance, sites allocated for employment development are supported by credible robust evidence demonstrating that they are needed to meet the development needs of businesses in Hackney and support its economy for the next 15 or more years. In addition, the supporting text to the policy shows flexibility in its recognition "that some commercial uses may no longer be viable, and that such land and floorspace needs to adapt to changing economic circumstances, avoiding the long term protection of sites where there is no reasonable prospect of a site being used for that purpose, having regard to market signals, and allowing improvement and the introduction of new uses on such land, to support the creation of employment and location of businesses within the Borough", demonstrating sufficient flexibility and full conformity with advice at paragraphs 19 - 22 of NPPF. It is the Council's experience that in many cases proposals for redevelopment of employment land and floorspace include token employment floorspace without the economic potential of the site being fully considered, or the retention of the existing occupiers considered or new occupiers identified. The Council can only assess applications based on the information submitted. The submission of marketing evidence provides a consistent basis upon which applicants can demonstrate the employment potential of the site reflecting current market signals rather than providing a tokenistic supply of employment floorspace thereby maximising higher value uses such as residential and student housing on employment sites/floorspace in all instances. The submission of a marketing strategy for new employment floorspace will also help demonstrate that the applicant has designed the space with end users in mind and that it will likely be let rather than remain vacant and be subject to a change of use applications to residential at a later date. The flexibility to consider other alternative employment generating uses is also allowed under DM14.	No change required.
52	Barton willmore	HG Capital Investments Ltd	52.5	Chapter 5 Providing Better Homes	DM24		Welcomes the introduction of a specific policy in relation to student accommodation as this can provide clarity on how such proposals are assessed. They do however wish to object to the following elements of this policy: • **Employment Land**: criterion (ii) should make reference to Policies DM14-17 as if compliance with these policies has been demonstrated then student accommodation on employment land should be considered • **Affordable Tenancies:** there is no basis in national and local policy to require student accommodation to be the subject of affordable tenancies. Student accommodation is by its very nature designed to be 'affordable' and attractive to potential tenants based on prevailing market rents in a particular area to ensure the ability to attract the necessary level of student occupation to make a scheme viable. •**Management and Contractual Arrangements:** we recognise the requirement to ensure student accommodation is secured for occupation by members of specified educational institutions to ensure compliance with London Plan Policy 3.53 and that it is occupied by students enrolled at Institutions in Hackney or in a reasonable travelling distance of the Borough. This can be undertaken via an appropriately worded S106 Obligation in line with the approach taken to Planning Permissions recently	• Employment Land: Agree that student housing schemes can be considered on non-designated employment land subject to the criteria in the policy, however, the Borough has limited designated employment land and as such the policy will be clarified to state that student housing should not involve the loss of employment land or floorspace on designated employment land. • Affordable Tenancies: The Council's experience is that student housing schemes are not affordable to UK students. As such, the Council considers that it is reasonable to encourage affordable tenancies for such students, and to ask for information on rents that will remain confidential as part of the planning application process. Financial information is required for other policy area, e.g. affordable housing, as such it is considered reasonable to ask for this information for student housing schemes. • Management and Contractual Arrangements: Details of the education institution to which the student housing will serve should be submitted with an application, and to ensure that institution will be served a S106 agreement can be used as set out in the existing policy, thus removing the need for	• Employment Land: Amendment to policy to state that student housing "(i) Will not be granted planning permission on designated employment land, or sites allocated or suitable for general housing provision, or for any other allocated use". • Affordable tenancies – Emphasise in para 5.6.7 that information on rents and likely level of support available to the intended occupiers will be treated confidentially as part of the planning application process. • Management and contractual agreements: The requirement for a management plan in relation to the impact of the use on local amenity has been incorporated into the policy, "Details of the management of such developments must be submitted with an application, setting out how the impact of development on local amenity will be minimised."

							issued in the Hackney area (e.g. East Road, Planning Permission Ref: 2010/0488 dated 11th February 2011). The requirement to demonstrate management and contractual arrangements with specified Institutions as part of a planning application is an unreasonable and excessive requirement when an appropriately worded Obligation can be formulated and entered into to ensure appropriate controls on occupation and links with Institutions.	contractual arrangements. The requirement for a management plan in relation to the impact of the use on local amenity has been incorporated elsewhere in the policy.	
65	A Roberts	N/A	65.5	Chapter 5 Providing Better Homes	DM21		The Council should encourage more affordable housing provision where possible however even well-paid workers can't afford housing these days, so I think the definition of affordable housing needs to be stretched as well.	The definition of affordable housing can not be stretched. Paragraph 5.3.1 will include the definition of affordable housing by the NPPF. Paragraph 5.3.3 reiterates Core Strategy policy 20 which sets a target of 50% of the dwellings on a scheme of 10 or more units that should be affordable. Policy DM21 states that "The Council may refuse proposals where it is considered that the site has the capacity to provide residential development to meet or exceed the above threshold in (i) above".	Include the NPPF definition of affordable housing in paragraph 5.3.1
65	A Roberts	N/A	65.6	Chapter 5 Providing Better Homes	DM23		Whilst it is becoming difficult for young couples to find a one-bedroom flat in the area it is important that landlords are not allowed to turn existing houses into a series of tiny dwellings in order to make more and more money.	The Council uses the minimum standards for dwelling sizes contained in the London Plan policy 3.5 and the Housing SPG to ensure that converted properties do not contain smaller than standard dwellings. This is emphasised in para 5.5.4, this para will be amended to clarify the London Plan position, and the policy will be amended to reflect this.	Change to para 5.4.4 to provide correct reference to London Plan policy 3.5 the Housing SPG, and insertion into policy to make reference to GLA standards.
7	DP9	Middlewater Trading and Investment Ltd	7.8	Chapter 6 Cleaner Safer Greener	DM28		The section of the policy which deals with alterations and extensions states they should be confined to the rear or least important facades. The draft policy does not deal with roof extensions in Conservation Areas which is a common proposition when seeking to refurbish and extend such buildings. This type of alteration should be included within the draft policy.	Comment noted. Policy DM28 will be amended to deal with roof extensions in conservation areas.	Fourth bullet point of third paragraph of Policy DM28 amended 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."
10	City of London		10.7	Chapter 6 Cleaner Safer Greener	DM28	6.6	Is Hackney planning to provide any further advice or guidance relating to archaeological remains/ archaeological potential in a Planning Advice Note or SPD?	The document references consulting English Heritage, and Hackney is not planning to provide any further advice or guidance relating to archaeology remains.	No change required.
10	City of London		10.3	Chapter 6 Cleaner Safer Greener	DM31		There is a minor typo in proposed policy DM31 - omission of the word 'person' (after 4 sq m per…)	Comment noted. The minor typo will be corrected.	Amend the second bullet point of the second paragraph of Policy DM31 to read: "4 sqm per employee from commercial development schemes".
12	CMA Planning	N/A	12.6	Chapter 6 Cleaner Safer Greener	DM31		We consider that levels of communal space should be linked to private amenity space provision. If large private gardens are provided, then there would be less need for communal amenity space. Private amenity space levels are set out in the London Plan Housing SPG (draft) and we consider that the communal level should be expressed to allow flexibility as to how an overall requirement could be divided up. More importantly, we consider that the level sought is just too high to be feasible in most situations. For example, we have had an application (2012/1781) approved earlier this month at 68-82 Digby Road in Homerton, which has 49 dwellings capable of accommodating 158 people. As such, under this policy, the communal amenity requirement would be 1580 sqm. However, the site area is only 1910 sqm. By comparison, Tower Hamlets seek 50sqm for the first 10 units, plus a further 5sqm for every 5 additional units thereafter. The Council consider that levels of communal space should be linked to private amenity space provision.	Comment noted. Paragraph 6.9.9 states that non accessible living roofs and private amenity space can be considered to off-set the quantitative requirement. Open space especially shared and public ones are considered to be a important part of Hackney's character and contribute to the wellbeing of it's population. The requirement of 10sqm per person attached to new residential development is below the average of 23sqm per person identified by the 2005 Hackney Open Space Assessment. Furthermore, as drafted paragraph 6.9.7 provides the opportunity for applicant to justify why on-site provision is not feasible or needed and allows for off site physical and financial and physical contributions. Insert into the supporting reference to off-site contribution.	At the end of paragraph 6.9.4 add "…to off-set the quantitative requirement." Insert following to the end of paragraph 6.9.7: "Guidance on how on site or off-site contributions will be calculated will be set out in the Council's revised Supplementary Planning Document on Planning Contributions."

14	Montagu Evans	Plough Yard Developments Limited	14.14	Chapter 6 Cleaner Safer Greener	DM28		The 'Conservation Areas' and 'Listed Buildings' sections of the policy should better reflect Paragraphs 133 and 134 and 135 of the NPPF with regard to designated heritage assets.	Comment noted. A text reflecting paragraphs 133 and 134 and 135 of the NPPF will be inserted in the 'Conservation Area' and 'Listed Buildings' sections of Policy DM28 to reflect the comment.	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 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)." (see also ref 15.6) 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."
15		HDG LTD	15.6	Chapter 6 Cleaner Safer Greener	DM28		The 'Conservation Areas' and 'Listed Buildings' sections of the policy should better reflect Paragraphs 133 and 134 and 135 of the NPPF with regard to designated heritage assets.	Comment noted. A text reflecting paragraphs 133 and 134 and 135 of the NPPF will be inserted in the 'Conservation Area' and 'Listed Buildings' sections of Policy DM28 to reflect the comment.	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 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)." (see also ref 14.14) 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."
17	Canal & River Trust	N/A	17.01	Chapter 6 Cleaner Safer Greener	DM36	N/A	Proposed Policy DM36 - Residential Moorings: We are pleased to note the inclusion of this policy, which will help meet the demand for residential moorings in the borough.	Comment noted. Support welcomed.	No change required.
17	Canal & River Trust London	N/A	17.03	Chapter 6 Cleaner Safer Greener			The Town and Country Planning Association's Policy Advice Note: Inland Waterways (2009) outlines the value of the waterways to local economies and health and well-being aims, providing a comprehensive framework for assisting in the delivery of high quality public waterspaces and waterside developments. This should be referenced within these documents.	Proposed DMLP policy DM36 'Residential Mooring' specifically addresses the issue of residential / permanent moorings and must be read in conjunction with adopted Core Strategy 26 'Water and Waterways', which addresses the value of water and waterways. The supporting text of adopted Policy CS26 highlights a number documents which address waterways such as British Water's (now Canal and River Trust') Waterways and Development Plans, the Environment Agency's London River Action Plan (2009). The addition of this	No change as a result of this representation.

								Advice will not significantly although useful will not add to the Policy or document.	
18	English Heritage	N/A	18.6	Chapter 6 Cleaner Safer Greener	DM28	6.2.1 and 6.5.1	Buildings of Townscape Merit should be identified as heritage assets and their level of significance and protection clarified.	Comment noted. Additional text will be inserted in paragraph 6.5.1 to incorporate the suggestion.	Insert new text to the end of paragraph 6.5.1 "Furthermore, the Conservation Area Appraisals have identified Buildings of Townscape Merits and Area of Townscape Interest which are of local historic and architectural significance."
18	English Heritage	N/A	18.7	Chapter 6 Cleaner Safer Greener	DM28	6.3.3	Paragraph 6.3.3 could usefully provide a reference the demolition tests in the NPPF.	Comment noted. Amend Policy DM28 and supporting text to provide reference to demolition tests in the NPPF. Also cross reference to amended Appendix 4 of the DMLP.	New text added to paragraph 6.3.3 "…. to the applicant has met the test criteria set out in paragraphs 133, 134, 135 and 136 of NPPF, and that…." Insert new text to Policy DM28."Where a proposal will lead to substantial harm to or total loss of 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)."
18	English Heritage	N/A	18.8	Chapter 6 Cleaner Safer Greener	DM28		Policy DM28 should be reworded to ensure its consistency and compliance with the NPPF in terms of its language, i.e., be framed in terms of“ historic significance”. In addition, a statement of policy should be inserted regarding the demolition test referred to above.	Comment noted. The supporting text will be in terms of "historic significance", and that a statement regarding demolition test is inserted (see ref 18.7). However, Policy wording must be in accordance with the Planning (Listed Buildings and Conservation Areas) Act 1990.	In paragraphs 6.2.1, 6.2.2 and 6.3.2 inserted reference to conserving and enhancing the significance of Hackney's historic environment and heritage assets.Insert new text to Policy DM28."Where a proposal will lead to substantial harm to or total loss of 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)." (see ref 14.14, 15.6 and 18.7) 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."
18	English Heritage	N/A	18.9	Chapter 6 Cleaner Safer Greener	DM28		When putting forward proposals which may affect historic setting, applicants should 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. English Heritage has produced The Setting of Heritage Assets (2011) which provides a methodology for assessing settings impacts. New paragraph relating to the setting of heritage assets.	A new paragraph relating to the setting of the heritage assets will be inserted.	Insert new paragraph: "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."
18	English Heritage	N/A	18.10	Chapter 6 Cleaner Safer Greener	DM29		Policy DM29 should be reworded for compliance with the NPPF in addressing the historic significance of buildings and conservation areas, rather than simply their architecture.	Point ii of Policy DM29 will be reworded for compliance with the NPPF.	Amend Point (ii) of Policy DM29 to read ".....(ii) Not adversely affect the historic significance of buildings, and be sensitive to the character of an area through size and siting, especially those areas of historic significance;....." (see also ref 34.1).

18	English Heritage	N/A	18.1	Chapter 6 Cleaner Safer Greener		General	For consistency with the terminology used for the historic environment in the National Planning Policy Framework (NPPF) we suggest using the term “historic significance” instead of “special architectural or historic interest” or “special interest”. Buildings of Townscape Merit should be referenced in the document. Use the term "historic significance" and reference Buildings of Townscape Merit.	Comment noted. The term "historic significance" will be used instead of "special, architectural or historic interest".	Amend Policy DM29 to read: Advertisements must be of the highest possible standard and contribute to a safe and attractive environment, and shall: (i) Not cause a hazard to pedestrians or road users; (ii) Not adversely affect the historic significance of buildings, and be sensitive to the character of an area through size and siting, especially those areas of historic significance; (iii) Not contribute to an unsightly proliferation or clutter of signage in the vicinity and detract from the amenity of the street scene; (iv) Not cause visual intrusion by virtue of light pollution into adjoining residential properties, and avoid flashing internal or external illumination. 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."
18	English Heritage	N/A	18.2	Chapter 6 Cleaner Safer Greener		Glossary	For clarity and recognise different approaches to certain heritage assets. Entries for : Heritage Assets, locally listed buildings and Buildings of Townscape Merit.	Comment noted. Definitions of these terms will be inserted in the Glossary.	Insert into the glossary entries for 'Heritage Assets' 'Historic Significance' and 'Historic Environment'
18	English Heritage	N/A	18.3	Chapter 6 Cleaner Safer Greener		New Policy	London Borough of Hackney has a rich historic environment, significant development pressure (particularly to the south of the borough) and a variety of existing building heights which create very different neighbourhood characteristics across the borough as a whole. English Heritage and the Borough have worked closely to establish a plan-led approach, as recommended by the Guidance, in the Core Strategy, drawing on the Borough’s tall buildings study, and we are very keen to ensure that this is sufficiently supported with appropriate criteria in the development management document.	Comment noted. However, proposed Policy DM1 builds upon adopted Core Strategy Policy CS24 ‘Design’ which covers the issue of building heights. It explicitly asks for a detailed assessment of the local area environment and references the Hackney Tall Building Strategy while map 8.1 identifies the Tall Building Opportunity Areas. It is not considered that it is necessary to have a new policy on Tall Buildings.	No change required.
21	DP9	Rocket Investment Ltd	21.8	Chapter 6 Cleaner Safer Greener	DM31		Includes a requirement for 10 sq m of communal open space per person for residential schemes and 4 sq m per employee for non-residential schemes. The Council should consider that this needs more flexibility as it will result in an entirely unrealistic level of communal open space being required, especially for high density major schemes.	Open space especially shared and public ones are considered to be a important part of Hackney’s character and contribute to the wellbeing of it's population. The requirement of 10sqm per person attached to new residential development is below the average of 23sqm per person identified by the 2005 Hackney Open Space Assessment. If there is no provision for communal open space as a direct result of housing and other development, as the population increases the quantum of public and or communal open space per person will go down without necessarily improvement in the quality of the existing supply. Furthermore, as drafted paragraph 6.9.7 provides the opportunity for applicants to justify why on-site provision is not feasible or needed and allows for off site physical and financial and physical contributions.	Insert following to the end of paragraph 6.9.7: "Guidance on how on site or off-site contributions will be calculated will be set out in the Council's revised Supplementary Planning Document on Planning Contributions." (See also refs 12.6 and 52.6)
22	Environment Agency	N/A	22.1	Chapter 6 Cleaner Safer Greener	DM34	6.12.1	The specific problems and opportunities for rivers and river corridors in terms of addressing poor water quality and improving habitat are not currently recognised in the draft policies. We note proposed policy DM34 Sites of Nature Conservation Value and the associated guidance text and that the SINC designation also including the main water bodies and waterways (paragraph 6.12.1). We also support the reference to the Biodiversity Action Plan in paragraph 6.12.2 and Living Roofs in 6.12.3.	Noted, the issue of water and waterways is specifically addressed in Core Strategy CS28, this is already referenced in paragraph 6.14.1. However, will reference the need to maintain and improve water quality on Hackney’s water and waterways, in the supporting text to Policy DM36. (see also ref 22.2)	Amend paragraph 6.14.3 to read: " 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."
22	Environment Agency	N/A	22.2	Chapter 6 Cleaner Safer Greener	DM34	6.12.1	Whilst we support the general principle of policy DM34 we think this should go further or a separate policy should be included that directly addresses the WFD reasons for failure of the rivers in Hackney. The policy should reference the Thames RBMP / WFD objectives and set out the measures that developments would be required / encouraged to meet to help the River Lee/Lee Navigation and Regents Canal achieve good ecological status / potential. The inclusion of such a policy would be in line with London Plan Policies 7.24 Blue Ribbon Network and 7.28 Restoration of the Blue Ribbon Network. Both these policies advice that Local Authorities through Local Plans identify and plan for the Blue Ribbon Network, working across borough boundaries and recognise its importance as a multi-functional network which can link to the All London Green Grid (policy 2.18).	Policy DM36 is focussed on residential mooring. The issue of water and waterways are addressed in Core Strategy 28, and this is explicitly referenced in paragraph 6.14.1. However, will insert reference to the Environment Agency's Thames River Basin Management Plan and Water Framework Directive.	Insert text into paragraph 6.12.2 "In addition for Hackney's waterways the Environment Agency's Thames River Basin Management Plan and the European Water Framework Directive provides guidance on the protection, enhancement and sustainable use of the water environment especially for ecology. http://www.environment-agency.gov.uk/.
22	Environment Agency	N/A	22.3	Chapter 6 Cleaner Safer Greener	DM34	6.12.2	Planning proposals can make a significant contribution to protecting and enhancing rivers and river corridors by setting developments back from river banks (our minimum setback standard is eight metres), planting native species, removing invasive species, providing passage for fish and where possible restoring and naturalising river channels and banks. Improving ecological connectivity of river corridors between sites and other open spaces provide migration routes for flora and fauna and green infrastructure which helps alleviate the impacts of climate change.	Paragraph 6.14.6 cross references Core Strategy Policy CS28, which states that where appropriate an undeveloped buffer strip alongside the watercourse should be incorporated into the proposal.	No change required.
30	Islington Council	N/A	30.28	Chapter 6 Cleaner Safer Greener	DM28		No objection	Noted	No change required.
30	Islington Council	N/A	30.29	Chapter 6 Cleaner Safer Greener	DM29		No objection	Noted	No change required.
30	Islington Council	N/A	30.3	Chapter 6 Cleaner Safer Greener	DM30		No objection	Noted	No change required.
30	Islington Council	N/A	30.31	Chapter 6 Cleaner Safer Greener	DM31		No objection	Noted	No change required.
30	Islington Council	N/A	30.32	Chapter 6 Cleaner Safer Greener	DM32		No objection	Noted.	No change required.
30	Islington Council	N/A	30.33	Chapter 6 Cleaner Safer Greener	DM33		No objection	Noted. No objection welcomed.	No change required.
30	Islington Council	N/A	30.34	Chapter 6 Cleaner Safer Greener	DM34		No objection	Noted	No change required.
30	Islington Council	N/A	30.35	Chapter 6 Cleaner Safer Greener	DM35		No objection	Noted. No objection welcomed.	No change required.
30	Islington Council	N/A	30.36	Chapter 6 Cleaner Safer Greener	DM36		No objection	Noted	No change required.

