

Adoption and Consultation Statement for the London Legacy Development Corporation Hackney Wick and Fish Island Supplementary Planning Document (March 2018)

In accordance with Regulation 14 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the London Legacy Development Corporation in its role as Local Planning Authority for its administrative area gives notice that it has **adopted** its Hackney Wick and Fish Island Supplementary Planning Document on **22nd March 2018**. The adopted supplementary planning document and associated documents can be viewed on the Legacy Corporations website at [insert web address]. These can also be viewed in person at the Legacy Corporations offices by prior appointment at the following address: <http://www.queenelizabetholympicpark.co.uk/planning-authority/planning-policy/supplementary-planning-documents>

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Consultation

Public consultation was undertaken between 25th July and 31st October 2016 with all parties whose details were held on the planning policy consultation list being notified by letter and/or email. The list comprises a range of statutory bodies, other bodies and organisations, including local organisations, businesses and individuals that have requested that they are consulted on planning policy matters when responding to previous consultations.

The consultation document and information on how to respond to it was also placed on the Legacy Corporation website and a paper copy made available for inspection in person at the offices of the London Legacy Development Corporation.

Seven hundred and thirty-nine individual responses were received in writing as a result of the consultation and the responses received are summarised at Appendix 1 to this statement.

Modifications

A number of modifications have been made to the supplementary planning document as a consequence of the consultation undertaken and these are set out as part of Appendix 1 to this statement.

Judicial Review

Any person with sufficient interest in the decision to adopt this supplementary planning document may apply to the High Court for permission to apply for judicial review of that decision. Any such application must be made promptly and in any event not later than three months after the date on which this supplementary planning document was adopted.

Appendix 1: Hackney Wick and Fish Island SPD Consultation Summaries and Responses

No.	Name & Organisation	SPD section page/issue	Summary of consultation comment/issue	Response to comment	Changes proposed to SPD
1.	Ref: 001 Highways England	-	No specific comments provided	-	-
2.	Ref: 002 Health and Safety Executive	-	No specific comments provided	-	-
4.	Ref: 003 Natural England	-	Natural England does not consider that this Hackney Wick & Fish Island SPD poses further risk or opportunity in relation to our statutory purpose and so does not wish to specifically comment on this consultation.	-	-
3.	Ref: 004 Thames Water		<p>Proposed Change to SPD Thames Water recommends that developers engage with them at the earliest opportunity to establish the following:</p> <p>The developments demand for water supply and network infrastructure both on and off site and can it be met;</p> <p>The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and</p> <p>The surface water drainage requirements and flood risk of the development both on and off site and can it be met</p> <p>Thames Water consider that text along the lines of the following should be added to the SPD:</p> <p>“Water Supply, Wastewater & Sewerage Infrastructure</p>	Adding the specific wording requested would simply repeat parts of Local Plan Policy S.5 Water supply and waste water disposal. However, it would be appropriate to provide a short reference to the need to take these issues into account and engage with Thames Water on a scheme by scheme basis along with a cross reference to Policy S.5.	<p>Flooding and Drainage section to be renamed “Water, flooding and drainage”.</p> <p>Add additional paragraph:</p> <p>“Policy S.5 Water supply and waste water disposal requires major development proposals to demonstrate that there is sufficient existing or planned water supply and waste water disposal infrastructure or that capacity improvements are part of the scheme. Early engagement with Thames Water is recommended.”</p>

			<p>Developers will be required to demonstrate that there is adequate water supply, waste water capacity and surface water drainage both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing water and/or waste water infrastructure.</p> <p>Drainage on the site must maintain separation of foul and surface flows. Where there is an infrastructure capacity constraint the Council will require the developer to set out what appropriate improvements are required and how they will be delivered.</p>		
4.	Ref: 005 Environment Agency	Public Realm, Open Space and Waterways	<p>We support many of the design principles put forward in this section, particularly those that make specific reference to improving and enhancing the waterways for biodiversity and drainage. Policy BN2 of the Local Plan includes “Support the aims of the Thames River Basin Management Plan” and we think this section would benefit from setting out how the aims of the TRBMP can be achieved for this area. We would expect developments to consider the TRBMP aims and actions when designing developments next to the waterways and so the SPD should be enabling that to happen by providing more detail.</p> <p>The “Locations and Designations” list on page 21 doesn’t list the River Lea Navigation as designated watercourse for the Water Framework Directive. The Water Framework Directive should be considered a way in which waterways have been designated as the current ecological condition of the waterways and</p>	<p>Support for the design principle expressed is welcomed.</p> <p>Agree that reference to the WFD be added to the text.</p> <p>While noting the desirability of an 8 metre zone along the banks of the River Lee/Lee Navigation, the scale of the illustration within the SPD would not make this possible in an accurate and representative sense.</p> <p>Agree that a reference to the opportunity to improve the connection between rivers and their floodplains should be</p>	<p>Add the following to the Locations and Designations list: “<i>Water Framework Directive - River Lee and Lee Navigation are designated as a WFD waterbody</i>”.</p> <p>Add the following to the “Strategic Green Linkages” section (page 23 of the</p>

		<p>actions identified to attain good ecological status (or potential) are set out in the TRBMP. You could simply insert <i>“Water Framework Directive – River Lee and Lee Navigation are designated a WFD waterbody.”</i></p> <p>The “Open Space and Waterways” map on page 22 should label the waterways e.g. Hertford Union Canal, Lee Navigation, River Lee, etc. It should also highlight the WFD designated River Lee/Lee Navigation in a specific colour or pattern so it is easily distinguished on the map. We would also welcome an 8 metre zone marked on either side of the River Lee/Lee Navigation to demarcate the area in which a natural green corridor should be protected (more comments on this below).</p> <p>The “Strategic green corridor linkages” makes note of some local green assets. The waterbody wide actions include aspirations to improve floodplain connectivity with Hackney Marshes and Wick Field (see enclose the Waterbody Summary Report for River Lee). To reflect this we suggest a sentence is added that states <i>“There is also an opportunity to improve the connection between rivers and their floodplains at Hackney Marshes and Wick Field.”</i> This links with the infrastructure project identified for the Hackney Marshes to alleviate flood risk in Hackney Wick which may also improve drainage and enhance biodiversity. As a general point it would also be good to tie the strategic aims with the Lee Valley Regional Park Authority Biodiversity Action Plan.</p> <p>The “Enhancing Green Corridors” initial scene setting paragraph could be improved by inserting the following in <i>italics and underlined</i> after the first sentence: <i>The River Lee/Lee Navigation is currently failing to meet Water Framework Directive standards</i></p>	<p>added in the context of Hackney Marshes and Wick Field.</p> <p>Agree that additional text to “Enhancing Green Corridors” section to address water quality issues would be appropriate</p>	<p>consultation draft SPD: <i>“There is also an opportunity to improve the connection between rivers and their floodplains at Hackney Marshes and Wick Field.”</i></p> <p>Add the following text to first paragraph of “Enhancing Green Corridors” section (page 23 of consultation draft SPD)</p>
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		<p>(classification in 2015 is “bad”) due to a combination of pollution from sewerage discharges, urban runoff and hard engineered walls and structures. Maintenance of the high quality habitat areas along with opportunities to expand and improve the River Lee and these corridors are present through:</p> <p>This enables the audience to understand that the WFD context for the River Lee is an important aspect of enhancing green corridors and this leads onto the design principles below. We support the measures you have already listed and we suggest this includes the following additional design measures <i>in italics and underlined</i>:</p> <ul style="list-style-type: none"> • <u>Linking and enhancing existing green assets with the creation of new green spaces and corridors</u> • <i>Appropriate waterway edge treatment including native planting and reedbeds</i> • <u>Re-naturalise waterways where appropriate by removal of hard banking and obsolete structures</u> • <i>Setting new development back from the waterway edge/tow path <u>aiming for a minimum of eight metres</u></i> • <i>Concentrating green roofs <u>and sustainable drainage systems</u> within new development along these corridors</i> • <u>Managing and preventing the spread of invasive species</u> • <u>Designing lighting to minimize the impact on sensitive habitat</u> <p>The additions are quite specific but we feel this is appropriate for the SPD. The eight metre minimum setback is a standard requirement we have to ensure access can be maintained for</p>	<p>Additional text to list on page 23 of the consultation draft SPD is agreed. However, a setback along the western edge of the Lee Navigation in particular of eight metres has the potential for compromising the existing and future urban context. Further qualifying text is therefore inserted.</p>	<p>“The waterways, parkland and other green edges within and around Hackney Wick and Fish Island present the opportunity to enhance the local wildlife and habitat linkages that these create. <u>The River Lee/ Lee Navigation is currently failing to meet Water Framework Directive standards due to a combination of pollution from sewerage discharges, urban run-off and hard engineered walls and structures.</u> Maintenance of the high quality habitat areas along with opportunities to expand and improve these corridors are present through:”</p> <p>Amend text in “Enhancing Green Corridors” section:</p> <ul style="list-style-type: none"> • <u>Linking and enhancing existing green assets with the creation of new green spaces and corridors</u> • <i>Appropriate waterway edge treatment including native planting and reedbeds where <u>appropriate</u></i> • <u>Re-naturalise waterways where appropriate by</u>
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		<p>maintenance and inspection of flood defence assets or emergency removal of blockages. It also provides a green corridor to allow movement of wildlife and create habitat. Whilst we appreciate eight metres cannot always be achieved we expect this to be a minimum to aim for and compensated for where it cannot be achieved. Even where previous developments on site or in the vicinity have not achieved this setback, developments should aim to improve the buffer width to give greater space for drainage, potential flooding, access and enhanced habitat. It contributes to enhancing strategic green corridors and lessens vulnerability to future climate change impacts such as increased flood risk from heavy rainfall. We appreciate that it will not always be appropriate to remove hard banking along the River Lee particularly the navigable section. However, where it can be achieved it will make a significant contribution to the river achieving more natural conditions and encouraging aquatic habitat to thrive. Obsolete structures refers to structures along the river which may no longer be needed e.g. weirs, and their removal can mean freer movement of fish.</p> <p>A WFD waterbody wide actions for the River Lee is “planting along artificial channel banks to bring back marginal aquatic habitat to the area.” Planted reedbed habitat is a UK BAP priority habitat (http://jncc.defra.gov.uk/page-5706) which we encourage for the River Lee in this area.</p> <p>Other waterbody wide actions include the following:</p> <p><input type="checkbox"/> Improve the drainage from the A12 including installation and upgrading interceptors</p>		<p><u>removal of hard banking and obsolete structures</u></p> <ul style="list-style-type: none"> • <u>Setting new development back from the waterway edge/tow path aiming for a minimum of eight metres where the context is appropriate</u> • <u>Concentrating green roofs and sustainable drainage systems within new development along these corridors</u> • <u>Managing and preventing the spread of invasive species</u> • <u>Designing lighting to minimize the impact on sensitive habitat</u>
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			<input type="checkbox"/> Misconnections rectified for polluted surface water catchments <input type="checkbox"/> Improvements to or removal of Combined Sewer Outfalls <input type="checkbox"/> Improve highway runoff management The SPD also make reference to these, as its possible developments in Hackney Wick and Fish Island could contribute to solving some of the problems with point source pollution such as sewerage discharges or diffuse pollution from highways runoff.		
5.	Ref: 005 Environment Agency	Flooding and Drainage	We acknowledge the intention to populate this section with up-to-date recommendations from the flood risk study you are currently undertaking. We want this section to assist developers in understanding how flood risk can be reduced and managed in this area, in a way that helps them to implement policy S8 “Flood Risk and Sustainable Drainage Measures” of the Local Plan. Under “Flood Risk in Hackney Wick and Fish Island” there is a scene setting paragraph explaining the risk of fluvial and surface water flooding. We recommend this is updated once the flood risk study is finalised and to perhaps explain the flooding characteristics in more detail, for example, potential depths of flooding across the area, the condition and location of flood defences. Climate change should be mentioned here as an important aspect to be considered when designing for flood risk in this area, as we are more likely to experience extreme rainfall events in the future. We suggest	The ARUP Flood Risk Study has now provided a review the approach to flood risk in this and other locations within the LLDC area. The general principles set out in the consultation draft SPD remain unchanged. However, reference to the more detailed advice for specific site allocations in the ARUP report has been added along with new text highlighting the importance of flood risk as a consideration in parts of Hackney Wick and Fish Island. Environment Agency text changes have also been included.	Final sentence of first paragraph (page 27 of consultation draft SPD): <i>Proposals for new development will need to take account of that flood risk in how they are designed and also ensure that flood risk levels are not worsened <u>aim to achieve a reduction in flood risk.</u></i> Additional paragraph added before the ‘Guidance Principles’ section (page 27 consultation draft SPD): <u>“Flood Risk Information and Guidance</u>

		<p>the final sentence is amended to read <i>“Proposals for new development will need to take account of that flood risk in how they are designed and aim to achieve a positive reduction in flood risk.”</i></p> <p>The “Guidance Principles (development within Flood Zones 2 & 3)” on page 27 are useful and we suggest again they will need to be reviewed/refreshed if needed in light of the recommendations from the flood risk study. What is not mentioned is the climate change allowances guidance published earlier this year in February and from recent experience this has proven to be an important and challenging element of the assessment and design of risk in this area. We recommend you amend the first bullet point to read: <i>A site specific Flood Risk Assessment would be required which includes an appropriate assessment of climate change risk.</i></p> <p>We ask that you make a specific reference to the “Flood risk assessments: climate change allowances” guidance on gov.uk (https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances) in this section. This could either be as a specific bullet point in the guidance principles or as a separate paragraph. The assessment of flood risk may look at a range of climate change allowances and then the appropriate allowance (based on development type/vulnerability and lifetime) should be used to design and mitigate for future flood risk impacts.</p> <p>The reference to ‘resistance’ in the 8th bullet point should be removed. Discussions as part of the Hackney Wick Masterplan have shown that due to the predicted climate change flood heights ‘resisting’ flood water is likely to be dangerous (due to water pressure on walls) and</p>		<p><u><i>The current Strategic Flood Risk Assessments (SFRAs) published by London Boroughs of Hackney and Tower Hamlets will be important sources of information for assessing flood risk. A Flood Risk Review report has also been prepared by ARUP for the Legacy Corporation which includes up dated detailed flood risk guidance for relevant individual site allocation. The report can be found on the Legacy Corporation website at [INSERT LINK].”</i></u></p> <p>Amend first bullet point:</p> <ul style="list-style-type: none"> • <u><i>A site specific Flood Risk Assessment would be required which includes an appropriate assessment of climate change risk.</i></u> <p>Add new bullet point after the first:</p> <ul style="list-style-type: none"> • <u><i>Flood risk assessments will need to take account of climate change risk by incorporating the climate</i></u>
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			<p>instead water will need to enter most ground floor buildings. Therefore the focus needs to be on flood resilience measures.</p> <p>In “General Principles (all development)” for consistency, bullet point 3 on “Set back of development along water front areas” should reflect the earlier section on open space and waterways by being specific as to the set back that should be aimed for. We recommend this is changed to read:</p> <p><i>“Set back of development along water front areas to aim for a minimum eight metre wide buffer strip.”</i></p>		<p><u><i>change allowances specified within the national guidance at www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances.</i></u></p> <p>Add following to bullet point 5:</p> <ul style="list-style-type: none"> • Development within areas shown to be at ‘actual’ risk of flooding may require compensatory storage to demonstrate there will be no loss of floodplain storage. <u>Early dialogue with the planning authority and Environment Agency on the approach this and to building footprints is recommended.</u> <p>Amendment to bullet point 8:</p> <ul style="list-style-type: none"> • <i>Incorporation of flood resistance/resilience measures up to the flood level</i> <p>Amend final bullet point:</p>
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					<ul style="list-style-type: none"> • <u>Set back of development along water front areas, aiming for a minimum of eight metres where the context is appropriate</u>
6.	Ref: 005 Environment Agency	Projects and Improvements	In "Projects and Improvements" we welcome the reference to the Hackney Marshes flood alleviation project. It is possible that the borough's Surface Water Management Plans have identified specific flood risk mitigation measures to alleviate surface water flooding. It would be useful if this SPD could identify these (where relevant) and on a map as its possible developments could ensure their delivery to improve the drainage and lower surface water flooding risk in the area.	No specific flood risk mitigation measures beyond those guidance principles included within the SPD text have been identified. However, additional text has been added to highlight the borough Surface Water Management Plans and the Critical Drainage Area at Hackney Wick.	<p>Add additional paragraph to follow "Flood Risk Information and Guidance section first paragraph:</p> <p><u>"Surface Water Drainage Hackney Wick is within Critical Drainage Area (CDA). The LB Hackney Surface Water Management Plan should be taken into account when carrying out development specific flood risk assessment."</u></p>
7.	Ref: 006 Bell Cornwell on behalf of Gasfun Properties Ltd	Fish Island Mid	The thrust of our previous representations was that policy for the area around and including our client 's property should make greater provision for the inclusion of residential uses as part of any mixed use redevelopment of the area. We therefore welcome the more flexible tone of the SPD which makes greater provision for housing to be provided across the area than earlier policy documents. For example, we note that within mixed use areas, which is shown as including the whole of Dace Road (see page 11) new residential development will be allowed "alongside and over new and retained employment uses" and within the Fish Island Mid sub-area which is also shown as including the whole of Dace Road (see page 43) the strategy for the development of unallocated sites envisages <i>"smaller mixed use development</i>	Where support is expressed for the approach in the SPD this welcomed. However, no additional flexibility to the policies in the Local Plan are proposed as this would represent a change in the adopted Local Plan policy. The 'inconsistency' in the identification of the site in question is related to the fact that this is within the Local Plan policy designation of 'Other Industrial Location' within the Local Plan and so the SPD takes an approach of relating its description based on the designation rather than	No change proposed

			<p><i>replacing existing employment floor space and providing new residential development ... '.</i></p>	<p>the absolute geographic character of Fish Island Mid. As the OIL designation does indicated the potential for inclusion of elements of residential development within such a designated location, it is considered that the approach taken in this instance is the correct one. The relationship of the site to the its surroundings within Fish Island-mid would need to be considered in developing an appropriate scheme should the site come forward for development but it is not considered that this needs such a specific reference within the SPD.</p>	
8.	Ref: 006 Bell Cornwell on behalf of Gasfun Properties Ltd	Fish Island Mid/Fish Island South	<p>However, there does seem to be some inconsistency of approach with regard to the precise policy position which is proposed to apply to the land to the west of Dace Road. For example, we note that whilst many parts of the SPD show this land as being within the Fish Island Mid sub area a number of drawings (for example those on Page 44 of the document) do show a black line which implies that the land on the western side of Dace Road (and which includes our clients land) is actually excluded from the Fish Island Mid Area sub area. We also note that Figure 1 '<i>Employment Character Areas1</i>' identifies this area as being located within area type 5 '<i>Other Industrial Locations</i>' rather than within area type 4 '<i>Fish Island Mid</i>' which is identified as being a mixed uses area where employment uses can be</p>	See above	See above

			<p>provided alongside housing, retail and community space.</p> <p>We note the SPD does allow the possibility of residential uses being allowed within '<i>Other Industrial Locations</i>' and our client supports this provision. However, in our view it is illogical for any part of Dace Road to fall within area type 5. It is physically and visually separated (by both distance, the barrier effect of the Greenway and changes in levels) from the existing industrial area to the south to which area type 5 generally relates and therefore represents an illogical 'outlier'. Notwithstanding the factual basis for including the land within Fish Island Mid, the current inconsistency makes it difficult to clearly discern the precise policy approach which should be adopted with regard to future development potential in this part of Fish Island. In our view, all parts of the SPD should therefore identify the land west of Dace Road as being within the Fish Island Mid sub-areas with a consistent approach being applied to all relevant policies such as those on housing and employment.</p> <p>In summary therefore, our client supports the emphasis on the increased provision of housing across Fish Island including those areas which are proposed to be designated as being within the Fish Island Mid and Other Industrial Locations. However, they consider that the land to the west of Dace Road within Fish Island should be clearly and unequivocally be identified as being within Fish Island Mid rather than any other part of the SPD area.</p>		
11.	Ref: 007 Historic England	Heritage and	Historic England supports the LLDC's intention to produce detailed design guidance to help manage development change within Hackney	Support welcomed.	-

		townscape	Wick and Fish Island. We are pleased to note the identification of heritage-led regeneration and high quality design as a priority for the area, and that the Heritage and Townscape and Townscape and Character are addressed in specific sections. The document recognises the unique and varied industrial landscape of the area, which creates both significant challenges and opportunities which must be carefully balanced if new development is to preserve and enhance the historic environment, whilst delivering the wider growth aspirations.		
10.	Ref: 007 Historic England	Heritage and townscape	The area comprises of two conservation areas "Hackney Wick" and "Fish Island and White Post Lane". These are noted to possess mutual heritage values reflecting the growth of 19 th century industrial development along the canal. Hackney Wick has recently been subject to a detailed masterplan process in response to its more fragmented townscape and the greater envisaged change within and around the conservation area. It would therefore be useful to signpost the (emerging?) Masterplan and set out how the various guidance documents are linked.	The Hackney Wick Central Masterplan planning application is linked through a reflection of the two dimensional strategy and principles within that part of the Neighbourhood Centre. The Local Plan and therefore the SPD does not in itself suggest or require a masterplanned approach to development in this location. It is not considered necessary to establish an explicit link between the masterplan planning application and the SPD guidance as it will also be possible for individual development proposals to come forward and gain planning permission within this location and meet the policy requirements.	No specific change proposed.
11.	Ref: 007 Historic England	Heritage and townscape	The Guidance would benefit from further clarification in respect to the setting of historic assets, particularly the setting of conservation areas and the canals .These are sensitive to the	For both Hackney Wick and Fish Island it is not considered necessary for the SPD to repeat the strategy and	Add Amended text references with hyperlinks to each relevant Historic England Document:

			<p>impacts of tall buildings and it would be useful to clarify in the guidance where, and if, these are considered appropriate. The Hackney Wick Masterplan seeks to do this within the Hackney Wick conservation area and it would be sensible to provide more defined guidance for the wider area. We would recommend reference to the criteria set out in our Historic England Advice Notes 3 and 4, The Setting of Heritage Assets and Tall Buildings.</p>	<p>approach within the Local Plan and the conservation area assessments and management guidelines in detail within the SPD as references and links to these are provided. However, some minor text changes are proposed to clarify the importance of these when developing or assessing development proposals. Reference to the Historic England advice notes and criteria will also be included.</p> <p>In respect of references to height of the built form within this section additional text is proposed for inclusion in the Key Local Plan Policies section for Policy BN.10.</p>	<p><i>“Heritage Assets Heritage assets are also identified within Figure 3. Any development proposal that is likely to have an effect on the identified heritage assets or their setting will need to be developed and assessed in accordance with the most up to date Historic England guidance ‘Managing Significance in Decision-Taking in the Historic Environment - Historic Environment Good Practice Advice in Planning: 2 (Historic England, March 2015) and this may include the need for a specific assessment of significance in accordance with this guidance. <u>Other guidance relevant guidance published by Historic England that should be applied in relevant circumstances includes ‘The Setting of Heritage Assets, Historic Environment Good Practice Advice in Planning: 3’ and ‘Tall Buildings: Historic England Advice Note 4’.”</u></i></p>
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					<p>Insert following text to the section of text on Policy BN.10:</p> <p><i><u>“For Hackney Wick ad Fish Island, the Local Plan sets a height of 20 m above ground level above which development proposals will need to demonstrate that they meet the tests set out in the Policy. Meeting the tests within the policy will be of importance in demonstrating that any built height greater than this would not be significant enough to harm the character of the sub area or immediate surroundings.”</u></i></p>
12.	Ref: 007 Historic England	Heritage and townscape	A number of the heritage assets within the conservation areas are in need of positive viable uses which will secure their long term preservation and repair. We would therefore encourage the inclusion of guidance to help secure the retention and repair of these assets in accordance with Policy BN.16. This might include signposting to a positive heritage strategy and the use of S106, CIL or other sources of investment.	Agree that text should be added to encourage the preparation of a heritage strategy for significant development proposals that have an impact on identified heritage assets and encouraging the retention, repair and reuse of those assets where this is possible.	<p>Add the following text to the end of the “Strategy – heritage led regeneration” paragraph at the start of the page (page 29 of consultation draft SPD):</p> <p><i><u>“The retention, repair and reuse of heritage assets, where this is possible, is encouraged as a key part of this approach. Where significant development schemes are proposed that have an impact on identified</u></i></p>

					<i>heritage assets, the preparation of a heritage strategy in line with Historic England Guidance is also encouraged.”</i>
13.	Ref: 007 Historic England	Heritage and townscape	The area encompasses archaeological priority areas and this will need to be taken into consideration in future development. We would therefore suggest that a section identifying the appropriate LLDC Policies and an explanation about Archaeological Priority Areas and the consultation process with Historic England is included.	Add reference to Policy BN.12 and the need to consult Historic England.	Add the following text section below the text on Policy BN.10: <i>“Policy BN.12: Protecting Archaeological interest - much of the Hackney Wick and Fish Island area is within an Archaeological Protection Area (APA). A current APA map should be consulted along with any potential for archaeological interest should be considered when defining the level of evaluation that would be need for a specific development proposal. Consultation with Historic England is advised at an early stage in order to support the approach taken.”</i>
14.	Ref: 007 Historic England	Heritage and townscape	Page 11. Housing 1. The Neighbourhood Centre has been subject to a Masterplanning exercise which seeks to balance densities, character, and the scale and location of tall buildings. It would be helpful to make reference to the availability of more detailed guidance.	See above at 10 for explanation on relationship to the Hackney Wick Central planning application and at 11 for proposed additional text making reference to Historic England guidance.	See proposed new text at 11 in respect of Historic England guidance.

