

HWM/LT/DP2832

8<sup>th</sup> September 2014

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Dear Ms Copsey

**WRITTEN STATEMENT IN RESPECT OF THE EXAMINATION OF THE HACKNEY  
DEVELOPMENT MANAGEMENT LOCAL PLAN**

**On behalf of Rocket Investments**

We act on behalf of our client, Rocket Investments, and wish to make the following written statement in respect of the above document. Similar comments were made directly to London Borough of Hackney in September 2013 and it is considered that these remain applicable for the reasons set out below:

**Draft Policy DM1- High Quality Design**

We object to part (ii) of draft Policy DM1, which states that development should respect the established scale and massing of an area. Such a policy could be read to prevent taller buildings and is not consistent with part (v) of this policy, which states that development should 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.

The current wording is potentially restrictive and at odds with the National Planning Policy Framework which requires local plans to *“proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs”*.

We propose that part (ii) of draft Policy DM1 be revised to be consistent with the aims of the NPPF and the working of part (v) of draft Policy DM1 and read as follows:

*“development should respond to and be compatible with the established scale and massing of an area, having regard to the particular circumstances of the site”*.



## **Draft Policy DM7 (New Retail Development) and DM11 (Night Time Economy)**

Both of the above policies promote Class A1 retail development (DM7) and Class A3-A4 uses (DM11) within town and local centres. Both of the policies should also enable the provision of Class A1 retail and Class A3-A4 uses within the Central Activities Zone, especially at ground floor level as part of wider mixed-use schemes.

The NPPF sets out that planning policies should aim to create places with active street frontages.

Our Client has recently gained consent within the CAZ for redevelopment of the site at '127, Crown House, 145 City Road and 37 East Road'. The scheme includes 943 sq m flexible Class A1/A3 retail at ground floor level, which will provide activity and a sense of place as part of the wider scheme. The Class A1/A3 aspect of the proposal were considered by the applicant and the Council to be an important aspect of the development providing a valuable and active use as part of the major mixed use development, which would encourage residents and office workers to remain within the development site. Retail use is also promoted within the CAZ in Policy 2.10(f) of the adopted London Plan and the above two policies within this document should be amended to be consistent with the aspirations of the NPPF and the adopted London Plan policy.

It is proposed that the first sentence of Policy DM7 is amended as follows (change underlined);

*"The Council will seek to ensure that retail uses (Use Class A1) are predominantly located within all its designated town centres and the CAZ".*

It is proposed that the first sentence of Policy DM11 is amended as follows (change underlined);

*"Evening and night-time economy uses, including restaurants and cafes (A3), drinking establishments (A4), take-aways (A5), assembly and leisure (D2) and some sui-generis uses, should primarily be located in the Borough's Major, District and Local Shopping Centres and the CAZ".*

## **Draft Policy DM17 – Development within Primary Employment Areas (PEAs)**

The policy also states that proposals for development that are within the Shoreditch and Wenlock PEAs and the Central Activities Zone (CAZ) to redevelop office floorspace must re-provide, and should result in an increase of office floorspace compared to the existing amount.

Part (iv) of this draft policy states proposals to redevelop office floorspace in the Shoreditch and Wenlock PEAs and CAZ must re-provide, and should result in an increase in the amount of existing office floorspace.

We consider that this policy is too prescriptive and at odds with the NPPF which requires Local Plans to have "*sufficient flexibility to adapt to rapid change*".


The policy should not be based solely on the level of office floorspace proposed and should also take into consideration other factors such as that proposed office redevelopment can result in significantly improved office floorspace compared to the existing offer, which meets the requirements of the current market and can also be flexible to enable a wide range of occupiers.

It is proposed that para. 3 of Policy DM17 should be more flexible in accordance with the NPPF and amended as follows:

*"The amount of commercial floorspace proposed should match existing or preferably result in a significant uplift in floorspace, or result in a significantly improved quality of office floorspace compared to the existing".*

We trust that the above is all in order. Should you have any queries please contact Hugh Morgan or Luke Thrumble of DP9 Limited.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'DP9' with a stylized flourish.

**DP9 Limited**