33	Natural England	N/A	33.2	Chapter 6 Cleaner Safer Greener	DM31	6.9	Section 6.9 in respect of Open Space refers to the All London Green Grid (ALGG) and the potential to link the borough's spaces into it. This aspiration is welcomed and to be encouraged. Biodiversity and the natural environment can lead to various opportunities, not just for wildlife activity and connection, but also health, recreation, contributing to climate change adaptation and improving quality. The Council should look at the potential to alleviate fragmentation of open spaces and the linking of them back to paths and other sites, which may be possible to be achieved through new development and links within the All London Green Grid. This can be made explicit in the Document and policies included to ensure the area's green infrastructure is designed to deliver multiple function.	Comments noted. It should be noted that Core Strategy Policy 26 and its supporting text is specifically about a network of open space including creating links between open spaces to enhance Hackney's green infrastructure. However, text will be inserted requiring all development providing new or replacement open space to link into the ALGG wherever possible.	Amend paragraph 6.9.2 to read: "Hackney's network of open spaces should be regarded as integral infrastructure which will contribute to the 'London wide Green Grid', and the quality of the overall environment as advocated in the All London Green Grid (ALGG) SPG and London Foundations (March 2012). The network forms part of Hackney's character and has a vital role in the well-being of communities. In order to facilitate the linking of the Borough's open spaces into the All London Green Grid, the Council will require all development providing new or replacement open space, wherever possible, to connect to the All London Green Grid. ....."
33	Natural England	N/A	33.3	Chapter 6 Cleaner Safer Greener	DM31		The requirement to include Open Space, bio-diverse and environmental considerations from the outset of development proposals is welcomed and encouraged.	Noted	No change required.
33	Natural England	N/A	33.4	Chapter 6 Cleaner Safer Greener	DM34	6.12	Section 6.12 Biodiversity and Nature Conservation, includes references to protect, conserve and enhance nature conservation areas, whilst also encouraging development to include measures that contribute to the Borough's natural environment and biodiversity. This approach is welcomed and supported.	Noted	No change required.
33	Natural England	N/A	33.5	Chapter 6 Cleaner Safer Greener	DM34		Policy DM34 is welcomed and encouraged	Noted	No change required.
33	Natural England	N/A	33.6	Chapter 6 Cleaner Safer Greener	DM35		Reference to local sourced/provident and native species to be used is to be encouraged, providing biodiversity and environmental gain locally.	Comment noted. A text making reference to local sourced/provident and native species to be used will be inserted to encourage provision of biodiversity and environmental gain locally.	In paragraph 6.13.2 insert the words " sourced/provident and" between "locally" and "native species"
33	Natural England	N/A	33.1	Chapter 6 Cleaner Safer Greener		2.1.1	Seeking to protect and enhance open space is welcomed and encouraged and broadly supports Policies that promote the protection and enhancement of biodiversity and open space. The Council should also seek to provide new or additional opportunities for biodiversity within new build/.development, where possible. This would be in line with National Planning Policy Framework.	Comment noted. However, it should be noted that Adopted Core Strategy CS27 specifically encourages all new development to include measures that contribute to the Borough's natural environment and biodiversity, while CS24 'Design' requires development to ensure "good and optimum arrangement of the site in terms of form, mass and scale, including usable amenity space where appropriate and addressing biodiversity matters. Could reemphasise the Core Strategy and included reference to new build in the supporting text.	Paragraph 6.12.3 amended to include the sentence: "The Council will seek, wherever possible, to ensure that new or additional opportunities for biodiversity is provided within new build/development."
34	Chris Thomas Ltd Outdoor Advertising Consultants	British Sign and Graphics Association	34.1	Chapter 6 Cleaner Safer Greener	DM29		*Draft Policy DM29 is contrary to the law and is therefore unsound. It does not comply with Circular 03/2007, NPPF and Town and Country Planning (control of Advertisements) (England) regulations 2007. Point (iv) has no justification in terms of amenity or public safety, nor does the supporting text provide any justification for this proposed restriction.*	Comments noted. Policy DM29 and the supporting text will be amended to comply with the relevant Circular, the NPPF, and the Town and Country Planning (Control of Advertisements) (England) Regulations.	Delete bullet point iv of Policy DM29 " Where relevant relate to the business...." Amend Policy DM29 to read "Advertisements must be of the highest possible standard and contribute to a safe and attractive environment, and shall: (i) Not cause a hazard to pedestrians or road users; (ii) Not adversely affect the historic significance of buildings, and be sensitive to the character of an area through size and siting, especially those areas of historic significance; (iii) Not contribute to an unsightly proliferation or clutter of signage in the vicinity and detract from the amenity of the street scene; and (iv) Not cause visual intrusion by virtue of light pollution into adjoining residential properties, and avoid flashing internal or external illumination. 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." (see ref 35.1). Insert into paragraph 6.7.3 the following : ".....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....."
34	Chris Thomas Ltd Outdoor Advertising Consultants	British Sign and Graphics Association	34.2	Chapter 6 Cleaner Safer Greener	DM29		*Large advertising hoardings restriction has no justification in the supporting text, in fact and in law. In fact there are very many "large advertisement hoardings" throughout Hackney which area displayed with consent granted by the Council or by the Secretary of State on Appeal. All advertisement should be considered on its merits, and thus a blanket ban on large advertisement is unnecessary and unjustified. The Local Plan should not should not presume against all advertisements of a certain type as they all fall within the normal definition of advertisement.*	Comments noted. Policy DM29 will be amended to comply with the relevant Circular, the NPPF, and the Town and Country Planning (Control of Advertisements) (England) Regulations.	Delete from Policy DM29 the sentence beginning "Large advertising hoardings area generally....." Amend Policy DM29 to read "Advertisements must be of the highest possible standard and contribute to a safe and attractive environment, and shall: (i) Not cause a hazard to pedestrians or road users; (ii) Not adversely affect the historic significance of buildings, and be sensitive to the character of an area through size and siting, especially those areas of historic significance; (iii) Not contribute to an unsightly proliferation or clutter of signage in the vicinity and detract from the amenity of the street scene; and (iv) Not cause visual intrusion by virtue of light pollution into adjoining residential properties, and avoid flashing internal or external illumination. 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." (see ref 35.2).
35	Chris Thomas Ltd Outdoor Advertising Consultants	Outdoor Media Centre	35.1	Chapter 6 Cleaner Safer Greener	DM29		*Draft Policy DM29 is contrary to the law and is therefore unsound. It does not comply with Circular 03/2007, NPPF and Town and Country Planning (control of Advertisements) (England) regulations 2007. Point (iv) has no justification in terms of amenity or public safety, nor does the supporting text provide any justification for this proposed restriction.*	Comments noted. Policy DM29 and the supporting text will be amended to comply with the relevant Circular, the NPPF, and the Town and Country Planning (Control of Advertisements) (England) Regulations.	Delete bullet point iv of Policy DM29 : " Where relevant relate to the business...." Amend Policy DM29 to read "Advertisements must be of the highest possible standard and contribute to a safe and attractive environment, and shall: (i) Not cause a hazard to pedestrians or road users; (ii) Not adversely affect the historic significance of buildings, and be sensitive to the character of an area through size and siting, especially those areas of historic significance; (iii) Not contribute to an unsightly proliferation or clutter of signage in the vicinity and detract from the amenity of the street scene; and (iv) Not cause visual intrusion by virtue of light pollution into adjoining residential properties, and avoid flashing internal or external illumination. 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." (see ref 34.1) Insert in paragraph 6.7.3 the following : ".....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....."
35	Chris Thomas Ltd Outdoor Advertising Consultants	Outdoor Media Centre	35.2	Chapter 6 Cleaner Safer Greener	DM29		*Large advertising hoardings restriction has no justification in the supporting text, in fact and in law. In fact there are very many "large advertisement hoardings" throughout Hackney which area displayed with consent granted by the Council or by the Secretary of State on Appeal. All advertisement should be considered on its merits, and thus a blanket ban on large advertisement is unnecessary and unjustified. The Local Plan should not should not presume against all advertisements of a certain type as they all fall within the normal definition of advertisement.*	Comments noted. Policy DM29 will be amended to comply with the relevant Circular, the NPPF, and the Town and Country Planning (Control of Advertisements) (England) Regulations.	Delete from Policy DM29 the sentence beginning "Large advertising hoardings area generally....." Amend Policy DM29 to read "Advertisements must be of the highest possible standard and contribute to a safe and attractive environment, and shall: (i) Not cause a hazard to pedestrians or road users; (ii) Not adversely affect the historic significance of buildings, and be sensitive to the character of an area through size and siting, especially those areas of historic significance; (iii) Not contribute to an unsightly proliferation or clutter of signage in the vicinity and detract from the amenity of the street scene; and (iv) Not cause visual intrusion by virtue of light pollution into adjoining residential properties, and avoid flashing internal or external illumination. 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." (see ref 34.2)
38	marine management organisation	N/A	38.1	Chapter 6 Cleaner Safer Greener	General	N/A	The MMO have the responsibility under the Marine and Coastal Access Act 2009 to produce Marine Plans for English Inshore and Offshore waters. We are currently in the process of producing the first two plans, for the Eastern Inshore and Eastern Offshore areas. As the Borough of Hackney does not sit within the plan area for this work we have no comments to submit from a Marine Planning perspective.	Noted.	No change required.
38	marine management organisation	N/A	38.2	Chapter 6 Cleaner Safer Greener	General	N/A	The MMO is also responsible for issuing marine licences. A marine licence is required for many activities involving a deposit or removal of a substance or object below the mean high water springs mark or up to the tidal extent in any river. Please be aware that if any of the developments set out in the two documents being consulted on are to take place along a part of river that is under tidal influence a marine licence from the MMO may be required. For more information please visit our website www.marinemanagement.org.uk.	Comment noted. Hackney section of the River Lea is not classified as tidal influenced.	No change required.
40	mobile operators association	N/A	40.1	Chapter 6 Cleaner Safer Greener	DM30		NPPF should include requirements that are positively prepared, justified, effective and consistent with national policy. Provision for screening through landscaping, building design or planting is not feasible or necessary in every instance. Inappropriate on listed buildings and within conservations areas is overly restrictive to network rollout and could leave significant areas of Hackney especially those in Conservation Areas without the benefits associated with high quality infrastructure. It considered to be unnecessary as sensitive siting and design of telecommunication development to preserve historic townscape qualities is entirely possible. Moratorium on the installation of telecommunication equipment on listed buildings or in Conservation Areas is unsound and wholly contrary to the NPPF. All operators of radio transmitters are under a legal obligation to operate in accordance with the conditions of their license. Operation of telecommunication equipment in accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other electrical equipment, instrumentation, or air traffic systems. All mobile telecommunications proposals accord with the relevant legislation and will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest. On this basis this is unnecessary. Recommended Change: Proposals for telecommunication development will be permitted provided that the following criteria are met: - Siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area; missing revised wording - If on a building apparatus and associated structures should be sited and designed in order to seek to minimise impact on the external appearance of the host building - If proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts to other structures. Such evidence should accompany any application made to the (local) planning authority. - 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 or architectural or historic interest.	Comments noted. Policy DM30 and the supporting text will be amended.	Amend Policy DM30 to read "Telecommunication development infrastructure should be designed and, as far as possible, sited, in such a way that does not adversely affect visual amenity, and the character or appearance of a building or an area. Applications may be permitted where it can be demonstrated that: • If necessary appropriate screening through landscaping, building design or planting is provided; • The applicant has explored alternative sites and can demonstrate why such sites are not considered suitable; • The use of existing facilities or sharing the equipment of other operators has been explored. 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. Development should facilitate high speed broadband and advancement in communication networks where possible." Delete from paragraph 6.8.3 sentence beginning "Telecommunication equipment is considered inappropriate...." and insert the following "....Whilst recognising that there may be potential for the siting of telecommunication apparatus and associated structures in conservation areas and on/around statutory and locally listed buildings, the Council is concerned to ensure that the amenity, character and quality of its conservation areas and listed buildings and their settings are protected. In this regard, the Council will apply more stringent requirements on the design and siting of telecommunications equipment on listed buildings and within conservation areas."

40	mobile operators association	N/A	40.2	Chapter 6 Cleaner Safer Greener	DM30	Supporting text	Modern telecommunications systems have grown rapidly in recent years with more than two thirds of the population now owning a mobile phone. Mobile telecommunications are now considered an integral part of the success of most business operations and individual lifestyles. With new services such as the advanced third generation (3G) services, demand for new telecommunications infrastructure is continuing to grow. The authority is keen to facilitate this expansion whilst at the same time minimising any environmental impacts. It is our policy to reduce the proliferation of new masts by encouraging mast sharing and siting equipment on existing tall structures and buildings.	The third bullet point of Policy DM DM30 encourages the sharing of facilities.	No change as a result of this representation, however, policy amended in response to ref 40.1.
41	Lee Valley Regional Park Authority	N/A	41.7	Chapter 6 Cleaner Safer Greener	DM32		This could be inserted after Policy DM32 'Protection and Enhancement of Existing Open Space'. The following wording is suggested for both a policy and justification text: Lee Valley Regional Park The Council supports the Lee Valley Park Authority's (LVRPA) Park Development Framework (PDF) adopted Area Proposals schedule for the area of the Park within Hackney. These will be treated as a material consideration in the determining of planning applications in this area. In summary the current proposals address: a) Provision of new and enhanced visitor facilities at Springhill, Springfield Park, and Hackney Marshes available to general Park visitors as part of the visitor infrastructure within the wider area, b) opportunities to protect and develop sporting and recreational use and activity within the area, in particular water based activity and opportunities for a canoe trail down the Lee Navigation. c) working with partners to develop and enhance route networks, including new directional signage, within and through Hackney Marshes linking the Queen Elizabeth Olympic Park with Lea Bridge Road, Walthamstow Marshes, Springfield Park and Walthamstow Wetlands. d) The conservation and enhancement of landscape quality including the continued protection of features of historic and geological interest, protection of the openness of the valley and of views out across the Regional Park. e) Improving pedestrian and cycle links through to the Regional Park from adjoining residential areas and from Clapton Station f) Protection and enhancement of ecological value of the area and improvements to access to nature particularly at Springfield Park, Middlesex Filter Beds, Hackney Marshes and alongside the waterways. g) Support for events and community use of the open parkland Once the Authority adopts other Area Proposals within the Park that form part of the Borough these will be treated as a material consideration when applications for planning permission are considered.	Comment noted. The policy and justification text will be amended provide greater acknowledgement of the LVRP Authority.	Policy DM32 title changed to "Protection and Enhancement of Existing Open Space and the Lee Valley Regional Park" 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."

41	Lee Valley Regional Park Authority	N/A	41.8	Chapter 6 Cleaner Safer Greener	DM32		**Justification text: Lee Valley Regional Park Authority** 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. The Regional Park is statutorily designated for leisure, recreation, sport and nature conservation. It covers an area of 10,000acres (4,000 hectares) and extends for 26 miles following the River Lea from Ware in Hertfordshire south through Essex and North London to the River Thames. 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 will support and work with the Regional Park Authority and other stakeholders to deliver the Park Plan 2000 and the Park Development Framework Area Proposals where these 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 Lee Valley Regional Park Authority is a statutory authority created by the Lee Valley Regional Park Act 1966 (the Park Act). It has a statutory responsibility to either provide directly or work with partners to provide facilities for sport, recreation, leisure, entertainment and nature conservation throughout the Park. Section 14 (1) of the Park Act requires the Authority to prepare a plan setting out proposals for the future management and development of the Regional Park and riparian planning authorities such as Enfield Council are required to include those parts of the plan affecting their area within their own relevant planning strategies and policies (Section 14(2) (a)) although inclusion does not infer that the planning authority necessarily agrees with them (Section 14 (2) (b)). Both the Park Plan 2000 and the Park Development Framework are relevant in terms of Section 14 (2) of the Park Act and are formal statements of the Authority's position in respect of development within the Regional Park. Further, sections 14 (subsections 4-7) of the Park Act requires local planning authorities to consult with the Authority on applications for planning permission which they consider could affect the Park. Section 14 (subsections 8-9) allows the Authority to refer the decisions of the riparian authorities to the Secretary of State if it is considered by the Authority that the decision taken materially conflicts with the proposals of the Authority for the development of the Park. 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. Those adopted Area Proposals relevant to Hackney are included as the Appendix 'Lee Valley Regional Park Area Proposals'.	Comment noted. The policy and justification text will be amended provide greater acknowledgement of the LVRP Authority.	Insert new supporting 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.u 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. The policy below also recognises the LVRP's Park Plan and Park Development Area Proposals."
41	Lee Valley Regional Park Authority	N/A	41.9	Chapter 6 Cleaner Safer Greener	DM32		Please refer to Appendix A to this letter which sets out the relevant adopted Area Proposals for inclusion within the DMLP.	The inclusion of individual projects is too detailed to be included into the document. Additional detail including reference and link to the LVRP page should be suffice (see 41.8).	No change as a result of this comment, however greater reference to the LVRP has been added.

41	Lee Valley Regional Park Authority	N/A	41.1	Chapter 6 Cleaner Safer Greener	DM36		**Residential Moorings:** The Authority objects to proposed Policy DM36 'Residential Moorings' which supports residential moorings provided supporting uses and facilities are or will be in place. Whilst the Authority supports the use of the waterways within the Park for recreational cruising and the associated need for visitor and casual moorings, residential moorings are a residential use and therefore inappropriate within the Park. The waterways within the Park in Hackney are designated as MOL and as Sites of Importance for Nature Conservation. They create an important ecological corridor connecting habitats and biodiverse sites within the Park. The Lea Navigation and its associated open space is also an important sporting and leisure resource, home to the Lea Rowing Club and Leaside Canoe Club and the Authority is engaged in discussions to develop a canoe trail along its length through Hackney connecting to the Queen Elizabeth Olympic Park. The Navigation towpath is a very popular leisure route for visitors, cyclists and local walkers and accommodates the Lea Valley Walk and part of National Cycle Route NC1. The existing multifunctional nature of the waterways within the Park suggests that the criteria against which residential moorings would be assessed under Policy DM 36 could not be met.	Comment noted. Core Strategy Policy CS28 'Water and Waterways' should be read in alongside this DM36. Residential moorings is an issue that the Council as the planning authority need to address, however will ensure that the LVRP Plan and Areas Proposals are taken into consideration.	Paragraph 6.14.3 amended to read "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." Policy DM36 amended 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. Proposals for such uses and associated facilities should not: (i) Hinder navigation along the waterway, through being off line from main navigation routes; (ii) Have a detrimental impact on nature conservation and biodiversity; (iii) Impede public access and be located on the non-towing side of the waterway; (iv) Detrimentally affect leisure provision, amenity and the character and appearance of the waterway and surrounding area."
41	Lee Valley Regional Park Authority	N/A	41.11	Chapter 6 Cleaner Safer Greener	DM36		The London Plan (July 2011) Policy 7.27 Blue Ribbon Network: 'Supporting Infrastructure and Recreational Use' states under A c) New mooring facilities should normally be off line from main navigation routes i.e. in basins or docks." Supporting text in paragraph 7.84 states "New moorings should be managed in a way that respects the character of the waterways and the needs of users. The BRN should not be used as an extension of the developable land in London nor should parts of it be a continuous line of moored craft." A major amendment is needed to Policy DM36 to ensure consistency with the London Plan and to ensure residential moorings are not supported within the Regional Park.	Comment noted. An amended text will be added to Policy DM36 and supporting text requiring residential moorings to comply with the Park Plan of the Lee Valley Regional Park Authority and is consistent with the London Plan.	Policy DM36 amended 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. Proposals for such uses and associated facilities should not: (i) Hinder navigation along the waterway, through being off line from main navigation routes; (ii) Have a detrimental impact on nature conservation and biodiversity; (iii) Impede public access and be located on the non-towing side of the waterway; (iv) Detrimentally affect leisure provision, amenity and the character and appearance of the waterway and surrounding area." Amend paragraph 6.14.3 to read: "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."