15.	Ref: 007 Historic England	Heritage and townscape	<p>Page 29 Heritage and Townscape. See above. It would be useful to expand where additional guidance/advice is provided, including the NPPF, NPG, CA Appraisals and Management Guidelines.</p> <p>See main comments above. We would recommend reference to archaeological priority areas and the need for developers to take this into account in developing proposals. Further guidelines for best practice are set out in Historic England's Greater London Archaeological Priority Area Guidelines document (2016) https://historicengland.org.uk/images-books/publications/greater-london-archaeological-priority-area-guidelines/ . In addition you may wish to incorporate a summary of the archaeological resource that has been found in Mid-Lea Valley and how archaeological potential has been modelled.</p> <p>Historic England's advice notes are referred to as <i>advice</i> rather than <i>guidance</i> in line with government guidelines.</p> <p>The final paragraph refers to "Conservation Area and Listed Building Consent". Conservation area consent is no longer a requirement within the planning system as this has been integrated into planning permission as part of the Enterprise and Regulatory Reform Act 2013.</p> <p>You may wish to encourage early consultation with your planning/conservation department where applications may require listed building consent.</p>	<p>See changes proposed above in accordance with the Historic England comments above in reference to advice notes, guidance and archaeological priority area guidance.</p> <p>It is proposed to amend final paragraph to remove reference to "conservation area consent"</p>	<p>Amend text as follows to ensure accurate reference to planning permission requirements within conservations areas:</p> <p>"Conservation area and Listed Building Consent <i>It should be noted that the London Legacy Development Corporation is the determining authority for any application for Listed Building Consent or Conservation Area Consent within its administrative area.</i></p> <p><u><i>Early engagement with the local planning authority will be particularly important where a proposed scheme might include a heritage asset or is within or adjacent to one of the two conservation areas."</i></u></p>
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16.	Ref: 007 Historic England	Townscape and Character	<p>Page 31 Townscape and Character</p> <p>In our view it would be beneficial to more clearly state the relationship between the Heritage and Townscape and Townscape and Character sections through a clear summary of the “significance” of the conservation areas and wider local character. This will help better establish that the guidance seeks to reflect the National Planning Policy Guidance which states the desirability of new development making a positive contribution to local character and distinctiveness.</p> <p>Paragraph 2. This could include stating that “positive” character derived from the historic development of industrial buildings of varied scale around internal working yards, with varied scale and character reflecting sequential change and adaptation over time. Character and appearance is unified through a reliance on robust materials and simple detailing with architectural embellishment reflecting the functional hierarchy of the buildings. This is referred to in para.2 but would benefit from more clearly referencing the precedents for local character.</p> <p>Responding to streets. As above, reference to local character would help underpin the guidance. For example, the opportunity to implement a typology of varied development around yards will be to some degree driven by plot size and the hierarchy of streets, which themselves do not respond to a formal grid but reflect the development of industries reliant on the canal with service access, and cross cutting infrastructure. The raised rail-line being a strong physical presence.</p>	<p>Comments noted. While some amendments have been made to this section overall, the intention is for to remain concise. It is therefore considered more appropriate to rely on the already published Conservation Area Appraisals and Management guidelines for detailed identification of significance and precedents in relation to detail of character. These elements and related matters of character, use and building heights are also dealt with elsewhere in the SPD and in reference to the relevant policies in the Local Plan. It is intended that these sections of the SPD provide specific guidance principles rather than reiterate the character and significance to which they relate. Additional references are proposed to make this clear.</p> <p>To this end Appendix 2 as detailed guidance on townscape and public realm has been removed.</p>	<p>Appendix 2 has been removed and this section of the document updated.</p> <p>The following amendment have also been proposed:</p> <p>“Built Form Massing and Grain: The built form of new buildings should respond to the <u>positive and</u> distinct character and urban grain of the Conservation Areas. <u>Reference should be made to the conservation area appraisals and management guidelines in respect of their ‘significance’ and character precedents.</u> The area is characterised by large urban plots composed of multiple and amalgamated buildings and dramatic steps in height between buildings.”</p>
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			<p>Little survives of the original domestic heritage of the area beyond a few narrower linear streets, and the Lord Napier PH and houses on Hepscot Road and Eastway. Outside of the conservation areas this has led to many former domestic terraces being replaced by tall and unbroken walls. The reinstatement of active streets in these locations would help bring active use, meet growth targets and reflect former historic uses.</p> <p>Paragraph 3. It would be helpful to clarify/illustrate what is meant by large scale articulation in this context. The use of large frames and areas of alternating cladding can easily produce poor architectural results, whereas robust materials and a strongly expressed solid to void relationship are more likely to reflect the best attributes of local character (as illustrated on page 59).</p> <p>Paragraph 7 “Facades located on different typical conditions etc.” insert “streets” after different.</p>		
17.	Ref: 007 Historic England		<p>Page 32 Façade Design para 2. Delete “flush”. Flush windows will not bring depth and definition (this is presumably a mistake).</p> <p>Façade Design Para. 4 The sentence “Cast materials...a distinct identity”, would benefit from clarification. Is it intended to say these are appropriate where the manufacturing process is reflected in their appearance eg. board-pressed concrete?</p> <p>We would recommend the reference to “dramatic steps in height” is clarified as between one to five stories. You may wish to add that the</p>	See above at 16.	See above at 16.

			<p>varied townscape also demonstrates a sense of openness accentuated by both low level storage uses, and development sites.</p> <p>Integrated Mix. It would be helpful to state that the focusing of cultural and craft based activity and SME's within the area must also be considered to reflect its legacy of innovation, whilst its growing concentration of bars and restaurants makes it increasingly popular as an exemplar for fostering a vibrant community atmosphere. This is a strong positive element of existing local character.</p> <p>Page 35. Neighbourhood Centre. The character summary fails to identify this area as the central focus of the Hackney Wick conservation area. We would value inclusion of a statement to this effect and that the Local Plan policies on page 29 apply.</p>		
18.	Ref: 007 Historic England		Page 36. Active frontages. In a significant number of locations the canal side acts as café/public house outside seating. You may therefore wish to reflect this activity in respect of this section.	See above at 16.	See above at 16.
19.	Ref: 007 Historic England	Eastway , Trowbridge Estate and Wick Village	Page 41. Eastway, Trowbridge Estate and Wick Village. Strategy Paragraph 1. This area includes the complex of Grade II listed buildings around St Mary of Eton. We would suggest including the requirement that new development respect the setting of this historic cluster in addition to the scale and residential use.	Additional wording is proposed to make reference to this within the 'Strategy' paragraph of this sentence to reference the historic cluster.	Add the following to the end the Strategy section (page 41 of consultation draft SPD): <i>"Any new development would need to relate well to and respect the setting of the complex of Grade II listed buildings at St. Mary of Eton and the wider residential character."</i>
20.	Ref: 007 Historic England	Implementation and Delivery	Page 53. We would encourage the LLDC to consider mechanisms for ensuring that important local heritage assets currently underused and/or in need of repair are delivered	In general development proposals will be expected to address the opportunities for repair and/or re-use within the	Add the following text to form new final paragraph "Planning permission and S106 agreements" section

			<p>alongside the wider regeneration/development of the area. Given the relatively small proportion of historic buildings which make a positive contribution to character and appearance in proportion to areas identified for redevelopment the targeted refurbishment and enhancement of those assets should form a major element of any area wide strategy, in accordance with NPPF Policy requirement for local authorities to set out a positive strategy for the historic environment.</p>	<p>boundary of that proposal, while also demonstrating that there is no substantial harm to the setting of any listed building or conservation are outside of the proposal. It is proposed to add additional text to the "Planning permission and S106 agreements" section to identify the principle of securing mitigation for identified environmental effects, including those effects on the historic environment.</p>	<p>(page 54 of consultation draft SPD):</p> <p><i><u>"Where a development proposal has been identified as having a likely significant effect on an aspect of its surrounding environment, including identified heritage assets, conditions or planning obligations will be used to secure appropriate mitigation measures. In the case of heritage assets this might include repair, refurbishment and/or enhancement of the asset or its setting."</u></i></p>
21.	Ref: 007 Historic England		<p>Appendix 2 We have provided previous comments in respect of the Design Codes and consider these to be robust and well considered.</p>	<p>Support welcomed, however, see above for reference to the new approach that updates text within the body of the SPD and removes Appendix 2.</p>	<p>See above at 16 for revised approach to the content of Appendix of the consultation draft SPD.</p>
22.	Ref: 008 Sport England		<p>Planning Policy in the National Planning Policy Framework identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process and providing enough sports facilities of the right quality and type and in the right places is vital to achieving this aim. This means positive planning for sport, protection from unnecessary loss of sports facilities and an integrated approach to providing new housing, employment land and community facilities is important. The SPD therefore should reflect national policy for sport as set out in the above document with particular</p>	<p>As the SPD does not create any new policies to those already within the Local Plan, it would be inappropriate to make the specific references requested. However, the policies within the Local Plan and its overall strategy focus on achieving outcomes that have health and wellbeing of those living and working in these locations as an integrated consideration. In the context of the SPD providing targeted guidance rather than guidance on every aspect of IN this sense the section on</p>	<p>No specific change proposed.</p>

		<p>reference to Paragraph 73 of the National Planning Policy Framework to ensure proposals comply with National Planning Policy.</p> <p>Sport England considers that the design of where communities live and work is key to keeping people active and placemaking should create environments that make the active choice the easy choice. Therefore, Sport England and Public Health England have produced Active Design Guidance that aims to inform the urban design of places, neighbourhoods, buildings, streets and open spaces to promote sport and active lifestyles. The guide sets out ten principles to consider when designing places that would contribute to creating well designed healthy communities. Sport England recommends that these principles are incorporated within the SPD. More information, including the guidance, can be found via the following link;</p> <p>http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/</p> <p>In this regard, Sport England welcomes the area wide policies that focus on new or improved walking and cycling routes, improving the role of the waterways for leisure, protecting and enhancing existing open and green spaces for leisure and play, delivery of open space and the promotion of youth space. Sport England would advise that all the relevant principles of Active Design are reflected in the SPD, especially in relation to design and layout.</p>	<p>Youth Space within the SPD does provide specific target guidance that promotes activity within the environment in addition to the range of Local Plan policy on open space, health and well-being and increasing levels of walking and cycling through local connectivity and form of development. Therefore, no specific change is proposed to the SPD in this respect.</p>	
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			Overall, Sport England have reviewed the Hackney Wick & Fish Island SPD (Consultation Draft) and do not raise an objection.		
23.	Ref:009 (Private individual)	Infrastructure and connectivity	Number 7 bridge on the route network on page 14 of the HWFI supplementary planning document should not be built. There is a perfectly good road/pedestrian bridge at White Post Lane and a pedestrian bridge at Swan Wharf suitable for wheelchairs. Please save Vittoria Wharf and read their proposals for a community.	See specific response to bridges H14 and H16 within the separate Save Hackney Wick representation response table.	See specific response to bridges H14 and H16 within the separate Save Hackney Wick representation response table.
24.	Ref:009 (Private individual)	Infrastructure and connectivity	Pedestrian Crossings urgently needed across the A12 at Wick.	While the Local Plan does promote improved pedestrian, cycle and wider highway connectivity, introduction of specific measures such as pedestrian crossing remain the responsibility of the London Borough of Tower Hamlets as the Highways Authority. However, it would be appropriate to include reference to the potential for including safe pedestrian crossing a part of existing and new routes through the SPD area.	Add the following text to the end of "Key interventions and connectivity projects" section (page 13 of consultation draft SPD): <i><u>"Consideration will need to be given to the provision of new or improved pedestrian crossings as part of programmes to provide new or improved safe pedestrian and cycle routes as these schemes are programmed and designed in conjunction with Boroughs of Hackney and Tower Hamlets as the relevant local Highways Authorities."</u></i>
25.	Ref:009 (Private individual)		Don't accept the concrete works planning – please think of the children in the area. Three of the five most polluted schools in London are near the site. They don't need pollution levels to rise further.	Comment noted. The SPD, while acknowledging the presence of the existing rail head and concrete production facilities at Bow West within Fish Island South, does not identify or reference any proposal for additional facilities or other changes in the	No specific change proposed.

				function of the site. The planning applications referred to are outside the SPD area and there are therefore no specific or relevant changes that could be made to this SPD.	
26.	Ref: 010 Greater London Authority		The Mayor welcomes the draft SPD which provides further guidance and detail to the policies contained in the LLDC Local Plan and is of the opinion that the SPD is in general conformity with the London Plan.	Comment noted and welcomed.	No specific change.
27.	Ref: 010 Greater London Authority		<p>Industry, employment uses and locations</p> <p>Overall, the strategy for retaining employment uses and locations and increasing B use classes' floor space is welcomed. In particular, the Mayor is pleased to see that the character and function of Strategic Industrial Land (SIL), Locally Significant Industrial Sites (LSIS) and Other Industrial Locations (OIL) will be protected, with intensification and compliant uses encouraged. Additionally, the screening of SIL uses in Employment Character Area 5 as recommended previously and in accordance with London Plan policy 2.17 C is particularly welcome.</p> <p>The loss of industrial capacity in some areas is recognised and that large industrial storage (82 and 88) uses might not be compatible with residential development. However, in line with London Plan policy 4.4, the LLDC should take account of loss of industrial land against the indicative industrial land release benchmark figures set out in the Mayor's Land for Industry SPG for the area. Inner London industrial sites serve a particularly important function for London's economy and providing sustainable distribution services for the Central Activities</p>	Comments noted and welcomed.	No specific change.

			<p>Zone. Some of these industrial uses may have low employment densities but provide vital services which support other businesses in London, many of which will have significantly higher employment densities.</p> <p>The Mayor is particularly pleased to see Policy B.4 which will seeks to encourage provision of new low-cost or managed workspace. Hackney Wick provides important facilities for artistic production and it is welcomed that this is recognised through the inclusion of creative studio space as an appropriate employment typology.</p>		
28.	Ref: 010 Greater London Authority		<p>Infrastructure - Connectivity The north- south connectivity between Hackney Wick and Fish Island needs to be improved to support the growth envisaged and the development of a new Neighbourhood Centre. The proposed improvements to Hackney Wick Station and other transport initiatives are welcomed.</p>	Comment noted. The 'north-south' route identified in the Local Plan, the draft SPD and the current IDP identify the elements required to achieve this connectivity and an approach to achieving this.	No specific change.
29.	Ref: 011 LB Tower Hamlets		In general, officers welcome the SPD and support the principles set out to guide the delivery of new homes, jobs, ensure that new development is of a high quality and provide the necessary infrastructure, such as new bridges and schools.	Support welcomed.	No specific change.
30.	Ref: 011 LB Tower Hamlets		LBTH has commenced work to prepare a new Local Plan and it is important that consideration is given to wider strategic cross boundary opportunities and infrastructure projects. To ensure this, the SPD needs to strengthen its approach to ensure the area becomes a joined up part of Tower Hamlets by acknowledging the adjoining communities and opportunities west of its boundary.	Comment noted. The LLDC Local Plan approach to this area and the draft SPD have been formulated to seek a more connected Hackney Wick and Fish Island and identify a range if potential projects that could help to achieve this.	No specific change.

31.	Ref: 011 LB Tower Hamlets	General	<p>The challenges to strike an appropriate balance between new residential developments and waste in Tower Hamlets, given the London Plan Waste Apportionment (2015) are acknowledged in the SPD.</p> <p>The plan making process is the appropriate method of addressing this issue. Within Fish Island, LBTH's draft waste management evidence base (2016) identifies three sites and two areas of search suitable for the management of waste over the next 15 years. They are:</p> <ul style="list-style-type: none"> • Iceland Metal Recycling, Iceland Wharf • Land at Wick Lane • 455 Wick Lane • Bow Midlands West Rail Site • Fish Island SIL <p>It is critical that the SPD clearly sets out the approach to safeguarding land and allocating capacity for waste management and does this through working strategically with the Tower Hamlets Council and the Greater London Authority.</p>	<p>The approach to planning for waste for locations and sites in the LLDC area is set out within the adopted LLDC Local Plan and has been tested at examination. Where sites are within SIL or an LSIS waste use is specifically addressed. Where these sites are outside of a specific designation the provisions are dealt with by the wider policy. While it is not considered that the SPD itself needs to further expand on this approach, the need for LLDC and LBTH to cooperate on waste planning matters will be important and will need specific discussion as LBTH progresses its Local Plan review. This will then need to be considered and reflected within the future LLDC Local Plan review.</p>	<p>No specific change within the SPD but the need to ensure ongoing cooperation as LBTH reviews its Local Plan is noted.</p>
32.	Ref: 011 LB Tower Hamlets	Appendix x 2	<p>The SPD is supported by a number of design code appendices. Whilst this information is welcomed, the location in the appendices does not integrate well with the main document. It would be beneficial to feed this information into the main document, setting out a clear placemaking vision together with detailed land use and design principles for Fish Island Mid and South, similarly to the detail set out for the Neighbourhood Centre. This will be helpful given that Fish Island Mid and South will provide a range of employment space alongside housing.</p>	<p>The Townscape and Character and the Public Realm principles sections of the SPD (pages 31-24 in the consultation draft SPD have been reviewed and some amendments made which are identified elsewhere in this consultation report. In light of other comments in relation to the appendix and in order to keep the SPD concise, the appendix has been removed from the SPD in its final version.</p>	<p>Appendix 2 Guidance on 'Townscape and Public Realm', has been removed from the final draft SPD and amendments made to the related 'Heritage, Townscape and Public Realm' section within the body of the SPD.</p>

33.	Ref: 011 LB Tower Hamlets	General	<p>Going forward, it will be important to ensure continuing engagement in the Tower Hamlets emerging Local Plan and all other projects in and around the shared boundary.</p>	<p>Comment noted. LLDC will continue to cooperate with LB Tower Hamlets in respect of the review of the LB Tower Hamlets Local Plan and in due course, the review of the Legacy Corporation Local Plan.</p>	No specific change proposed.
34.	Ref: 125 (Private individual)		<p>I am writing to register my objection to the proposals outlined in the SPD. My son and his family live in Eastway and their house is pictured in the SPD.</p> <p>They are very concerned about the proposals and how they will affect the local character and amenities that surround them and that they enjoy.</p>	<p>Comment noted. The SPD does not in itself contain any new policy or specific development proposals as these are set out within the adopted Local Plan. Where individual proposals become the subject of planning applications there will be opportunities to respond to the formal consultation on these as part of the planning application process.</p>	No specific change proposed.
35.	Ref: 131 National Grid	General	<p>An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high pressure gas pipelines and also National Grid Gas Distribution's Intermediate / High Pressure apparatus. National Grid has identified the following underground cable as falling within the Hackney Wick and Fish Island area boundary:</p> <ul style="list-style-type: none"> • 400kv - City Road - West Ham 1 <p>From the consultation information provided, the above underground cable does not interact with any of the proposed development sites. <i>Gas Distribution – Low / Medium Pressure</i></p> <p>Whilst there is no implication for National Grid Gas Distribution's Intermediate / High Pressure</p>	<p>Comments noted</p>	No specific change proposed.

			apparatus, there may however be Low Pressure (LP) / Medium Pressure (MP) Gas Distribution pipes present within proposed development sites.		
36.	Ref 132 Transport for London (Property)	General	Highlights TfL Property view that the site Bartrip Street South site allocation (SA1.9) should be brought forward as a normal residential development rather than as a Gypsy and Traveller site.	The comments are noted. However, the SPD does not provide an opportunity to review the policies and site allocations within the adopted Local Plan. At the time of the Local Plan preparation TfL had indicated its acceptance of the then proposed Gypsy and Traveller site allocation.	No specific change proposed.
37.	Ref 133 Transport for London (TfL Planning)	Infrastructure – connectivity, Page 13	<p>13.1 "...the focus for the area is primarily the delivery of new or <u>and</u> improved walking and cycling routes and an accessible public realm that will in turn improve access to public transport".</p> <p>13.16 Additional four routes which also serve the area have been included, as well as slight changes to bus terminating points. "Current bus routes that service Hackney Wick and Fish Island are:</p> <ul style="list-style-type: none"> • Route 30 - Oxford Street <u>Marble Arch</u> to Hackney Wick (Eastway) • Route 488 - Bromley-by-Bow to Kingsland Rd <u>Dalston Junction</u>, Hackney • Route 388 - Blackfriars Station to Stratford • Route 8 -Tottenham Court Road to Roman Road <u>Bow</u> • <u>Route 26 - Hackney Wick, Eastway – Waterloo</u> • <u>Route 236 - Hackney Wick, Eastway – Finsbury Park</u> • <u>Route 276 - Newham Hospital – Stoke Newington Common</u> 	Corrections and additions noted and accepted.	Corrections and additions inserted into text as identified.

