

**The following comments to the LLDC Draft Local Plan have been prepared by the Hackney Wick and Fish Island CIG Planning sub-group. They concern those elements of the Draft Plan that relate to Hackney Wick and Fish Island.**

We believe that the development of the Local Plan provides an excellent opportunity to foster a creative, affordable and sustainable neighbourhood. As detailed below, we think the current Draft does not appropriately address some of the key issues concerning the future of the area. We would like to see greater emphasis in policies that work towards the sustainability of an affordable ecology that over the years has allowed the development of a thriving artistic and cultural scene spanning several generations of practitioners. Supporting such community-led regeneration, we believe, could provide a blueprint for similar scenarios across Britain and the world – one which feeds from, rather than overtakes, grassroots dynamism.

## **Strategic Policies (pp. 39-44)**

### **SP.2: Housing**

This policy refers to housing that is designed to be built to the local context and character. This local character needs to be documented in detail, many schemes seen to date by the PDG have referred to local character of the HWFI area as a pastiche warehouse typology. This interpretation is literally skin deep - the local context is one of a complex mix of public and private spaces and has been successfully documented in publications commissioned by LLDC (Notably Richard Browns work), these commissions need to be highlighted as representative of the intrinsic character of the HWFI area and similar qualitative guidance documents should be commissioned for other areas around the Olympic Park.

The work by Richard Brown also highlights Live-Work as a key component of the character of HWFI - we wholeheartedly believe in the value of live work and would urge LLDC to write strong policy guidance to support managed sustainable live-work as both a part of Hackney Wick but also a tool for creating affordable environments that support entrepreneurialism.

Please use the evidence gathered in the 'Hackney Wick and Fish Island design and planning guidance' by MUFF DRMM AZ Urban Studio, as well as Richard Brown's 'HWFI Creative Factories' to inform what defines 'local context' within SP.3: The built Environment and SP.4: The Historic Environment

## **Business, Economy and Employment (pp. 45-63)**

### **Employment Hubs - pp. 50-51, fig 5.1:**

We support the designation of a hub north of Hackney Wick Station (Hub 5), but think it should be extended to the south of the station (between the current hubs 5 and 10). The artistic/creative uses of these hubs should be amplified via a clear commitment to providing affordable workspace and supporting live/work where appropriate. As acknowledged in p. 148, "South of Hackney Wick Station... artisan uses predominate and this needs to be maintained".

Employment Hub 10 which is currently defined as an area south of the greenway should also be extended northwards to include a large part of Fish Island which has a character similar to the description of Hub 10 though this area of Fish Island may also be represented by a separate area designation that has characteristics that transition between the nature of area 5 and area 10.

#### **Policy BEE.4: Employment Uses in other locations: (p54)**

Paragraph 5.12 highlights an extremely important point regarding management of proposed employment uses and whilst this is taken forward into Policy BEE.4 the management aspect should be explicitly stated within the policy itself. Demonstrating demand is important but developments should be required to show how the proposal will be managed to ensure that it continues to be viable (and also affordable if designed as such). This management plan should take a long term view of development and where proposals are from developers with an intent to sell post construction, they should be encouraged to partner with a management organisation at an early stage..

#### **Policy BEE.6: Managed and Affordable Work Space: (p. 55)**

Details of affordable workspace should be a planning requirement rather than being left to s106 negotiation, which would happen after planning consent has been granted. All planning submissions should include details of management strategies and rent levels. (This may be what is happening at the McGrath site and should be further developed in the Local Plan). Management of affordable workspace should not be limited to larger studio providers, HW&FI is home to many independent studio manager/providers and collectives, who form a long term sustainable community in the area, these local organisations are to be actively engaged with as a means to ensuring locally driven development.

A further policy in the BEE section should be added for live/work for Hackney Wick and Fish Island. The area currently thrives with creative practitioners working through a live/work arrangement, and this constitutes a key ingredient of the ecology of the neighbourhood that cannot be lost or left unprotected (this is acknowledged in p.149 "610 studios (including live/work)"). The HWFI CIG is keen to work with LLDC and developers to develop workable frameworks for affordable work space and live/work management. Several formulas are currently being explored.