41	Lee Valley Regional Park Authority	N/A	41.1	Chapter 6 Cleaner Safer Greener	General		The draft Development Management Local Plan (DMLP) should include a policy to guide future development within the Regional Park in accordance with the Park's remit and Park Plan and Park Development Framework Proposals. This would be best placed within Chapter 6 'Cleaner Safer Greener' to form part of the suite of policies on open space.	Comment noted. Explicit reference to the LVRPA, it's Park Plan and Development Framework will be inserted into Policies DM32 and DM36 and supporting text.	Amend Policy DM32 to read "The Council will protect and enhance existing Designated Open Space and Amenity Green Space, subject to the criteria set out in Core Strategy policy 26, and as set out in the Development Management Policies Map, and will seek to improve, wherever possible, the quality of access to Hackney's open spaces, and natural environment, including the creation of pocket parks, community gardens, and allotments. Where current access is restricted, the Council will seek through agreement with owners, developers and operators greater public access and enjoyment of open spaces where appropriate. The Council supports the provision and improvement of outdoor open space and leisure facilities. Small scale ancillary developments which enhance the park and open space offer, such as refreshment facilities, public conveniences, public art installations or outdoor play and fitness equipment, will be permitted, provided that they would: (i) Be of a high standard of design and quality, safe and accessible to all; (ii) Not have a detrimental impact on nature conservation and biodiversity, and should seek to improve such; (iii) Not result in the loss of functional open space; and (iv) Not adversely detract from the overall function, character and appearance of the park or open space. 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."
41	Lee Valley Regional Park Authority	N/A	41.2	Chapter 6 Cleaner Safer Greener	General		The DMLP will contain policies that will be used to assess planning applications and guide development and the use of land within the Borough. Substantial open space areas of the Regional Park, ecological resources and strategic pedestrian and cycle routes lies within the London Borough of Hackney (approximately 197 hectares, or 487 acres). These include Hackney Marshes, the River Lee and Lea Navigation, parts of the Queen Elizabeth Olympic Park, Middlesex Filter Beds nature reserve, Millmeads and Springfield Park. The DMLP will be an important document in terms of the protection, enhancement, development and management of the Regional Park and the public enjoyment of its leisure, ecological, and sporting resources.	The Regional Park along with other open spaces are protected by Core Strategy Policy 26. Furthermore, the Council's Leisure and Cultural Services have a Park Strategy and individual Management and Action Plans which will cover the same areas, and sets out the Council's vision and aims. However, will insert into the policy and supporting text more explicit recognition of the role of the LVRPA and its plans.	Paragraph's 6.10.4 - 6.10.6 amended to read: "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, 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. 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."
41	Lee Valley Regional Park Authority	N/A	41.3	Chapter 6 Cleaner Safer Greener	General		The Lee Valley Regional Park Authority is a statutory authority created by the Lee Valley Regional Park Act 1966 (the Park Act). It has a statutory responsibility to either provide directly or work with partners to provide facilities for sport, recreation, leisure, entertainment and nature conservation throughout the 4,000ha of the Park. Section 14 (1) of the Park Act requires the Authority to prepare a plan setting out proposals for the future management and development of the Regional Park. Of particular concern to the Authority in responding to consultations on the above documents is the fact that Riparian planning authorities are under a mandatory obligation to include those parts of the plan affecting their area within their own relevant planning strategies and policies (Section 14(2) (a)) although inclusion does not infer that the planning authority necessarily agrees with them (Section 14 (2) (b)).	Comment noted. Explicit reference to the LVRPA, it's Park Plan and Development Framework will be inserted into Policies DM32 and DM36 and supporting text.	The following has been added to 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." Furthermore, paragraphs 6.10.4 - 6.10.9 has been added to the justification. See also ref 41.1 and 41.2.
41	Lee Valley Regional Park Authority	N/A	41.4	Chapter 6 Cleaner Safer Greener	General		Further, sections 14 (subsections 4-7) of the Park Act requires local planning authorities to consult with the Authority on applications for planning permission which they consider could affect the Park. Section 14 (subsections 8-9) allows the Authority to refer the decisions of the riparian authorities to the Secretary of State if it is considered by the Authority that the decision taken materially conflicts with the proposals of the Authority for the development of the Park.	Comment noted. Explicit reference to the LVRPA, it's Park Plan and Development Framework will be inserted into Policies DM32 and DM36 and supporting text.	The following has been added to 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." Furthermore, paragraphs 6.10.4 - 6.10.9 has been added to the justification. See also ref 41.1 and 41.2.
41	Lee Valley Regional Park Authority	N/A	41.5	Chapter 6 Cleaner Safer Greener	General		For the purposes of the Park Act the London Borough of Hackney is a riparian Authority. For the purposes of section 14 of the Lee Valley Regional Park Act 1966 the Park Plan (Parts 1&2) 2000 (Park Plan 2000), is still the adopted s.14 Plan of the Authority. However the Authority is in the process of producing a Park Development Framework which will in due course amend either in part or in its entirety the Park Plan 2000 for the purposes of s.14.	Comment noted. Explicit reference to the LVRPA, it's Park Plan and Development Framework will be inserted into Policies DM32 and DM36 and supporting text.	The following has been added to 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." Furthermore, paragraphs 6.10.4 - 6.10.9 has been added to the justification. See also ref 41.1 and 41.2.
41	Lee Valley Regional Park Authority	N/A	41.6	Chapter 6 Cleaner Safer Greener	General		The Authority has adopted (October 2011) Area Proposals that include some of the Park area within Hackney; “The Three Marshes: Walthamstow, Leyton and Hackney”. Consultation is currently underway on Area based Proposals for those sections of the Park that lie within Waltham Forest Haringey and Enfield. It should be noted that the PDF is consistent with the Park Plan 2000 and our remit. Accordingly both the Park Plan 2000 and the PDF are relevant in terms of Section 14 (2) of the Park Act and are formal statements of the Authority’s position in respect of development within the Regional Park. The DMLP should therefore include a policy that supports appropriate development in the Park in accordance with the Park’s remit and the adopted Park Development Framework Area Proposals as they relate to Hackney. A similar policy forms part of Waltham Forest’s draft DMD and the Authority is in discussion with Enfield to also include a ‘Park policy’ in their revised DMD following consultation.	Comment noted. Explicit reference to the LVRPA, it's Park Plan and Development Framework will be inserted into Policies DM32 and DM36 and supporting text.	The following has been added to 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." Furthermore, paragraphs 6.10.4 - 6.10.9 has been added to the justification. See also ref 41.1 and 41.2.
46	GLA	N/A	46.17	Chapter 6 Cleaner Safer Greener	DM31	6.9	Need to reference the All London Green Grid SPG and London's Foundations (March 2012)	*Comment noted. These publications will be referenced.*	Amend paragraph 6.9.2 to read: "Hackney’s network of open spaces should be regarded as integral infrastructure which will contribute to the ‘London wide Green Grid’, and the quality of the overall environment as advocated in the All London Green Grid (ALGG) SPG and London Foundations (March 2012). The network forms part of Hackney’s character and has a vital role in the well-being of communities. In order to facilitate the linking of the Borough’s open spaces into the All London Green Grid, the Council will require all development providing new or replacement open space, wherever possible, to connect to the All London Green Grid. ....."

46	GLA	N/A	46.19	Chapter 6 Cleaner Safer Greener	DM32	6.10.4	No reference is made to the Mayor's updated supplementary planning guidance on play space "Shaping Neighbourhoods: children and young people's play and informal recreation SPG"	Noted. The guidance will be referenced. Reference needed for other relevant strategies and plans and reference to the Core Strategy and specifically policy 26 'Open Space Network'.	Insert new supporting 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, 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."
46	GLA	N/A	46.18	Chapter 6 Cleaner Safer Greener	DM35		Should include a reference to the Mayors Trees and Woodlands SPG (July 2012)	*Comment noted. Reference to the Major Trees and Woodworks SPG (July 2012) will be inserted.*	Insert to the end of paragraph 6.13.1: "Support for the protection, maintenance and enhancement of trees and woodlands as a valued resource at strategic level is highlighted in the London Plan and the Mayor's Trees and Woodlands SPG (July 2012)."
50	Drivers Jonas Deloitte	Geffrye Museum	50.4	Chapter 6 Cleaner Safer Greener	DM28		The Museum notes that policy DM28 which sets out the Council's approach to protecting heritage assets. The Museum is located in the Kingsland Road Conservation Area and the existing almshouses are Grade I listed. The Museum notes the Council's approach to demolition in conservation areas. The Museum supports this approach and agrees that replacement buildings, other development or vacant sites should preserve or enhance the character or appearance of the conservation area. The Museum notes the Council's approach to development or alteration of listed buildings. The Museum supports this approach whereby development will not be detrimental to the special interest of the building and will harmonise with the period, style, materials and detailing of the building. The Museum has undertaken a detailed assessment of significance to inform its own current development proposals and seeks to minimise any harm to the special interest of the buildings.	Support welcomed.	No change required.
51	Sustainable Hackney	N/A	51.11	Chapter 6 Cleaner Safer Greener	DM31		Hackney does have lots of open green space but it is not in the areas under most intense development pressure. We would like to see a positive commitment to identify the parts of the Borough that do not have access to local open space, the identification of potential sites for new green space and a requirement that new developments create such space. Planning contribution for the expansion of open space in such areas should be ring fenced.	Map 8.2 of the Core Strategy identifies areas of deficiency of certain facilities and public parks. Also, the Council's Park Strategy and other plans have identified sites for new or enhanced open space. There is thus a positive commitment to rectifying deficiencies in areas that do not have access to local open space, including publicly accessible open space (e.g. Eastern Curve). Further, Proposed Policy DM31 seeks on-site communal open space and preferably publicly accessibly and proposes the pooling of open space contributions for open space provision.	No change required.

51	Sustainable Hackney	N/A	51.12	Chapter 6 Cleaner Safer Greener	DM34		The draft DM34 is too weak. The purpose of this policy is to provide robust protection against development pressure, not as presently drafted, to minimise damage.Revised Policy: LBH will not permit any development on green space unless under very exceptional circumstances it can be clearly demonstrated that there is a public benefit to the majority of Hackney residents. Under no circumstances will any development be permitted on designated nature reserves and SINCs (Sites of Important for Nature Conservation). SINCs are vital links to the natural world and a precious resource. In order to protect them LBH will not permit development within 10m of such sites unless the development includes substantial green, open areas and sympathetic planting. A buffer zone of 50m around all SINCs will be subject to special development control to ensure all developments close to SINCs add to rather than detract from those green spaces. In areas of known deficiency in green space all major developments (i.e. more than 50 units) will be required to enhance local public amenity by creating public open space and public tree areas.	Core Strategy Policy 26 'Open Space Network' states there should no loss of certain designated open space (including the identified SINCS), and only under certain conditions can other open spaces which may not be identified be developed upon which includes replacement /or enhancement of open space of better or equivalent quality.The respondent's proposal regarding provision of substantial green, open space and sympathetic planting is to a large extent covered by proposed policy DM31 'Open Space and Living Roofs' which specifically links open space to development. The specific purpose of the space will be determined by individual circumstances. The proposed amendments to policy DM34 as suggested will not allow for exceptional circumstances where it can be demonstrated that there is a public benefit to Hackney to permit a development to proceed.Regarding a wider buffer zone, proposed policy DM34 does refer to development adjacent to SINCs not having a significantly detrimental impact on the nature conservationvalue and biodiversity value of thesite. In terms of special consideration given to schemes within the proposed 'buffer zone', Core Strategy policies 24 and 27 advocate that all schemes should address and incorporate measures that will enhance biodiversity, mitigate or enhance any harm, and paragraph 6.12.2 refers to the Council's Biodiversity Action Plan. Furthermore, Hackney Planning does identify development within a set radius of open spaces.	No change required.
51	Sustainable Hackney	N/A	51.13	Chapter 6 Cleaner Safer Greener	DM35		SH broadly welcomes and supports the draft DM35 but would like to see greater detail and specifically as regards tree protection. Suggested text :The Council is aware of and firmly committed to its statutory duty to protect trees. All developments will be expected to conform fully to the British Standard 5837 or any replacement standard in design and protection for trees. Root Protection Areas (RPAs) will always be respected. Developments requiring felling of category B trees will only be permitted in exceptional circumstances where the landscaping benefits of the development clearly outweigh the value of the existing trees. Developments requiring the felling of category A trees will not be permitted. The Council will use its tree protection powers (i.e. TPOs) to protect valuable trees.	Comment noted, will incorporate wording similar to that suggested.	Amend paragraph 6.13.6 to read: "This policy also relates to those individual or groups of trees considered to be of amenity value but not protected by TPOs. 'Amenity value' means that they have interest biologically, aesthetically or culturally. 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. Planning conditions and/or legal agreements will be used to retain and protect trees and Root Protection Areas during construction and in completed development, and to require the planting of new trees if not contained within proposals. However, in some cases tree planting may not be appropriate, as they may damage other habitats. In assessing applications, the Council will determine the value of existing trees including their classification under BS 5837:2012 and landscape features, and indicative planting and landscaping schemes should accompany applications."
52	Barton willmore	HG Capital Investments Ltd	52.6	Chapter 6 Cleaner Safer Greener	DM31		Object to the requirement to provide the levels of communal amenity open space quoted in this policy for student accommodation schemes. Student accommodation is different from residential schemes in terms of the requirements for on-site amenity space and living roofs. In this regard, students in this part of London can be expected to use a wide variety of areas of open space depending upon which Institution they attend; the nature of their course; and the facilities provided by the Institution. The need for open space is also not required to be met throughout a calendar year due to differing time periods of an academic year. To require a student scheme to provide the same amount of on-site communal amenity space as a residential scheme is therefore unreasonable. To provide sufficient flexibility and avoid onerous requirements, we recommend the requirement for open space and living roofs is assessed on a site and scheme specific basis. This will then provide an opportunity for a developer to demonstrate to LB Hackney the realistic requirement for open space based on anticipated occupier requirements. Recommended change: Policy DM31: delete the requirement	The main purpose of Policy DM31 is to ensure that as population increases, and working opportunity intensifies the provision of open space as relaxation, leisure and communal areas for existing and future residents and workers are integral to any scheme. However, agree that student and other type of supporting housing may not be expected to provide the same level of open space as a housing scheme within the Use Class Order C3. In addition, it should be made explicit that social and community facilities are also not be expected to provide the stated quantum of communal open space.	"Delete from first paragraph of Policy DM31"… and large student and shared accommodation schemes". 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." 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. 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."

							for student accommodation schemes to provide specified levels of communal amenity open space.		
57	CgMs	Notting Hill Housing Trust	57.9	Chapter 6 Cleaner Safer Greener	DM31		Proposed Policy DM31 – Open Space and Living Roofs Policy DM31 requires new residential schemes to deliver 10 sq m per person of communal amenity open space and 4 sq m per person from non residential schemes. Given the restrictions of many urban sites this overall provision of communal open space is considered to be excessive and will impact on the density, and potentially viability, of developments. Many developments will provide private amenity space for individual units in accordance with other local and regional guidance. It is unclear whether the Policy requires communal space to be provided in addition to private space. This should be clarified. The final paragraph of Policy DM31 notes that where it is not possible to provide new communal open space on site, the Council will seek financial contributions towards the enhancement of existing open space. It is considered that the policy should acknowledge that financial contributions will need to be considered as part of the overall scheme viability.	Paragraph 6.9.4 makes it clear that communal space is required in addition to private space. Although later at paragraph 6.9.9 that provision of private amenity space and living roof can be used to off-set any quantitative requirement. This provides a degree of flexibility in the quantum sought from a development. It should also be noted that financial viability has always been a factor in accessing planning applications. As the population increases so will the pressure on `soft' infrastructure. Open spaces can contribute to physical and mental health, general wellbeing, climate change and biodiversity. Therefore on site contribution will be preferably, although financial contribution to the improvement and accessibility of existing open spaces may be acceptable.	Insert following to the end of paragraph 6.9.7: "Guidance on how on site or off-site contributions will be calculated will be set out in the Council's revised Supplementary Planning Document on Planning Contributions." (See also refs 12.6, 21.8 and 52.6)
65	A Roberts	N/A	65.3	Chapter 6 Cleaner Safer Greener	DM28		If ugly buildings are allowed to spring up in conservation areas the wealthier people who have moved to Hackney in recent years won't be attracted anymore and the area will go downhill again.	Comment noted. One of the main purposes of the planning system is to ensure that development and uses are appropriate in terms of use and increasingly design. Conservation Areas identify and protect areas of special character and appearance.	No change required.
67	A Mansfield	N/A	67.3	Chapter 6 Cleaner Safer Greener	DM28		Locally listed buildings should also be protected. The Mare Street conservation area needs some urgent care and attention.	Comment noted. Paragraph 6.4.1 and Policy DM28 explicitly refer to Locally Listed Buildings. The Council has recently completed an assessment of locally listed buildings, and they are identified as heritage assets that should be protected and are a material consideration in the event of any planning application.	No change as a result of this comment, however, include reference to Buildings of Townscape Merits in paragraph 6.5.1.
67	A Mansfield	N/A	67.6	Chapter 6 Cleaner Safer Greener	DM32		The Council should protect and enhance existing open spaces and improve the quality of access to Hackney's open spaces and natural environment, Including creation of pocket parks, community gardens, allotments etc. See Cordwainers Garden on London College of Fashion site as example.	Hackney's adopted Core Strategy and specifically Policy 26 'Open Space Network' should be read in conjunction with the DMLP, which primarily seeks to protect and enhance existing open space. Proposed DM32 expand on this principle. The Hackney Open Space Assessment demonstrates that there is quite a significant amount of open within the borough especially on housing estates. The main purpose of policy DM32 is to try and enhance these spaces to transform them into a welcoming and accessible space. Will create reference back to policy CS26, and recognise some of the possible function as suggested in the comment "pocket park, community gardens allotments etc" However, many open spaces have a number of different benefits and roles which could include dedicated play space, public squares, meadows, orchards, sports fields furthermore, it should be recognised that not every open space needs to have a 'function' or be of ecological value to contribute to the wellbeing of Hackney's communities. Arrangement for the maintenance of open spaces either newly created or enhanced especially those in the private sector remains crucial for its long term sustainability. Management arrangement of existing and proposed one space is expressed in paragraph 6.7.9 of the DMLP.	Amend beginning of Policy D32 to read: "The Council will protect and enhance existing Designated Open Space and Amenity Green Space, subject to the criteria set out in Core Strategy policy 26, and as set out in the Development Management Policies Map, and will seek to improve, wherever possible, the quality of access to Hackney's open spaces, and natural environment, for example the creation of pocket parks, community gardens, and allotments. Where current access is restricted, the Council will seek through agreement with owners, developers and operators greater public access and enjoyment of open spaces where appropriate." Insert new paragraph "The policy below also provides a link between the Core Strategy Proposals Map and its proposed replacement, 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."

7	DP9	Middlewater Trading and Investment Ltd	7.9	Chapter 7 Climate Change and Environmental Sustainability	DM39		The requirement to achieve a BREEAM rating of excellent must be subject to demonstrating feasibility. It may not be possible to achieve this ambitious target in all cases and the policy needs to be sufficiently flexible to deal with such a scenario. The requirement to achieve a BREEAM rating of excellent must be subject to demonstrating feasibility.	Noted. Additional wording will be included in line with the London Plan in the supporting text of policies DM37 and DM38 (paragraph 7.3.11) and DM39 (paragraph 7.4.4) to highlight that measures to achieve these targets should take into consideration such factors as ease of practicality of connection to existing networks, context, size, nature, location, accessibility and expected operation. Furthermore, the targets are associated with all aspects of building design which is subject to technical and financial feasibility and every major development proposal should be accompanied by a energy assessment demonstrating how the targets have been met. In those case where targets shall be unmet, justification should be provided and the Council will consider this as part of the application process.	Insert the following text under paragraph 7.3.11 and 7.4.4:- Measures to achieve these emissions should take into account such factors as ease of practicality of connection to existing networks, context, size, nature, location, accessibility and expected operation.
12	CMA Planning	N/A	12.7	Chapter 7 Climate Change and Environmental Sustainability	DM37	and DM38	There are confusing aspects to these two policies and the deferring Code for Sustainable Homes targets, i.e. Code 4 for 10 unit plus schemes, unless within Dalston and Hackney town centres, when it is 5 units, all other schemes being Code 3. The supporting text does not explain why the standards are different. Why should 9 and 10 unit schemes be treated differently? Why should there be a higher threshold in Dalston and Hackney town centres? Why not have the same threshold in Shoreditch?We are not objecting to the approach in principle, but just feel it has not been explained. We do consider that a single Code requirement for all schemes across the entire Borough would be simpler and it there is a change from this, there should be a good reason for doing so.	Both the Hackney Central and Dalston town centres are identified as growth areas in Hackney's Core Strategy and Dalston is identified as an area of intensification in the London Plan. As such the Council considers that development in these areas should make the greatest contribution to reducing C02. Supporting text will be inserted to explain why the standards are different for different parts of the Borough.	Insert the following paragraph:- 7.2.1 In light of this, the Council has set a range of goals for CO2 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 CO2. In this town centre 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.
16	Thames Water Utilities Ltd, Town Planning Team	N/A	16.06	Chapter 7 Climate Change and Environmental Sustainability	DM44	1.1	This criteria should be revised to require developers to demonstrate the 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. As highlighted in the Core Strategy sewer flooding poses a potential danger however, Policy DM44 and the supporting text makes no reference to sewer flooding. The policy and supporting text should be revised to address the issue of sewer flooding. Section 1.1 – This criteria should be revised to require developers 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.	Noted. Additional wording will be included in the supporting text of DM44 along with specific policy additions (1.9 and 1.10) to address sewer flooding and water and waste infrastructure.	Additional supporting text on sewer flooding and water and wastewater infrastructure has been included in paragraphs 7.8.14 - 7.8.16 along with additional policy wording to DM44:- 1.9 The 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.
16	Thames Water Utilities Ltd, Town Planning Team	N/A	16.7	Chapter 7 Climate Change and Environmental Sustainability	DM44	1.2	This criteria should be revised to align with Policy 5.13 of the London Plan and Policy 2 of the London Water Strategy which relate to sustainable drainage and requires surface water run-off to be managed as close to source as possible whether the site is Brownfield or Greenfield. Section 1.2 – This criteria should be revised to align with Policy 5.13 of the London Plan and Policy 2 of the London Water Strategy which relate to sustainable drainage and requires surface water run-off to be managed as close to source as possible whether the site is a Brownfield or Greenfield site.	Noted. Section 1.2 of Policy DM44 will be amended to require surface water to be managed as close to the source as possible.	Amend section 1.2 of Policy DM44 to read:- 1.2 All development should utilise sustainable urban 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.
16	Thames Water Utilities Ltd, Town Planning Team	N/A	16.8	Chapter 7 Climate Change and Environmental Sustainability	DM44	1.3, 1.4	Sections 1.3 and 1.4 - The Mayor's Supplementary Planning Guidance for Sustainable Design and Construction sets the standards for drainage in new developments. This sets out that the essential standard is to achieve a 50% attenuation of the undeveloped sites surface water run-off at peak times. Consequently Section 1.3 should be revised to apply to all developments and to require that both the volume and rate of run-off is reduced by at least 50%. This would then negate the need for Section 1.4.	Noted. Section 1.3 of Policy DM44 will be amended to apply to all developments and to required that both the volume and rate of run-off is reduced by at least 50%. Section 1.4 of Policy DM 44 has also been removed.	Delete Section 1.4 and amend Section 1.3 of Policy DM44 to read:- 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.