			<ul style="list-style-type: none"> • <u>Route 339 - Shadwell – Leytonstone.</u>” 		
38.	Ref 133 Transport for London (TfL Planning)	Infrastructure – connectivity, Page 15	<p>Style guide is for “<u>Quietway</u>”, rather than Quiet Way</p> <p>15.2 “Public Accessibility levels (PTALs) for the Hackney Wick and Fish Island area, and the projected PTALs levels for the area by 2031. While only one indicator in interpreting policies for development density and levels of parking, the PTALs levels along with other relevant factors will help....”</p>	Corrections and additions noted and accepted.	Corrections and additions inserted into text as identified.
39.	Ref 133 Transport for London (TfL Planning)	Infrastructure – connectivity, Page 16	<p>There are some minor adjustment and updates given ongoing work, as follows:</p> <p>“16.1 The proposed route for Crossrail 2 serves Tottenham Hale and includes a potential branch via Hackney , with the intention that the scheme is delivered <u>in the early 2030s</u>.</p> <p>16.2 While not included in the formal proposal, an eastern branch to Crossrail 2 is being promoted by the boroughs of Hackney, Newham and Barking and Dagenham along with Essex County Council <u>and Thurrock Council</u>. This considers the potential for a route via Hackney Wick and considers the possibility of stations at Hackney Wick and/or Stratford <u>before linking the existing Essex Thameside rail network serving Thurrock and South Essex</u>.</p> <p>16.3 While this has no direct impact on the guidance or development outcomes sought within this SPD, should the proposal for an Eastern branch to be taken forward this would then be taken into account in a future review of the Local Plan which would reflect any firm proposals and route safeguarding”.</p>	Corrections and additions noted and accepted.	Corrections and additions inserted into text as identified.

40.	Ref 133 Transport for London (TfL Planning)	Public Realm - mixed use areas, Page 33	33.9 "Footways must have a consistent approach to finish and colour, that are appropriate to their context and must give priority to pedestrians, including at vehicle crossovers. <u>Minimum pedestrian level of service should comply with LLDC inclusive design standards for minimum footway widths and provision of accessibility features.</u> "	Corrections and additions noted and accepted.	Corrections and additions inserted into text as follows: "Footways must have a consistent approach to finish and colour, that are appropriate to their context and must give priority to pedestrians, including at vehicle crossovers. <u>Account should also be taken of the Legacy Corporation inclusive Design Standards for minimum footway widths and provision of accessibility features.</u> "
41.	Ref 133 Transport for London (TfL Planning)	Public Realm - mixed use areas, Page 34	34.11 "...all freestanding metal street furniture should be powder coated black." Note that bus stop flags and shelters may not comply with this guidance. 34.18 "Legible London signage should be installed on key spaces and on key pedestrian and cycle routes". <u>In each case it will need to be defined what is classified as a key space and a key pedestrian and cycle route, TfL can assist with any Legible London strategies.</u>	Comment on 34.11 noted. 34.18 suggested amendment accepted.	Corrections and additions inserted into text as follows: "Legible London signage should be installed on key spaces and on key pedestrian and cycle routes". <u>In each case it will need to be defined what is classified as a key space and a key pedestrian and cycle route, TfL can assist with any Legible London strategies.</u>
42.	Ref 133 Transport for London (TfL Planning)	Fish Island South, Page 49	49.2 "Long-term project for potential replacement of existing pedestrian and cycle bridge with a new road bridge across the A12 connecting Fish Island and Bow <u>contributing to enhanced access, especially for public transport connections.</u> "	Corrections and additions noted and accepted.	Corrections and additions inserted into text as identified
43.	Ref 133 Transport for London (TfL Planning)	Implementation &	53.8 A proposal for an eastern spur to Crossrail 2 which would include a potential station in Hackney Wick has been made by the London	Corrections and additions noted and accepted.	Corrections and additions inserted into text as identified.

		Delivery Page 53	boroughs of Hackney, Newham, Barking & Dagenham and by Essex County Council <u>and Thurrock Council</u> . Any future safeguarding for this route and effects would be taken into account in a future Local Plan review.		
44.	Ref 133 Transport for London (TfL Planning)	Implementation & Delivery Page 55	<p>Table 2 - No comments on the specific items or wording in this table.</p> <p>TfL will be pleased to comment on future consultations of the LLDC's Infrastructure Delivery Plan Projects List. As TfL has a key role in the delivery of several projects across the LLDC area we would wish to continue working closely together in developing proposals, ensuring that current thinking on potential transport infrastructure projects and their funding and priority is aligned. However, TfL cannot commit contributions to transport infrastructure not directly linked to our own network and assets, and even in cases where this condition is met, there is no guarantee of funding. Projects that relate to TfL assets e.g. A12 crossings, will also have to be considered alongside other TfL projects, where priorities may not be the same as the LLDC's. Care will ultimately need to be taken where items may have both S106 and CIL identified as potential funding sources.</p>	Comments noted.	No specific change proposed.
45.	Ref 133 Transport for London (TfL Planning)	Appendix x 2 Page 88	Page 88.7 "...all freestanding metal street furniture should be powder coated black." Note that bus stop flags and shelters may not comply with this guidance.	Comment noted.	See no.40 above. Appendix 2 has been omitted from the final SPD.
46.	Ref 133 Transport for London (TfL Planning)	Appendix x 2 Page 91	Page 91.8 "Legible London signage should be installed on key spaces and on key pedestrian and cycle routes". In each case it will need to be defined what is classified as a key space and a key pedestrian and cycle route, TfL can assist with any Legible London strategies. Signage is most likely to be required at Historic Streets and	Comment noted.	See no.40 above. Appendix 2 has been omitted from the final SPD.

			Passages and Canal Edges where decision points are.		
47.	Ref: 134 Nathaniel Lichfield & Partners on behalf of East London Regeneration Ltd	Employment Uses and Locations	<p>The SPD recognises that the Hackney Wick and Fish Island area is a 'focus for a significant proportion of the projected 59,000sqm of additional B use classes floor space requirement' for the LLDC until the end of its local plan period in 2031 (p7).</p> <p>We support in principle the proposed 'Employment Character' of the Hackney Wick Neighbourhood Centre (area 3, SPD page 8) which includes the Wallis Road sites and is presented as:</p> <p><i>A mix of employment, retail and community uses along with new residential forming a focus around the Hackney Wick Station area and into Eastwick and Sweetwater (Use Classes predominantly B1a, B1c, A1-A5, D1, D2 and C3).</i></p> <p>The SPD must however be clear that a balance needs to be struck between employment floorspace and residential accommodation in new development to ensure that mixed use schemes are not unnecessarily inhibited by restrictive employment policy.</p> <p>We support the SPD's section on 'compatibility of uses' (p10) which acknowledges circumstances where existing employment uses (i.e. B2) would be incompatible within an 'otherwise acceptable development scheme' and would therefore justify their removal from a development site.</p> <p>The SPD's emphasis on relocation strategies for existing occupants is at odds with this objective (Appendix 2 of the SPD) and is unacceptable. We present our representation to this in detail later in this letter (see Appendix 2 further below).</p>	Comment noted	See below for specific responses or changes.
48.	Ref: 134 Nathaniel Lichfield & Partners on	Housing	The SPD's guidance on LLDC Local Plan Policy H2 'Affordable Housing' states that affordable	Support for the approach to the Neighbourhood Centre is	No specific changes proposed.

	behalf of East London Regeneration Ltd		<p>housing on sites of 10 units or more should be maximised, and smaller sites within the Neighbourhood Centre are 'encouraged to cooperate when planning affordable housing delivery' (p11). The SPD should acknowledge that the maximum quantum of affordable housing that a scheme can sustainably provide should be derived having regard to development viability. This will also be influenced by the character of the site and the vision that the LLDC is aiming to achieve on respective sites. Contributions to the emerging Hackney Wick and Fish Island communities will vary depending on context and this flexibility should be recognised in the SPD.</p> <p>We welcome the SPD's description of a designated 'Neighbourhood Centre' (p11) which includes sites such as Wallis Road North and is identified to accommodate:</p> <p><i>New residential development mixed with new and retained employment space, retail and community uses, with potential for higher densities inside the centre boundary where compatible with the Conservation Area Designation.</i></p>	welcomed. In terms of viability and affordable housing, it is not considered necessary to add text that simply repeats policy requirements within the Local Plan, London Plan or other guidance as the SPD is intended to provide further guidance on specific matters.	
49.	Ref: 134 Nathaniel Lichfield & Partners on behalf of East London Regeneration Ltd	Infrastructure (connectivity)	<p>We support the SPD's statement that the principal focus for ensuring connectivity throughout Hackney Wick and Fish Island is the provision of new/improved walking and cycling routes and an accessible public realm. However the way in which this is implemented through and around the Wallis Road North site is considered excessive and unwarranted. One local/service route is proposed to bisect the site, and two further local/service routes are proposed along the site's northern and western perimeters which will unnecessarily reduce the site's developable footprint. P4/8 12599145v1</p>	<p>The general support expressed is welcomed. The routes shown on page 14 of the draft SPD, where a route does not already exist, are expressed as a principle and are indicative. Any actual new service or other route/connection would, in this context need to be considered when specific development proposals are developed in the context of that development proposal.</p>	No specific change.

			<p>The SPD should be amended to reduce the number of these routes around and across the Wallis Road North site.</p> <p>The SPD shows that the PTAL rating for the Wallis Road North site will rise from Level 3 to Level 4 (where one is poor and 6 is excellent) by 2031 (p15). In line with London Plan density guidance, the SPD should enable developers to take a longer term view on the acceptability of higher densities to reflect anticipated improvements in accessibility.</p>		
50.	Ref: 134 Nathaniel Lichfield & Partners on behalf of East London Regeneration Ltd	Infrastructure (district heating network)	<p>We note that SPD presents four Heat Network Options (p17) for the extension of the existing or creation of a new heat network. These options were informed by the findings of the Hackney Wick and Fish Island District Heating Study (April 2016).</p> <p><i>The preferred option (Option 1) consists of a 'connection to the existing heat network crossing the Lee Navigation to provide a heat network to Hackney Wick and Fish Island-mid. Heat network bridge crossings at one or more bridge (White Post Lane Bridge and Bridge B14, Bridge B16)'.</i></p> <p>Where developments are encouraged to connect to the heat network, the SPD needs to states that this is subject to practicality and viability. Once this is addressed, subject to there being sufficient capacity for schemes such as Wallis Road North to connect to the existing heat network, and the provision of relevant associated infrastructure to facilitate this, we support this preferred option.</p>	<p>This section of the SPD identifies a strategy and potential options for achieving extension of the existing heat network or creation of new networks. Local Plan policies S.2 and S.3 set out the approach required in terms of energy assessment and carbon reduction which provide the context against which the practicality, feasibility and viability of achieving the desired outcome will be assessed. AS these policies are reference within this section of the SPD it is not and it is not considered necessary to repeat these caveats within the SPD.</p>	<p>No specific change is proposed to the SPD text.</p>
51.	Ref: 134 Nathaniel Lichfield & Partners on behalf of East London Regeneration Ltd	Public realm, open space and	<p>Whilst ELR accepts, and indeed welcomes, the overall strategy for the creation of open space, the SPDs proposed quantum shown of over 40% is excessive when considered in the context of the current use of the site.</p>	<p>General support welcomed. There are no references within either the draft SPD or the Local Plan to a requirement for 40% open space within the ELR site. Any development</p>	<p>No specific change is proposed.</p>

		waterways		proposal will need to be assessed in terms of it space provision in terms of Policy BN.7 in the Local Plan.	
52.	Ref: 134 Nathaniel Lichfield & Partners on behalf of East London Regeneration Ltd	Heritage	<p>The SPD identifies a series of buildings/structures identified under the ‘umbrella’ term: <i>Heritage Assets</i> (p30). In our view, the LLDC should distinguish between genuine heritage assets and those of lesser significance. The protection given to heritage assets should be proportionate to its value in accordance with the NPPF.</p> <p>The SPD designates the ‘Central Books and Rubber Works’ building directly to the west of the Wallis Road North site as Heritage Asset no. 9, and the ‘Eton Mission Rowing Club’ directly to the east of the site as Heritage Asset no.14. These are not listed and are not recognised on the Historic England register, yet the SPD seeks to afford them protection. A proportionate value hierarchy should be established.</p> <p>This issue needs to be reviewed and clarified to support developers’ delivery of the transformative change the LLDC aims to promote.</p>	<p>The map and list included at page 30 of the draft SPD is simply a reproduction of that within the Local Plan. It shows designated and non-designated heritage assets with Local Plan policies BN.16 and 1.4 being most relevant to these. Any development proposal would need to be considered in this context, which is consistent with the provision of the NPPF. The SPD does not change or add to the policy requirements or to the list of heritage assets identified in the Local Plan.</p>	No specific change proposed.
53.	Ref: 134 Nathaniel Lichfield & Partners on behalf of East London Regeneration Ltd	Townscape and Character	<p>The SPD guidance on townscape and character is too prescriptive for the remit of a planning guidance document and fails to appreciate the value of varied design responses to varied spatial contexts throughout the Hackney Wick and Fish Island area. This is addressed in further detail in our representations on Appendix 2 (see further below in this letter).</p>	<p>It is considered the level of guidance provided in this section is appropriate to an SPD. It should be noted that its function is that of guidance.</p> <p>The guidance in this section has been reviewed and amended revised while the more detailed guidance in Appendix 2 has been removed.</p>	The guidance in this section has been reviewed and amended while the more detailed guidance in Appendix 2 has been removed.

54.	Ref: 134 Nathaniel Lichfield & Partners on behalf of East London Regeneration Ltd	Neighbourhood Centre: Area Specific Guidance (applicable to the Wallis Road North site)	<p>This section of the SPD lifts material directly from the LLDC's current live application for Hackney Wick Central. The plans throughout this section show the LLDC's outline proposals as the basis for the guidance. This is premature and inappropriate. The inclusion of a live planning application as the basis for planning guidance suggests that the current application has been predetermined and brings into question the LLDC's objectivity and impartiality in the determination of its own planning application. This material has clearly been prepared for an outline planning application and not for the purposes of adopted planning guidance. In our view it should be comprehensively updated, omitting the detailed prescriptive material from the outline application. Notwithstanding this, the following outlines our comments on this section of the SPD.</p> <p>The LLDC outline application's proposed layout for the Wallis Road North site, as presented by the SPD, comprises one building within the western part of the site with a 'horseshoe' shaped plan form and one standalone canalside building in the east of the site. The proposed layout and connection links/pathways (illustrated on p38) for the Wallis Road North site propose excessive land to be taken for permeability purposes and unreasonably restrict the build footprint. The number of pedestrian routes shown to run through and around the site is unnecessarily high and should be reduced. Additionally, the 'Connections' image (p38) omits the dotted line arrow to represent the north-south link from Wallis Road to White Post Lane. This should be corrected.</p> <p>The image (p38) entitled 'Existing and new public spaces' identifies a disproportionately large area of 'existing public space' around the</p>	<p>While elements of the guidance in the draft SPD are drawn from work used to develop the Hackney Wick Central planning application, the guidance included in the final version of the SPD in particular, is considered to be at an appropriate level and capable of functioning as guidance for the area. By nature of the SPD providing guidance rather than creating new policy, the layout of any drawing or plans are indicative rather than prescriptive, unless already established in detail within the Local Plan policy or its Policies Map. Any planning proposal for the site will need to be considered primarily in the context of the Policy and site allocation requirements identified within the Local Plan.</p> <p>Responses to comments on routes and open space are provided at 49 and 51. It is noted that the connections image on page 38 of the draft SPD does include a dotted line with arrows along the route of the north-south route from Wallis Road to White Post Land</p> <p>It is, however, proposed to amend relevant drawings and drawing titles in this section to</p>	<p>The following changes are proposed:</p> <p>Potential for workspace clusters drawing (page 37 of consultation draft SPD): remove clusters shown outside of the Neighbourhood Centre.</p> <p>Connections (existing and new) drawing (page 38 of consultation draft SPD): amend title to read – "<i>Connections (existing and potential new)</i>"</p> <p>Existing and new public spaces drawing (page 38 of consultation draft SPD): amend drawing to remove elements shown outside of the designated Neighbourhood Centre. Amend the title to read "<i>Existing and potential new public spaces</i>"</p> <p>Retaining heritage assets drawing (page 39 of consultation draft SPD): amend drawing to remove elements shown outside of the designated Neighbourhood Centre. Amend title to read "<i>Retaining Heritage Assets</i>".</p>
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			<p>Wallis Road North site. This is incorrect as the 'existing public space' is shown to encroach into the existing Wallis Road North site boundary (which currently does not comprise public space). This image should be amended to reflect the reality of the existing environment. Notwithstanding this, we welcome the opportunity in design terms for the redevelopment of the Wallis Road North site to realise the vision and the benefits of this proposed canalside public space.</p>	<p>ensure that these only provide guidance within the designated Neighbourhood Centre area and to ensure that the titles are clear where the drawings show matters that are 'potential' or 'indicative' rather than existing.</p>	
55.	<p>Ref: 134 Nathaniel Lichfield & Partners on behalf of East London Regeneration Ltd</p>	<p>Appendix 1: Acceptable Relocation Strategies</p>	<p>Our representation specific to Appendix 1 is an overarching concern relating to a requirement for forthcoming development proposals to provide detailed employment relocation strategies; by doing so the SPD will not support the delivery of the legacy of this area, but rather inhibit development and growth. Our objection to the principle of Appendix 1 is detailed below.</p> <p>1 The Hackney Wick Neighbourhood Centre (and therefore the Wallis Road North site) is designated for new mixed-use development in the adopted LLDC Local Plan. Developers such as ELR have responded and will continue to respond to the LLDC's vision in their proposals. This vision means that B2 employment uses (which will, by definition of the Use Classes Order, be incompatible with emerging 'mixed' uses such as residential and community use) must therefore relocate from Hackney Wick Centre in order to comply with the LLDC's own vision. This is an inherent contradiction in the SPD.</p> <p>2 The principle of relocation has been assessed and agreed in the Employment Land Review used to support the adoption of this vision for Hackney Wick Centre in the LLDC Local Plan. It</p>	<p>Local Plan Policy B.1 is clear in its requirement for maintenance or re-provision of employment floorspace subject to the detailed policy tests listed in Part 5 of the policy. One of those tests is the provision of relocation strategies to show how existing business can be accommodated, or indeed relocated if it is not possible for them to remain at that location.</p> <p>The draft guidance on relocation strategies has been included to provide a benchmark for relocation strategies that are sought within these requirements of Local Plan Policy B.1. The introductory text within the draft SPD Appendix 1 is clear about this relationship and also clarifies that this is a recommended approach. It is also acknowledged in this text that each scheme will have</p>	<p>No specific change proposed.</p>

			<p>is unreasonable to undermine the evidence base to the Local Plan which justifies the land use transition from industrial to mixed-use in the neighbourhood centre, and then contradictorily introduce an SPD to the Local Plan requiring the protection of these industrial uses in the area.</p> <p>3 The preparation and implementation of a detailed relocation strategy is beyond the remit of a developer. It is not expected that tenants at the end of their lease should be found alternative premises in other comparable scenarios; indeed the inherent nature of a lease gives both the leaseholder and occupier security for a limited period of time only. The requirement for preparing and implementing relocation strategies by a developer is unnecessary and will inhibit otherwise acceptable development.</p> <p>4 Unit occupation is driven by market demand and it is unreasonable to expect the developer to tailor its units to a certain returning/relocated occupier, thereby potentially limiting its chances of occupation (and profitability). Accordingly the proposed developments should be encouraged to seek to create flexible employment floorspaces and ensure the long term sustainability of the local area.</p>	<p>different circumstances and that each case will need to be discussed with the LPA. Given this, it is considered that that the contents of the appendix are appropriate and justified.</p>	
56.	Ref: 134 Nathaniel Lichfield & Partners on behalf of East London Regeneration Ltd	Appendix 2: Townscape and Public Realm	<p>This Appendix has again been lifted directly from the Design Code prepared for the Hackney Wick Central outline application (16/00166/OUT). As above, this is a live application, currently pending determination by the LLDC's Planning Policy and Decisions Team. Numerous references make little/no sense in the context of the SPD, including direct references to other sections of the LLDC outline application which have been retained here in error (reference to Reserved Matters applications and Section 2?).</p>	<p>See the response provided at 53.</p>	<p>See the response provided at 53.</p>

			<p>Again, this text has not been prepared for the purpose of the SPD. It is overly prescriptive and detailed. To retain this Appendix in the adopted SPD is premature and suggestive of pre-determination of a current live planning application submitted by the LLDC itself. For these reasons we would advise the LLDC to comprehensively revisit this design guidance. Notwithstanding this our comments on the current guidance are added below.</p> <p>Firstly, the guidance remains far too prescriptive. The guidance should be sufficiently flexible to apply to the different characters of the various sub-areas within the Hackney Wick and Fish Island area. By lifting the Design Code from the LLDC outline application (16/00166/OUT) which was produced for the discrete area of Hackney Wick Central only, and applying it to the wider SPD area, the LLDC risks 'cleansing' this area of its varied areas of townscape characters and identity. Appendix 2 (in particular pages 93-94) is too prescriptive in terms of suggested materials and manufacturers. This is inappropriate within a policy document, it limits the developer unnecessarily and the level of detail is, again, well beyond the remit of an SPD. There are also elements of the design guidance which are not supported by any form of justification. These are outlined below:</p> <p><i>1 Block lengths should be limited to 50m, otherwise a break or step in massing is required (p60).</i></p> <p><i>2 Steps in height within and between blocks should be deliberate and purposeful, and should be a minimum of 2 storeys (6m)(p60).</i></p> <p><i>3 Any steps in height should be kept away from the corners by 8 metres minimum (p62).</i></p>		
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			<p>4 The guidance on page 64 relates to the <i>façade design and layout of buildings fronting narrower passages of 11m and less.</i></p> <p>5 <i>Where vertical railings are uses [sic] fins of 80-100mm in depth at 80mm centers should be uses [sic] (p64).</i></p> <p>This guidance is excessively prescriptive for a large urban area such as Hackney Wick and Fish Island. The dimensions/scales given are apparently arbitrary and lack any supporting evidence.</p> <p>The SPD fails to justify why the above measures are necessary to achieve successful development design. This overly mechanistic quantitative approach fails to appreciate the proportionate impact the proposed design guidance would have on schemes of different sizes and scales. For instance, a two-storey step in height from a block of four storeys to two storeys would have a greater visual impact than a two-storey step in height from a block of nine storeys to seven storeys. There is no 'one size fits all' approach to good design and the SPD's current inability to recognise this is concerning. The design of new development across the area should be a response to site specific opportunities and constraints and should not be dictated by a set of universal rules (or in this case a design code lifted from a live planning application covering only a small proportion of the area to which the guidance would relate). For these reasons, Appendix 2 must clearly be revisited in full.</p>		
57.	Ref: 135 Chair of the Association of Iron Works Residents	Infrastructure and	Page 13: INFRASTRUCTURE – CONNECTIVITY	Bridges H14 and H16 are identified as 'Principle Connection improvements' and	Update text on Bridges H14 and H16 at page 46 of the consultation draft SPD.