#### **Interim Use**

The interim use of vacant land/buildings for affordable workspace should be encouraged and favoured, but only if the interim period is of substantial length, i.e.3-5 years.

What were the findings of the LLDC investigation into artistic practices?

## **6. Housing**

The second draft of the local plan should acknowledge the result of consultations on both the London Plan and the Housing SPG which are currently out to consultation in their own rights.

#### **Specialist Housing Needs pp. 77-79**

The points made in this section are valid and we fully support them however the list of specialist housing should look in more detail at some of the alternative communities that presently exist in the fringes of the LLDC area, notably the live-work/warehouse collective based communities in HWFI but also the community of people that live on the waterways that in many senses define the Legacy Corporation Area. Whilst neither of these examples are traditionally part of a local plan the Legacy Corporation is not a traditional body and should seek to support ALL of the unique communities that currently exist within it's boundaries.

Specialist and alternative housing should also include reference to co-housing and self/custom-build schemes. It is vital that LLDC develop policies that support and encourage the development of these alternative housing models in order to fully support the diverse community within its boundary. The local plan should acknowledge that in the context of a diverse population that alternative housing models can fulfil needs that are otherwise

unfulfilled by the traditional housing market. It should also be acknowledged that these alternative models might not fulfil all the criteria .

## **Sub Area 1 - Hackney Wick and Fish Island (pp. 146-166)**

### **Vision for Sub Area 1 (p. 151):**

The statement does not sufficiently stress the importance of retaining the existing and vibrant community of practitioners. We believe all future plans for the area should start from an acknowledgment of these cultural and artistic practices, which have given the area the character it is known for. In relation to this, we support the active yard spaces proposal.

### **Fish Island Mid and North (p. 152):**

This is an encouraging paragraph which speaks to this groups' vision. It should however make more explicit mention of the retention of existing affordable studio space.

### **Fish Island South (p. 153):**

Policy BEE.6 should be applied to this area

### **Hackney Wick Station (p. 153):**

The idea of a new neighbourhood centre is compelling, albeit presented in a generic fashion which does not establish a productive dialogue with the singularity of the area or its current creative and artistic uses: "Around the station there is the potential to establish a neighbourhood centre comprising a wide range of business and other employment uses and new homes, in addition to the range of retail, service industry, cultural and community uses that might be expected in such a centre."

The local plan should clearly define how the new centre would contribute to the existing social fabric as opposed to annihilating it.

12.17: what area of affordable studio space will LLDC be requiring? This should be added to 12.17.

### **Policies for the sub area: SA1.1: Building heights (p. 156):**

While the proposed baseline height of 2-6 storeys is appropriate, the inclusion of "exceptional circumstances" in which this may be bypassed ("either where they are close to the Neighbourhood Centre or where they relate well to the surrounding form of development and street environment") is highly problematic. First, these are rather vague circumstances; secondly, it could potentially sanction previous malpractice by considering it an established feature of the landscape.

### **Site allocations: Neighbourhood Centre (p. 164), Fish Island South and Fish Island North (p. 165):**

It is of pivotal importance that these areas have policy designation BEE6 (affordable workspace). Hub 5 should be extended to the south of the extension, and be designated BEE6 as well. A new live/work BEE designation is required (see comments above).

## **The 'Live/Work' Typology**

The 'unofficial' Live/Work hybrid typology must be acknowledged and supported within the local plan. Live work in HWFI, is an affordable solution for young practitioners and graduates to find time and space to develop resilient creative businesses. It is the responsibility of the LLDC to engage with the issue of how this 'unofficial' typology is managed and supported.

Live-Work should form a key component of Strategic policy for Sp.2 Housing and Sp.1 business, economy and employment in sub area 1.

**London, 5 Feb 2013**

**The HWFI Planning and development group is made up of local professionals in the field of art, design and planning and is part of the Hackney Wick CIG.**

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