22	Environment Agency	N/A	22.4	Chapter 7 Climate Change and Environmental Sustainability	DM37	7.3.4	Despite reference to water efficiency standards we could not find a specific policy setting out the standards expected to reduce water use in Hackney. London Plan Policy 5.15 Water and Water Use and Supplies requires residential development to meet water consumption targets of 105 litres/head/day (l/h/d). Improving water efficiency of new development should be a priority for Hackney and new development should comply with the standards set out in the Development Management Polices LP. Hackney sits within an area of 'serious' water stress. This means there is a high population with high water demands and limited water availability – it does not reflect water companies ability to supply water. Average consumption in Hackney in 2010-11 was 166.5 litres per person per day which is above the England and Wales average of 148l/h/d. Inefficient use of water can lead to unnecessary carbon emissions. Currently water use accounts for 27 percent of all carbon emissions from our homes. Building a house to 105 l/h/d will save 79 kilograms of CO2 and 15 cubic meters of water per year, per house, over and above building regulations (125l/h/d).	Noted. Policy DM37 will be amended to required all development to minimise the use of water mains by incorporating measures in order to achieve set water use targets in the London Plan.	Insert additional policy section in DM37:- 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.
22	Environment Agency	N/A	22.5	Chapter 7 Climate Change and Environmental Sustainability	DM37		Non-households consume significant amounts of water. In London non-households accounts for 29 percent of water consumption and is therefore an area where further water and carbon savings can be made. We therefore recommend you require that new non-household development, including refurbishments, achieve a water efficiency standard, such as BREEAM (BRET Environmental Assessment Method) 'Excellent' with maximum number of 'water credits.'	Noted. DM Policy 39 sets out the requirements for major non-residential development and sets the requirement of BREEAM 'Excellent' standard. This policy will be amended to include refurbishments and also require development to where possible achieve the maximum number of water credits. Supporting text to this effect will also be included in paragraph 7.4.3.	Insert in paragraph 7.4.3 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 (BRE Environmental Assessment Method) "Excellent", and where possible, achieve the achieve the maximum number of water credits' possible. Amend the wording of Policy DM 39 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.
22	Environment Agency	N/A	22.6	Chapter 7 Climate Change and Environmental Sustainability	DM42		Concerned that the way the policy is currently worded may dissuade developers from bringing contaminated sites back to beneficial use. The policy could be strengthened by setting out the minimum information that would be required by an applicant for sites potentially effected by contamination. We will need a Preliminary Risk Assessment (PRA) to assess if land contamination may be present at the site. The PRA needs to include information on past and current uses, if sensitive controlled waters receptors are present and if the site could pose a pollution risk. The PRA should also consider if any aspects of the proposed development could pose a pollution risk should contamination be present (i.e. deep drilling to facilitate the installation of foundation piles, site drainage). A good example of an emerging development management policy on land contamination is the Enfield draft DM document: (DMD 65 Land Contamination – pg 135: https://www.enfield.gov.uk/downloads/file/5674/draft_dmd). Policy could be strengthened by setting out the minimum information that would be required by an applicant for sites potentially affected by contamination. EA require a Preliminary Risk Assessment (PRA) to assess if contamination is present at the site.	Noted. Additional text will be inserted into paragraphs 7.6.3, 7.6.4, 7.6.5, 7.6.6 and 7.7.5 and in policy DM42 setting out the minimum information that would be required by an applicant for sites potentially affected by contamination to strengthen the policy DM42. DM42 will also be amended to include reference to the requirement to provide desk study information and what this encompasses.	Further text has been inserted as paragraphs 7.6.3, 7.6.4, 7.6.5, 7.6.6 and 7.7.5 to set out the minimum information that would be required by an applicant for sites potentially affected by contamination that will further strengthen policies within DM42. Insert in DM42:- 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.
22	Environment Agency	N/A	22.7	Chapter 7 Climate Change and Environmental Sustainability	DM42		In order to protect groundwater quality and public water supply, we need to look to restrict certain contamination activities within SPZ1 – the inner source protection zone of the public water supply abstractions. We would like to refer Hackney to our groundwater policies in Groundwater Protection: Principles and Practice (consultation draft 2011 – final version due late 2012). This sets out our position for a wide range of activities and developments including waste management, discharge of liquid effluents, land contamination, ground source heat pumps, cemeteries and drainage. We encourage this to be referenced	Noted. Paragraph 7.6.7 will be amended to include reference to the Environment Agency as one of the bodies whose publications desktop studies, site investigations etc will need to be in line with. It is not considered to appropriate to single out this particular piece of guidance as there are a number of guidance documents that are periodically reviewed and updated and warrant mention.	Amend paragraph 7.6.7 to read:- Any desktop study, site investigation, remediation and verification 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), Environment Agency, British Standards Institute, Buildings Research Establishment, The Construction Industry Research and Information Association (CIRIA), Hackney Council, or the GLA.

							in paragraph 7.6.4.		
22	Environment Agency	N/A	22.8	Chapter 7 Climate Change and Environmental Sustainability	DM43		Development proposals should include measures to reduce the risk to the water environment and aim to protect and improve the water quality of surface water and groundwater. Should be amended to take account of water quality in addition to air, light and noise pollution.	Noted. An additional section of policy under DM43 along with supporting text in paragraphs 7.7.18 - 7.7.21 will be included under DM43 requiring 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.	Further text in relation to water quality has been included in paragraphs 7.7.18 - 7.7.21 to provide context to the proposed new policy section. Insert new policy section under DM43 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.
30	Islington Council	N/A	30.37	Chapter 7 Climate Change and Environmental Sustainability	DM37	Also DM38-40	No objection	Noted and welcomed.	No change required.
30	Islington Council	N/A	30.38	Chapter 7 Climate Change and Environmental Sustainability	DM41		No objection	Noted and welcomed.	No change required.
30	Islington Council	N/A	30.39	Chapter 7 Climate Change and Environmental Sustainability	DM42		No objection	Noted and welcomed.	No change required.
30	Islington Council	N/A	30.40	Chapter 7 Climate Change and Environmental Sustainability	DM43		No objection	Noted and welcomed.	No change required.
30	Islington Council	N/A	30.41	Chapter 7 Climate Change and Environmental Sustainability	DM44		No objection	Noted and welcomed.	No change required.
33	Natural England	N/A	33.7	Chapter 7 Climate Change and Environmental Sustainability			The Council should give consideration to linking the policies under this Chapter with those of Chapter 6 also. Open/Green spaces and Green Infrastructure can help alleviate issues of heat island affects and can contribute to energy efficient buildings, whilst also providing leisure and amenity opportunities as well as flood storage opportunities. The use of the existing natural signature of the borough can be used to help deliver this and other environmental objectives. Natural signature refers to the underlying landscape of an area, which if drawn out, can make a direct and powerful contribution to 'sense of place' and local distinctiveness. Natural England's London Landscape Framework gives further guidance on 'natural signatures', including a section. This could be used to help the Council achieve its aspirations.	Noted and supported. The supporting text in paragraph 7.8.5 of Chapter 7 and paragraph 6.13.2 of Chapter 6 will be amended to highlight linkages between policies in Chapters 6 and 7.	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 well as flood storage opportunities (see Chapter 6 - Cleaner Safer Greener)

46	GLA	N/A	46.2	Chapter 7 Climate Change and Environmental Sustainability	New	7.5	Section 7.5 explains that Decentralised energy requirements in the body of the document but 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. A bespoke Decentralised Energy policy, stipulating the requirement to connect to existing or proposed district heat networks, or to commit to future proofing should be included.	Noted. DM41 will be amended to require development to be designed to connect to decentralised heat and energy networks where they are planned or existing and connection is technically feasible. Also supporting text is inserted in paragraph 7.5.3 requiring development proposals in areas identified in Hackney's heat mapping report of 2010 to be designed to connect to existing or planned decentralised energy networks or be committed to future proofing.	Amend paragraph 7.5.3 to read:- In 2010, Hackney Council commissioned AECOM to produce a report identifying sites most suitable for development of decentralised networks in the Borough. This report is available to view and download from www.hackney.gov.uk/Assets/Documents/hackney_heat_mapping_report_july2010.pdf. The Council will expect provision to be made in areas which have been identified in the report as suitable for the development of decentralised networks. 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. 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. Minor developments should, where technically possible, similarly be designed to connect to existing or planned decentralised energy networks.
46	GLA	N/A	46.21	Chapter 7 Climate Change and Environmental Sustainability			Suggest that a reference is included stating that waste sites/issues are set out in the North London Waste plan	Noted. A reference the North London Waste Plan will be inserted in paragraph 7.1.5.	Insert paragraph 7.1.5:- 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
50	Drivers Jonas Deloitte	Geffrye Museum	50.6	Chapter 7 Climate Change and Environmental Sustainability	DM39		The Museum notes that major non-residential development with a site area of 1000sqm or more must achieve the BREEAM Excellent standard and must be built to standards in-line with the current Government programme (2010-2013 25% reduction in C02 emissions and 2013-2016 40% reduction). The Museum supports these targets but request that these are applied on a flexible case by case basis, in particular, taking account of site constraints and opportunities and recognition of the importance of heritage assets.	Noted. Additional wording will be included in line with the London Plan in the supporting text of policies DM37 and 38 (paragraph 7.3.11) and DM39 (paragraph 7.4.4) to highlight that measures to achieve these targets should take into consideration such factors as ease of practicality of connection to existing networks, context, size, nature, location, accessibility and expected operation. Furthermore, the targets are associated with all aspects of building design which is subject to technical and financial feasibility and every major development proposal should be accompanied by a energy assessment demonstrating how the targets have been met. In those case where targets shall be unmet, justification should be provided and the Council will consider this as part of the application process.	Insert the following text under paragraph 7.3.11 and 7.4.4:- Measures to achieve these emissions should take into account such factors as ease of practicality of connection to existing networks, context, size, nature, location, accessibility and expected operation.
50	Drivers Jonas Deloitte	Geffrye Museum	50.7	Chapter 7 Climate Change and Environmental Sustainability	DM40		The Museum notes policy DM40 whereby if the Council accepts that it is not possible to reduce C02 emissions on-site by the specified levels, carbon emission off-setting payments will be required. These will be secured via legal agreement. The Museum supports the aspirations of this policy but requests further detail on how off-setting payments will be calculated. The Museum requests that these payments are negotiated on a site by site basis considering project viability and the need to balance the benefits associated with protecting and enhancing heritage assets.	Noted. Section 7.4.4 will be revised to state that further details will be provided in the upcoming revised Planning Contributions SPD.	Insert in paragraph 7.4.4:- Further details on carbon emission off-setting calculations and its payment will be provided in the upcoming revised Planning Contributions Supplementary Planning Document.
50	Drivers Jonas Deloitte	Geffrye Museum	50.8	Chapter 7 Climate Change and Environmental Sustainability	DM41		The Museum supports DM41 which requires new build development to take account of the need to adapt to higher temperatures, avoid and mitigate overheating and meet the need for cooling in terms of layout, design, construction, materials and landscaping.	Supported and welcomed.	No change required.
51	Sustainable Hackney	N/A	51.14	Chapter 7 Climate Change and Environmental Sustainability	DM38		Part L of the Building Regulations is supposed to reduce the carbon emissions from buildings and to apply to significant change to existing buildings. We are concerned it is not being properly enforced. For example if a block of flats is re-rendered the additional cost of adding external wall insulation is minor but such work is rarely done despite it being required by Part L. The Local Plan should require developers to meet their Building Control obligations during refurbishment and construction of extensions and the Council should properly enforce such	Noted. However it should be noted that developers already have a statutory obligation to meet the requirements of the Building Regulations under the Building Act 1984. Hackney Council acts upon any known breaches of the Building Regulations and intervenes to ensure that an application is made to the Council so that the work is controlled and consequential improvements to the thermal efficiency of the fabric is achieved where possible.	No change required.

							requirements.		
53	Timber Trade federation	N/A	53.1	Chapter 7 Climate Change and Environmental Sustainability	DM37 - DM40	N/A	The timber industry welcomes Hackney's decision to seek to reduce carbon emissions through the use of high thermal performance materials with lower embedded energy. We applaud the decision to highlight the use of sustainably sourced timber and look forward to participating in the consultation on any further emerging planning guidance. It would be admirable if Hackney become the first authority to follow the recommendations of the recent Independent Panel on Forestry and introduced Wood First guidance.	The DMLP does not contain a policy favouring any one type of construction material. Policies DM37, 38 and 39 allow applicants to demonstrate how they meet the required standards, which can be through the use of one or a number of materials. In general, the Council is undertaking research on the appropriate use of sustainable construction materials in the Borough which includes sustainably-sourced timber and other materials such as concrete and steel to reduce carbon emissions in the building's full life cycle. Paragraph 7.3.3 has been amended to remove the reference to sustainably sourced timber as well as concrete, steel and hybrid materials and in now makes the general reference to sustainable construction materials.	No change required.
53	Timber Trade federation	N/A	53.2	Chapter 7 Climate Change and Environmental Sustainability	DM37 - DM40	N/A	We urge that Hackney include the following points in any assessment for sustainable building materials and for life cycle assessment of final buildings. 1. That equal priority is given to the **renewable** nature of the material in question as is given to the recyclability and end of life factors. This is often overlooked. While many materials can claim to improve their recycling rates, no other mainstream material can claim to be renewable. With sustainably sourced timber, forests are replanted and replaced in a such as way that no net loss occurs. This is an important sustainable quality and one which no other material can claim. The use of ALL other materials, regardless of recycling rates, results in net reduction in the quantities of that material. Forests are re planted and sustainable timber therefore a renewable resource.	The DMLP does not contain a policy favouring any one type of construction material. Policies DM37, 38 and 39 allow applicants to demonstrate how they meet the required standards, which can be through the use of one or a number of materials. In general, the Council is undertaking research on the appropriate use of sustainable construction materials in the Borough which includes sustainably-sourced timber and other materials such as concrete and steel to reduce carbon emissions in the building's full life cycle. Paragraph 7.3.3 has been amended to remove the reference to sustainably sourced timber as well as concrete, steel and hybrid materials and in now makes the general reference to sustainable construction materials.	No change required.
53	Timber Trade federation	N/A	53.3	Chapter 7 Climate Change and Environmental Sustainability	DM37 - DM40	N/A	2. That any life-cycle assessment takes the tree growth phase - and all sequestered carbon therein - as part of a WHOLE lifecycle assessment. Timber is the only mainstream material which can plausibly lay claim to having been "alive", yet many life cycle methodologies take their starting point the point at which the tree is felled rather than include the life aspects the numerous benefits they bring, along with the sequestered and stored carbon should be included in any fair assessment.	The DMLP does not contain a policy favouring any one type of construction material. Policies DM37, 38 and 39 allow applicants to demonstrate how they meet the required standards, which can be through the use of one or a number of materials. In general, the Council is undertaking research on the appropriate use of sustainable construction materials in the Borough which includes sustainably-sourced timber and other materials such as concrete and steel to reduce carbon emissions in the building's full life cycle. Paragraph 7.3.3 has been amended to remove the reference to sustainably sourced timber as well as concrete, steel and hybrid materials and in now makes the general reference to sustainable construction materials.	No change required.
53	Timber Trade federation	N/A	53.4	Chapter 7 Climate Change and Environmental Sustainability	DM37 - DM40	N/A	3. The carbon stored in the timber itself is accounted for in the assessment criteria in line with emerging guidelines on Harvested Wood Products (HWP) as part of the Land Use, Land Use Change and Forestry (LULUCF) agenda in the European Commission accounting rules.	The DMLP does not contain a policy favouring any one type of construction material. Policies DM37, 38 and 39 allow applicants to demonstrate how they meet the required standards, which can be through the use of one or a number of materials. In general, the Council is undertaking research on the appropriate use of sustainable construction materials in the Borough which includes sustainably-sourced timber and other materials such as concrete and steel to reduce carbon emissions in the building's full life cycle. Paragraph 7.3.3 has been amended to remove the reference to sustainably sourced timber as well as concrete, steel and hybrid materials and in now makes the general reference to sustainable construction materials.	No change required.

53	Timber Trade federation	N/A	53.5	Chapter 7 Climate Change and Environmental Sustainability	DM37 - DM40	N/A	4. The end of life statistics are requested from the main industry body - Timber Trade Federation & Wood for Good - which can provide up to date figures form WRAP, Defra and elsewhere. The most recent at time of writing are from 2010. End of life calculations should also take account the fact that wood waste is likely to be banned from landfill **before** the end of life of any buildings currently being commissioned. Defra is consulting on this issue at present in line with other EU countries and the Timber Industry is lobbying in favour of this. This means that current wood waste to landfill statistics would be meaningless when considering applications for new timber buildings.	The DMLP does not contain a policy favouring any one type of construction material. Policies DM37, 38 and 39 allow applicants to demonstrate how they meet the required standards, which can be through the use of one or a number of materials. In general, the Council is undertaking research on the appropriate use of sustainable construction materials in the Borough which includes sustainably-sourced timber and other materials such as concrete and steel to reduce carbon emissions in the building's full life cycle. Paragraph 7.3.3 has been amended to remove the reference to sustainably sourced timber as well as concrete, steel and hybrid materials and in now makes the general reference to sustainable construction materials.	No change required.
53	Timber Trade federation	N/A	53.6	Chapter 7 Climate Change and Environmental Sustainability	DM37 - DM40	N/A	The consultation also anticipates a huge rise in wood waste being used as fuel for waste-to-energy installations and biomass installations. In this case the "waste" is substituting for high carbon fossil fuels and should be considered as such.	The DMLP does not contain a policy favouring any one type of construction material. Policies DM37, 38 and 39 allow applicants to demonstrate how they meet the required standards, which can be through the use of one or a number of materials. In general, the Council is undertaking research on the appropriate use of sustainable construction materials in the Borough which includes sustainably-sourced timber and other materials such as concrete and steel to reduce carbon emissions in the building's full life cycle. Paragraph 7.3.3 has been amended to remove the reference to sustainably sourced timber as well as concrete, steel and hybrid materials and in now makes the general reference to sustainable construction materials.	No change required.
53	Timber Trade federation	N/A	53.7	Chapter 7 Climate Change and Environmental Sustainability	DM37 - DM40	N/A	5. That emissions reduction through material substitution is also accounted for in the assessment criteria. Hackney has seen, with Bridport House and Stadthause in Murray Grove, how timber products can substitute for steel and concrete and the time and cost savings this can bring along with emissions reductions.	The DMLP does not contain a policy favouring any one type of construction material. Policies DM37, 38 and 39 allow applicants to demonstrate how they meet the required standards, which can be through the use of one or a number of materials. In general, the Council is undertaking research on the appropriate use of sustainable construction materials in the Borough which includes sustainably-sourced timber and other materials such as concrete and steel to reduce carbon emissions in the building's full life cycle. Paragraph 7.3.3 has been amended to remove the reference to sustainably sourced timber as well as concrete, steel and hybrid materials and in now makes the general reference to sustainable construction materials.	No change required.
53	Timber Trade federation	N/A	53.8	Chapter 7 Climate Change and Environmental Sustainability	DM37 - DM40	N/A	6. The pre-engineered, off site manufacture qualities of timber are taken into account and the beneficial impact this has on environmental agendas such as dust, noise and safety, along with the improvements this brings in terms of speed and cost of construction. These local agendas are often overlooked in the bigger environmental picture. Modern timber methods of construction can help reduce the impact of construction work on this agenda with reduced dust, noise and improved health and safety record.	The DMLP does not contain a policy favouring any one type of construction material. Policies DM37, 38 and 39 allow applicants to demonstrate how they meet the required standards, which can be through the use of one or a number of materials. In general, the Council is undertaking research on the appropriate use of sustainable construction materials in the Borough which includes sustainably-sourced timber and other materials such as concrete and steel to reduce carbon emissions in the building's full life cycle. Paragraph 7.3.3 has been amended to remove the reference to sustainably sourced timber as well as concrete, steel and hybrid materials and in now makes the general reference to sustainable construction materials.	No change required.