		connectivity	<p>There is clear conflict between Key Policies T4, T6 and T9; and Key interventions and connectivity project No. 6, H14 Bridge. Policy T4 Transport Choices and Local Connectivity: designing new development to minimise the demand for private car use, facilitate access to public transport and encourage walking and cycling. Policy T6 Facilitating Local Connectivity: the need for new development to facilitate local connectivity and prioritise walking and cycling. Policy T9 Providing for Pedestrians and Cyclists: principles and standards for walking and cycling infrastructure. Key interventions and connectivity project No. 6. H14 Bridge, Monier Road to Sweetwater - replacement of pedestrian and cycle bridge with an all modes bridge. Converting a well-used pedestrian / cycling bridge into a traffic bridge is unnecessary and will turn Monier Road into a major road route through Fish Island, thereby destroying the sense of place and legibility of the conservation area. A traffic bridge in this position would also present serious risk to the integrity of the 'Carlton' Chimney Stack, a heritage asset within the conservation area. Maintaining the Monier Road bridge as a pedestrian / cycling bridge would negate the need to destroy Vittoria Wharf in order to build the new H16 footbridge, thereby displacing Vittoria Wharf's thriving community and businesses and damaging the creative heritage and vibrancy of Hackney Wick & Fish Island.</p>	<p>as a 'Key Connection on-road' and 'Key Connection Off-road' within the adopted Local Plan. These are also bridges that have outline planning permission as part of the Legacy Communities Scheme planning permission (Application reference 11/90621/OUTODA). Planning applications for the detailed design of the bridges have now also been approved (application references (16/00587/REM, 16/00588/REM). While opposition to the construction of those bridges is acknowledged, these remain a key element of the local infrastructure strategy within the Legacy Communities Scheme. It is therefore considered inappropriate to remove reference to the bridges from the SPD.</p>	<p>“Bridge H14 (Monier Road Bridge) replacement. Planned replacement of temporary walking and cycling route bridge to provide a road bridge access as part of the Legacy Communities Scheme. A requirement of the Legacy Communities Scheme planning permission.</p> <p><u>A multi-modal bridge that will replace the temporary pedestrian and cycle bridge from the Sweetwater development area to Monier Road. Delivery of the bridge is a requirement of the Legacy Communities Scheme planning permission. This permitted the parameters for the bridge which now has approval for its detailed design. The design includes ducting that will allow the Heat Network to extend to areas to the west of the canal in the future.”</u></p> <p>“Bridge H16 (Beachy Road) new pedestrian and cycle bridge to Sweetwater.</p>
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			<p>In reference to the <i>Fish Island & Whitepost Lane Conservation Area Management Guidelines</i> (2015): Page 5: “<i>The London Plan (2011, as amended to comply with the NPPF 2012) is the relevant regional planning policy for the area. Policy 7.8 and 7.9 of the London Plan seek to ensure the preservation of heritage assets and their setting and notes that conservation areas make a significant contribution to local character and should be protected from inappropriate development.</i>”</p>		<p><u>Planned new pedestrian and cycle bridge to provide link between Beechy Road and the planned Legacy Communities Scheme Sweetwater development. A requirement of the Legacy Communities Scheme planning permission. Providing a new pedestrian and cycle connection between the Sweetwater development area and Beachy Road, this will also provide an access route to the new Sweetwater school. The parameters of the bridge were approved as part of the Legacy Communities Scheme planning permission and the detailed design of for the bridge now has approval.</u>“</p>
58.	Ref: 135 Chair of the Association of Iron Works Residents	General	<p>Page 8: GENERAL PRINCIPLES <i>“In determining applications for planning permission relating to any land or buildings in a conservation area, the planning authority is required to pay special attention to the desirability of preserving or enhancing the character and appearance of that area. Policies in respect to the preservation or enhancement of heritage assets and their special interest are contained within the Local Plan. 2</i></p> <p><i>Fish Island and White Post Lane, and its setting, has a distinctive sense of place that is due, in</i></p>	<p>Comment noted. The principles for new and improved local connections have been established within the adopted Local Plan and the SPD, as further guidance to this adopted policy cannot revisit those principles.</p>	<p>No specific change proposed.</p>

			<i>part, to its island character. This character is created by the strong edges formed by surrounding infrastructure including the Northern Outfall Sewer/Greenway, waterways and elevated roads and railway. While allowing for improvements to pedestrian and cycle friendly routes in and out of the area, new developments should have regard to this enclave character.</i>		
59.	Ref: 135 Chair of the Association of Iron Works Residents	Heritage and townscape	Page 7: <i>"Some historic granite kerbs and cobbles remain and opportunities should be taken to restore and extend these positive elements of the streetscape. Work by statutory undertakers should not diminish what remains of traditional street surfaces, hard edges or any buried archaeology."</i>	Comment noted. The SPD provides guidance further to Local Plan policy and can only apply to those works that require planning permission. Not all work undertaken by statutory undertakers will require planning permission.	No specific change proposed to the SPD.
60.	Ref: 135 Chair of the Association of Iron Works Residents	Employment uses and Locations	Page 9: <i>"...much of the original street pattern within the conservation area survives. These surviving streets range from the principle east-west streets of White Post Lane and Dace Road, whose non-orthogonal path suggest pre-industrial incarnations, to the loose grid of former residential streets in the northern part of Fish Island."</i>	Comment noted.	Comment noted.
61.	Ref: 135 Chair of the Association of Iron Works Residents	Employment uses and Locations	Page 10: (regarding the Crown Wharf 'Carlton' Chimney Stack, featured on p.19 of the document) <i>"New developments can preserve or enhance the character of the area by respecting the role these landmarks play in the legibility of the area and by not blocking views to them or diminishing their landmark status through the inappropriate location, bulk or form of the new development."</i>	Comment noted.	Comment noted.
62.	Ref: 135 Chair of the Association of Iron Works Residents	Heritage and	Page 29: HERITAGE AND TOWNSCAPE I am in favour of the following strategies for heritage-led regeneration:	Comment noted.	Comment noted.

		Townsc ape	<p>Policy BN.1 Responding to Place – including respecting existing typologies in the urban fabric, including those of heritage value.</p> <p>Policy BN.10 Proposals for Tall Buildings – proposals need to preserve or enhance heritage assets and the views to/from these and positively contribute to their setting (including conservation areas).</p> <p>Policy BN.16 Conserving or enhancing heritage assets - a need to conserve or enhance heritage assets and their settings, including incorporation of viable uses consistent with their conservation and with heritage led regeneration.</p> <p>Policy 1.4 Preserving or enhancing heritage assets in Hackney Wick - preserve or enhance the special architectural or historic interest; enhance and reveal the significance of heritage assets; reference the architectural and historic interest within design of new development, retain or reprovide street trees where appropriate.</p>		
63.	Ref: 135 Chair of the Association of Iron Works Residents	Heritage and Townsc ape	<p>HERITAGE ASSETS</p> <p>Swan Wharf is identified as a heritage asset (no. 35) within Figure 3, to which Policy BN.16 applies.</p> <p>Any demolition or partial demolition of Swan Wharf’s multi-storey stable block would destroy the historic fabric of the building, dramatically diminishing its legibility and significance to the Fish Island and White Post Lane Conservation Area. Building over the yard at Swan Wharf would create a barrier at the canal edge, obscuring the existing visibility into and out of the conservation area and presenting an unattractive and incongruous vista from its protected waterways.</p> <p><i>The Fish Island and White Post Lane Conservation Area Appraisal</i> (November 2014)</p>	<p>Comments noted.</p> <p>Swan Wharf: comments noted. Any development proposal will need to demonstrate that it complies with the policies in the Local Plan and any other material planning considerations including those on heritage assets..</p> <p>The Forge at Crown Wharf: the map included in the consultation draft SPD at page 30 is simply replicated from the adopted Local Plan and so it would not be appropriate to</p>	No consequential change proposed

			<p>identifies the Swan Wharf stable block as being a heritage asset within the 'Dace Road Cluster', described as "a rare surviving group of transitional structures (from cast-iron and timber to steel and concrete). They form a coherent and complementary group of medium to high heritage significance ... due to their architectural and historic interest, and every effort should be made to preserve or enhance them, as they contribute positively to the character and appearance of the conservation area."</p> <p>Any demolition of the Swan Wharf stable block would create a precedent which threatens the future of all other heritage assets within the 'Dace Road Cluster'. Its loss would cause substantial harm to the Fish Island and White Post Lane Conservation Area, weakening its integrity and leading to its eventual demise. It would be of more benefit to the growing local community and a far greater asset to the conservation area for Swan Wharf to be retained and restored to enhance its current creative, cultural, hospitality and leisure uses. 3</p> <p>The Forge at Crown Wharf is shown as an unidentified heritage building within Figure 3 (the small purple block by the waterway in front of numbers 34 and 35 within the conservation area). The Forge does not form part of any other development and so should be identified and numbered in its own right.</p>	<p>amend this map within the SPD. There will be an opportunity to review, and amend where appropriate, this detail through the planned review of the Local Plan itself.</p>	
64.	Ref: 135 Chair of the Association of Iron Works Residents	Public realm – mixed use areas	<p>Page 33: PUBLIC REALM – MIXED USE AREAS</p> <p>I am in favour of the Key Design Objectives.</p>	Support welcomed.	No specific change proposed.

65.	Ref: 135 Chair of the Association of Iron Works Residents	General	Although not within the Local Plan, I have serious concerns with regard to applications for four factories (cement and asphalt) to be situated nearby on a 6.0 hectare triangular plateau which was used as the warm-up track for the 2012 Olympics. The site is situated on the southwest boundary of the London Borough of Newham at its junction with the London Borough of Tower Hamlets; it is bordered to the north by the embankment of the Jubilee Greenway (pedestrian and cycle routes), with the London–Docklands Light Railway(DLR), Norwich mainline railway and Crossrail line to the southeast.	Comments noted. The planning applications referred to will be determined in accordance with relevant national, London Plan and Local Plan policy and in the light of any other relevant material planning considerations.	No specific change is proposed to the SPD.
66.	Ref: 136 Port of London Authority	General	In this instance therefore, the PLA has no specific observations to make in terms of the content of the SPD itself. It is noted however, that the strategy includes the aim and objective of improving and enhancing the role of waterways for drainage, biodiversity, leisure and transport, which can only be supported. Policy T.10 seeks to promote the increase in using the waterways for transport related transport, and whilst not within the PLAs jurisdiction at this point of The Lea, is encouraging. The reactivation of the Blue Ribbon Network (of which the Canal and River Lea are part of), is also fully supported. The River Lea and Hertford Union Canal are very important to the character and industrial heritage of Hackney Wick, and it is pleasing to see that this has been recognised throughout the supplementary document. Proposed development should indeed create better access to the water edge, and encourage use of water ways.	Comments noted and support welcomed.	No specific changes proposed.

67.	Ref: 136 Port of London Authority	General	Currently, the Lea's navigation is predominantly used for leisure activity (and the continuation of this should be encouraged), however it is pleasing to note that there are efforts currently underway to revive commercial traffic into the canal. The PLA must be involved in these on-ward discussions as the use of the canal network in this regard would have a bearing on the workings of the Thames and indeed, the proportion of the River Lea that does fall within PLA jurisdiction (effectively up to A13 crossing). Use of the Canal Network for commercial waterborne traffic would provide the welcomed opportunity to encourage the delivery of construction material and removal of waste by water as well as the transportation of passengers as an alternative and more sustainable form of transport.	Comments noted.	No specific changes proposed.
68.	Ref: 137 - Firstplan on behalf of Aggregate Industries UK Ltd and London Concrete	Employment uses and locations	Page 7, <i>Employment Strategy</i> AI and LCL support the inclusion within the summarised employment strategy for the Hackney Wick and Fish Island to " <i>maintain the industrial character and function of the Strategic Industrial Land (SIL) areas and encourage intensification of compliant uses</i> ". However, this should include specific reference to the safeguarded rail site at Bow Midland Yard West and to highlight the key employment and freight function this serves. Planning policy at all levels requires that this site and associated plant are expressly protected.	Page 47 within the draft SPD includes the cluster function description for designated employment areas within Fish Island South. This includes that for Bow Midland West Site and replicates the cluster function description in the Local Plan, including reference to the safeguarded rail status.	No specific change proposed.
69.	Ref: 137 -Firstplan on behalf of Aggregate Industries UK Ltd and London Concrete	Employment uses and locations	Page 8, Figure 1 AI and LCL note the employment character areas identified at Figure 1. Employment Character Zone 6, includes Bow Midland West. It is not understood why the text has sought to alter the "Cluster Function" descriptions as set out in the Adopted Local Plan, Table 2, Reference B1a2. Adopted Policy B.1 is clear	See 68. Above. The draft SPD does not seek to alter the cluster function wording that is in the Local Plan. Figure 1 is simply a broad strategy diagram. This also specifically replicates the Local Plan Policies Map designations for	No specific change is proposed.

			<p>that B Use Classes shall be focused according to type within the clusters shown in Table 2. The wording in Figure 1 for Character Zone 2 - should replicate that in the Table 2, for area Reference B1a2 of the Adopted Plan in full – in particular so that express reference is made to the safeguarded rail head and associated bulk freight distribution use, and that uses should make effective use of the railhead, including potential for aggregate distribution and for concrete batching, the manufacture of coated materials, other concrete products and handling, processing and distribution of aggregate.</p> <p>Similarly, Employment Character Zone 5 does not properly accord with the requirements of the relevant section of Table 2 of the Adopted Local Plan. This should be amended to replicate that in Local Plan Table 2, area reference B1.b5.</p>	<p>Other Industrial Location and Strategic Industrial Land, with the text making reference to Local Plan Policy B.1 and Table 2 Employment Clusters, to ensure that there is no ambiguity. Therefore, no change is proposed.</p>	
70.	<p>Ref: 137 - Firstplan on behalf of Aggregate Industries UK Ltd and London Concrete</p>	<p>Employment uses and locations</p>	<p>Page 9, Employment use typologies and locations</p> <p>As per Figure 1 above references to most appropriate typologies within the main text under this heading and as summarised in the accompanying table, albeit taken from the 2015 Legacy Corporation Employment Space Study are not considered helpful or appropriate as they do not fully accord with the provisions of Adopted Policy B.1 and Table 2 for the corresponding areas. The “generally appropriate typology” identified for Character Area 6, which includes Bow West, omits any reference to safeguarded rail head, associated bulk freight distribution use and uses making effective use of the rail.</p> <p>Whilst there is a note to the SPD table which states that: “...<i>For specific policy requirements and uses reference should be made to the Local</i></p>	<p>This section and table are drawn from the conclusions of the Employment Space Study. The intention here is to provide typology guidance where new development is proposed that is otherwise compliant with employment and other policies. It is not considered necessary in this context to replicate the references to Bow Midland West that are already made on the previous page and within the Fish Island South section of the draft SPD. A minor wording change is proposed to the text preceding the table to be clear about the</p>	<p>Amend paragraph titles “Employment use typologies and locations” on page 9 of the consultation draft SPD as follows:</p> <p><i>“Taking into account the Local Plan strategy for Hackney Wick and Fish Island and the application of its detailed policies and site allocations, the following <u>table provides guidance on</u> are considered to be the most appropriate typologies within each employment character area. The study has been published alongside this SPD.”</i></p>

			<p><i>Plan Policy B.1 and table 2 (employment clusters) with the Local Plan 2015-2031</i>", it is potentially confusing and misleading to have three different summaries of the employment function – one in the adopted plan, another at Figure 1 of the draft SPD, and a further one comprising a summary table from the Employment Study.</p> <p>The identified generally appropriate typologies relevant to Bow Midland West should be amended to accord fully with the adopted Local Plan (Table 2, area ref B1.a2) and should be consistently replicated throughout the SPD.</p>	purpose of the table and its role as guidance.	
71.	Ref: 137 - Firstplan on behalf of Aggregate Industries UK Ltd and London Concrete	Housing	<p>Page 11, Housing Locations</p> <p>Under the heading "Housing Locations", subsection 5 "Residential in the Other Industrial Location" indicates that a limited amount of residential use is seen as acceptable where this successfully allows for a transition of use and environment between the Greenway and Fish Island-mid in the north and the SIL to the south. Bow Midland West is located within "the SIL to the south". The Local Plan does of course make provision for "some potential for residential and live work" in OILs within employment cluster B1.b5, however this is subject to bullet point 5 of Policy B.1. Amongst other things this indicates that such proposals shall be considered against "proximity of incompatible uses to the existing and proposed use" and of course has to ensure that it does not prejudice the function of the adjoining SIL more generally and the safeguarded rail site, in terms of these specific objections, more specifically. As identified earlier for safeguarding to be effective its remit must extend not just to safeguarding the site itself for a range of "appropriate" uses – but also safeguarding the site from development in the</p>	This comment recognises that the SPD and Local Plan identify the Other Industrial Location as the transition zone to the Strategic Industrial Land uses to the south that includes Bow Midland West. It is not considered necessary to repeat this guidance within the Housing section of the SPD in order to ensure that the reader is aware of this issue.	No specific change is proposed.

			<p>surrounding area which could prejudice its operation. This approach is reflected in the Area Specific Guidance for Fish Island South later in the draft SPD – but should also be referenced within this section of the SPD.</p> <p>Housing Location, Section 5, Residential in Other Industrial Locations, should additionally state that residential proposals will not be permitted where they would prejudice the function of the SIL and safeguarded rail site.</p>		
72.	Ref: 137 -Firstplan on behalf of Aggregate Industries UK Ltd and London Concrete	Fish Island South	<p>Page 47, Area Specific Guidance Fish Island South - <i>Strategy</i> AI and LCL support references within the Strategy to</p> <ul style="list-style-type: none"> • Maintaining, protecting and where possible intensifying the SIL within the allocated SIL area; • Avoiding introduction of sensitive uses close to the SIL boundary; • Protect and intensify employment uses within the Other Industrial Location and manage the introduction of a small element of residential development <u>where this will remain compatible with the existing or new employment uses.</u> <p>However, the Strategy fails to make specific reference to the importance of the safeguarded Bow Midland West Site, although it is acknowledged that it is referenced under the following “Site and uses” section. Notwithstanding this, express reference should be added under the “Strategy” heading to the status of the safeguarded rail site.</p>	It is not considered necessary for the strategy section of this part of the SPD to make reference to the safeguarding of the rail functions at the Bow Midland West site given that this is included in the ‘Sites and Uses’ table included on the same page..	No specific change proposed.

73.	Ref: 137 -Firstplan on behalf of Aggregate Industries UK Ltd and London Concrete	Fish Island South	<p><i>Sites and uses</i></p> <p>The specific reference to Bow Midland West e in the table under the heading “Sites and uses” setting out the key policy designations and sites within Fish Island is welcomed. The description closely matches that set out in the adopted Local Plan – although for completeness should include missing text as underlined here for avoidance of doubt: “<u>Safeguarded rail head and associated bulk freight distribution use. Uses should make effective use of the railhead, including potential for concrete...</u>”</p>	The table at this section of the draft SPD replicates the text within the adopted Local Plan and is closely associated with the detail of Policy B.1. As a result it would be inappropriate to add the suggested text to this table within the SPD as this might suggest a change in Local Plan policy..	No specific changes proposed.
74.	Ref:138 - Network Rail	General	Network Rail can confirm that we fully support the views and opinions expressed by Firstplan on behalf of AI and LCL.	See responses to 68 – 73.	See responses to 68 – 73.
75.	Ref:233 (Private individual)	General	I strongly object to the plans for Hackney wick and fish island. They do not serve the local community and will just bring further gentrification and overcrowding whilst driving away those who have made the area interesting creative and prosperous.	Comment noted. The draft SPD provides further guidance on aspects of Local Plan Policy. It is the adopted Local Plan that has set the planning policy strategy and approach for Hackney Wick and Fish Island rather than the SPD.	No specific related changes proposed.
76.	Ref: 254 (Private individual)	Infrastructure - connectivity	<p>Firstly, I object to the connectivity strategy element of the SPD.</p> <p>Replacing existing pedestrian and cycle bridges with bridges for motorised transport will encourage rat running through a new residential neighbourhood for cars and trucks to get more quickly from the A12 motorway to Stratford, rather than taking appropriate main routes. There is no need to destroy existing sustainable transport infrastructure to prioritise and encourage unsustainable and undesirable modes of transport. There is no need to take buses right to people's front doors, so this is not</p>	The connectivity strategy within the SPD reflects that within the adopted Local Plan and simply adds some additional guidance and detail in respect of specific elements of this. Any change in the planning strategy, including the connectivity strategy, could only be achieved through a review of the Local Plan. A review is programmed to begin before 2018/19.	See responses to the ‘Save Hackney Wick’ representations for any detailed changes proposed for the SPD.

			<p>a valid excuse to build this unwanted new motor-traffic bridge.</p> <p>The H16 bridge is also unnecessary, as it only duplicates a nearby crossing and at too high a cost - the destruction of an existing, highly-valued heritage building.</p> <p>There should be a general strategy for road filtering to prevent rat running and encourage sustainable transportation.</p>		
77.	Ref: 254 (Private individual)	Townscape and character	<p>Secondly, the SPD seeks to create a place that is fundamentally generic.</p> <p>There should be stronger protection for the existing buildings in the area. Too often this document seeks to sweep away existing buildings in the pursuit of a very generic 'vision' that only undermines the existing character to create a neighbourhood that could be anywhere in London, or indeed the world. This includes both historic buildings with intrinsic character and existing industrial buildings that have value by contributing to a sense of place.</p> <p>The built form examples should be drawn from and informed by the existing neighbourhood, not pictures from all over the world that the design team happened to like.</p> <p>There is no reference to the previous work of Hackney Council to seek to create a distinctive place in Hackney Wick through the use of evergreens for street trees and soft landscaping, which is a shame.</p>	<p>The draft design guidance is further to the Local Plan policy that focuses on the opportunity for 'heritage-led regeneration' putting the strategy for development and change in Hackney Wick and Fish Island in the context of the character and heritage assets identified within the conservation area appraisals for the Hackney Wick and the Fish Island and White Post Lane conservation areas.</p> <p>See responses to the 'Save Hackney Wick' representations for any more detailed changes proposed for the SPD.</p>	<p>See responses to the 'Save Hackney Wick' representations for any detailed changes proposed for the SPD.</p>

			<p>I believe that this needs a serious rethink before a further consultation, involving:</p> <ul style="list-style-type: none"> - a new approach to transport and connectivity, informed by current best practice on sustainable transport and closer consultation with the existing community. - A built form approach founded on a closer, detailed investigation of the characteristics of the neighbourhood. 		
78.	Ref: 267(Private individual)	General	<p>I support the comments of Save Hackney Wick on the Hackney Wick Fish Island SPD especially in regards to the Unit APD Planning comments on bridges H14 and H16. I feel that the bridges will intrinsically change and put at risk the village feel of Fish Island and have a negative impact on air quality. I also feel strongly that the Local Plan should be more explicit about provisions for community and public space on Fish Island. There is negligible indication as to the provision of community/public space south of Hackney Wick furthermore given the high density of artist on Fish Island and the location of some of the only Arts and culture venues within HWFI its imperative that Fish Island be identified as a Cultural Cluster with relevant provisions for cultural spaces and current Assets of Community Value.</p>	Comments noted – see separate table for responses to the Save Hackney Wick representation.	See Save Hackney Wick representation table for proposed changes to the SPD.
79.	Ref: 287 (Private individual)	General	<p>I moved to Hackney in 2004 because of the cultural vibrancy of the area, often centred around its canals. In recent years Hackney Wick has become the epicentre of this. The juxtaposition of creative workers in spaces suitable for use as artistic studios, with longstanding and diverse communities whose character had built up over generations resulted in Hackney's characteristic cultural signature.</p>	See responses to the Save Hackney Wick consultation response within its separate table.	See responses to the Save Hackney Wick consultation response within its separate table.