54	The British Concrete Federation Ltd	Modern Masonary Alliance	54.1	Chapter 7 Climate Change and Environmental Sustainability	DM37 - DM40	N/A	Register strong objection to the proposal by Hackney to promote Timber as "First Choice" material for the construction of all types of building which pre-judged any consultation and goes far beyond anything a Local Council should do. The exact quote referred to: "*We are the first London Borough to be promoting the use of timber as a first choice building material, and the Wood First Conference will be a spring board for emerging planning policies".*	The DMLP does not contain a policy favouring any one type of construction material. Policies DM37, 38 and 39 allow applicants to demonstrate how they meet the required standards, which can be through the use of one or a number of materials. In general, the Council is undertaking research on the appropriate use of sustainable construction materials in the Borough which includes sustainably-sourced timber and other materials such as concrete and steel to reduce carbon emissions in the building's full life cycle. Paragraph 7.3.3 has been amended to remove the reference to sustainably sourced timber as well as concrete, steel and hybrid materials and now makes the general reference to sustainable construction materials.	No change required.
54	The British Concrete Federation Ltd	Modern Masonary Alliance	54.2	Chapter 7 Climate Change and Environmental Sustainability	DM37 - DM40		Believe that this policy goes far beyond the remit of the Council and is wrong for the following reasons. * Timber is not more sustainable than masonry alternatives * The carbon foot print of timber is measured from the port of entry and takes no account of de-forestation and shipping * The design life of timber is quoted as 60 years whereas masonry will last at least 150 years * Timber is a combustible material and presents a much higher fire risk to life and property than masonry * All structural timber used in building is imported or processed abroad in countries such as Scandinavia, Canada and Russia. This costs British jobs and threatens our balance of payments * The raw materials for masonry comes from quarries in the UK and are manufactured locally reducing carbon from transportation * 93% of consumers in a recent CBA survey said they wanted to live in brick and block homes * 92 pence in the pound spent on construction stays in the UK. This is because we make it here. If we change this mix our manufacturing plants will continue to close and we will loose the capacity we need for the future * Brick and block construction is a huge employer. Hackney has high levels of youth unemployment well above the national average of 22%. If Hackney were to adopt a Wood First Policy it would further destroy jobs and erode the skill base. This is totally unacceptable.	The DMLP does not contain a policy favouring any one type of construction material. Policies DM37, 38 and 39 allow applicants to demonstrate how they meet the required standards, which can be through the use of one or a number of materials. In general, the Council is undertaking research on the appropriate use of sustainable construction materials in the Borough which includes sustainably-sourced timber and other materials such as concrete and steel to reduce carbon emissions in the building's full life cycle. Paragraph 7.3.3 has been amended to remove the reference to sustainably sourced timber as well as concrete, steel and hybrid materials and in now makes the general reference to sustainable construction materials.	No change required.
54	The British Concrete Federation Ltd	Modern Masonary Alliance	54.3	Chapter 7 Climate Change and Environmental Sustainability	General	N/A	If this policy was to be adopted we will make a legal and political challenge to overturn it.	The DMLP does not contain a policy favouring any one type of construction material. Policies DM37, 38 and 39 allow applicants to demonstrate how they meet the required standards, which can be through the use of one or a number of materials. In general, the Council is undertaking research on the appropriate use of sustainable construction materials in the Borough which includes sustainably-sourced timber and other materials such as concrete and steel to reduce carbon emissions in the building's full life cycle. Paragraph 7.3.3 has been amended to remove the reference to sustainably sourced timber as well as concrete, steel and hybrid materials and now makes the general reference to sustainable construction materials.	No change required.

55	The British Constructional Steelwork Association Limited	N/A	55.5	Chapter 7 Climate Change and Environmental Sustainability	DM37 - DM40	7.3.1	The role of good design in achieving low carbon buildings is well understood in this plan. However we feel that the emphasis on thermal mass in Section 7.3.1 should be treated with care since it is a technically contentious area and many of the claims which are made in its favour are unproven. We recommend that it is removed from the framework document.	The DMLP does not contain a policy favouring any one type of construction material. Policies DM37, 38 and 39 allow applicants to demonstrate how they meet the required standards, which can be through the use of one or a number of materials. In general, the Council is undertaking research on the appropriate use of sustainable construction materials in the Borough which includes sustainably-sourced timber and other materials such as concrete and steel to reduce carbon emissions in the building's full life cycle. Paragraph 7.3.3 has been amended to remove the reference to sustainably sourced timber as well as concrete, steel and hybrid materials and in now makes the general reference to sustainable construction materials.	No change required.
55	The British Constructional Steelwork Association Limited	N/A	55.6	Chapter 7 Climate Change and Environmental Sustainability	DM37 - DM40	7.3.3	We are aware that the statement in Section 7.3.3 that the Council is currently undertaking research on the appropriate use of timber construction in the Borough has already resulted in a great deal of adverse comment from material producers and building designers. This is focussed on two potentially unfavourable effects of giving timber preferential status in planning decisions:* It will constrain design freedom and inhibit the ability of the construction sector to deliver best value buildings* The sustainability case in favour of timbers is not yet proven and decisions which favour that material may be counterproductive in the long term.We recommend that this is removed from the document to demonstrate that the framework proposal is focused on outcomes.	The DMLP does not contain a policy favouring any one type of construction material. Policies DM37, 38 and 39 allow applicants to demonstrate how they meet the required standards, which can be through the use of one or a number of materials. In general, the Council is undertaking research on the appropriate use of sustainable construction materials in the Borough which includes sustainably-sourced timber and other materials such as concrete and steel to reduce carbon emissions in the building's full life cycle. Paragraph 7.3.3 has been amended to remove the reference to sustainably sourced timber as well as concrete, steel and hybrid materials and in now makes the general reference to sustainable construction materials.	No change required.
55	The British Constructional Steelwork Association Limited	N/A	55.7	Chapter 7 Climate Change and Environmental Sustainability	DM37 - DM40	N/A	The emphasis on Code for Sustainable Homes Level 4 (CSH) and BREEAM Excellent in new buildings in the Borough is commended. However, care should be taken to ensure that disproportionate emphasis is not placed on these. Both have shortcomings and, although they perform a valuable function in terms of an assessment of the environmental sustainability of a building, they place less weight on the equally important economic and social aspects.	Noted. However DM policies 37-40 set out the criteria for development in achieving sustainable performance and environmental sustainability in line with statutory requirements. The Council recognises the importance of the economic and social aspects of development in policies contained in Chapter 3 Delivering Sustainable Growth which promote high quality design, consideration of amenity, health and wellbeing issues, including contributions for employment and opportunities for Borough residents, sustainable design and exemplar development. These relate not just to the aesthetic appearance of the environment but also about enabling an improved quality of life and economic growth and wellbeing.	No change required.
56	mpa The Concrete Centre	N/A	56.5	Chapter 7 Climate Change and Environmental Sustainability	DM37		Timber first is flawed in terms of the true whole life sustainability of every type of built development and will have an anti-competitive effect on the construction materials market.	The DMLP does not contain a policy favouring any one type of construction material. Policies DM37, 38 and 39 allow applicants to demonstrate how they meet the required standards, which can be through the use of one or a number of materials. In general, the Council is undertaking research on the appropriate use of sustainable construction materials in the Borough which includes sustainably-sourced timber and other materials such as concrete and steel to reduce carbon emissions in the building's full life cycle. Paragraph 7.3.3 has been amended to remove the reference to sustainably sourced timber as well as concrete, steel and hybrid materials and now makes the general reference to sustainable construction materials.	No change required.

56	mpa The Concrete Centre	N/A	56.1	Chapter 7 Climate Change and Environmental Sustainability	DM37 - DM40	N/A	Implacably opposed to any preference for wood in construction that may be introduced as part of planning policy or guidance. Consider such a preference for timber would be both ill-considered and based on a number of false premises.	The DMLP does not contain a policy favouring any one type of construction material. Policies DM37, 38 and 39 allow applicants to demonstrate how they meet the required standards, which can be through the use of one or a number of materials. In general, the Council is undertaking research on the appropriate use of sustainable construction materials in the Borough which includes sustainably-sourced timber and other materials such as concrete and steel to reduce carbon emissions in the building's full life cycle. Paragraph 7.3.3 has been amended to remove the reference to sustainably sourced timber as well as concrete, steel and hybrid materials and now makes the general reference to sustainable construction materials.	No change required.
56	mpa The Concrete Centre	N/A	56.10	Chapter 7 Climate Change and Environmental Sustainability	DM37 - DM40	N/A	The Wood First Conference was held as part of the initial consultation process was biased towards timber in terms of presentations and the outcome was predetermine (press release being issued 2 hours prior to the completion of the event).	The DMLP does not contain a policy favouring any one type of construction material. Policies DM37, 38 and 39 allow applicants to demonstrate how they meet the required standards, which can be through the use of one or a number of materials. In general, the Council is undertaking research on the appropriate use of sustainable construction materials in the Borough which includes sustainably-sourced timber and other materials such as concrete and steel to reduce carbon emissions in the building's full life cycle. Paragraph 7.3.3 has been amended to remove the reference to sustainably sourced timber as well as concrete, steel and hybrid materials and now makes the general reference to sustainable construction materials.	No change required.
56	mpa The Concrete Centre	N/A	56.11	Chapter 7 Climate Change and Environmental Sustainability	DM37 - DM40	N/A	Believe that adoption of a material bias will remove the responsibility for design and material selection from those design professionals best placed and qualified to ascertain and compare real whole life sustainability as part of the design process for each individual building.	The DMLP does not contain a policy favouring any one type of construction material. Policies DM37, 38 and 39 allow applicants to demonstrate how they meet the required standards, which can be through the use of one or a number of materials. In general, the Council is undertaking research on the appropriate use of sustainable construction materials in the Borough which includes sustainably-sourced timber and other materials such as concrete and steel to reduce carbon emissions in the building's full life cycle. Paragraph 7.3.3 has been amended to remove the reference to sustainably sourced timber as well as concrete, steel and hybrid materials and now makes the general reference to sustainable construction materials.	No change required.
56	mpa The Concrete Centre	N/A	56.12	Chapter 7 Climate Change and Environmental Sustainability	DM37 - DM40	N/A	The blanket presumption in favour of any material is contrary to true sustainable outcomes and fails on most counts to meet Government policy as reinforced by the key sustainability criteria set out in the NPPF. * Living with the planet's environmental limits * Ensuring a strong, healthy and just society * Achieving a sustainable economy * Promoting good governance * Using sound science responsibly	The DMLP does not contain a policy favouring any one type of construction material. Policies DM37, 38 and 39 allow applicants to demonstrate how they meet the required standards, which can be through the use of one or a number of materials. In general, the Council is undertaking research on the appropriate use of sustainable construction materials in the Borough which includes sustainably-sourced timber and other materials such as concrete and steel to reduce carbon emissions in the building's full life cycle. Paragraph 7.3.3 will be amended to remove the reference to sustainably sourced timber as well as concrete, steel and hybrid materials and now makes the general reference to sustainable construction materials.	No change required.

56	mpa The Concrete Centre	N/A	56.13	Chapter 7 Climate Change and Environmental Sustainability	DM37 - DM40	N/A	Carbon - The adoption of this policy would not deliver the intended carbon reduction outcomes as over the lifetime of a building the use of timber does not necessarily reduce carbon when both embodied and in use energy is considered.	The DMLP does not contain a policy favouring any one type of construction material. Policies DM37, 38 and 39 allow applicants to demonstrate how they meet the required standards, which can be through the use of one or a number of materials. In general, the Council is undertaking research on the appropriate use of sustainable construction materials in the Borough which includes sustainably-sourced timber and other materials such as concrete and steel to reduce carbon emissions in the building's full life cycle. Paragraph 7.3.3 has been amended to remove the reference to sustainably sourced timber as well as concrete, steel and hybrid materials and now makes the general reference to sustainable construction materials.	No change required.
56	mpa The Concrete Centre	N/A	56.14	Chapter 7 Climate Change and Environmental Sustainability	DM37 - DM40	N/A	Social Criteria - The adoption of this policy will be to the detriment of the local labour force an many locally produced materials in favour of an imported material together with the associated carbon cost.	The DMLP does not contain a policy favouring any one type of construction material. Policies DM37, 38 and 39 allow applicants to demonstrate how they meet the required standards, which can be through the use of one or a number of materials. In general, the Council is undertaking research on the appropriate use of sustainable construction materials in the Borough which includes sustainably-sourced timber and other materials such as concrete and steel to reduce carbon emissions in the building's full life cycle. Paragraph 7.3.3 has been amended to remove the reference to sustainably sourced timber as well as concrete, steel and hybrid materials and now makes the general reference to sustainable construction materials.	No change required.
56	mpa The Concrete Centre	N/A	56.15	Chapter 7 Climate Change and Environmental Sustainability	DM37 - DM40	N/A	Economic Criteria - Adoption of this policy will increase the cost of construction contrary to guidance given by Sir John Harman and thus reduce the potential for sustainable development by skewing the market. "Local plans should be realistic and viable, the Local Housing Delivery Group has said in a report today (June 22). Sir John Harman, chairman of the group, stressed that local authorities need to strike a balance between achieving sustainable development and economic viability, and should adopt a collaborative approach to devising local plans".	The DMLP does not contain a policy favouring any one type of construction material. Policies DM37, 38 and 39 allow applicants to demonstrate how they meet the required standards, which can be through the use of one or a number of materials. In general, the Council is undertaking research on the appropriate use of sustainable construction materials in the Borough which includes sustainably-sourced timber and other materials such as concrete and steel to reduce carbon emissions in the building's full life cycle. Paragraph 7.3.3 has been amended to remove the reference to sustainably sourced timber as well as concrete, steel and hybrid materials and now makes the general reference to sustainable construction materials.	No change required.
56	mpa The Concrete Centre	N/A	56.16	Chapter 7 Climate Change and Environmental Sustainability	DM37 - DM40	N/A	BREEAM and The Code for Sustainable Homes - Believe policy is not in line with current sustainability standards as material choice of itself is but one of many sustainability criteria to be considered. Any further hurdles that are added to promote the use of timber will both undermine the current methodology and create an un level playing field as the checks and balances of the existing system will not be recognised.	The DMLP does not contain a policy favouring any one type of construction material. Policies DM37, 38 and 39 allow applicants to demonstrate how they meet the required standards, which can be through the use of one or a number of materials. In general, the Council is undertaking research on the appropriate use of sustainable construction materials in the Borough which includes sustainably-sourced timber and other materials such as concrete and steel to reduce carbon emissions in the building's full life cycle. Paragraph 7.3.3 has been amended to remove the reference to sustainably sourced timber as well as concrete, steel and hybrid materials and now makes the general reference to sustainable construction materials.	No change required.

56	mpa The Concrete Centre	N/A	56.17	Chapter 7 Climate Change and Environmental Sustainability	DM37 - DM40	N/A	Unsound Science - Claim: "Every cubic metre of wood used in construction saves 0.8 tonnes of CO2 from the atmosphere". Fact: The BSI standard for assessing life cycle greenhouse gas emissions (known as PAS 2050) use a 100yr assessment period. In the case of timber, it is assumed* that by the end of this period some of it will have been land-filled or burn, and only 70% of the CO2 originally captured remains locked up. As a result, the embodied Co2 of timber over a 100 year life cycle is actually between +400 and +980 kg Co2/tonne. These figures are taken from a TRADA (Trade Research and Development Associated) document entitled Timber Carbon Footprints (Dec 2009) and apply to Swedish Redwood, which is often used in UK timber frame construction. When averaged, these figures give a value of 690 kg CO2/ tonne. Far from saving 0.8 tonnes it emits 0.69 tonnes and then is in accordance with the authoritive timber body in the UK.	The DMLP does not contain a policy favouring any one type of construction material. Policies DM37, 38 and 39 allow applicants to demonstrate how they meet the required standards, which can be through the use of one or a number of materials. In general, the Council is undertaking research on the appropriate use of sustainable construction materials in the Borough which includes sustainably-sourced timber and other materials such as concrete and steel to reduce carbon emissions in the building's full life cycle. Paragraph 7.3.3 has been amended to remove the reference to sustainably sourced timber as well as concrete, steel and hybrid materials and now makes the general reference to sustainable construction materials.	No change required.
56	mpa The Concrete Centre	N/A	56.18	Chapter 7 Climate Change and Environmental Sustainability	DM37 - DM40	N/A	The statement should use the term 'timber' if talking about construction; trees are made from wood, buildings are made from timber. This is an important distinction when talking about embodied Co2. Whilst timber remains in use, this statement may be true but over its lifecycle it is not. So it looks like the Wood for Good campaign is not using cradle to grave embodied Co2 data in some of its claims.	The DMLP does not contain a policy favouring any one type of construction material. Policies DM37, 38 and 39 allow applicants to demonstrate how they meet the required standards, which can be through the use of one or a number of materials. In general, the Council is undertaking research on the appropriate use of sustainable construction materials in the Borough which includes sustainably-sourced timber and other materials such as concrete and steel to reduce carbon emissions in the building's full life cycle. Paragraph 7.3.3 has been amended to remove the reference to sustainably sourced timber as well as concrete, steel and hybrid materials and now makes the general reference to sustainable construction materials.	No change required.
56	mpa The Concrete Centre	N/A	56.19	Chapter 7 Climate Change and Environmental Sustainability	DM37 - DM40	N/A	Fire Risk - the proposed policy does not take account of the recent NHBC Foundation report and CLG statistics in relation to fire risk. Fire risk is adding significant overheads to timber frame building costs due to insurance claims and costs and the concomitant design and on site measures required to reduce risk. This has been reflected in a quantum drop in market share for this type of construction.	The DMLP does not contain a policy favouring any one type of construction material. Policies DM37, 38 and 39 allow applicants to demonstrate how they meet the required standards, which can be through the use of one or a number of materials. In general, the Council is undertaking research on the appropriate use of sustainable construction materials in the Borough which includes sustainably-sourced timber and other materials such as concrete and steel to reduce carbon emissions in the building's full life cycle. Paragraph 7.3.3 has been amended to remove the reference to sustainably sourced timber as well as concrete, steel and hybrid materials and now makes the general reference to sustainable construction materials.	No change required.
56	mpa The Concrete Centre	N/A	56.2	Chapter 7 Climate Change and Environmental Sustainability	DM37 - DM40	7.3.1	Support Para 7.3.1. - design to reduce carbon… minimise overheating… achieve optimal levels of thermal mass.	Noted.	No change required.
56	mpa The Concrete Centre	N/A	56.2	Chapter 7 Climate Change and Environmental Sustainability	DM37 - DM40	N/A	The report 'Fire performance of new residential buildings' by the NHBC Foundation (housing research in partnership with BRE Trust) states on p14 final paragraph; The data led the DCLG to the general conclusion: 'The appropriate statistical test (Pearson's chi-squared test) indicates that fires in timber-framed dwellings do tend to have a greater area of fire and heat damage than fires in dwellings of no special construction' {20}.	The DMLP does not contain a policy favouring any one type of construction material. Policies DM37, 38 and 39 allow applicants to demonstrate how they meet the required standards, which can be through the use of one or a number of materials. In general, the Council is undertaking research on the appropriate use of sustainable construction materials in the Borough which includes sustainably-sourced timber and other materials such as concrete and steel to reduce carbon emissions in the building's full life cycle. Paragraph 7.3.3 has been amended to remove the reference to sustainably sourced timber as well as concrete, steel and hybrid materials and now makes the general reference to sustainable construction materials.	No change required.

56	mpa The Concrete Centre	N/A	56.21	Chapter 7 Climate Change and Environmental Sustainability	DM37 - DM40	N/A	Practical Aspects - A key element in sustainability of building construction is durability. Particularly in the domestic housing market over 50% of the housing stock is over 60 years old. While sustainability was not on the agenda in the design of these properties any new construction should deliver a long service life and requires key design considerations* Durability of basic structure* Efficient retrofitting* Flexibility* Minimum maintenance* Good basic detailing* Reuse	The DMLP does not contain a policy favouring any one type of construction material. Policies DM37, 38 and 39 allow applicants to demonstrate how they meet the required standards, which can be through the use of one or a number of materials. In general, the Council is undertaking research on the appropriate use of sustainable construction materials in the Borough which includes sustainably-sourced timber and other materials such as concrete and steel to reduce carbon emissions in the building's full life cycle. Paragraph 7.3.3 has been amended to remove the reference to sustainably sourced timber as well as concrete, steel and hybrid materials and now makes the general reference to sustainable construction materials.	No change required.
56	mpa The Concrete Centre	N/A	56.22	Chapter 7 Climate Change and Environmental Sustainability	DM37 - DM40	N/A	With the majority of the older housing stock was constructed using masonry, less than 3% of houses over 60 years old are timber framed and the majority of these were built before the 20th century. There is clear practical evidence to support the fact that existing masonry housing stock can meet the sustainable criteria for long service life, this is not proven at the practical level for modern timber framed construction. There is a risk that a commitment to timber may not provide longer term housing stock solutions.	The DMLP does not contain a policy favouring any one type of construction material. Policies DM37, 38 and 39 allow applicants to demonstrate how they meet the required standards, which can be through the use of one or a number of materials. In general, the Council is undertaking research on the appropriate use of sustainable construction materials in the Borough which includes sustainably-sourced timber and other materials such as concrete and steel to reduce carbon emissions in the building's full life cycle. Paragraph 7.3.3 has been amended to remove the reference to sustainably sourced timber as well as concrete, steel and hybrid materials and now makes the general reference to sustainable construction materials.	No change required.
56	mpa The Concrete Centre	N/A	56.23	Chapter 7 Climate Change and Environmental Sustainability	DM37 - DM40	N/A	Other Sustainability Issues - As recognised by BREEAM and the Code for Sustainable Homes a whole range of issues are not properly addressed by the adoption of this emerging planning policy to list but a few; Responsible Resourcing; Waste; Recycling; Flood Resilience; Local and plentiful supple of local resources; Durability; Acoustic separation; Industry Annual Transparent data collection and reporting, target setting.	Chapter 7 of the DMLP includes policies in relation to reducing energy consumption and improving the performance of new development, decentralised energy, contaminated land, and flooding and flood risk/flood resilience. The Sustainable Construction and Design SPD will provide further guidance and advice on sustainable design and construction. Whilst this SPD is at the early stages of development and the exact structure and content has yet to be finalised, it is envisioned that the SPD will cover a range of topic areas including accessibility and security; air, noise and land pollution; biodiversity, landscaping and urban greening; carbon offset; energy efficiency; environmental performance methodologies and standards; materials; water and waste. The North London Waste Plan will identify sites for waste management use and set out policies for determining waste planning applications.	No change required.
56	mpa The Concrete Centre	N/A	56.3	Chapter 7 Climate Change and Environmental Sustainability	DM37 - DM40	7.3.3	Support Para 7.3.3 - use of materials with high thermal mass	The DMLP does not contain a policy favouring any one type of construction material. Policies DM37, 38 and 39 allow applicants to demonstrate how they meet the required standards, which can be through the use of one or a number of materials. In general, the Council is undertaking research on the appropriate use of sustainable construction materials in the Borough which includes sustainably-sourced timber and other materials such as concrete and steel to reduce carbon emissions in the building's full life cycle. Paragraph 7.3.3 has been amended to remove the reference to sustainably sourced timber as well as concrete, steel and hybrid materials and now makes the general reference to sustainable construction materials.	No change required.

56	mpa The Concrete Centre	N/A	56.6	Chapter 7 Climate Change and Environmental Sustainability	DM37 - DM40	N/A	If adopted as policy, it will most certainly put planning officers in the position of having to make judgements on the sustainability of building design that they are not best qualified to make and may well affect the position as regards principle designer under CDM regulations.	The DMLP does not contain a policy favouring any one type of construction material. Policies DM37, 38 and 39 allow applicants to demonstrate how they meet the required standards, which can be through the use of one or a number of materials. In general, the Council is undertaking research on the appropriate use of sustainable construction materials in the Borough which includes sustainably-sourced timber and other materials such as concrete and steel to reduce carbon emissions in the building's full life cycle. Paragraph 7.3.3 has been amended to remove the reference to sustainably sourced timber as well as concrete, steel and hybrid materials and now makes the general reference to sustainable construction materials.	No change required.
56	mpa The Concrete Centre	N/A	56.7	Chapter 7 Climate Change and Environmental Sustainability	DM37 - DM40	N/A	The policy will have significant unintended consequences in both the materials and construction market and may well lead to a negative impact on the provision of housing and building of all types in the Borough.	The DMLP does not contain a policy favouring any one type of construction material. Policies DM37, 38 and 39 allow applicants to demonstrate how they meet the required standards, which can be through the use of one or a number of materials. In general, the Council is undertaking research on the appropriate use of sustainable construction materials in the Borough which includes sustainably-sourced timber and other materials such as concrete and steel to reduce carbon emissions in the building's full life cycle. Paragraph 7.3.3 has been amended to remove the reference to sustainably sourced timber as well as concrete, steel and hybrid materials and now makes the general reference to sustainable construction materials.	No change required.
56	mpa The Concrete Centre	N/A	56.8	Chapter 7 Climate Change and Environmental Sustainability	DM37 - DM40	N/A	The appropriateness of materials must be gauged on a case-by-case basis. Timber is not a sustainable construction method in all cases. The strong presumption against materials other than timber is therefore seriously misguided.	The DMLP does not contain a policy favouring any one type of construction material. Policies DM37, 38 and 39 allow applicants to demonstrate how they meet the required standards, which can be through the use of one or a number of materials. In general, the Council is undertaking research on the appropriate use of sustainable construction materials in the Borough which includes sustainably-sourced timber and other materials such as concrete and steel to reduce carbon emissions in the building's full life cycle. Paragraph 7.3.3 has been amended to remove the reference to sustainably sourced timber as well as concrete, steel and hybrid materials and now makes the general reference to sustainable construction materials.	No change required.
56	mpa The Concrete Centre	N/A	56.9	Chapter 7 Climate Change and Environmental Sustainability	DM37 - DM40	N/A	All major building materials have sustainability benefits and issues that have to be effectively managed both in the provision of the materials and in the design stage. An unequivocal presumption in favour of timber construction cannot be supported at any significant level due to the competitive demands on land for food and biomass resource.	The DMLP does not contain a policy favouring any one type of construction material. Policies DM37, 38 and 39 allow applicants to demonstrate how they meet the required standards, which can be through the use of one or a number of materials. In general, the Council is undertaking research on the appropriate use of sustainable construction materials in the Borough which includes sustainably-sourced timber and other materials such as concrete and steel to reduce carbon emissions in the building's full life cycle. Paragraph 7.3.3 has been amended to remove the reference to sustainably sourced timber as well as concrete, steel and hybrid materials and now makes the general reference to sustainable construction materials.	No change required.

56	mpa The Concrete Centre	N/A	56.4	Chapter 7 Climate Change and Environmental Sustainability	DM37, DM38		The DM DPD (policies 37 and 38) and Core Strategy (Policy 29) require BREEAM and Ecohomes / CfsH standards. Discussed at great length at the meeting between BCSA and LBH the potential imbalances that may arise from the introduction of a preference for any one material or the addition of further weightings that do not take into account the broader sustainability criteria already addressed in these standards.	The DMLP does not contain a policy favouring any one type of construction material. Policies DM37, 38 and 39 allow applicants to demonstrate how they meet the required standards, which can be through the use of one or a number of materials. In general, the Council is undertaking research on the appropriate use of sustainable construction materials in the Borough which includes sustainably-sourced timber and other materials such as concrete and steel to reduce carbon emissions in the building's full life cycle. Paragraph 7.3.3 has been amended to remove the reference to sustainably sourced timber as well as concrete, steel and hybrid materials and now makes the general reference to sustainable construction materials.	No change required.
14	Montagu Evans		14.15	Chapter 8 Transport	DM48		Policy DM48 should include reference to the guidance in the London Plan on car parking along with the statement in Paragraph 8.4.14 that on-site parking should not exceed standards. Should there be adopted Hackney car parking standards reference should be made to this standard in the policy. It is proposed that Paragraph 6 of Policy DM48 be amended to read: 'Where car parking is proposed and is in accord with London Plan parking standards, all developments, including redevelopments and change of use should provide well designed, high quality parking provision incorporating appropriate safety and security measures in line with the standards set out in the London Plan or any future Council standards. Adequate provision must be made for disabled parking.'	All proposed car parking provision is normally required to accord with the London car parking standards. As the Borough will have car parking standards in the future, all developments proposing car parking provision will be required to comply with the Borough's future car parking standards, once adopted. Section (c) of Policy DM48 will be amended to reflect the thrust of the comments. Reference will also be made to the London Plan and future Hackney car parking standards.	The Council will require a Transport Assessment/Statement to justify any proposed parking, subject to the thresholds referred to in paragraph 8.2.3 and 8.2.4. Where car parking is proposed the following will apply: i) All developments, including redevelopments and changes of use, should provide well-designed, high quality parking facilities in accordance with the London Plan (2011) maximum car parking and minimum cycle parking standards and any future Council standards; ii) the provision will be in accordance with the parking needs hierarchy of Hackney's adopted Parking and Enforcement Plan iii) any permitted provision is designed to be safe and secure, to achieve place-making objectives, to minimise land take and the urban heat island effect by providing adequate soft landscaping, permeable surfaces and other treatments to off-set adverse impacts of surface water run-off; iv) parking proposals will be required to preserve a buildings setting and the character of the surrounding area by avoiding over-dominance of parking and hard-standing surface areas to ensure that front gardens make a positive contribution to street appearance; v) the provision of electric charge points in accordance with the standards set out in the London Plan The supporting texts of Policy DM48, from paragraphs 8.4.1 to 8.4.20 will also be amended to reflect Hackney's stance towards parking in Hackney.
15			15.7	Chapter 8 Transport	DM48		Policy DM48 should include reference to the guidance in the London Plan on car parking along with the statement in Paragraph 8.4.14 that on-site parking should not exceed standards. Should there be adopted Hackney car parking standards reference should be made to this standard in the policy.	All proposed car parking provision is normally required to accord with the London car parking standards. As the Borough has its own car parking standards, all developments proposing car parking provision will be required to comply with the Borough's car parking standards. Policy DM48 has been amended to reflect the thrust of the comments. Reference will also be made to the Borough's car parking standards.	The Council will require a Transport Assessment/Statement to justify any proposed parking, subject to the thresholds referred to in paragraph 8.2.3 and 8.2.4. Where car parking is proposed the following will apply: i) All developments, including redevelopments and changes of use, should provide well-designed, high quality parking facilities in accordance with the London Plan (2011) maximum car parking and minimum cycle parking standards and any future Council standards; ii) the provision will be in accordance with the parking needs hierarchy of Hackney's adopted Parking and Enforcement Plan iii) any permitted provision is designed to be safe and secure, to achieve place-making objectives, to minimise land take and the urban heat island effect by providing adequate soft landscaping, permeable surfaces and other treatments to off-set adverse impacts of surface water run-off; iv) parking proposals will be required to preserve a buildings setting and the character of the surrounding area by avoiding over-dominance of parking and hard-standing surface areas to ensure that front gardens make a positive contribution to street appearance; v) the provision of electric charge points in accordance with the standards set out in the London Plan

17	Canal & River Trust	N/A	17.02	Chapter 8 Transport	DM47	N/A	Proposed Policy DM47 - Walking and Cycling: The Regent's Canal and River Lee Navigation towpaths are heavily used by cyclists and pedestrians, and we have launched a recent campaign to encourage considerate use by all, to reinforce that no particular type of user has priority – please see our website regarding Share the Space, Drop Your Pace: http://canalrivertrust.org.uk/see-and-do/cycling/share-the-space-drop-your-pace. We would request support for further development of parallel routes in particularly congested stretches of towpath. Our Enterprise team will be employing a new post (funded by TfL) for someone to explore and develop these improvements off the Trust's land, and will be looking for further funding for these sort of projects. We would also support consideration of parallel routes within the layout of large new developments.	Comments noted and support will be given for further development of parallel routes in particularly congested stretches of towpath by inserting a new text to reflect the support.	Para 8.3.3 - There has been a drive towards alternative transport methods such as walking and cycling in recent years in Hackney and as a result towpaths in London have become very busy. For example, at peak times, over 500 cyclists per hour use the towpaths through Regent's Canal. Further development of parallel routes in particularly congested stretches of towpath, particularly along Regents Canal and River Lee Navigation are therefore encouraged.
21	DP9	Rocket Investment Ltd	21.9	Chapter 8 Transport	DM48		Policy requires a parking space for every dwelling to be used by a disabled resident. The London Plan requires 10% of units to be wheelchair accessible and it is unlikely that large residential developments would be able to meet this requirement. There should be greater flexibility in the policy to recognise that it is not realistic for the standard to be met in large schemes.	Comment noted. However parking for disabled people is a necessary requirement to ensure all of Hackney's residents have equal access to facilities and services. The London Plan does not state that a "parking space is required for every dwelling to be used by a disabled resident" but rather says that "adequate parking space for disabled people must be provided, preferably on-site". All development should meet London Plan standards in any case.	No change.
30	Islington Council		30.42	Chapter 8 Transport	DM45		No objection	No objection noted.	No change.
30	Islington Council		30.43	Chapter 8 Transport	DM46		No objection - by taking a similar approach this should be beneficial when planning for improvements to transport interchanges close to the Borough Boundary, such as at Old Street and Finsbury Park	No objection noted.	No change.
30	Islington Council		30.44	Chapter 8 Transport	DM47		No objection	No objection noted.	No change.
30	Islington Council		30.45	Chapter 8 Transport	DM48		No objection	No objection noted.	No change.
33	Natural England		33.8	Chapter 8 Transport	DM47		Natural England is broadly supportive of sustainable transport options such as walking and cycling. The Council is encouraged to consider the potential for Green Infrastructure opportunities linking these transport options with green chains, links or corridors, where appropriate.	Support welcomed. The potential for Green Infrastructure opportunities linking transport options with green chains, links or corridors, where appropriate, is recognised and encouraged by the Council as exemplified in Policies DM1, DM47 and the section on open space of the Development Management Local Plan.	No change.
36	cgms consulting		36.2	Chapter 8 Transport	DM46		As background, with regards to plans and decisions, the NPPF states that 'development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe'. Tesco thus object to DM46 on the following grounds: - The need for the inclusion of such wording in the draft Plan given the overarching princples of the planning policy and the determination of planning applications is to consider any application on its individual merits, including impact on highway safety and free flow of traffic. The draft policy wording does not provide for individual consideration of development in accordance with the NPPF. - There is no definition of 'significant movement' of goods or materials. - In point 'i' there is no definition of 'close' to TfL's Road Network, the Strategic Road Network or other major roads. - In point 'ii' there is no definition of 'unnecessary movement' of vehicles over 7.5 tonnes in predominantly residential areas.	Objection noted. Policy DM46 will be amended to include in a new paragraph at the end of the policy, the statement in the NPPF that development should only be refused on transport grounds where the residual cumulative impacts of development are severe. The phrase 'significant movement of goods' is defined in para 8.2.12. Point (i) will be amended to state "will be located with easy access to TfL's Road Network, the Strategic Road Network or other major roads".	Second to last paragraph of Policy DM46 amended to read: "The Council will expect development which is considered to generate significant movement of goods or materials, both during construction and operation, to: (i) Be located with easy access to TfL's Road Network, the Strategic Road Network or other Major Roads;" Paragraph 8.2.12 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." A new paragraph is added at the end of Policy DM46 to say "The Council will assess each application on its individual merits and will only refuse planning permission on transport grounds where the residual cumulative impacts of a development is severe."

36			36.3	Chapter 8 Transport	DM46		There is no justification for the use of 7.5 tonne vehicles as the threshold for movements of vehicles in residential areas. As stated above, each site should be considered on it's individual merits and vehicles of 7.5 tonnes or smaller can not in principle be appropriate for all predominantly residential areas, nor can a larger vehicle be unacceptable in principle.	Point noted. Reference to the use of 7.5 tonne vehicles as the threshold for movement of vehicles in residential areas is deleted.	Relevant point (ii) of Policy DM46 will be deleted.
46	GLA		46.22	Chapter 8 Transport	DM46		TfL suggest that a general statement is included in the policy to explain the need to integrate land use with transport networks. It is important that development demonstrates no unacceptable impacts will be made to the network.	Commented noted. New paragraph will be inserted in policy DM46 to reflect this point.	New paragraph 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."
46	GLA		46.23	Chapter 8 Transport	DM46		The Policy should include a reference to facilitating the Mayor's Cycle Hire Scheme. this could be addressed under the section "Development should be suitable provision for encouraging the use of public transport, walking and cycling. The Council will require the provision of the following, as appropriate." It is suggested the following line is included –"infrastructure and/or funding for expansion of the Mayor's London Cycle Hire Scheme."	Comment noted. The policy will be amended to incorporate the suggested wording.	The fourth bullet point of the second paragraph of Policy DM46 will be 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;"
46	GLA		46.24	Chapter 8 Transport	DM46		The Policy should also include a reference to the need for development proposals to be accompanied by a Construction and Logistic Plan (CLP) and Delivery and Servicing Plan (DSP). these can both be coordinated with Travel Plans in order to promote sustainable transport and construction. CLP and DSP are required on a site-by-site basis. Both above travel plans are required for all large developments and can also be required for the smaller applications depending on the site and location. There is no set standards for when either plan is required, if a development is located on the TLRN TfL would request a CLP and possibly DSP. As the contractor and final details may not be confirmed until a later stage, TfL would request a framework for both CLP and DSP to be submitted in accordance with TfL's best practice guide. It should be noted, in TfL's comments submitted September 2012, point 3 refers to Servicing and Delivery Plan, this should be Delivery and Servicing Plan (DSP), as changed above.	Comment noted. The wording of Policy DM46 and its supporting text will be amended making reference to the need for development proposals to be accompanied by a Construction and Logistics Plan (CLP) and Delivery and Servicing Plan (DSP).	A new supporting text will be added to paragraph 8.2.12 to read "...The Council will expect development which is considered to generate significant movement of goods or materials, both during its construction and operation to be located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. This is because such a development would involve several journeys to and from the development resulting in disruption of traffic movement and congestion. Goods vehicles manoeuvring, and loading and unloading also add to pollution and may cause congestion, danger to pedestrians and other road users. Unloading and loading may also damage pavements. To mitigate against this, the Council will require development proposals to be accompanied by a Construction and Logistics Plan (CLP) and Delivery and Servicing Plans (DSP) in accordance with TfL guidance, 'Making Freight Work for You' to minimise congestion, noise and road danger. Second to last paragraph of Policy DM46 amended to read: "The Council will expect development which is considered to generate significant movement of goods or materials, both during construction and operation, to: (iii) minimise disruption for local communities through effective management, including through optimisation of collection and delivery timings. Development proposals should be accompanied by a Construction and Logistics Plan (CLP) and Delivery and Servicing Plan in accordance with TfL guidance".
46	GLA		46.25	Chapter 8 Transport	DM46		Hackney Council should be able to fully assess the impact on the local highways network. However, it is reminded that TfL will also need to assess the possible impact of any TLRN or SRN and Public Transport system.	Comment noted. Supporting text to Policy DM46 will be amended to reflect this point.	Insert new line after 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."
46	GLA		46.26	Chapter 8 Transport	DM46		Reference should be made to the Crossrail required from developers in line with the Mayor's Supplementary Planning Guidance.	Comment noted. A new text in paragraph 8.2.10 will be inserted making reference to this requirement.	A new paragraph 8.2.10 is inserted to read: "The Council is also required to collect contributions from developers towards the construction of Crossrail on behalf of the Mayor which will help to support growth by significantly improving rail capacity in London and reducing pressure on its existing public transport network."
46	GLA		46.27	Chapter 8 Transport	DM46		The policy should include a reference to The Mayor's Community Infrastructure Levy (CiL). the will be paid on commencement of most new development in Greater London that was granted planning permission on or after 1st April 2012. If the site is located in the Crossrail s106 charging zones the Mayor's CiL charge will be treated as accredit towards the S106 liability. The practical effect of this will be that only the larger of the two amounts will normally be sought.	Comment noted. A new text will be added to reflect this point.	A new paragraph 8.2.10 is inserted to read: "The Council is also required to collect contributions from developers towards the construction of Crossrail on behalf of the Mayor which will help to support growth by significantly improving rail capacity in London and reducing pressure on its existing public transport network."