			<p>This integrated opportunities for young people with neighbourhoods that improved organically for older residents to enjoy. Poor planning strategies that prioritise neither of these key elements have made this more precarious throughout East London. Whilst economic growth is an important component in local planning, in isolation it means little if it comes at the expense of what is already positive in the area. Loss of pride in what is done locally, and the disengagement of local communities are ultimately very expensive prices to pay.</p> <p>I therefore very much support the comments of Save Hackney Wick on the Hackney Wick Fish Island SPD</p>		
80.	Ref: 314 (Private individual)	General	<p>With regards to the SA1.8 Sweetwater development that also applies in part to other sites e.g. SA1.7:</p> <p>I do not believe it is appropriate to develop on land situated directly above and around a radiological waste silo when no ongoing monitoring of the site has been put in place. Safeguards should be put in place to confirm that the existing silo is not disturbed during any construction, and more importantly is not adversely affected after construction going forward (i.e. begins to leach more material into surrounding waterways) It is already known that all new works on the Olympic site where building work deeper than 1m is taking place has the potential to discover new radioactive materials of unknown safety. The Olympic Park now in use by the general public; it should be a matter of public safety that there is now on-going monitoring of air quality during works for carcinogenic particulates (e.g. dust borne alpha</p>	<p>Comment noted. The Local Plan includes policy that requires appropriate site investigation and mitigation measures are undertaken where development is proposed on land that has past potentially contaminating uses.</p> <p>In the case of development within the Queen Elizabeth Olympic Park, remediation of contamination has been undertaken and suitable measures put in place within the scope of approval from planning and other relevant regulatory regimes.</p> <p>Development within the scope of the outline Legacy Communities Scheme planning permission will be</p>	No specific change proposed to the SPD.

			emitters, asbestos et al) in the park and surrounding areas.	assessed in line with planning conditions relevant to this issue. Any proposals within new planning applications will also need to take land quality issues into account where relevant.	
81.	Ref: 314 (Private individual)	Infrastructure - connectivity	<p>With regards to proposed H14 Monier Road Bridge / H16 Beach Road Bridge developments:</p> <p>The area of Fish Island is currently used predominately by pedestrians and cyclists. Allocating a primary route for road traffic through its new residential developments destroys both the existing character of the area and any ability to form a sense of community, and is in direct contradiction to policies T4 and T6. In addition, the proposed H16 pedestrian/cycle bridge emerges into an area used by industry which is far less suitable for bikes or pedestrians, and makes little sense.</p> <p>Measured (as opposed to modelled) 2012 levels of NO2 along White Post Lane exceeded legal limits, although this area is currently not residential. Forcing a new primary route through H14 will likely see illegal levels of NO2 seen in the new residential developments. In addition, the adjacent SIL near Pudding Mill lane, if developed, will be forced to use Loop Road due to the overloading of existing junctions – this forces heavy goods vehicles along the primary route and will lead to noisy, dangerous conditions. Since this route takes in the two new primary schools, I fear that an accident can only be a matter of time.</p>	<p>See no.57 above in respect of Bridges H14 and H16.</p> <p>The Bow East Goods Yard proposals are also the subject of current planning applications and are being assessed and determined outside of the SPD preparation process.</p>	No specific change proposed.
82.	Ref: 314 (Private individual)	Infrastructure -	With regards to the Wansbeck Road enhancement:	This simply indicates the potential for pedestrian and	No specific change proposed.

		connectivity	Wansbeck Road is already used as a rat run by many vehicles, the consultation paper left me unclear as to what changes were to be made to it, however any expansion of this route will likely make it more dangerous than it already is, which may be of concern considering the Neptune Wharf primary school development.	cycling improvements along this Wansbeck Road route as outlined on page 13 of the draft SPD.	
83.	Ref: 314 (Private individual)	Townscape and character	<p>With regards to new developments in the area in general:</p> <p>Townscape and character – new developments are going up that are too tall, as a result too close together, and being constructed entirely in grey brickwork that is outside of the character of the area. Planning policy seems to be that developments whose visual appearance "mirrors the industrial heritage of the area" will be approved. Putting aside the lie of an industrial heritage for an area that was once housing, what we are seeing in part are buildings that clash with existing historical structures without being notable architecture or enhancing the area in themselves getting approval due to architect claims of "industrial inspired". It is a shame that we appear to be losing the distinctiveness of the area that had been described akin to "walking into a different country" to be replaced with the forgettable bland soulless uniformity of New London Vernacular, anything is better than this.</p> <p>Assigned retail space and shop fronts are being assigned along primary road routes. It would seem to make far more sense, and to retain far more of the areas character, to have store fronts along pedestrianised areas which are far less hostile to footfall.</p>	Comments with regard to approved developments noted. In respect of new retail space, policies within the Local Plan primarily direct new retail space to the Neighbourhood Centre.	No specific change proposed.
84.	Ref: 314 (Private individual)	Public realm,	With regards to the green corridor:	Support for the approach to green corridors is welcomed.	No specific change proposed.

		open space and waterways	<p>Although I welcome any mention of a green corridor, any beneficial effects have yet to be seen, and its presence does not appear to have been taken into consideration when any existing planning decisions have been made. The view from the ground is that the areas enclosed by the green corridors are currently in the process of being "concreted to death" by new developments. There needs to be real, meaningful application of the principles of the green corridor before it is too late.</p> <p>For example, the new Carpenters Wharf development on Roach Road will concrete to the canal edge and leave no green space, unlike the older 90s residential developments along the Lee and navigation channel on Fish island that sustain natural green habitats along the canal bank.</p> <p>Existing temporary green space wildflowers and trees chopped down to make way for a Primary School as part of the Sweetwater development will be replaced by steel fences enclosing concrete. Outside of the HW/FI area, we find the tallest tower block in East London being planned inside the green corridor. Clearly, the "green corridor" designation as it stands is not being enforced at the planning stage, or is being waved away assuming it won't matter; in short changes here urgently need to be made.</p>	Comments in respect of approved and existing new developments are noted.	
85.	Ref: 314 (Private individual)	General	<p>Finally, some positive feedback. I appreciate this is scarce, put this down to it being far easier to criticise!</p> <p>It's commendable that new developments are set to be 60% affordable. Putting the definition of "affordable" aside, well done.</p>	Comments noted.	No specific change proposed

			<p>I welcome the forward thinking expansion of the district heating network – those with a good scope like option 1 or 2 appear preferable, even if I am unable to benefit from it myself.</p> <p>Finally, we have seen some good decisions made to protect some working historical structures from redevelopment (eg Algha Works).</p>		
86.	Ref: 444 (Private individual)	General	<p>I am writing to add my voice to the objections I'm sure you have read by Save Hackney Wick, on the Hackney Wick Fish Island SPD</p> <p>https://savehackneywick.org/hwfi-local-plan/our-objections</p> <p>In particular, reading the draft I'm amazed that the existing facilities and venues in the area are ignored in their reflections on youth & community space.</p> <p>It is also clear that protecting existing buildings and open space in general has not been the focus that it ought to be. What is already established in this area is both important to local residents, and a draw for those living further away, which should not be underestimated.</p>	Comments noted – see separate table for responses to the Save Hackney Wick representation.	Comments noted – see separate table for responses to the Save Hackney Wick representation.
87.	Ref: 469 – Daniel Watney on behalf of Roypark (1988) Ltd and Newstates Ltd	Townscape and Character	<p>Purpose of Supplementary Planning Documents</p> <p>National Planning Practice Guidance (PPG) states that Supplementary Planning Documents (SPDs) should be prepared only where necessary and in line with paragraph 153 of the NPPF.</p> <p>The NPPF states that additional Development Plan documents should only be prepared and adopted where they can be clearly justified as they are intended to help applicants in making</p>	Comment noted. The draft SPD provides design and other guidance with the intention that this enables development proposals to consider the context set within the range of policies of the Local Plan and the related supporting work that characterises the area, including the conservation areas and their settings. It is	No specific changes proposed. Specific changes to the design guidance within the draft SPD are outlined elsewhere in this table.

			<p>successful applications or to aid infrastructure delivery. PPG is explicit when stating that an SPD is required to “<i>build upon and provide more detailed advice on guidance on the policies in the Local Plan. They should not add unnecessarily to the financial burdens on development</i>”. It is important therefore that the proposed Hackney Wick and Fish Island SPD adheres to national policy and guidance by assisting applicants to help make successful planning applications, rather than provide additional burden to development. We strongly contend that the proposed SPD does not currently do this, and in fact provides another layer of design restrictions which would negatively impact on the viability of development on Hamlet Industrial Estate.</p>	<p>unclear as to how providing positive design guidance based on existing policy requirements would negatively impact on the viability of development proposals in this area and no evidence to support this suggestion has been provided. Specific changes to the design guidance within the draft SPD are outlined elsewhere in this table.</p>	
88.	<p>Ref: 469 – Daniel Watney on behalf of Roypark (1988) Ltd and Newstates Ltd</p>	<p>Neighbourhood Centre</p>	<p>Workspace Cluster Page 37 of the SPD seeks to allocate workspace clusters across the Hackney Wick neighbourhood centre, specifically suggesting Hamlet Industrial Estate could be utilised at ground floor level as a working yard.</p> <p>Firstly, these workspace clusters have been allocated to ensure that sufficient commercial floorspace is retained and provided within the Neighbourhood Centre. However, Hamlet Industrial Estate has been included within this policy even though it falls outside of the Centre. The implications of this allocation is that these workspaces are subject to more controlled design restrictions as per page 104 of the SPD which provides design guidance for public realm within working yards.</p> <p>By allocating Hamlet Industrial Estate as a workspace cluster, the SPD provides a greater restriction on the development potential of the</p>	<p>Agreed that the Local Plan policies will require employment floorspace to be maintained or re-provided, particularly in accordance with the requirements of Local Plan Policy B.1. The form and type of commercial space would however, need to comply with the policy requirements for locations outside of the Neighbourhood Centre. The clusters indicated are no allocations as the SPD only provides guidance and the Local Plan policies, allocations and designations remain the primary consideration. The workspace cluster diagram on page 37 of the draft SPD does require amending to show only those locations that fall with</p>	<p>Workspace cluster diagram on page 37 of the draft SPD amended to exclude locations that fall outside of the Neighbourhood Centre boundary.</p>

			<p>site, in addition to those policies within the Local Plan.</p> <p>Any redevelopment of the site would already be subject to the policies within the Local Plan, requiring the commercial floorspace to be re-provided in a manner which is sensitively incorporated with the residential units above.</p>	<p>the Neighbourhood Centre boundary and so exclude reference to the Hamlet Industrial Estate site.</p>	
89.	Ref: 469 – Daniel Watney on behalf of Roypark (1988) Ltd and Newstates Ltd	Appendix x 2	<p>Design Considerations</p> <p>As discussed, the SPD places additional burden on development within the area including design restrictions above and beyond those which are already established through the parameters within the adopted Local Plan and Conservation Area Guidelines. There is no need to introduce another layer of design restrictions in this area, which this SPD seeks to achieve. This would be contrary to national guidance and policies by adding unnecessary burden to development.</p> <p>The SPD states that “<i>elevations should have a predominantly consistent and simple roofline and within the conservation areas should not compete with, or detract from retained heritage assets.</i>” We consider that it would be more flexible if the SPD stated that the roof form should be designed as an integral component of the building design.</p> <p>The SPD states that “<i>elevations should have a regular pattern of openings and should respond to the material, scale and proportions of retained heritage assets. Building heights should step down in response to the setting of heritage assets, and step up in tall building locations. A minimum of two storeys should be maintained to ensure good definition of the street</i>”.</p>	<p>Comments noted. The design guidance provided sets out a range of principles to help in the process of designing acceptable solution to specific sites in the context of the range of relevant policy requirements within the Local Plan. In this way the SPD is considered to provide helpful guidance rather than restrictions to development that are not already set out in the Local Plan. It is also correct to note that development proposals would need to meet the requirements of Policy BN.10 in respect of building height. No changes are proposed to the SPD in this respect. However, the overall approach to design guidance within the SPD has been reviewed, revised and consolidated, with Appendix 2 now removed.</p>	<p>No specific changes proposed. However, the ‘Heritage, Townscape and Character and the Public Realm’ section of the SPD have been revised and Appendix 2 removed.</p>

			<p>We advocate taller buildings where they are appropriate, however this should be assessed having regard to Policy BN10 of the Local Plan, rather than requiring further restrictions through this SPD. For example, there should be greater prevailing height along the canal due to the width across the canal from the site to nearby Sweetwater and East Wick. Hamlet Industrial Estate represents a suitable location for a tall building, which would not be supported through the SPD due to development being required to step up in tall building locations, which the site falls outside of. The SPD needs to reflect Policy BN10 by acknowledging that key tall buildings outside of these specified locations will help from a townscape perspective for a number of reasons, including wayfinding, creating legibility of key spaces and providing a more varied, interesting townscape.</p> <p>The SPD states with regard to street facing elevations that “<i>projecting balconies should be avoided and the use of canopies, projecting signage, down pipes or any other ancillary element protruding outside of the building line should be kept to an absolute minimum</i>”. It is important to recognise that the relationship between ground floor uses such as commercial floorspace / restaurants and the residential units above, can have a variety of acceptable design solutions.</p>		
90.	Ref: 469 – Daniel Watney on behalf of Roypark (1988) Ltd and Newstates Ltd	Implementation and Delivery	<p>Viability The SPD includes requirements for the provision of affordable workspace and housing through redevelopment, however does not make any reference to viability of developments throughout the document, therefore not recognising the approach taken in the Local Plan which states that “<i>the balance of uses within proposals for</i></p>	The premise of the comment is considered to be incorrect. The SPD is designed to provide additional guidance in respect of particular policy areas within the Local Plan. It is not considered necessary to repeat the reference to	Add the following to the first paragraph of the Implementation and Delivery section of the SPD: “ <i>Aside from High Quality Design, the key to ensuring</i>

			<p><i>mixed use development will be assessed on the basis of the overall viability of a proposal and any overriding factors”.</i></p> <p>As the SPD is proposing another layer of planning policy protection, it needs to reflect that viability is a crucial consideration in schemes to ensure that regeneration is stimulated and the Local Plan targets in respect of housing, employment growth and overall development objectives are satisfied.</p> <p>By adding another layer of regulation and burden which could stifle development, in doing so the SPD could prevent the delivery of much needed housing and infrastructure.</p> <p>The document does not reflect the Local Plan which requires schemes to be assessed having regard to viability, therefore acknowledging that the delivery of affordable workspace and housing whilst also stimulating regeneration is not always achievable and therefore each scheme needs to be assessed on its own viability merits.</p>	<p>scheme viability within Local Plan policies within the SPDt. However, it is proposed to add an element of text to the introduction to Part 3, Implementation and Delivery, to make this clear.</p>	<p><i>the success of these elements in creating successful places will be the delivery of key elements of physical and social infrastructure. In most cases, where change is outside of the direct control of the Legacy Corporation, specific intervention to make development happen will not be necessary. However, where it becomes necessary to assemble viable sites or acquire land to ensure delivery of necessary new physical infrastructure, the use of the Development Corporations compulsory purchase powers will remain as an option. <u>Ensuring the viability of schemes, within the context of meeting Local Plan and London policy requirements will also be important.</u></i></p>
91.	Ref: 469 – Daniel Watney on behalf of Roypark (1988) Ltd and Newstates Ltd	General	<p>Summary</p> <p>The primary objective of establishing the London Legacy Development Corporation was to stimulate regeneration following the Olympic Games in 2012. Whilst Stratford in particular has experienced significant amounts of redevelopment, Hackney Wick and Fish Island have not, despite the large number of planning applications that have been made. The majority of these planning applications have proposed affordable workspace at ground and lower floors, and have been limited to no more than six floors of residential accommodation above,</p>	<p>Comment noted. However, the SPD provides further guidance to policies within the Local Plan and is by definition not a Development Plan Document and does not create new policy.</p>	<p>No specific changes proposed beyond those proposed above.</p>

			<p>including affordable housing. These parameters have generally been set through the direction of the Local Plan.</p> <p>The lack of development being undertaken in the local area despite the high number of planning permissions suggests that schemes are not currently viable to develop. Adding another layer of planning policy including further design restrictions and requirements will simply restrict development even further as viability will be compromised.</p> <p>The Local Plan already places significant strain on the viability of schemes being brought forward due to the requirement for affordable workspace, affordable housing and general restrictions on height and design. A further Development Plan Document will not result in development being stimulated, rather is likely to have the opposite effect due to increased restrictions and regulations.</p>		
92.	Ref: 517 - Nathaniel Lichfield & Partners on behalf of Hatton Garden Properties Ltd.	Employment uses and locations	<p>Employment Uses and Locations</p> <p>The SPD recognises that the Hackney Wick and Fish Island area is a 'focus for a significant proportion of the projected 59,000sqm of additional B use classes floor space requirement' for the LLDC until the end of its local plan period in 2031 (p7).</p> <p>We support in principle the proposed 'Employment Character' of the Hackney Wick Neighbourhood Centre (area 3, SPD page 8) which includes the Queen's Yard site and is presented as:</p> <p><i>A mix of employment, retail and community uses along with new residential forming a focus around the Hackney Wick Station area and into Eastwick and Sweetwater (Use Classes predominantly 81a, 81c, A 1-A5, 01, 02 and C3).</i></p>	<p>Support for the overall approach to employment elements of the SPD is welcomed. The SPD, by providing guidance further to relevant Local Plan policies is considered to retain the balanced approach within those adopted policies.</p> <p>The guidance on relocation strategies is not considered to be at odds with this as this simply provides guidance on how best to meet the requirements within Local Plan Policy B.1 for the submission of relocation strategies in certain circumstances. The</p>	No specific changes proposed.

			<p>The SPD must however be clear that a balance needs to be struck between employment floorspace and residential accommodation in new development to ensure that mixed use schemes are not unnecessarily inhibited by restrictive employment policy. We support the SPD's section on 'compatibility of uses' (p10) which acknowledges circumstances where existing employment uses (i.e. 82) would be incompatible within an 'otherwise acceptable development scheme' and would therefore justify their removal from a development site.</p> <p>The SPD's emphasis on relocation strategies for existing occupants is at odds with this objective (Appendix 2 of the SPD) and is unacceptable.</p>	<p>introductory text to the Appendix also specifically recognises that the actual approach that will be appropriate to each development proposal will need to be specific to its circumstances.</p>	
93.	Ref: 517 - Nathaniel Lichfield & Partners on behalf of Hatton Garden Properties Ltd.	Housing	<p>Housing The SPD's guidance on LLDC Local Plan Policy H1 'Providing a mix of housing types' should add a caveat to consider the appropriateness of family housing at certain sites. For example, the LLDC's aspiration for the redevelopment of the Queen's Yard site is to retain an operational working yard at the core of the site. Given this activity, the Queen's Yard site is less appropriate for family housing than other sites (inherently more suitable for family housing) within Hackney Wick Neighbourhood Centre. The HGP application's dwelling mix reflects the site specific circumstances. The SPD should be amended to provide greater flexibility in family housing provision reflecting the rich variety of development sites in Hackney Wick and Fish Island, some of which are less suitable for family housing. The SPD's guidance on LLDC Local Plan Policy H2 'Affordable Housing' states that affordable housing on sites of 10 units or more should be maximised, and smaller sites within the Neighbourhood Centre are 'encouraged to</p>	<p>The matters of housing mix and family housing within this mix are addressed within Local Plan policies, particularly Policies H.1 and H.2. It will be more appropriate for these issues to be addressed on a site-specific basis within individual development schemes on a case-by-case basis whereas the SPD cannot be used to create new policy.</p> <p>The approach to affordable housing is set out explicitly within Local Plan Policy H.2, with this referenced in the Housing section of the SPD. The policy is clear on the need to take viability into account and it is not considered necessary to add a specific reference at this point of the</p>	See 90 above for specific proposed wording change.