46	GLA		46.28	Chapter 8 Transport	DM47		Cycle Parking provided should have regard to the London Plan revised early minor alterations (June 2012) standards. The promotion of the Legible London initiative is welcomed to improve pedestrian wayfinding. More detail is required on specific locations, for example the areas of Dalston and Hackney Marshes where regeneration is planned through new developments, redevelopments of sites and transport improvements. TFL will assist where required and possible with the installation of Legible London, to improve pedestrian wayfinding. Plans for regeneration through new development, redevelopment and improvements to public transport will be supported with the use of LIP funding.	Hackney Council welcome's TfL's proposed assistance for the promotion of Legible London Initiative. Policy DM47 will be amended to reference the London Plan Revised Early Minor Alterations June 2012 Cycling Parking Standards.	The third bullet point of Policy DM47 will be amended to read: "Provide for generous levels of secure cycle parking as per the London Plan Revised Early Minor Alterations June 2012 Cycle Parking Standards, and provide sufficient provision of changing and shower facilities for cyclists in employment sites"
46	GLA		46.29	Chapter 8 Transport	DM48		TfL support the proposed policy on car-free and low car parking developments and welcome hackney's provision for electric vehicle charging points as part of any proposed car parking. Secure, integrated and accessible cycle parking facilities should be provided in line with the standards set out for each class use. TfL welcome the proposed low car parking provision under the London Plan standards.	Support welcomed.	No change.
51	Sustainable Hackney		51.15	Chapter 8 Transport	DM46		The Local Plan should commit Hackney to a modal shift in transport use away from cars and towards walking, cycling and public transport. All major developments should contribute in some way to such a modal shift. Hackney just cannot take any more development unless more of its residents switch to sustainable forms of transport.	Comment welcomed. The thrust of this comment is inherent in both the Core Strategy and the DMLP policies.	No change.
51	Sustainable Hackney		51.16	Chapter 8 Transport	DM47		Welcome the commitment to increased permeability where ramped routes encourage more direct access across Hackney. This is not just good for cyclists. It is good for pedestrians too; particularly for those who are elderly and have mobility problems.	Comment welcomed. Noted.	No change.
51	Sustainable Hackney		51.17	Chapter 8 Transport	DM48		Don't understand why any off street parking should be allowed unless new developments first make provision for car club parking.	Although all new developments are required to provide a variety of parking types which includes off-street parking, parking for disabled people and car club parking; the Council prioritises spaces for car clubs, pool cars and disabled people car parks over any off-street car parking as set out in the last sentence of paragraph 8.4.6. DM47 and DM48 essentially heavily support more sustainable forms of transport, and also AAP and Core Strategy policies. The Council will be considering more stringent car parking standards to come forward in place of London Plan standards.	No change.
65			65.10	Chapter 8 Transport	DM47		It's becoming too dangerous to ride a bike. There needs to be separate cycle lines everywhere, Berlin style.	Comment noted. The Council seeks to encourage provision of more safe and secure cycle lines as much as is possible as do TfL. Hackney seeks to achieve this through Policy DM45 (Movement Hierarchy), which states that all development proposals should prioritise pedestrians, those with mobility difficulties and cyclists; Policy DM46 (Development and Transport), also requires that all development proposals should maximise safe, convenient and inclusive movement and accessibility to, from and within the site for pedestrians, cyclists and public transport users; and Policy DM47 (Walking and Cycling), also promotes walking and cycling in the Borough through various means.	No change.
65			65.9	Chapter 8 Transport	DM48		Far too many cars in the area. All brownfield land currently being used as public car parks should be released for building on.	Comment noted. There are already very few public car parks (i.e. Council-owned or owned by large supermarkets) in the Borough. Hackney's policies seek to reduce car parking in the Borough as outlined in Policy DM48. The Council's transport policies in general aim to prioritise walking, cycling and public transport as the main modes of transport in the Borough.	No change.
66	Hackney Councillor		66.1	Chapter 8 Transport	DM47		There should be more cycle parking facilities in town centres particularly on Hoxton Street	Comment noted. The Council seeks to promote and encourage more cycle facilities in all town centres, which includes Hoxton Street as stated in the second, third and fourth bullet points of Policy DM47.	No change.

23	London Borough of Haringey Planning and Sustainability	N/A	23.1	General			The emerging policy approaches in the draft Development Management Local Plan are supported. We would welcome continued discussion on the evolution of these documents as they progress towards adoption, and to share information for best practice. We welcome ongoing engagement on the preparation of Hackney's spatial planning documents to ensure a coordinated approach that supports the spatial planning objectives of both Hackney and Haringey Councils, and also meets the Duty to Co-operate.	Your welcome noted.	No change required.
28	Highways Agency	N/A	28.1	General		N/A	No comments	Noted.	No change required.
29	Civil Aviation Authority	N/A	29.1	General			Other than consultation required by Section 110 of the Localism Act 2011, it is not necessary to consult the CAA about strategic planning documents.	Your comment is noted.	No change required.
55	The British Constructional Steelwork Association Limited	N/A	55.1	General		N/A	Found the DM LP to be well balanced and ambitious and it addresses most of the issues which the BCSA would hope to see in an area development plan.	Noted.	No change required.
65	A Roberts	N/A	65.1	General			In response to question: 'The Council should make sure that new commercial, retail, mixed-use, cultural and leisure development is accessible to all and reflects local needs': Agree however it should not be the case that because an area is fairly deprived another cheap supermarket for example should be given precedence over independent (and slightly more expensive) traders.	The Planning system is bound by the Use Classes Order (UCO) and cannot discriminate between particular types of companies. The retail policies DM8 and DM9 further support the Core Strategy by promoting small and independent shops and ensuring designated shopping areas provide a core of A1 uses which essential means local shops	No change required.
65	A Roberts	N/A	65.1	General			In response to question: 'The Council should make sure that new commercial, retail, mixed-use, cultural and leisure development is accessible to all and reflects local needs': Agree however it should not be the case that because an area is fairly deprived another cheap supermarket for example should be given precedence over independent (and slightly more expensive) traders.	The Planning system is bound by the Use Classes Order (UCO) and cannot discriminate between particular types of companies. The retail policies DM8 and DM9 further support the Core Strategy by promoting small and independent shops and ensuring designated shopping areas provide a core of A1 uses which essential means local shops.	No change required.
65	A Roberts	N/A	65.4	General			New and refurbished homes should be built in a way that does not waste land, energy or water and helps to address climate change however at the same time they should not be so cramped that people have a poor quality of life.	Your comment is noted. Development proposals are required to achieve high quality design outcomes so that they are not cramped but allow people to enjoy high quality life. In this regard, it should be noted that the CS and draft DMLP policies support the London Plan Policy 3.4 Optimising Housing Potential and associated Density Matrix outlined in Table 3.2. Energy and water related policies are also outlined in DMLP which further support the London Plan and Core Strategy in terms of local context. The Council is also working with 6 other boroughs in developing the North London Waste Plan which will influence how waste is to be dealt with in North London in the future. The Council's achievement against these policy objectives is outlined in the Authority's Annual Monitoring Report.	No change required.
65	A Roberts	N/A	65.4	General			New and refurbished homes should be built in a way that does not waste land, energy or water and helps to address climate change however at the same time they should not be so cramped that people have a poor quality of life.	Your comment is noted. Development proposals are required to achieve high quality design outcomes so that they are not cramped but allow people to enjoy high quality life. In this regard, it should be noted that the CS and draft DMLP policies support the London Plan Policy 3.4 Optimising Housing Potential and associated Density Matrix outlined in Table 3.2. Energy and water related policies are also outlined in DMLP which further support the London Plan and Core Strategy in terms of local context. The Council is also working with 6 other boroughs in developing the North London Waste Plan which will influence how waste is to be dealt with in North London in the future. The Council's achievement against these policy objectives is outlined in the Authority's Annual Monitoring Report.	No change required.

67	A Mansfield	N/A	67.10	General			Outwith council control but is there anything that can be done through neighbourhood plans to stop Hackney being home of betting shops, strip clubs and fast food?	The Planning system is bound by the Use Classes Order (UCO) and cannot discriminate between particular types of companies. The retail policies DM8 and DM9 further support the Core Strategy by promoting small and independent shops and ensuring designated shopping areas provide a core of A1 uses which essentially means local shops. Neighbourhood Plans are not brought forward by the Council but by local communities. The Council has a duty to facilitate Neighbourhood Plans once proposed by local communities. For additional planning requirements governing a changes of use for certain land use types an Article 4 Directive may need to be undertaken. This is something the Council may consider for particular uses, such as betting offices, considered to have negative impacts on the local community.	No change required.
67	A Mansfield	N/A	67.10	General			Outwith council control but is there anything that can be done through neighbourhood plans to stop Hackney being home of betting shops, strip clubs and fast food?	The Planning system is bound by the Use Classes Order (UCO) and cannot discriminate between particular types of companies. The retail policies DM8 and DM9 further support the Core Strategy by promoting small and independent shops and ensuring designated shopping areas provide a core of A1 uses which essentially means local shops. Neighbourhood Plans are not brought forward by the Council but by local communities. The Council has a duty to facilitate Neighbourhood Plans once proposed by local communities. For additional planning requirements governing a changes of use for certain land use types an Article 4 Directive may need to be undertaken. This is something the Council may consider for particular uses, such as betting offices, considered to have negative impacts on the local community.	No change required.
67	A Mansfield	N/A	67.9	General			The Mare Street/Well Street area needs urgent attention and funding. It was a focal point for the riots and needs access to any post-riot improvements. The use mix is good with a wide range of activity but there are too many hostels and drug services co-located in a small area, creating a very difficult place to live and work. The rest of Mare Street seems to be regenerating at a much faster pace. There also needs to be much stricter enforcement against illegal development, of which there is a lot in this area. Can a neighbourhood plan be developed for this area?	A key purpose of the DMLP is to provide more local guidance to inform new planning applications as they come forward. Design quality is a core focus of all the DMLP policies. Policies DM1, DM2 and DM3 set the tone for this focus. In addition, the Site Allocations Local Plan identifies those strategic sites likely to come forward over the next 15 years. A number of these sites are located in the vicinity of the Mare Street / Well Street area which once redeveloped will bring significant new investment into the area. Neighbourhood Plans are not brought forward by the Council but by local communities. The Council has a duty to facilitate Neighbourhood Plans once proposed by local communities. Further, Policy DM26 seeks to ensure that proposals for hostels do not result in an over-concentration of similar uses which may be detrimental to amenity. Enforcement against illegal development is an on-going operation of the Council's Planning enforcement team.	No change required.

67	A Mansfield	N/A	67.9	General			The Mare Street/Well Street area needs urgent attention and funding. It was a focal point for the riots and needs access to any post-riot improvements. The use mix is good with a wide range of activity but there are too many hostels and drug services co-located in a small area, creating a very difficult place to live and work. The rest of Mare Street seems to be regenerating at a much faster pace. There also needs to be much stricter enforcement against illegal development, of which there is a lot in this area. Can a neighbourhood plan be developed for this area?	A key purpose of the DMLP is to provide more local guidance to inform new planning applications as they come forward. Design quality is a core focus of all the DMLP policies. Policies DM1, DM2 and DM3 set the tone for this focus. In addition, the Site Allocations Local Plan identifies those strategic sites likely to come forward over the next 15 years. A number of these sites are located in the vicinity of the Mare Street / Well Street area which once redeveloped will bring significant new investment into the area. Neighbourhood Plans are not brought forward by the Council but by local communities. The Council has a duty to facilitate Neighbourhood Plans once proposed by local communities. Further, Policy DM26 seeks to ensure that proposals for hostels do not result in an over-concentration of similar uses which may be detrimental to amenity. Enforcement against illegal development is an on-going operation of the Council's Planning enforcement team.	No change required.
68	Bell	Tower Hamlets	68.1	General			LBTH supports the guidance in the documents and views the coordination of planning policy with its neighbouring boroughs to be an important factor in developing guidance and implementing the development management process.	Support noted.	No change required.
68	Bell	Tower Hamlets	68.1	General			LBTH supports the guidance in the documents and views the coordination of planning policy with its neighbouring boroughs to be an important factor in developing guidance and implementing the development management process.	Support noted.	No change required.
68	Bell	Tower Hamlets	68.2	General			Designations such as the Bishopsgate Goods Yard and Hackney Wick Hub should be referenced and identified as examples of cross-borough working.	Hackney Wick Hub is outlined in the approved Hackney Wick AAP which is being used by the LLDC as part of their planning powers afforded to them from the 1st October 2012. Bishopsgate Goods Yard is identified as a strategic site within the Council's draft Site Allocations Local Plan (Site Reference 108). The SALP specifically mentions joint working with LBTH in relation to the site's redevelopment.	No change required.
68	Bell	Tower Hamlets	68.2	General			Designations such as the Bishopsgate Goods Yard and Hackney Wick Hub should be referenced and identified as examples of cross-borough working.	Hackney Wick Hub is outlined in the approved Hackney Wick AAP which is being used by the LLDC as part of their planning powers afforded to them from the 1st October 2012. Bishopsgate Goods Yard is identified as a strategic site within the Council's draft Site Allocations Local Plan (Site Reference 108). The SALP specifically mentions joint working with LBTH in relation to the site's redevelopment.	No change required.
68	Bell	Tower Hamlets	68.3	General			Ordnance Survey base maps could be used to help map viewers orientate themselves within and outside of the borough; enabling them to look beyond the borough boundaries.	Whilst your suggestion is acceptable in principle, however it is difficult to implement in practice. Adding the OS layer beyond the Borough boundary significantly increases the Policies Map's file size making it more difficult to email and longer to download from the website. For this reasons your suggested amendment, whilst useful, has not been progressed.	No change required.
68	Bell	Tower Hamlets	68.3	General			Ordnance Survey base maps could be used to help map viewers orientate themselves within and outside of the borough; enabling them to look beyond the borough boundaries.	Whilst your suggestion is acceptable in principle, however it is difficult to implement in practice. Adding the OS layer beyond the Borough boundary significantly increases the Policies Map's file size making it more difficult to email and longer to download from the website. For this reasons your suggested amendment, whilst useful, has not been progressed.	No change required.

10	City of London	N/A	10.1	General			The paragraphs that precede policies, along the wording similar to "The following proposed policy sets out the Council's approach to the consideration of proposals for…", should be removed as they are superfluous and not necessary.	This is consistent wording used throughout the document to introduce the DM policies. They are not considered superfluous and unnecessary at this stage. Therefore the suggested amendment is not considered substantive and is therefore not supported.	No change required.
32	The Office of the Archdeacon of Hackney	N/A	32.1	General			The Church of England is committed to supporting the growing population of the Borough and it is pleasing to note the number of times that the Church is noted as being a key part of communities particularly in the centres such as Dalston and Hackney. There is a long tradition of Churches working to meet local needs. We have worked with your Council successfully over the years on a range of physical and social projects (for example, at St John at Hackney) as part of Hackney's ongoing regeneration and hope that this will continue for many years to come.In the final version of the documents the Churches can be described also as centres of social action.	Suggestion whilst agreed with in principle is considered to already be in place. Paragraph 3.6.1 mentions social and community facilities (which includes places of worship) as contributing to making an area more than just a place to live.	No change required.
12	CMA Planning	N/A	12.8	Glossary			Replace PPS with NPPF Add a definition of the NPPF in glossary.	Suggested amendment accepted. The term "PPS4" in Paragraph 4.10.2 will be deleted and replaced with the term "NPPF", and a definition of NPPF will be added in the glossary.	The term 'PPS4' in paragraph 4.10.2 line 9 is replaced with the term 'NPPF' and a definition of NPPF is given in the glossary.
14	Montagu Evans	Plough Yard Developments Limited	14.16	Glossary			Car-Free' and 'Car-Capped' development should be defined in the Glossary.	Suggested amendment is accepted.	The following definitions are added to the Glossary: 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 meet the needs of disabled people. 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.
15	Montagu Evans	HDG LTD	15.8	Glossary			Car-Free' and 'Car-Capped' development should be defined in the Glossary.	Suggested amendment is accepted.	The following definitions are added to the Glossary: 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 meet the needs of disabled people. 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.
10	City of London	N/A	10.9	Policies Map		Hackney/City border	As an adjoining land and property owner, the City is supportive of a flexible mix of both business uses and sizes within these areas. The City is supportive that primary consideration is given to B1 office use. The City will comment on Hackney cases with regards to the London View Management Framework Protected Vistas as such cases/proposals may have an impact on the scale and scope of development on City owned sites in Hackney, and sites that have an impact on views of St. Paul's Cathedral from the City and the South Bank. The City will also comment on cases which impact on the backdrop to views of St. Paul's Cathedral. This should be acknowledged somewhere in the text of the DMLP.	The Mayor of London's London View Management Framework SPG is referenced in paragraph 3.2.5 as well as in Proposed Policy DM1 - High Quality Design. The Strategic View Background Area is also outlined on the Policies Map.	No change required.
12	CMA Planning	N/A	12.9	Policies Map		Appendix 1: Map reference 175	This is not open space and should be removed.	Site is classified as "cemeteries and church yards" and described as 'Church has formal planted garden & nursery has hard surface play area'. Space does not have to be green, public accessible or have any defined function to be designated as open space. Aerial photos (may 2012) indicates that site contains open space. A recent scheme has been approved over the site which while resulting in some net loss of open space the remain space incorporates improvements to its capacity and utilisation.	No change required.

18	English Heritage	N/A	18.11	Policies Map		Chapter 6	The Borough should show on the proposals map all Heritage Assets, including listed buildings (national and local), historic parks and gardens and scheduled monuments. It would also be useful to identify any strategic and locally designated views.	The two Linear Views identified in the London View Management Framework SPG that directly affects Hackney are identified on the Policies Map. The three English Heritage Registered Parks and Gardens of Special Historic Interest are also on the Policies Map. There are around 1300 statutorily listed buildings and approximately 340 locally listed buildings. It is not considered appropriate to identify these on the Proposals Map , however, will include link to the Council's conservation web page which will provide information i.e. Buildings At Risk.	No change to the Policies Map, however, will include a link to the Council's Conservation pages in the supporting text to DMLP Policy DM28.
41	Lee Valley Regional Park Authority	N/A	41.12	Policies Map			Draft Proposed Development Management Local Plan Policies Map:The Authority welcomes the proposal to designate the area of the Queen Elizabeth Olympic Park within Hackney as MOL, part of which lies within the Regional Park. There is concern however that the 'Potential New Open Space' shown on what used to be the 'Arena Field' site, adjacent to the eastern side of Lee Navigation (site 270 on the draft Policies Map) has not also been designated MOL This site lies within the Regional Park and forms a valuable open space within the Hackney Wick area.	The potential open space is still applicable as the land where the open space is proposed to be is, at June 2013, part of a construction site. Therefore, the Policies Map cannot designate this land as existing open space or MOL. Furthermore, the site falls within the London Legacy Development Corporation area.	No change required.
41	Lee Valley Regional Park Authority	N/A	41.13	Policies Map			There would also appear to be a discrepancy in the size of the proposed development platform lying on the east side of Waterden Road included in Figures 13, 14 and 17 (Appendix 1 to the DMLP) compared to what has been agreed within the Legacy Communities Scheme. The effect of this is to overstate the amount of MOL retained in this part of the Queen Elizabeth Olympic Park. Given the weight accorded to MOL in these figures and Hackney's stated intention to secure public access to these areas in legacy a clear policy affirming the importance of MOL is considered necessary to support both Hackney's and the Authority's objectives.	Adopted Core Strategy Policy CS26 ' Network of Open Spaces', and proposed Hackney DMLP Policy DM32 'Protection and Enhancement of Existing Open Space' seeks to protect and enhance open spaces. Both Policies relate to the accompanying Proposals Map and Policies Map which recognises the boroughs MOL. London Plan Policy 7.17 'Metropolitan Open Land' provides strategic policy guidance on MOL, and is a material consideration in any planning application. A specific policy on MOL is unlikely to offer any more protection or guidance than the policies that are currently in place and proposed policy DM32 which has been amended to explicitly include reference to the Lee Valley Regional Park Authority Plan and Development Framework.	No change required.
41	Lee Valley Regional Park Authority		41.14	Policies Map			The Lee Valley Regional Park notation is quite difficult to read on the draft Policies Map and does not appear to be shown at all on areas of the Park at Springhill and Springfield, nor is it shown on site 270 'Potential New Open Space'. The Authority asks that these amendments are made to ensure the correct boundary and area is included.	The boundary of LVRP is based upon the information available to the Council and what was supplied to the Council at the Core Strategy Proposals Map. No changes has been made to boundary since the Core Strategy.	Try to make the boundary of the LVRP more distinctive.
50	Drivers Jonas Deloitte	Geffrye Museum	50.5	Policies Map	DM32	N/A	The Museum gardens are designated on the draft proposed DMLP Policies Map as Open Space (designation 252). The Museum supports this designation which includes the publicly accessible front gardens, the rear period gardens and the education gardens below the Branson Coates extension. The Museum supports Policy DM32 which seeks to protect and retain open space. The Museum notes that this policy also seeks to improve access to open space through agreement with owners. The Museum supports this aspiration but wishes to note that some of the improved open space, as part of the current proposals at the Museum site, will be primarily for educational purposes and public access will be limited for this reason. There will be no change to the publicly accessibly space at the front of the Museum and access to the period gardens at the rear will be improved to DDA standards.	Noted, open space does not have to be publicly accessible to have value as open space.	No change required.

42	Peacock and Smith Limited	Wm Morrison Supermarket Plc	42.1	Appendix 3		Figure 2: Stoke Newington Frontages	I note that the existing Morrisons store (47-49 Stamford Hill) falls within the boundary for Stoke Newington Town Centre and is designated Secondary Shopping Frontage. However, my client strongly recommends that it is designated as Primary Shopping Frontage in recognition of its key anchor role in the town centre.	Your comment is noted. However, your client's site, as you rightly point out, lies at the periphery of Stoke Newington District Centre and not within the centre of the Stoke Newington Town Centre area where there is a concentration of retail developments for which the area is designated as a Primary Shopping Frontage. The designation of the area where your client's site is located as Secondary Shopping Frontage does not diminish the Borough's recognition of the anchor role existing Morrisons plays. It affirms the area as a protected retail frontage.	No change required.
10	City of London		10.8	Appendix 4		N/A	This is a useful appendix to the Development Management Local Plan. What is the source of information behind the Marketing Evidence and Marketing Strategy? Is it the Hackney Surveyors Department? The City is looking at developing similar evidence and would find it useful to discuss the methodology behind this further.	It is a product of Hackney requirements sourced from benchmarking the GLA and other Boroughs.	No change required.
57	CgMs	Notting Hill Housing Trust	57.2	Appendix 4		N/A	It is considered that the requirement for sites to be vacant for at least 2 years before alterative uses will be considered is far too onerous and restrictive. In the current economic climate and the Government's recent announcements to stimulate development it is considered that this requirement will stifle and hinder development on particular sites. Appendix 4 requires the submission of 'compelling evidence' before alternative uses will be considered. There will often be circumstances where there is compelling evidence and exceptional circumstances (e.g. the decline of a specific sector) which mean that alternative uses should be considered ahead of waiting 2 years before redevelopment can take place. Although we support the guidance in Appendix 4 outlining what the marketing evidence may comprise of, it is currently too prescriptive and does not allow for individual site circumstances. It is considered that Appendix 4 should therefore state that the precise marketing evidence required and associated marketing timescales should be agreed with the Council on a site by site basis through the pre-application process.	Your comment is noted. The requirement for sites to be vacant for 2 years before alternative uses will be considered will be amended.	Amend paragraphs 1.5 and 1.6 of Appendix 4 so as 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 generating use/re-use, including provision for smaller flexible units or alternative smaller flexible employment generating use. 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" indicating that the requirement for sites to be vacant for 2 years before alternatives uses will be considered has been removed.
57	CgMs	Notting Hill Housing Trust	57.4	Appendix 4		N/A	In relation to the marketing strategy outlined within Appendix 4, the text should also stress that the details provided are only a guide and the precise marketing strategy should be agreed on site by site basis.	Appendix 4 outlines what the Council considers necessary to be submitted to constitute robust marketing evidence and an appropriately detailed marketing strategy in support of relevant DM policies. It is felt these standards are necessary in order to ensure consistency in decision making. The proposed amendment is therefore not accepted.	No change required
14	Montagu Evans		14.15	Chapter 8 Transport	DM48		Policy DM48 should include reference to the guidance in the London Plan on car parking along with the statement in Paragraph 8.4.14 that on-site parking should not exceed standards. Should there be adopted Hackney car parking standards reference should be made to this standard in the policy. It is proposed that Paragraph 6 of Policy DM48 be amended to read: 'Where car parking is proposed and is in accord with London Plan parking standards, all developments, including redevelopments and change of use should provide well designed, high quality parking provision incorporating appropriate safety and security measures in line with the standards set out in the London Plan or any future Council standards. Adequate provision must be made for disabled parking.'	All proposed car parking provision is normally required to accord with the London car parking standards. As the Borough will have car parking standards in the future, all developments proposing car parking provision will be required to comply with the Borough's future car parking standards, once adopted. Section (c) of Policy DM48 will be amended to reflect the thrust of the comments. Reference will also be made to the London Plan and future Hackney car parking standards.	The Council will require a Transport Assessment/Statement to justify any proposed parking, subject to the thresholds referred to in paragraph 8.2.3 and 8.2.4. Where car parking is proposed the following will apply: i) All developments, including redevelopments and changes of use, should provide well-designed, high quality parking facilities in accordance with the London Plan (2011) maximum car parking and minimum cycle parking standards and any future Council standards; ii) the provision will be in accordance with the parking needs hierarchy of Hackney's adopted Parking and Enforcement Plan iii) any permitted provision is designed to be safe and secure, to achieve place-making objectives, to minimise land take and the urban heat island effect by providing adequate soft landscaping, permeable surfaces and other treatments to off-set adverse impacts of surface water run-off; iv) parking proposals will be required to preserve a buildings setting and the character of the surrounding area by avoiding over-dominance of parking and hard-standing surface areas to ensure that front gardens make a positive contribution to street appearance; v) the provision of electric charge points in accordance with the standards set out in the London Plan

									The supporting texts of Policy DM48, from paragraphs 8.4.1 to 8.4.20 will also be amended to reflect Hackney's stance towards parking in Hackney.
15			15.7	Chapter 8 Transport	DM48		Policy DM48 should include reference to the guidance in the London Plan on car parking along with the statement in Paragraph 8.4.14 that on-site parking should not exceed standards. Should there be adopted Hackney car parking standards reference should be made to this standard in the policy.	All proposed car parking provision are normally required to accord with the London car parking standards. As the Borough has its own car parking standards, all developments proposing car parking provision will be required to comply with the Borough's car parking standards. Policy DM48 has been amended to reflect the thrust of the comments. Reference will also be made to the Borough's car parking standards.	The Council will require a Transport Assessment/Statement to justify any proposed parking, subject to the thresholds referred to in paragraph 8.2.3 and 8.2.4. Where car parking is proposed the following will apply: i) All developments, including redevelopments and changes of use, should provide well-designed, high quality parking facilities in accordance with the London Plan (2011) maximum car parking and minimum cycle parking standards and any future Council standards; ii) the provision will be in accordance with the parking needs hierarchy of Hackney's adopted Parking and Enforcement Plan iii) any permitted provision is designed to be safe and secure, to achieve place-making objectives, to minimise land take and the urban heat island effect by providing adequate soft landscaping, permeable surfaces and other treatments to off-set adverse impacts of surface water run-off; iv) parking proposals will be required to preserve a buildings setting and the character of the surrounding area by avoiding over-dominance of parking and hard-standing surface areas to ensure that front gardens make a positive contribution to street appearance; v) the provision of electric charge points in accordance with the standards set out in the London Plan.
17	Canal & River Trust	N/A	17.02	Chapter 8 Transport	DM47	N/A	Proposed Policy DM47 - Walking and Cycling: The Regent's Canal and River Lee Navigation towpaths are heavily used by cyclists and pedestrians, and we have launched a recent campaign to encourage considerate use by all, to reinforce that no particular type of user has priority – please see our website regarding Share the Space, Drop Your Pace: http://canalrivertrust.org.uk/see-and-do/cycling/share-the-space-drop-your-pace. We would request support for further development of parallel routes in particularly congested stretches of towpath. Our Enterprise team will be employing a new post (funded by TfL) for someone to explore and develop these improvements off the Trust's land, and will be looking for further funding for these sort of projects. We would also support consideration of parallel routes within the layout of large new developments.	Comments noted and support will be given for further development of parallel routes in particularly congested stretches of towpath by inserting a new text to reflect the support.	Para 8.3.3 - There has been a drive towards alternative transport methods such as walking and cycling in recent years in Hackney and as a result towpaths in London have become very busy. For example, at peak times, over 500 cyclists per hour use the towpaths through Regent's Canal. Further development of parallel routes in particularly congested stretches of towpath, particularly along Regents Canal and River Lee Navigation are therefore encouraged.
21	DP9	Rocket Investment Ltd	21.9	Chapter 8 Transport	DM48		Policy requires a parking space for every dwelling to be used by a disabled resident. The London Plan requires 10% of units to be wheelchair accessible and it is unlikely that large residential developments would be able to meet this requirement. There should be greater flexibility in the policy to recognise that it is not realistic for the standard to be met in large schemes.	Comment noted. However parking for disabled people is a necessary requirement to ensure all of Hackney's residents have equal access to facilities and services. The London Plan does not state that a "parking space is required for every dwelling to be used by a disabled resident" but rather says that "adequate parking space for disabled people must be provided, preferably on-site". All development should meet London Plan standards in any case.	No change.
30	Islington Council		30.42	Chapter 8 Transport	DM45		No objection	No objection noted.	No change.
30	Islington Council		30.43	Chapter 8 Transport	DM46		No objection - by taking a similar approach this should be beneficial when planning for improvements to transport interchanges close to the Borough Boundary, such as at Old Street and Finsbury Park	No objection noted.	No change.
30	Islington Council		30.44	Chapter 8 Transport	DM47		No objection	No objection noted.	No change.
30	Islington Council		30.45	Chapter 8 Transport	DM48		No objection	No objection noted.	No change.
33	Natural England		33.8	Chapter 8 Transport	DM47		Natural England is broadly supportive of sustainable transport options such as walking and cycling. The Council is encouraged to consider the potential for Green Infrastructure opportunities linking these transport options with green chains, links or corridors, where appropriate.	Support welcomed. The potential for Green Infrastructure opportunities linking transport options with green chains, links or corridors, where appropriate, is recognised and encouraged by the Council as exemplified in Policies DM1, DM47 and the section on open space of the Development	No change.

								Management Local Plan.	
36	cgms consulting		36.2	Chapter 8 Transport	DM46		As background, with regards to plans and decisions, the NPPF states that 'development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe'. Tesco thus object to DM46 on the following grounds: - The need for the inclusion of such wording in the draft Plan given the overarching princples of the planning policy and the determination of planning applications is to consider any application on its individual merits, including impact on highway safety and free flow of traffic. The draft policy wording does not provide for individual consideration of development in accordance with the NPPF. - There is no definition of 'significant movement' of goods or materials. - In point 'i' there is no definition of 'close' to TfL's Road Network, the Strategic Road Network or other major roads. - In point 'ii' there is no definition of 'unnecessary movement' of vehicles over 7.5 tonnes in predominantly residential areas.	Objection noted. Policy DM46 will be amended to include in a new paragraph at the end of the policy, the statement in the NPPF that development should only be refused on transport grounds where the residual cumulative impacts of development are severe. The phrase 'significant movement of goods' is defined in para 8.2.12. Point (i) will be amended to state "will be located with easy access to TfL's Road Network, the Strategic Road Network or other major roads".	Second to last paragraph of Policy DM46 amended to read: "The Council will expect development which is considered to generate significant movement of goods or materials, both during construction and operation, to: (i) Be located with easy access to TfL's Road Network, the Strategic Road Network or other Major Roads;" Paragraph 8.2.12 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." A new paragraph is added at the end of Policy DM46 to say "The Council will assess each application on its individual merits and will only refuse planning permission on transport grounds where the residual cumulative impacts of a development is severe."
36			36.3	Chapter 8 Transport	DM46		There is no justification for the use of 7.5 tonne vehicles as the threshold for movements of vehicles in residential areas. As stated above, each site should be considered on it's individual merits and vehicles of 7.5 tonnes or smaller can not in principle be appropriate for all predominantly residential areas, nor can a larger vehicle be unacceptable in principle.	Point noted. Reference to the use of 7.5 tonne vehicles as the threshold for movement of vehicles in residential areas is deleted.	Relevant point (ii) of Policy DM46 will be deleted.
46	GLA		46.22	Chapter 8 Transport	DM46		TfL suggest that a general statement is included in the policy to explain the need to integrate land use with transport networks. it is important that development demonstrates no unacceptable impacts will be made to the network.	Commented noted. New paragraph will be inserted in policy DM46 to reflect this point.	New paragraph 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."
46	GLA		46.23	Chapter 8 Transport	DM46		The Policy should include a reference to facilitating the Mayor's Cycle Hire Scheme. this could be addressed under the section "Development should be suitable provision for encouraging the use of public transport, walking and cycling. The Council will require the provision of the following, as appropriate." It is suggested the following line is included –"infrastructure and/or funding for expansion of the Mayor's London Cycle Hire Scheme."	Comment noted. The policy will be amended to incorporate the suggested wording.	The fourth bullet point of the second paragraph of Policy DM46 will be 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;"
46	GLA		46.24	Chapter 8 Transport	DM46		The Policy should also include a reference to the need for development proposals to be accompanied by a Construction and Logistic Plan (CLP) and Delivery and Servicing Plan (DSP). these can both be coordinated with Travel Plans in order to promote sustainable transport and construction. CLP and DSP are required on a site-by-site basis. Both above travel plans are required for all large developments and can also be required for the smaller applications depending on the site and location. There is no set standards for when either plan is required, if a development is located on the TLRN TfL would request a CLP and possibly DSP. As the contractor and final details may not be confirmed until a later stage, TfL would request a framework for both CLP and DSP to be submitted in accordance with TfL's best practice guide. It should be noted, in TfL's comments submitted September 2012, point 3 refers to Servicing and Delivery Plan, this should be Delivery and Servicing Plan (DSP), as changed above.	Comment noted. The wording of Policy DM46 and its supporting text will be amended making reference to the need for development proposals to be accompanied by a Construction and Logistics Plan (CLP) and Delivery and Servicing Plan (DSP).	A new supporting text will be added to paragraph 8.2.12 to read "...The Council will expect development which is considered to generate significant movement of goods or materials, both during its construction and operation to be located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. This is because such a development would involve several journeys to and from the development resulting in disruption of traffic movement and congestion. Goods vehicles manoeuvring, and loading and unloading also add to pollution and may cause congestion, danger to pedestrians and other road users. Unloading and loading may also damage pavements. To mitigate against this, the Council will require development proposals to be accompanied by a Construction and Logistics Plan (CLP) and Delivery and Servicing Plans (DSP) in accordance with TfL guidance, 'Making Freight Work for You' to minimise congestion, noise and road danger. Second to last paragraph of Policy DM46 amended to read: "The Council will expect development which is considered to generate significant movement of goods or materials, both during construction and operation, to: (iii) minimise disruption for local communities through effective management, including through optimisation of collection and delivery timings. Development proposals should be accompanied by a Construction and Logistics

									Plan (CLP) and Delivery and Servicing Plan in accordance with TfL guidance".
46	GLA		46.25	Chapter 8 Transport	DM46		Hackney Council should be able to fully assess the impact on the local highways network. However, it is reminded that TfL will also need to assess the possible impact of any TLRN or SRN and Public Transport system.	Comment noted. Supporting text to Policy DM46 will be amended to reflect this point.	Insert new line after 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."
46	GLA		46.26	Chapter 8 Transport	DM46		Reference should be made to the Crossrail required from developers in line with the Mayor's Supplementary Planning Guidance.	Comment noted. A new text in paragraph 8.2.10 will be inserted making reference to this requirement.	A new paragraph 8.2.10 is inserted to read: "The Council is also required to collect contributions from developers towards the construction of Crossrail on behalf of the Mayor which will help to support growth by significantly improving rail capacity in London and reducing pressure on its existing public transport network."
46	GLA		46.27	Chapter 8 Transport	DM46		The policy should include a reference to The Mayor's Community Infrastructure Levy (CiL). the will be paid on commencement of most new development in Greater London that was granted planning permission on or after 1st April 2012. If the site is located in the Crossrail s106 charging zones the Mayor's CiL charge will be treated as accredit towards the S106 liability. The practical effect of this will be that only the larger of the two amounts will normally be sought.	Comment noted. A new text will be added to reflect this point.	A new paragraph 8.2.10 is inserted to read: "The Council is also required to collect contributions from developers towards the construction of Crossrail on behalf of the Mayor which will help to support growth by significantly improving rail capacity in London and reducing pressure on its existing public transport network."
46	GLA		46.28	Chapter 8 Transport	DM47		Cycle Parking provided should have regard to the London Plan revised early minor alterations (June 2012) standards. The promotion of the Legible London initiative is welcomed to improve pedestrian wayfinding. More detail is required on specific locations, for example the areas of Dalston and Hackney Marshes where regeneration is planned through new developments, redevelopments of sites and transport improvements. TFL will assist where required and possible with the installation of Legible London, to improve pedestrian wayfinding. Plans for regeneration through new development, redevelopment and improvements to public transport will be supported with the use of LIP funding.	Hackney Council welcome's TfL's proposed assistance for the promotion of Legible London Initiative. Policy DM47 will be amended to reference the London Plan Revised Early Minor Alterations June 2012 Cycling Parking Standards.	The third bullet point of Policy DM47 will be amended to read: "Provide for generous levels of secure cycle parking as per the London Plan Revised Early Minor Alterations June 2012 Cycle Parking Standards, and provide sufficient provision of changing and shower facilities for cyclists in employment sites"
46	GLA		46.29	Chapter 8 Transport	DM48		TfL support the proposed policy on car-free and low car parking developments and welcome hackney's provision for electric vehicle charging points as part of any proposed car parking. Secure, integrated and accessible cycle parking facilities should be provided in line with the standards set out for each class use. TfL welcome the proposed low car parking provision under the London Plan standards.	Support welcomed.	No change.
51	Sustainable Hackney		51.15	Chapter 8 Transport	DM46		The Local Plan should commit Hackney to a modal shift in transport use away from cars and towards walking, cycling and public transport. All major developments should contribute in some way to such a modal shift. Hackney just cannot take any more development unless more of its residents switch to sustainable forms of transport.	Comment welcomed. The thrust of this comment is inherent in both the Core Strategy and the DMLP policies.	No change.
51	Sustainable Hackney		51.16	Chapter 8 Transport	DM47		Welcome the commitment to increased permeability where ramped routes encourage more direct access across Hackney. This is not just good for cyclists. It is good for pedestrians too; particularly for those who are elderly and have mobility problems.	Comment welcomed. Noted.	No change.
51	Sustainable Hackney		51.17	Chapter 8 Transport	DM48		Don't understand why any off street parking should be allowed unless new developments first make provision for car club parking.	Although all new developments are required to provide a variety of parking types which includes off-street parking, parking for disabled people and car club parking; the Council prioritises spaces for car clubs, pool cars and disabled people car parks over any off-street car parking as set out in the last sentence of paragraph 8.4.6. DM47 and DM48 essentially heavily support more sustainable forms of transport, and also AAP and Core Strategy policies. The Council will be considering more stringent car parking standards to come forward in place of London Plan standards.	No change.

65			65.10	Chapter 8 Transport	DM47		It's becoming too dangerous to ride a bike. There needs to be separate cycle lines everywhere, Berlin style.	Comment noted. The Council seeks to encourage provision of more safe and secure cycle lines as much as is possible as do TfL. Hackney seeks to achieve this through Policy DM45 (Movement Hierarchy), which states that all development proposals should prioritise pedestrians, those with mobility difficulties and cyclists; Policy DM46 (Development and Transport), also requires that all development proposals should maximise safe, convenient and inclusive movement and accessibility to, from and within the site for pedestrians, cyclists and public transport users; and Policy DM47 (Walking and Cycling), also promotes walking and cycling in the Borough through various means.	No change.
65			65.9	Chapter 8 Transport	DM48		Far too many cars in the area. All brownfield land currently being used as public car parks should be released for building on.	Comment noted. There are already very few public car parks (i.e. Council-owned or owned by large supermarkets) in the Borough. Hackney's policies seek to reduce car parking in the Borough as outlined in Policy DM48. The Council's transport policies in general aim to prioritise walking, cycling and public transport as the main modes of transport in the Borough.	No change.
66	Hackney Councillor		66.1	Chapter 8 Transport	DM47		There should be more cycle parking facilities in town centres particularly on Hoxton Street	Comment noted. The Council seeks to promote and encourage more cycle facilities in all town centres, which includes Hoxton Street as stated in the second, third and fourth bullet points of Policy DM47.	No change.