			<p>cooperate when planning affordable housing delivery' (p11). The SPD should acknowledge that the maximum quantum of affordable housing that a scheme can sustainably provide should be derived having regard to development viability. This will also be influenced by the character of the site and the vision that the LLDC is aiming to achieve on respective sites. For example, the Queen's Yard site is recognised as a cultural hub and consequently the LLDC aspiration is to have a new 'Yard Theatre' built on site. The HGP application cannot viably provide affordable housing in addition to the theatre (provision of land and seed funding) and this is reflected in the HGP submission. Contributions to the emerging Hackney Wick and Fish Island communities will vary spatially depending on context and in the case of Queen's Yard it is more appropriate to prioritise the delivery of community infrastructure rather than affordable housing. This flexibility should be recognised in the SPD.</p>	<p>SPD. An added reference to scheme viability is however proposed within the Implementation and Delivery section of the SPD (see 90 above for proposed wording).</p>	
94.	Ref: 517 - Nathaniel Lichfield & Partners on behalf of Hatton Garden Properties Ltd.	Infrastructure - connectivity	<p>Infrastructure (connectivity) We support the SPD's statement that the principal focus for ensuring connectivity throughout Hackney Wick and Fish Island is the provision of new/improved walking and cycling routes and an accessible public realm. This will be facilitated partly by new/enhanced areas of public realm leading to Hackney Wick Central Station (the planned improvements to which are also recognised as key to the area's growth). We note that the two key routes in proximity to Queen's Yard are 'North South Route (Hackney Wick Station)' which runs from Prince Edward Road down to White Post Lane (to the west of the Queen's Yard site) and the 'North South</p>	<p>Comments noted and areas of support welcomed.</p>	<p>No specific changes proposed.</p>

			<p>Route (Hertford Union Canal)' which runs from the southwestern corner of the Queen's Yard site down to Roach Road.</p> <p>The HGP application is consistent with this vision and these aspirations/ interventions are supported. We note that the one-way route through the Queen's Yard site proposed in the HGP application is consistent with the SPD which recognises this as a 'local/service route' (p14). Again, this is supported.</p> <p>The SPD shows that the PTAL rating for the Queen's Yard site will rise to Level 4 (where one is poor and 6 is excellent) by 2031 (p15). In line with London Plan density guidance, the SPD should enable developers to take a longer term view on the acceptability of higher densities to reflect anticipated improvements in accessibility.</p>		
95.	Ref: 517 - Nathaniel Lichfield & Partners on behalf of Hatton Garden Properties Ltd.	Infrastructure – heating and cooling	<p>Infrastructure (district heating network)</p> <p>We note that SPD presents four Heat Network Options (p17) for the extension of the existing or creation of a new heat network. These options were informed by the findings of the Hackney Wick and Fish Island District Heating Study (April 2016).</p> <p>The preferred option (Option 1) consists of a <i>'connection to the existing heat network crossing the Lee Navigation to provide a heat network to Hackney Wick and Fish Island-mid. Heat network bridge crossings at one or more bridge (White Post Lane Bridge and Bridge B14, Bridge B16)'</i>.</p> <p>Subject to there being sufficient capacity for schemes such as Queen's Yard to connect to the existing heat network, competitive pricing and the provision of relevant associated</p>	Support welcomed.	No specific changes proposed.

			infrastructure to facilitate this, HGP supports this preferred option.		
96.	Ref: 517 - Nathaniel Lichfield & Partners on behalf of Hatton Garden Properties Ltd.	Public realm, open space and waterways.	<p>Public realm, open space and waterways</p> <p>We welcome the SPD's identification for a 'potential new private or communal garden' in the southwestern corner of Queen's Yard. The Queen's Yard application is consistent with the inclusion of communal amenity space in this location and exceeds the area of green space shown in the SPD for the site.</p> <p>The 'Western Bank Interface' of the canal section by the Queen's Yard is identified in the SPD to provide 'potential for further opening up of waterway frontage, harder landscaping types but with opportunities for greening in parts' (p24). This is consistent with the HGP Queen's Yard application.</p>	Comment noted.	No specific change proposed.
97.	Ref: 517 - Nathaniel Lichfield & Partners on behalf of Hatton Garden Properties Ltd.	Heritage and townscape	<p>Heritage</p> <p>The SPD identifies a series of buildings/structures identified under the 'umbrella' term: <i>Heritage Assets</i> (p30). In our view, the LLDC should distinguish between designated heritage assets and those of only local significance. The protection given to heritage assets should be proportionate to its value in accordance with the NPPF. This issue needs to be reviewed and clarified to support developers' delivery of the transformative change the LLDC aims to promote.</p>	The map on page 30 of the consultation draft SPD showing heritage assets is reproduced from the Local Plan and so it is not considered appropriate to amend this.	No specific change proposed
98.	Ref: 517 - Nathaniel Lichfield & Partners on behalf of Hatton Garden Properties Ltd.	Townscape and character	<p>Townscape and Character</p> <p>The SPD guidance on townscape and character is too prescriptive for the remit of a planning guidance document and fails to appreciate the value of site specific design responses to varied spatial contexts throughout the Hackney Wick and Fish Island area. This is addressed in further detail in our representations on Appendix 2 (see further below in this letter).</p>	The support expressed is welcomed. This section are provided in the SPD as guidance and not a prescription, with the intention that this helps development design to meet the range or requirements set out in Local Plan policy. Notwithstanding this, this section has been	'Heritage, Townscape and Public Realm' section revised, with Appendix 2 removed.

			<p>With regard to Employment Use Design, we welcome the statement (p32) which states that: <i>Ground Floor workspace frontage will need to balance active frontages and daylight with adequate privacy and practical internal arrangements.</i></p> <p>This statement is consistent with the approach taken for the studio workspace units in the HGP Queen's Yard application.</p> <p>We also welcome the following six Key Design Objectives outlined in the SPD for the public realm of mixed-used areas:</p> <ol style="list-style-type: none"> 1 Improve Connectivity 2 Be accessible, inclusive and safe 3 Be simple, consistent, high quality and minimize clutter 4 Reflect the area's special qualities and distinctive character 5 Be multi-purpose and provide amenity 6 Be sustainable <p>The Queen's Yard application is again consistent with these objectives.</p>	<p>reviewed and revised, with Appendix 2 removed.</p>	
99.	Ref: 517 - Nathaniel Lichfield & Partners on behalf of Hatton Garden Properties Ltd.	Neighbourhood centre	<p>Neighbourhood Centre: Area Specific Guidance (applicable to the Queen's Yard site)</p> <p>This section of the SPD draws on the LLDC's current live application for Hackney Wick Central. The plans throughout this section show the LLDC's outline proposals as the basis for the guidance.</p> <p>This is premature and inappropriate. The inclusion of a live planning application as the basis for planning guidance suggests that the current application has been predetermined and brings into question the LLDC's objectivity and impartiality in the determination of its own planning application.</p>	<p>This section draws on the principles from elements of the work behind the approach to the LLDC's Hackney Wick Central planning application. The level of detail expressed within the SPD is neither that contained within the application itself nor is it prescriptive given that the SPD is presented as guidance. It is therefore considered that with minor amendments this section of the SPD is appropriate in its approach.</p>	<p>Minor amendments and corrections made to the drawings within this section. (ALSO UPDATE SHOULD HWC BE APPROVED).</p>

			<p>This material has clearly been prepared for an outline planning application and not for the purposes of adopted planning guidance. In our view it should be comprehensively updated.</p> <p>Notwithstanding this, the following outlines our comments on this section of the SPD.</p> <p>The SPD (p36) identifies active frontages, retail and community uses as principal elements of the Neighbourhood Centre strategy, yet the guidance on the Neighbourhood Centre redevelopment strategy (p35) does not acknowledge the Yard Theatre as one of the new community facilities to be delivered. The SPD should be amended to reflect this.</p> <p>The guidance (p36) states that 'retail, leisure and community uses should generally be focussed along the key active frontages where they are most visible and accessible'. This will not be the case for the Queen's Yard site with the new location for the Yard Theatre, given the LLDC's aspiration to concentrate activity around the working yard and retain Queen's Yard's status as a cultural hub. This aspect of the SPD guidance could be caveated to reflect site specific differences.</p> <p>The section on 'clusters of workspace' requiring potential changes to B2/B8 uses is in contradiction to the 'compatibility of uses' section (p10) and the Employment Character Area 3 description (p8) which already acknowledges B2 and B8 would not be considered appropriate in this location.</p>	<p>This section of the draft SPD outlines principles and does not provide detail of specific locations for specific uses or occupiers. The Yard Theatre is identified as community infrastructure in Table 2 Identified Infrastructure (at no.23) of the draft SPD.</p> <p>Comment with regard to the proposed location for the Yard Theatre is noted. The SPD outlines principles with specific development proposals needing to address these on a case by case basis. No specific change to the draft SPD is considered necessary in this respect.</p> <p>The 'Potential for workspace clusters' drawing is not considered to contradict other parts of the SPD or Local Plan policy to which it is associated. The drawing is non-use</p>	
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			<p>The image (p37) entitled 'Potential for Workspace Clusters', and its associated key, is incorrect. It presents the LLDC outline application's <i>proposed</i> rear servicing yard as an 'Historic Working Yard' but this yard space <i>does not exist</i> on site at present. As we have previously advised on our representations to the Masterplan application, this proposed yard is secondary, and in addition, to the central working yard at the core of the site. This would take servicing and activity away from the retained working yard and thereby alter its character. It therefore does not fully accord with the approach set out in the site allocation in the LLDC's Local Plan (SA 1.1) or with the LLDC Masterplan's own vision for Queen's Yard. This aspect of the SPD should be reviewed and the rear servicing yard removed to ensure consistency throughout the LLDC planning policy framework.</p> <p>The image (p38) entitled 'Connections (existing and new)' omits the dotted line arrow to represent the north-south link from White Post Lane to Wallis Road. This should be corrected. The image (p39) entitled 'Retaining heritage assets' identifies the entirety of the Working Yard at Queen's Yard as an 'Historic Street'. This is predominantly an enclosed yard with one one-way tertiary road loop and cannot reasonably be labelled as a 'street'.</p>	<p>specific while the accompanying text is clear that there should be a focus on Use Class B1a and B1c space within the Neighbourhood Centre and that changes from B2 and B8 uses will need to meet the policy test set out in Local Plan Policy B.1.</p> <p>Comments in respect of a potential rear servicing yard are noted, However, this is provided as guidance only and is designed to illustrate the potential for a cluster rather than a fixed masterplan or planning application solution. It is therefore considered appropriate to retain this detail in its illustrative form with a minor amendment to remove the notation of 'historic working yard from behind the northern buildings at Queens Yard. It would be appropriate to add text to the introduction for this set of drawings to be clear about their illustrative status.</p> <p>This draft SPD image showing connections does include a dotted line and arrow showing the north-south route from Wallis Road to White Post Lane.</p>	<p>Amend the 'Workspace clusters' drawing to remove 'historic working yard' notation from rear of northern buildings at Queen's Yard, and add the following to the introductory section for this set of drawings as follows:</p> <p>“Achieving the strategy - principle elements The following sets out the principles that will help development achieve a coherent and comprehensive approach to developing the neighbourhood centre <u>(associated drawings are illustrative).</u>”</p>
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				For the 'Retaining Heritage Assets' drawing on page 39 of the draft SPD , remove historic street indication for Queen Yard yard area.	For the 'Retaining Heritage Assets' drawing on page 39 of the draft SPD, remove historic street indication for Queen Yard yard area.
100.	Ref: 517 - Nathaniel Lichfield & Partners on behalf of Hatton Garden Properties Ltd.		Delivery and Implementation We note that the Yard Theatre is identified as one of the new infrastructure elements to come forward (SPD p56).	Comment noted	No specific change proposed.
101.	Ref: 517 - Nathaniel Lichfield & Partners on behalf of Hatton Garden Properties Ltd.		Appendix 1: Acceptable Relocation Strategies Our representation specific to Appendix 1 is an overarching concern relating to a requirement for forthcoming development proposals to provide detailed employment relocation strategies; by doing so the SPD will not support the delivery of the legacy of this area, but rather inhibit development and growth. Our objection to the principle of Appendix 1 is detailed below. 1 The Hackney Wick Neighbourhood Centre (and therefore the Queen's Yard site) is designated for new mixed-use development in the adopted LLDC Local Plan. Developers such as HGP have responded to the LLDC's vision in their proposals. This vision means that B2 employment uses (which will, by definition of the Use Classes Order, be incompatible with emerging 'mixed' uses such as residential and community use) must therefore relocate from Hackney Wick Centre in order to comply with the LLDC's own vision. This is an inherent contradiction in the SPD. 2 The principle of relocation has been assessed and agreed in the Employment Land Review used to support the adoption of this vision for Hackney Wick Centre in the LLDC Local Plan. It	The draft guidance on relocation strategies has been included to provide a benchmark for relocation strategies that are sought within the requirements of Local Plan Policy B.2. The introductory text within Appendix 1 is clear about this relationship and also clarifies that this is a recommended approach. It is also acknowledged in this text that each scheme will have different circumstances and that each case will need to be discussed with the LPA. It is therefore considered that, given this, and that the approach is guidance, that the contents of the appendix are appropriate.	No specific change proposed.

		<p>is unreasonable to undermine the evidence base to the Local Plan which justifies the land use transition from industrial to mixed-use in the neighbourhood centre, and then introduce an SPD to the Local Plan requiring the protection of these industrial uses in the area.</p> <p>3 The preparation and implementation of a detailed relocation strategy is beyond the remit of a developer. It is not expected that tenants at the end of their lease should be found alternative premises in other comparable scenarios; indeed the inherent nature of a lease gives both the leaseholder and owner security of tenure and rental income for a limited period of time only. The requirement for preparing and implementing relocation strategies by a developer is unnecessary and will inhibit otherwise acceptable development.</p> <p>4 Unit occupation is driven by market demand and it is unreasonable to expect the developer to tailor its units to a certain returning/relocated occupier, thereby potentially limiting its chances of occupation (and return an investment in regeneration). Accordingly the proposed developments should be encouraged to seek to create flexible employment floorspaces which could accommodate a range of occupiers and ensure the long term sustainability of the local area.</p> <p>5 In the specific case of Queen's Yard, the HGP application presents a survey conducted with the employment unit occupiers at the site, which found that all respondents had plans to expand their businesses (see the Statement of Community Involvement, p15). These</p>		
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			occupiers would seek to relocate of their own accord in line with the site's redevelopment timescales and the terms of their current leases.		
10 2.	Ref: 517 - Nathaniel Lichfield & Partners on behalf of Hatton Garden Properties Ltd.		<p>Appendix 2: Townscape and Public Realm This Appendix is taken directly from the Design Code from the Hackney Wick Central Masterplan Application (16/00166/OUT) prepared by joint applicants (LLDC Real Estate Team and the London Borough of Hackney). As above, this is a live application, currently pending determination by the LLDC's Planning Policy and Decisions Team. Numerous references make little/no sense in the context of the SPD, including direct references to other sections of the LLDC outline application which have been retained here in error (reference to Reserved Matters applications and Section 2?). Again, this text has not been prepared for the purpose of the SPD. It is overly prescriptive and detailed. To retain this Appendix in the adopted SPD is premature and suggests predetermination of a current live planning application submitted by the LLDC itself. For these reasons we would advise the LLDC to comprehensively revisit this design guidance.</p> <p>Notwithstanding this our comments on the current guidance are added below.</p> <p>Firstly, the guidance remains far too prescriptive. The guidance should be sufficiently flexible to apply to the different characters of the various sub-areas within the Hackney Wick and Fish Island area. By adopting the Design Code from the LLDC outline application (16/00166/OUT) which was produced for the discrete area of Hackney Wick Central only, and applying it to the wider SPD area, the LLDC risks 'cleansing' this area of its</p>	See responses and proposed changes at 98 and 99.	See responses and proposed changes at 98 and 99.

		<p>varied areas of townscape characters and identity.</p> <p>Appendix 2 (in particular pages 93-94) is too prescriptive in terms of suggested materials and manufacturers. This is inappropriate within a policy document, it limits the developer unnecessarily and the level of detail is, again, well beyond the remit of an SPD.</p> <p>There are also elements of the design guidance which are not supported by any form of justification. These are outlined below:</p> <p>1 <i>Block lengths should be limited to 50m, otherwise a break or step in massing is required (p60).</i></p> <p>2 <i>Steps in height within and between blocks should be deliberate and purposeful, and should be a minimum of 2 storeys (6m)(p60).</i></p> <p>3 <i>Any steps in height should be kept away from the corners by 8 metres minimum (p62).</i></p> <p>4 The guidance on page 64 relates to the <i>façade design and layout of buildings fronting narrower passages of 11 m and less.</i></p> <p>5 <i>Where vertical railings are used [sic] fins of 80-100mm in depth at 80mm centres should be used [sic] (p64).</i></p> <p>This guidance is excessively prescriptive for a large urban area such as Hackney Wick and Fish Island. The dimensions/scales given are apparently arbitrary and lack any supporting evidence.</p> <p>The SPD fails to justify why the above measures are necessary to achieve successful development design. This overly mechanistic quantitative approach fails to appreciate the proportionate impact the proposed design guidance would have on schemes of different sizes and scales. For instance, a two-storey step in height from a</p>		
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			<p>block of four storeys to two storeys would have a greater visual impact than a two-storey step in height from a block of nine storeys to seven storeys. There is no 'one size fits all' approach to good design. The design of new development across the area should be a response to site specific opportunities and constraints and should not be dictated by a set of universal rules (or in this case a design code taken from a live planning application covering only a small proportion of the area to which the guidance would relate). For these reasons, Appendix 2 must clearly be revisited in full.</p>		
10 3.	Ref: 527 (Private individual)		<p>I would like to raise my objections to the LLDC proposals at Hackney Wick, to namely the physical loss of it's industrial heritage and also the loss of inhabitation by the current artistic community which has turned Hackney Wick into probably the largest artistic community in Europe, and the most visually arresting. Hackney Wick is much like a large canvas, lavished with simply not just murals but with a working culture that influences the much wider area. Both my close friends [REDACTED] and [REDACTED] expect to leave their premises because of the current proposals. To wholly demolish this cultural fabric/ industrial heritage would be an unnecessary fate for a place that could be preserved and whose legacy could be lengthened over many more years.</p>	<p>The Local Plan, adopted in 2015, sets out the planning strategy for Hackney Wick and Fish Island and includes the policies against which planning applications will be assessed, including employment uses and the historic fabric. The SPD provides a link to these and detailed areas of specific guidance.</p>	No specific changes proposed.
10 4.	Ref: 572 – L&Q Development		<p>Chapter 1: Introduction L&Q welcomes the strategic approach of the SPD which seeks to respond to the challenge of managing change in Hackney Wick and Fish Island, whilst enhancing its historic character, providing much needed new homes and supporting the developing and changing business base.</p>	Support welcomed.	No specific changes proposed.

10 5.	Ref: 572 – L&Q Development (L&Q Group)		<p>Chapter 2: Vision L&Q supports the SPD’s vision for Hackney Wick and Fish Island to become home to mixed and balanced neighbourhoods with opportunities for social, cultural and economic activity. Creating a Neighbourhood Centre with strong transport links is important to connect the area both locally and more widely across London. We believe that new development has an important role to play in helping to realise this vision. The SPD sets out a series of priorities for Hackney Wick and Fish Island which are expected to be met, in part, by the development of a number of allocated sites. L&Q generally supports the LLDC’s priorities for the area, particularly in securing high quality design, providing mixed uses, improving connectivity, enhancing waterways and open spaces, and delivering new homes, retail, leisure and community spaces. We make specific comments in respect to the employment provision set out below.</p> <p>L&Q supports these priority themes, which we consider to have been demonstrated in our Bream Street scheme, which forms Site Allocation SA1.4.</p>	Support welcomed	No specific changes proposed.
10 6.	Ref: 572 – L&Q Development (L&Q Group)		<p>Policy B.1 – Location and maintenance of employment uses Policy B.1 sets out the acceptable locations for and approaches to maintaining or re-providing B use class floorspace within the Legacy Corporation area. L&Q is supportive of the development and growth of technology, broadcast and higher education uses at Here East, which should raise the profile of Hackney Wick as an employment destination.</p>	Policy B.1 is the prime employment use policy within the adopted Local Plan. The draft SPD seeks to express the approach in that policy which is considered to provide a sufficient level of flexibility in terms maintaining or re-providing employment floorspace in appropriate forms. The Bream Street scheme planning permission	No specific change proposed.

			<p>This policy seeks a diversification of uses in the Fish Island Mid area through the introduction of residential development and by ensuring that employment space is re-provided as part of new developments. L&Q is developing a significant amount of employment space within our Bream Street scheme, which takes the form of a high quality stand alone building. We consider that a flexible approach should be taken to the re-provision of employment uses in order to ensure that residential development opportunities, including the provision of much needed affordable housing, remains viable.</p> <p>This policy seeks to maintain the industrial function of Strategic Industrial Land and Locally Significant Industrial Land. L&Q supports the containment of industrial uses within the south of Fish Island and which should help to prevent any noise or disturbance to the mainly residential areas of Hackney Wick and Fish Island Mid.</p>	<p>was determined in the light of Local Plan policies and in that context considered to acceptable in its approach to employment floorspace.</p>	
10 7.	Ref: 572 – L&Q Development (L&Q Group)		<p>Policy B.2 – Thriving town, neighbourhood and local centres Policy B.2 seeks to identify new and existing town centres in the area and reinforce their attractiveness as hubs of employment, retail and community uses. L&Q supports the designation of Hackney Wick as a Neighbourhood Centre which will provide social, economic and cultural opportunities centred around Hackney Wick Station, alongside new homes. L&Q believes the Neighbourhood Centre could be a mixed use hub, which is both liveable and a place to operate business, with potential to drive the whole area economically.</p>	<p>Support welcomed.</p>	<p>No specific changes proposed.</p>
10 8.	Ref: 572 – L&Q Development (L&Q Group)		<p>Policy B.4 – Providing low-cost and managed workspace</p>	<p>Comment noted. Policy B.4 sets out the approach that is sought where ‘low-cost’</p>	<p>No specific change proposed.</p>

			<p>Policy B.4 seeks retention of existing employment floorspace within new development and encourages provision of new low-cost or managed workspace.</p> <p>Whilst L&Q supports the re-provision of employment workspace, delivering this at low-cost rents can often be challenging in terms of viability, especially when provided alongside significant levels of affordable housing. From our recent experience at Bream Street, we believe that workspace is viable when it is designed to be flexible that also suits the varied needs of cultural and creative industries. Such workspace can be provided as incubator spaces, small studios or large workshops which can be offered at varying terms, depending on size. This is preferable to subsidised rent that impacts the overall scheme viability and often results in the loss of overall employment space.</p>	workspace is proposed. The draft SPD does not change this approach or the need to consider specific schemes on their merits within this context.	
109.	Ref: 572 – L&Q Development (L&Q Group)		<p>Chapter 3: Area Wide Priorities- Housing</p> <p>This section sets out the SPD’s housing strategy for the Hackney Wick and Fish Island area, which includes the delivery of at least 4,400 new homes, maximising affordable housing and protecting existing communities.</p> <p>The SPD sets out housing locations across the area, which directs new residential development towards Hackney Wick Neighbourhood Centre, Fish Island Mid and Eastwick and Sweetwater. L&Q supports the provision of new homes within these areas, where brownfield development opportunities exist. This will introduce new residential communities into the area which will help to support the viability of local employment and commercial uses.</p>	Support welcomed.	No specific changes proposed.
110.	Ref: 572 – L&Q Development (L&Q Group)		<p>Policy H2 – Affordable Housing</p> <p>Policy H2 seeks to maximise affordable housing provision including a tenure split of 60% affordable/social rent and 40% intermediate.</p>	Support welcomed.	No specific changes proposed.

			L&Q supports the targets proposed. The affordable housing provision should be subject to viability to ensure that schemes can be delivered, especially for mixed use schemes.		
11 1.	Ref: 572 – L&Q Development (L&Q Group)		<p>Chapter 3: Area Wide Priorities- Infrastructure- Connectivity</p> <p>This section sets out the SPD’s approach to connectivity and transport infrastructure improvements across Fish Island and Hackney Wick.</p> <p>Policy T4 – Transport Choices and Local Connectivity</p> <p>Policy T4 requires new developments to promote sustainable transport modes. L&Q acknowledges the need to mitigate the impact of new development on the local road network. However, in light of restricting car usage, L&Q would encourage on-going and regular improvements to the local public transport system to ensure this remains an effective and accessible means of travel.</p> <p>L&Q supports the planned improvements to increase bus connections to Hackney Wick Station and we would also encourage the promotion of an eastern branch to Crossrail 2 which would potentially include route via Hackney Wick Station. Such local transport improvement would significantly support the delivery of housing and employment opportunities set out in the SPD.</p>	Comments and support noted.	No specific changes proposed.
11 2.	Ref: 572 – L&Q Development (L&Q Group)		<p>Policy 1.3- Connecting Hackney Wick and Fish Island</p> <p>Policy 1.3 requires new development to facilitate local connectivity, and in particular prioritise walking and cycling.</p> <p>The SPD sets out the key transport interventions required in order to achieve the projected PTAL levels for the area by 2031. L&Q strongly supports greater connectivity throughout</p>	Support welcomed.	No specific changes proposed.

			<p>Hackney Wick and Fish Island and to neighbouring areas, especially where this would increase PTAL's. This would in turn facilitate further development opportunities, meeting both the housing and economic needs in the area. L&Q supports increasing connectivity to transport hubs, local facilities and amenity areas. The Bream Street scheme will improve local connectivity to the Old Ford Lock and River Lee Navigation through the delivery of a new generous pedestrian route through the site.</p>		
11 3.	Ref: 572 – L&Q Development (L&Q Group)		<p>Chapter 3: Area Wide Priorities- Heating and Cooling This section sets out the SPD's strategy for developing heating and cooling networks to help reduce carbon emissions resulting from energy production. Policy S.3- Energy infrastructure and heat networks This policy seeks provision of new heat network infrastructure and encourages the connection of new development to heat networks. L&Q supports the SPD's targets to reduce carbon emissions and drive energy efficiency through, however consideration should be given to the viability and practicality of connecting to district heat networks.</p>	<p>Comment noted. The draft SPD presents a potential range of options in respect of heat networks and does not change the level of flexibility in terms of meeting carbon reduction targets to those presented within London Plan and Local Plan policy.</p>	No specific change proposed.
11 4.	Ref: 572 – L&Q Development (L&Q Group)		<p>Chapter 3: Area Wide Priorities- Infrastructure- School, Libraries, Health Facilities, Meeting Space This section sets out SPD's plans to meet social infrastructure needs in Hackney Wick and Fish Island. Policy CI.1 – New and existing community infrastructure Policy CI.1 states that existing community infrastructure will be protected or will be required to be replaced as part of new development.</p>	<p>Support welcomed.</p>	No specific change proposed

			L&Q supports the planned new social infrastructure in Table 1 (p. 21) which will see the delivery of new schools, medical facilities and community facilities across the Fish Island and Hackney Wick area.		
11 5.	Ref: 572 – L&Q Development (L&Q Group)		<p>Chapter 3: Area Wide Priorities- Public Realm, Open space and Waterways</p> <p>This section sets out the SPD’s approach to improving the public realm throughout Fish Island and Hackney Wick in order to enhance local connections, particularly to the Olympic Park.</p> <p>Policy BN.2 - Creating Distinctive Waterway environments</p> <p>Policy BN.2 seeks to enhance access to the River Lee and improve opportunities for leisure and recreation as well as preserving its ecological value.</p> <p>L&Q supports the strategy to activate the River Lee in order to fully realise its value as a significant asset to the area. The Bream Street scheme will enhance access to the River Lee, by providing new access routes to the Canal and delivering a new public open space adjacent to the Old Ford Lock, which will promote interaction with the River Lee. L&Q has worked closely with the Canals and River Trust to ensure that the Bream Street scheme responds positively to the River Lee. We are committed to working with the Canals and River Trust to improve the quality of the River Lee and preserve the ecological value of the River Lee as a Site of Importance for Nature Conservation (SINCs). Furthermore, L&Q suggests that future developments benefitting from the amenity that the canal offers should also contribute to the upkeep of its appearance.</p>	Comments noted and support welcomed.	No specific change proposed.

11 6.	Ref: 572 – L&Q Development (L&Q Group)		<p>Chapter 3: Area Wide Priorities- Heritage and Townscape This chapter sets out the heritage-led regeneration strategy for the area, which aims to integrate new mixed use development into the established street and waterway patterns, heritage assets and conservation areas Policy BN.10- Proposals for Tall Buildings Policy BN.10 requires proposals for tall buildings to preserve or enhance views to and from, and the setting of, heritage assets and conservation areas. The subsequent sections on Townscape and Character and Public Realm set out various design guidance to support the Policy. L&Q supports the policy preserving the existing historic context and townscape of Hackney Wick and Fish Island.</p>	Support welcomed.	No consequent changes proposed.
11 7.	Ref: 572 – L&Q Development (L&Q Group)		<p>Chapter 4: Area Specific Guidance This chapter sets out the LLDC’s ambition for the different areas of Hackney Wick and Fish Island. Neighbourhood centre L&Q recognises the important role of new development opportunities in the Neighbourhood Centre, in particular the land to the north and west of the Copper Box, to deliver a mix of town centre uses and new homes. L&Q welcome the provision of new community facilities such as a medical centre, a library and a nursery to the south of Kings Yard Energy Centre. We also support the creation of the new Hackney Wick Station underpass, reinforcing the north-south pedestrian/cycle link, which will encourage regeneration and will support the workspace cluster strategy (p.37)</p>	Support welcomed.	No consequent changes proposed.
11 8.	Ref: 572 – L&Q Development (L&Q Group)		<p>Eastway, Trowbridge Estate and Wick Village The SPD characterises this area as a core of quiet residential streets and develops a strategy focused on reinforcing the continuity of an</p>	Support welcomed.	No consequent changes proposed.

			<p>established neighbourhood of family homes and local businesses.</p> <p>L&Q supports this strategy and agrees that the main challenge lies in the natural boundaries around the area (A12, Lea Navigation, and the railway) which act as barriers to connectivity. L&Q supports improvements to local connections where possible.</p>		
11 9.	Ref: 572 – L&Q Development (L&Q Group)		<p>Fish Island Mid</p> <p>In the Fish Island Mid area, the SPD seeks to deliver mixed use development within the site allocation areas. It also plans to improve the quality of the public realm and the canal frontage, all within the context of the Conservation Area</p> <p>L&Q encourages the delivery of mixed use developments within the Site Allocations. However, whilst the policy requires the replacement of existing employment floor space, we would suggest that the focus should also be on re-delivering the correct type of employment floor space and increasing job densities, rather than just re-providing the existing quantum alone.</p> <p>L&Q also supports the provision of Bridge H14 (Monier Road Bridge) and Bridge H16 (Beechy Road) which will increase accessibility to the area and support new development opportunities.</p>	<p>Policies in the Local Plan, particularly Policy B.1, set out a policy position in maintaining and re-providing employment floor space requires consideration. The draft SPD does not seek to change the Local Plan policy approach.</p> <p>Support for provision of bridges H14 and H16 is noted and welcomed.</p>	No changes proposed.
12 0.	Ref: 572 – L&Q Development (L&Q Group)		<p>The Legacy Development Area</p> <p>The SPD seeks to support the development of the Legacy Development Area with the opportunity to create a sustainable and modern neighbourhood at Eastwick and Sweetwater. L&Q supports the proposed strategy to deliver a new residential neighbourhood in this area and realises the important role this plays in delivering the Legacy Communities Scheme vision for the Olympic Park. We also recognise the economic</p>	Support welcomed.	No consequential changes proposed.

			benefits of the new Here East development and its role in supporting employment and business opportunities in the Hackney Wick and Fish Island area.		
12 1.	Ref: 572 – L&Q Development (L&Q Group)		<p>Chapter 5: Implementation and Delivery</p> <p>This chapter outlines the LLDC’s overall delivery approach to achieving its aims and objectives for Hackney Wick and Fish Island. The delivery strategy incorporates a variety of methods. L&Q supports the LLDC’s plans to work closely with LB Tower Hamlets and LB Hackney to ensure a joint up approach to delivering change in the area. Furthermore, close working relationships with the Canals and River Trust will help deliver the LLDC’s plans for the waterways. L&Q realises the value of stakeholder engagement to ensure effective delivery of new developments. As a key stakeholder in the LLDC area, particularly as a long-term manager of Bream Street and Chobham Manor, representing more than a thousand homes, we welcome the opportunity to contribute to emerging planning policy. L&Q would encourage the delivery of projects listed on the Infrastructure Table and understands that these will be funded by either S106 contributions or the Community Infrastructure Levy. L&Q encourages the use of CIL contributions to fund local infrastructure improvements.</p>	Comments noted and support welcomed.	No consequential changes proposed.
12 2.	Ref: 589 (private individual)		While there are many positive aspects to the plan and future vision for the area, above all I am disappointed and concerned by the interpretation of accessibility as a need for more roads; in particular those through Fish Island and the West Olympic Park which are excessive beyond any requirement for vehicle access to new amenities and the requirements of the local community. These roads are at the expense of existing pedestrian routes and open space, will	Conversion of the ‘north south’ pedestrian and cycle approach to the stadium passing over Whitepost Lane to a road is part of the Legacy Communities Scheme planning permission and will provide local road access to the Sweetwater area from Waterden Road, as part of the	Updated text in relation to bridges H14 and H16 is set out above at no.57.

			<p>have a detrimental effect on health and safety and erode the current and future character of the area.</p> <p>My specific comments are as follows:</p> <p><u>Infrastructure - Connectivity</u></p> <ul style="list-style-type: none"> • The replacement of the main North South pedestrian approach to the Olympic Stadium and footbridge over Whitepost Lane with a primary vehicle road - this destroys a key part of the Olympic Legacy, what would have been and should still be the main pedestrian path from the athletes village and North Olympic Park to the Stadium entrance used both by athletes and the millions of international spectators during the games and still used by countless visitors and recreational events. Furthermore, turning this into a road will annex pedestrian access of the south of the Olympic park from the north, splitting the park into two smaller parks separated by roads. • H14 Bridge, change from pedestrian use to vehicle use - this is a clear loss of an existing and key pedestrian route and is not needed as there is an existing vehicle bridge 200 metres north at Whitepost Lane. • Primary road route through Sweetwater and Fish Island - the above points contribute to the creation of a primary road through Fish Island to be used as a short-cut for vehicle traffic from Stratford to the A12, including HGVs from the cement factory and coaches and visitor traffic from West Ham football matches. 	<p>Sweetwater Zone highway network.</p> <p>Bridges H14 and H16 are also permitted in outline as part of the Legacy Communities Scheme Planning permission. Planning applications for the detailed design of the bridges have now also been approved (application references (16/00587/REM, 16/00588/REM).</p> <p>No primary road is planned to run through Sweetwater</p> <p>These connections and their function are reflected within the adopted Local Plan and therefore also in the draft SPD. (See also the detailed response at no.57 above on Bridges H14 and H16).</p> <p>The north-south route identified within the Local Plan and the draft SPD is planned as a pedestrian and cycle route only.</p> <p>The Wallis Road – Lee Navigation route: there are no plans to change the bridge connection here from its existing pedestrian and cycle mode.</p>	
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		<ul style="list-style-type: none"> • H16 Bridge - this is not needed as there is an existing pedestrian bridge from Monier road, connecting an already established pedestrian and cycle route. The proposed location of the H16 bridge displaces an existing artist community. Furthermore it will not link to any pedestrian and cycle route and, under the proposal, will link a vehicle road with another vehicle road so of no real use to pedestrians or cyclists. • North South route - it is not clear whether this will be a pedestrian route or roads but if the latter, will further add unnecessary vehicle traffic and reduce pedestrian and cycle access across the area. • Wallis Road / Lee Navigation route - again, it is not clear whether this will be a pedestrian route or roads but if roads will increase vehicle traffic and reduce pedestrian and cycle access. <p>Additionally the above points and general proposal for new and excessive vehicle roads directly contradicts a number of LLDC key Transport policies giving preference to safe pedestrian and cycle travel over car use:</p> <ul style="list-style-type: none"> • T3 Supporting Transport Schemes - "the Legacy Corporation will support new public transport and highways schemes and improvements to existing ones proposed within or adjacent to its area where these... 3. Will result in improvements to public safety... 5. Will result in improvements to identified walking and cycling connection • T4 - "Managing development and its transport impacts to promote sustainable 		
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		<p>transport choices, facilitate local connectivity and prioritise pedestrians and cyclists. Through its planning powers, the Legacy Corporation will promote sustainable transport choices and minimise reliance on the private car... In doing so the Legacy Corporation will... Implement a street network that prioritises pedestrians and cyclists as the most important travel modes, followed by public transport and then the private car".</p> <ul style="list-style-type: none"> • T5 Street Network - " In implementing the street network and in considering development proposals that will impact on the network, the Legacy Corporation will prioritise pedestrians and cyclists as the most important travel modes, followed by public transport and then, as appropriate, the private car... Provide access to the Queen Elizabeth Olympic Park area by public transport, private car, pedestrian and cyclists. Where used by vehicles, primarily for access to the area, rather than passing through" • T9 Providing For Pedestrians & Cyclists - "The Legacy Corporation will promote and support the provision of safe routes for walking and cycling... Walking and cycling provision should be safe, direct, coherent and attractive" <p>There is additionally continued reference across other LLDC policies and documents relating to environmentalism, biodiversity, health, clean air and car free communities - all of which are contradicted or greatly lessened by the addition of new and excessive vehicle roads and traffic through the area.</p>		
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12 3.	Ref: 589 (private individual)		<p><u>Public Realm & Open Space</u></p> <ul style="list-style-type: none"> • Relating to my above concerns I am also worried by the decrease in real recreational space across the Olympic Park which, as mentioned will be reduced and split in two by the current road plan in and around Sweetwater. • I notice that the majority of new open spaces planed across the development area are recommended but are not be committed to. What is to stop developers from removing these or vastly decreasing their sizes? • Additionally there are very few new open spaces being planned and each are of a small scale. With high density buildings being planned for the area, it would be good to see more and larger open spaces. • From the above and generally I would want there to be more commitment to green spaces, not just open spaces. A concrete square gives very little benefit to the local community compared with a lawn or garden with plants and trees. • There is an existing skate park in mid Hackney Central (next to Hub) that was been providing constant recreational use for the last 3 years. This should be replaced. 	<p>The Local Plan policies and designations provide protection for identified areas of 'Metropolitan Open Land' and 'Local Open Space'. The Local Plan also includes identification of specific new public open spaces within specific site allocations where relevant. It also sets standards or reflects standards within Mayor of London guidance for open space, playspace and amenity space. The draft SPD does not alter those policy requirements. The draft SPD provides linkages and references to these.</p>	<p>No consequential changes proposed.</p>
12 4.	Ref: 589 (private individual)		<p><u>Heritage</u></p> <ul style="list-style-type: none"> • I applaud the LLDCs plans to relocate businesses and individuals affected by development of the area but would ask how this will work in practice with new spaces and higher rents, specifically regarding at threat artists and artist communities. 	<p>Comments noted in respect of street art, heritage assets and general character. It is considered that the Local Plan policies and the guidance within the draft SPD provide sufficient guidance in these areas of concern. It is noted that the concerns expressed</p>	<p>No consequential changes are proposed.</p>

			<ul style="list-style-type: none"> • Street art is a key part of the character of the area and I would like to see plans for keeping this part of future developments, whether it is a wider engagement between artists, businesses and residents or specific spaces given aside to street art. • There is a lot of language promoting the heritage assets of the area but not much being done to protect it. Two examples are Swan Wharf and the Carlton Chimney. Both of which are being threatened by new developments. • Similarly, the preservation of the unique character of the area is mentioned through this and other documents but the impact of an increase in the road network and vehicle traffic is not being considered on these areas. 	<p>are centred on the outcomes of the decision making process and in this respect the Legacy Corporation as the Local Planning Authority will need to continue to consider planning applications in the light of these planning policies and guidance and any other relevant material planning considerations.</p> <p>The guidance in the draft SPD on relocation strategies specifically addresses the matters that may need to be considered where a planning application proposal triggers a requirement for such a strategy under the terms of Local Plan Policy B.1. The actual approach taken for each relevant scheme will need to be considered on a case by case basis.</p>	
12 5.	Ref: 618 Canal & Rivers Trust		<p>Page 21 – Public Realm, Open Space and Waterways</p> <p>Where possible, waterway facilities and services should be provided or improved, to encourage active use of the waterways.</p>	Comment noted.	<p>Add additional bullet point to 'Public realm, waterways and open space strategy' section at page 21 of draft SPD, to read:</p> <p><u>"Improving waterway facilities and services to encourage active use of the waterways."</u></p>
12 6.	Ref: 618 Canal & Rivers Trust		<p>Page 23 - Enhancing Green Corridors</p> <p>Close to the waterway edge, appropriate planting species should be used. For example, Willow trees have extensive root systems that</p>	Comments noted and additional text included within the redrafted 'soft landscape and street trees' part of the	Add following bullet point text to the Soft Landscape and

			<p>can damage the waterway walls as they grow, and should therefore be avoided close to the waterway.</p> <p>Green Roofs Green roofs can create nutrient rich run off, that should not enter the waterways, and should be carefully managed and maintained. Substrate should vary between 80 and 150mm in depth and be aggregate-based, with less than 10% organic matter. Brown roofs should be planted with a mixture of sedum-type plants and wildflowers, which require low nutrient rates to thrive (extensive-type green roof). The design should require the application of little or no fertiliser.</p>	'Heritage, Townscape and Public Realm' section of the SPD.	<p>Street Trees' Section of the SPD:</p> <p><u>"Planting along the waterway should consist of native plants and any trees should have an appropriate root barrier installed to avoid causing damage to the waterway walls. Non-native, invasive species with vigorous and extensive root systems should be avoided."</u></p>
12 7.	Ref: 618 Canal & Rivers Trust		<p>Page 28 – Flooding and Drainage Any drainage into the waterways must be agreed with the Canal & River Trust.</p>	Agreed that an additional reference would be appropriate as part of the new 'Surface Water Drainage' text in this section of the SPD.	<p>Add the following text to Surface Water Drainage Section:</p> <p><u>"The agreement of the Canal and River Trust will be required where drainage into the waterways is proposed."</u></p>
12 8.	Ref: 618 Canal & Rivers Trust		<p>Page 30 Figure 3 – Heritage Assets We note and support the references in this plan to Bottom Lock and the boundary wall at the back of the towpath on the Hertford Union Canal, and Old Ford Lock on the River Lee Navigation. However, the plan does not include some important heritage features linked with the waterways and their development. It is important that the document includes these to raise awareness of features that were part of the workings of the waterways and this link with the surrounding former land uses. Features we believe should be highlighted include:</p>	While acknowledging that the features listed here are likely to have some value, these are not identified in the list of non-designated heritage assets in the Local Plan nor on the Local Lists of the relevant boroughs. It would, however, be appropriate to acknowledge that these features are present. The review of the Local Plan may also provide an opportunity to consider inclusion, where appropriate,	<p>Add the following to the 'Heritage Assets' section on page 29 of the draft SPD:</p> <p><u>"The following, while not identified as non-designated heritage assets in the Local Plan, are noted as features or structures of interest:</u></p> <p><u>1. Three ramps along the River Lee towpath, which may have been used for tipping materials from trucks on rails into barges;</u></p>

			<p>1. Three ramps along the River Lee towpath, which may have been used for tipping materials from trucks on rails into barges;</p> <p>2. Carpenters Road Lock, which is currently being restored, for re-opening in 2017 (https://canalrivertrust.org.uk/about-us/our-regions/london-waterways/carpenters-road-lock);</p> <p>3. Old River Lea tidal gate narrows;</p> <p>4. Entrance to Pudding Mill River, now culverted beneath the Stadium.</p> <p>We would also like to add reference to the pedestrian footbridge 'E35', which spans City Mill River, though note that this would fall outside of the SPD area. We consider that this asset is still an important feature in the area, and as a link to the 1930s programme of river works here.</p>	<p>when the Local Plan is itself reviewed.</p> <p>While acknowledging the importance of Bridge E35, as noted in the CRT comment, this does fall outside the SPD area and its inclusion would not specifically add to the guidance purposes of the SPD.</p>	<p><u>2. Carpenters Road Lock, now restored;</u></p> <p><u>3. Old River Lea tidal gate narrows;</u></p> <p><u>4. Entrance to Pudding Mill, now culverted beneath the Stadium."</u></p>
12 9.	Ref: 618 Canal & Rivers Trust		<p>Eastway, Trowbridge Estate and Wick Village Under "Issues and Opportunities", the Lea Navigation/Hackney Cut (the Trust refers to this as the Lee Navigation) is described "as a barrier to local movement and environmental resource". The Trust considers, as described by Sir Terry Farrell, that waterways connect rather than divide communities, allowing people to meet as they use this valuable local amenity, particularly now the Canal Park allows more space for people to sit and enjoy the waterside. The towpaths and Navigation also provide a linear, car free, route for pedestrians, cyclists and boaters.</p> <p>Quietways, as described below in the table 'Identified Infrastructure' also present an opportunity to improve connection in this area.</p>	<p>Comments noted in respect of the role of waterways as connectors. However, the SPD makes reference to the well-established principle that in this location the canal acts as a barrier to local movement across it for which opportunities to improve this exist.</p>	<p>No specific changes proposed.</p>

13 0.	Ref: 618 Canal & Rivers Trust		Fish Island Mid We support “Opportunities to activate the waterways and waterway frontages”.	Support welcomes	No consequential changes proposed.
13 1.	Ref: 618 Canal & Rivers Trust		<p>Page 46 - Projects and Improvements</p> <p>Hertford Union Canal Bridge replacement The Trust has not seen details of this proposed project, although we are aware of the principle. We would like to be involved as early as possible in the design stage. We would also advise that any amended bridge crossing would require a new commercial agreement with the Trust’s Estates team.</p> <p>Bridge H14 (Monier Road Bridge) replacement.</p> <p>Bridge H16 (Beechy Road) new pedestrian and cycle bridge to Sweetwater. The Trust has seen some details of these proposals at pre-application stage, but would be pleased to be kept updated of their progress. As above, we would also advise that any new or amended bridge crossings will require a new commercial agreement with the Trust’s Estates team.</p> <p>General highways and public realm Improvements</p> <p>District Heat Network installation/extension (including potential canal crossings)</p> <p>We would also like to be kept updated of any proposals for crossings over the waterways, which would also require agreements with the Trust.</p>	Comments noted.	No consequential changes proposed.
13 2.	Ref: 618 Canal & Rivers Trust		Fish Island South These sites often have a poor relationship with the Lee Navigation, and we would support their release for a more compatible land use, unless industrial uses propose making use of the	These locations are within Strategic Industrial Land and Other Industrial Land designations within the Local Plan. The Local Plan is	No consequential changes proposed.

			waterway for transport. There is also limited waterway edge protection at many of the sites, which has allowed debris to enter the waterway. We would be pleased to see improvements to this.	considered to be up to date and no release of land from these designations is proposed. Development proposals will need to include uses that reflect these designations but will also need to consider improving any waterside environments that they include in an appropriate way in order to meet Local Plan policy requirements.	
13 3.	Ref: 618 Canal & Rivers Trust		The Legacy Development Area Page 52 - Relationship to the Lee Navigation and the West. We are pleased that the importance of the Lee Navigation is recognised here.	Comment noted.	No consequential changes proposed.
13 4.	Ref: 618 Canal & Rivers Trust		Page 55 - Table 2: Identified Infrastructure 4. Local transport scheme: A new link between Fish Island North and Fish Island Mid to provide a more direct route between the hub at Hackney Wick and Fish Island Mid (includes Bridge over Hertford Union Canal) As above, the Trust would need to see details of the proposed replacement bridge, and have a formal commercial agreement with the delivery body. The design of the proposed link to the towpath is very important. 5. Add Ramp to south of Old Ford Lock for use by cycles and wheelchairs We would like to clarify where this is, but assume it might be the ramp of the existing footbridge over the Old River Lea. We would have no objection to the principle, providing that heritage features of the existing structure can be protected.	4. need for consultation with CRT in terms of the bridge element is noted. 5. Comment noted. As with all projects in the list these are projects identified within the LLDC Infrastructure Delivery Plan.	No consequential changes.

			<p>19. Open space - Canal Park along eastern edge of Lee Navigation forming part of Here East, East Wick and Sweetwater areas of Queen Elizabeth Olympic Park. We support the continuation of this project.</p> <p>24. Sustainability - provision of heat network bridge crossings. Delivery LLDC with development partners and relevant energy provider for Lee Navigation bridge crossings. As above, the Trust would need to be involved in any proposed waterway crossings, and give agreement for this.</p> <p>25. Flood risk - Hackney Wick and Hackney Marshes Flood alleviation and habitat enhancement We would like to understand more about this project and what impact there would be on the Trust's network.</p>	<p>19. Support noted.</p> <p>24. Need for CRT agreement noted.</p> <p>25. The project has been identified by LB Hackney and Environment Agency and it is acknowledged that the CRT would need to be involved in any elements of the project that could affect their interests, should this scheme be brought forward.</p>	
13 5.	Ref: 618 Canal & Rivers Trust		<p>We would like to bring forward a proposal for a Quietway along the Lee Navigation (between and including the Limehouse Cut and the M25/London Borough boundaries). In places the towpath is already of a reasonable condition but some areas need improvement. We would like to seek funding from local developments through S106/CIL to support this. Alternatively, specific developers may want to offer to undertake towpath improvement works as part of this and to the Quietway/towpath specification.</p> <p>Consideration of bike facilities could be included in this (such as bike racks, but also maintenance hubs) and benches to improve towpath space.</p>	<p>The potential for a Quietway project is noted but a formal Quietway would require engagement with Transport for London. Where specific project elements are identified within the LLDC area it is recommended that details are provided to the LLDC for potential inclusion within the LLDC Infrastructure Delivery Plan project list. Should specific detail be available before the finalisation of the SPD there will be potential to</p>	<p>Mo specific change proposed.</p>

			We would also suggest that the walkway across the southern end of Old Ford Lock should be improved, and potentially widened to accommodate increased use.	add projects to the table in the SPD.	
13 6.	Ref: 618 Canal & Rivers Trust		<p>Page 89 - Lighting</p> <p>This section states that “New lighting should be designed to minimise energy use and whole life costs and minimise light pollution, particularly near sensitive wildlife habitats.” We agree that lighting should be ‘bat friendly’ to encourage local populations, and in particular should not spill over waterspaces.</p> <p>The guidance should encourage developers to seek pre-application advice from the Canal & River Trust as well as other statutory consultees.</p>	Comment noted.	No consequential change proposed.
13 7.	Ref: 618 Canal & Rivers Trust		<p>Page 93 - Hard Landscape materials</p> <p>To add to the section of information on palettes and materials, we would encourage the use of materials that reference the local canal history, where possible. For example, to acknowledge the former brickfields of Hillingdon, and their transportation by canal, local schools in the area recently made bricks in the traditional way, and some were incorporated into new developments (https://www.prologis.co.uk/get-the-latest/local-brick-workers-commemorated-at-prologis-park). A tar-spray and chip surface is preferable for the towpath and the interactions with it. Surface treatment should not introduce slippery surfaces (resin-bound material can be slippery). Barriers, hazards and clutter should be minimised, and the placement of benches and signs carefully considered. The width of shared-use towpaths should be at least 2m, or more if possible without limiting mooring space and vegetation. Vegetation should be planted and maintained in</p>	Comments noted. However, Appendix 2 has now been removed but remains reflected in principle and at a higher level of detail within the Heritage, Townscape and Public Realm sections of the SPD.	Heritage, Townscape and Public Realm sections of the SPD updated and Appendix 2 of the draft SPD removed.

			a way that does not to encroach over the towpath.		
13 8.	Ref: 618 Canal & Rivers Trust		<p>Page 93 - Hard Landscape materials</p> <p>To add to the section of information on palettes and materials, we would encourage the use of materials that reference the local canal history, where possible. For example, to acknowledge the former brickfields of Hillingdon, and their transportation by canal, local schools in the area recently made bricks in the traditional way, and some were incorporated into new developments (https://www.prologis.co.uk/get-the-latest/local-brick-workers-commemorated-at-prologis-park). A tar-spray and chip surface is preferable for the towpath and the interactions with it. Surface treatment should not introduce slippery surfaces (resin-bound material can be slippery). Barriers, hazards and clutter should be minimised, and the placement of benches and signs carefully considered. The width of shared-use towpaths should be at least 2m, or more if possible without limiting mooring space and vegetation. Vegetation should be planted and maintained in a way that does not to encroach over the towpath.</p>	See response at 137.	See response at 137.
13 9.	Ref: 618 Canal & Rivers Trust		<p>Page 99 - Canal Edge</p> <p>This section states “The canal edge is significantly higher than the rest of the site...” although this actually varies along the lengths of both the River Lee Navigation and the Hertford Union Canal. Should this read “<i>Where</i> the canal edge is significantly higher than the rest of the site..”?</p> <p>As referred to above, under Lighting, new river or canalside lighting should be ‘bat friendly’ and not spill over the waterspace.</p>	See response at 137.	See response at 137.

			<p>Planting along the river or canalside should be native and any trees should have appropriate root protection to avoid their growth causing future damage to the waterway walls. Certain species, such as Willow, will be inappropriate adjacent to the waterway, as their root systems can cause considerable damage to the waterway edge.</p> <p>The document does not have many references to wayfinding, and the Trust would seek to improve this along the towpath and at interactions with it – such as through Legible London signage.</p>		
140.	Ref: 623: Nathiel Lichfield & Partners on behalf of Henley Homes	Employment Uses and Locations	<p>The SPD recognises that the Hackney Wick and Fish Island area is a ‘focus for a significant proportion of the projected 59,000sqm of additional B use classes floor space requirement’ for the LLDC until the end of its local plan period in 2031 (p7). We note the proposed Employment Character of the ‘Other Industrial Location’ (area 5, SPD page 8) which comprises the Iceland Wharf site and is presented as:</p> <p><i>An area of transition between the higher residential concentration to the north and the SIL area to the south and west. A mix of employment uses and some residential that ensure a clear transition of purpose and screening of SIL uses (Use Classes predominantly B1c, B2 and B8 with some C3).</i></p> <p>This employment character description requires amendment to reflect that the area includes more residential floorspace than employment uses. Indeed the land directly to the north of the Iceland Wharf site and beyond is entirely residential in use.</p> <p>Our objection on this aspect of the SPD is further supported by the Employment Land</p>	<p>The SPD does not change the Local Plan policy approach to sites within the area designated as Other Industrial Land and it will be for specific proposals to demonstrate that the relevant policy requirements are being met. Local Plan Policy B.1, part 5 remains relevant to these locations and the draft SPD is considered to accurately reflect this. It would be inappropriate for the SPD to react to the specifics of any one potential development proposal.</p> <p>The guidance on relocation strategies simply provides guidance on how best to meet the requirements within Local Plan Policy B.1 for the submission of relocation strategies in certain</p>	No consequential changes proposed.

		<p>Review produced to inform the LLDC Local Plan which states (p55): <i>“Our forecasts indicate that demand for industrial floorspace will continue to fall... Overall we project a decline in the requirement for industrial floorspace of between 9,700 sqm and 33,700 sqm”</i></p> <p>On this basis, if the LLDC is looking to retain and enhance employment space in the OIL area, then the SPD must allow an appropriate quantum of residential accommodation to cross-subsidise the enhanced employment space. The SPD identifies the generally appropriate typologies (p9) for an Other Industrial Location such as the Iceland Wharf site. Whilst examples given such as managed workspace, co-working space and creative studio would be appropriate, other suggested uses which are not compatible with residential use are not suitable in the OIL and should be focussed towards the SIL further south.</p> <p>As officers are aware, the Iceland Wharf site is currently occupied by buildings and a yard which provide a low density of jobs and represent an inefficient and unsustainable use of this prominent riverside site. The site is currently used as a scrap yard with approximately 1500sqm of employment floorspace and associated full and part time work. It represents a ‘bad neighbour’ use for the residential units within Iceland Wharf in terms of noise and visual impacts and environmental quality. The site presents a major opportunity to introduce a high quality mixed use scheme providing a significant increase and enhancement of employment floorspace alongside new homes.</p> <p>The SPD’s requirement for developer-led relocation strategies (Appendix 2 of the SPD) to assist this relocation of the existing incompatible</p>	<p>circumstances. The introductory text to Appendix also specifically recognises that the actual approach that will be appropriate to each development proposal will need to be specific to its circumstances.</p>	
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			employment uses is, however, unacceptable and we present our representation to this in detail later in this letter (see Appendix 2 further below).		
14 1.	Ref: 623: Nathiel Lichfield & Partners on behalf of Henley Homes	Housing	<p>The SPD's guidance on Housing Locations for 'Residential in the Other Industrial Location' (p11) requires significant review. It states: <i>A limited amount of residential use seen as acceptable where this successfully allows for a transition of use and environment between the Greenway and Fish Island mid to the north and the Strategic Industrial Land (SIL) to the south.</i> We strongly object to this wording and specifically to the reference of a 'limited amount' of residential use. The SPD should be amended to remove this wording and replace with a suitable phrasing that more accurately reflects the use class transition of the area that has already taken place. The emerging character of this area is increasingly residential. Whilst we appreciate the need to retain employment uses on mixed use sites, we consider that housing developments should also be optimised both to meet residential land use objectives and to underpin the provision of higher quality employment space.</p> <p>The SPD's guidance on Policy H2 'Affordable Housing' states that affordable housing on sites of 10 units or more should be maximised, and smaller sites within the Neighbourhood Centre are 'encouraged to cooperate when planning affordable housing delivery' (p11). The SPD should acknowledge that the amount of affordable housing should reflect present viability.</p>	<p>The use of 'limited amount of residential use' is considered to be entirely appropriate within the context of the Other Industrial Land (OIL) Designation, which anticipates a continued employment and industrial function for this OIL area as a whole as opposed to a predominantly residential one. The exact quantum of residential use, its form and location that might be acceptable on any given site within the OIL would need to be determined by the specific circumstances of the site in question including the proximity of the Strategic Industrial Land designated area.</p> <p>Policy H.2 within the Local Plan and the Local Plan as a whole is considered to provide sufficient reference to the approach sought to viability in determining the appropriate amount of affordable housing and as a consequence, the SPD does not offer any specific further guidance in this respect.</p>	No consequential changes proposed.
14 2.	Ref: 623: Nathiel Lichfield & Partners on	Infrastructure	We support the SPD's statement that the principal focus for ensuring connectivity	Support welcomed.	No consequential changes proposed.

	behalf of Henley Homes	(connectivity)	throughout Hackney Wick and Fish Island is the provision of new/improved walking and cycling routes and an accessible public realm.		
143.	Ref: 623: Nathiel Lichfield & Partners on behalf of Henley Homes	Infrastructure (district heating network)	<p>We note that SPD presents four Heat Network Options (p17) for the extension of the existing or creation of a new heat network. These options were informed by the findings of the Hackney Wick and Fish Island District Heating Study (April 2016).</p> <p><i>The preferred option (Option 1) consists of a 'connection to the existing heat network crossing the Lee Navigation to provide a heat network to Hackney Wick and Fish Island-mid. Heat network bridge crossings at one or more bridge (White Post Lane Bridge and Bridge B14, Bridge B16)'.</i></p> <p>Subject to there being sufficient capacity for schemes such as Iceland Wharf to connect to the existing heat network, and the provision of relevant associated infrastructure to facilitate this, we support this preferred option.</p>	Support welcomed.	No consequential changes proposed.
144.	Ref: 623: Nathiel Lichfield & Partners on behalf of Henley Homes	Heritage	<p>The SPD identifies a series of buildings/structures identified under the 'umbrella' term: <i>Heritage Assets</i> (p30). In our view, the LLDC should distinguish between genuine heritage assets and those of lesser significance. The protection given to heritage assets should be proportionate to its value in accordance with the NPPF.</p> <p>At present this is not the case, as is demonstrated by the Iceland Wharf site: two of the LLDC's designated Heritage Assets, 40 and 41 (Former Ammonia Works Warehouse and Public House 421 Wick Lane, respectively), are within/adjacent to the Iceland Wharf site in the SPD (p30). These are not listed or in a Conservation Area, yet the SPD seeks to afford them protection. A proportionate value hierarchy should be established. This issue needs to be</p>	The map on page 30 of the consultation draft SPD showing heritage assets is reproduced from the Local Plan and so it is not considered appropriate to amend this.	No specific change proposed

			reviewed and clarified to support developers' delivery of the transformative change the LLDC aims to promote.		
14 6.	Ref: 623: Nathiel Lichfield & Partners on behalf of Henley Homes	Townscape and Character	<p>The SPD guidance on townscape and character is too prescriptive for the remit of a planning guidance document and fails to appreciate the value of varied design responses to varied spatial contexts throughout the Hackney Wick and Fish Island area. This is addressed in further detail in our representations on Appendix 2 (see further below in this letter).</p> <p>With regard to Employment Use Design, we note the statement (p31) which envisages 'the design of ground floors allowing for continuous active frontages' for 'primary streets' such as Wick Lane which runs through Fish Island and bounds the Iceland Wharf site.</p> <p>We note that the current employment use on Wick Lane perimeter of the Iceland Wharf site does not have an active street frontage. The Henley Homes proposals seek to amend this under its proposed development at the site and would align with this LLDC SPD vision.</p>	The townscape and character guidance within the draft SPD is considered to be appropriate as this is guidance rather than prescription and will need to be interpreted in the context of the circumstances of individual sites and schemes. Appendix 2 has been removed from the final SPD, while the Heritage, Townscape and Public Realm Section has been reviewed and some revisions included.	Appendix 2 has been removed, while the 'Heritage, Townscape and Public Realm' section has been reviewed with some revisions made.
14 8.	Ref: 623: Nathiel Lichfield & Partners on behalf of Henley Homes	Fish Island South: Area Specific Guidance (applicable to the Iceland Wharf site)	<p>The SPD (p47) incorrectly identifies the character of the 'Other Industrial Land' (OIL) part of Fish Island South. The OIL is described to: <i>Have a focus on industrial, storage and distribution and other employment uses but also include some more recent purpose built live/work development. Some live/work units have become purely residential in use but the overall focus of the OIL area continues to be for a range of sizes of industrial, storage and distribution uses.</i></p> <p>This description is misleading and incorrect. The transition reality of this area is such that most of the floorspace in the OIL is already in residential use. Furthermore, the majority of employment uses in the area are storage and open yards</p>	See response provided at 140. The drafting within the draft SPD is considered to accurately reflect the approach, terminology and requirements within Local Plan Policy for land designated as Other Industrial Land. It would not be appropriate to seek to change the Local Plan policy approach through the SPD as by nature it is not a Development Plan Document. While some elements of historic 'Live/Work' schemes have become residential in	No consequential changes proposed.

			<p>rather than 'industry' as the description implies. The SPD should amend this description to be an accurate reflection of the OIL.</p> <p>The strategy for Fish Island South (p47) requires amendment. It promotes a strategy to:</p> <p><i>Protect and intensify employment uses within the Other Industrial Location and manage the introduction of a small element of residential development where this will remain compatible with the existing or new employment uses, and provides a transition in uses and environmental quality between the SIL area and Fish Island Mid to the North.</i></p> <p>This element of the SPD requires amendment to introduce more land use flexibility for developers. The introduction of only a 'small element' of residential development cannot be justified in the context of the reality that the OIL land is now predominantly residential use. The intensification of, for example, B1 uses would be an acceptable and efficient use of the land. However the protection of B2/B8 employment uses around existing residential development in the OIL is not supportable. This guidance hinders the prosperity of the current development in this area, in addition to its future regenerative potential. In the case of the Iceland Wharf site, the current employment use not only constitutes a 'bad neighbour use' to inflict poor living conditions on the adjacent residential uses (thereby limiting the appeal of the area), but also represents an inefficient use of the site. This site should be supported by the LLDC to achieve its optimal development potential; this strategy statement will unjustifiably restrict this if not amended.</p> <p>The strategy also stipulates developments should:</p>	<p>nature over time, the larger proportion of the OIL remains in employment use and remains subject to the policy requirements of Local Plan Policy B.1. By definition the OIL area as a whole will need to continue to provide a focus for employment and industrial uses with the level of residential within any specific scheme determined in light of the circumstances of any specific site and scheme, including the proximity to the Strategic Industrial Land designated area.</p> <p>See response at 144 in respect of heritage matters.</p>	
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			<p><i>Take account of the value and character of the identified Heritage Assets on Crown Close and Iceland Road. As outlined earlier, these designated Heritage Assets are not listed and therefore have no official value status. The protection afforded to them should be proportionate to their heritage significance. This statement should be amended in accordance with our comments on Heritage above.</i></p>		
14 9.	Ref: 623: Nathiel Lichfield & Partners on behalf of Henley Homes	Appendix 1: Acceptable Relocation Strategies	<p>Our representation specific to Appendix 1 is an overarching concern relating to a requirement for forthcoming development proposals to provide detailed employment relocation strategies; by doing so the SPD will not support the delivery of the legacy of this area, but rather inhibit development and growth. Our objection to the principle of Appendix 1 is detailed below.</p> <p>1 The Employment Land Review (p25) used to support the adoption of this vision for the LLDC Local Plan states that out of all land parcels assessed 'only parcel 1.1 [comprising the Iceland Wharf site] was recorded to have a majority (over 50%) of buildings in 'Poor' or 'Very Poor' condition'. It is clear that there is significant scope to regenerate this area of Fish Island and it is crucial that the SPD nurtures and facilitates this potential rather than creating unreasonable and unrealistic obstacles to development.</p> <p>2 We have established that a large proportion of the OIL (at least 60%) is now residential use. Therefore, the SPD's proposed protection of B2 employment uses (which are, by definition of the Use Classes Order, incompatible with residential use) fuels a disjointed approach to the LLDC's redevelopment of the OIL. The pursuit of the current SPD approach represents an</p>	<p>The draft guidance on relocation strategies has been included to provide a benchmark for relocation strategies that are sought within the requirements of Local Plan Policy B.2. The introductory text within Appendix 1 is clear about this relationship and also clarifies that this is a recommended approach. It is also acknowledged in this text that each scheme will have different circumstances and that each case will need to be discussed with the LPA. It is therefore considered that, given this, and that the approach set out is guidance, that the contents of the appendix are appropriate.</p>	<p>No consequential changes proposed.</p>

			<p>irresponsible disregard for the environmental quality of the existing and emerging residents in this area.</p> <p>3 In the event the B2 was released of its protection, the preparation and implementation of a detailed relocation strategy is beyond the remit of a developer. It is not expected that tenants at the end of their lease should be found alternative premises in other comparable scenarios; indeed the inherent nature of a lease gives both the leaseholder and occupier security for a limited period of time only. The requirement for preparing and implementing relocation strategies by a developer is unnecessary and will inhibit otherwise acceptable development.</p> <p>4 Unit occupation is driven by market demand and it is unreasonable to expect the developer to tailor its units to a certain returning/relocated occupier, thereby potentially limiting its chances of occupation (and profitability). Accordingly the proposed developments should be encouraged to seek to create flexible employment floorspaces and ensure the long term sustainability of the local area.</p>		
150.	Ref: 623: Nathiel Lichfield & Partners on behalf of Henley Homes	Appendix 2: Townscape and Public Realm	This Appendix has again been lifted directly from the Design Code from the Hackney Wick Central Masterplan Application (16/00166/OUT) prepared by joint applicants (LLDC Real Estate Team and the London Borough of Hackney). As above, this is a live application, currently pending determination by the LLDC's Planning Policy and Decisions Team. Numerous references make little/no sense in the context of the SPD, including direct references to other sections of the LLDC outline application which have been retained here in error (reference to Reserved Matters applications and Section 2?).	See response and changes proposed at 146.	See response and changes proposed at 146.

			<p>Again, this text has not been prepared for the purpose of the SPD. It is overly prescriptive and detailed. To retain this Appendix in the adopted SPD is premature and suggestive of pre-determination of a current live planning application submitted by the LLDC itself. For these reasons we would advise the LLDC to comprehensively revisit this design guidance. Notwithstanding this our comments on the current guidance are added below.</p> <p>Firstly, the guidance remains far too prescriptive. The guidance should be sufficiently flexible to apply to the different characters of the various sub-areas within the Hackney Wick and Fish Island area. By lifting the Design Code from the LLDC outline application (16/00166/OUT) which was produced for the discrete area of Hackney Wick Central only, and applying it to the wider SPD area, the LLDC risks 'cleansing' this area of its varied areas of townscape characters and identity. Appendix 2 (in particular pages 93-94) is too prescriptive in terms of suggested materials and manufacturers. This is inappropriate within a policy document, it limits the developer unnecessarily and the level of detail is, again, well beyond the remit of an SPD.</p> <p>There are also elements of the design guidance which are not supported by any form of justification. These are outlined below:</p> <p><i>1 Block lengths should be limited to 50m, otherwise a break or step in massing is required (p60).</i></p> <p><i>2 Steps in height within and between blocks should be deliberate and purposeful, and should be a minimum of 2 storeys (6m)(p60).</i></p>		
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		<p>3 Any steps in height should be kept away from the corners by 8 metres minimum (p62).</p> <p>4 The guidance on page 64 relates to the <i>façade design and layout of buildings fronting narrower passages of 11m and less.</i></p> <p>5 Where vertical railings are uses [sic] fins of 80-100mm in depth at 80mm centers should be uses [sic] (p64).</p> <p>This guidance is excessively prescriptive for a large urban area such as Hackney Wick and Fish Island. The dimensions/scales given are apparently arbitrary and lack any supporting evidence. The SPD fails to justify why the above measures are necessary to achieve successful development design.</p> <p>This overly mechanistic quantitative approach fails to appreciate the proportionate impact the proposed design guidance would have on schemes of different sizes and scales. For instance, a two-storey step in height from a block of four storeys to two storeys would have a greater visual impact than a two-storey step in height from a block of nine storeys to seven storeys. There is no 'one size fits all' approach to good design and the SPD's current inability to recognise this is concerning. The design of new development across the area should be a response to site specific opportunities and constraints and should not be dictated by a set of universal rules (or in this case a design code lifted from a live planning application covering only a small proportion of the area to which the guidance would relate). For these reasons, Appendix 2 must clearly be revisited in full.</p>		
15 1.	Ref: 634 (Private Individual)	The Local Plan drafting the policies for the area of Hackney Wick and Fish Island for the years	Comments noted. However, the Local Plan was adopted in	No consequential changes proposed.

		<p>2015 – 2031 are not enough visionary and progressive. It does not really tackle the issues we currently are facing like:</p> <ul style="list-style-type: none"> - chronic lack of affordable housing - not enough and affordable work spaces and artist studios - or simply the clean air in this particular area in London. <p>The new developments on the other side of the Queen Elisabeth park already are showing to be too expensive and are more the investment flats instead of flats the families from London can afford. Yet LLDC are repeating the same mistake here once again of not delivering the clear policy how to provide affordable housing.</p> <p>It does not consider the future tendencies with the rapid development of digital technologies what makes more and more people choosing to work at home instead in conventional office spaces by assigning the live-work as some 'unique', disregarding that live –work is the predominant in this area already, therefore showing what there is a big need for such a spaces and it needs to be recognized.</p>	<p>July 2015 following an Examination held by an independent planning inspector and its policies will remain as the relevant local plan policies until a future review and adoption of a revised Local Plan has taken place, which is currently envisaged to be by late 2019.</p>	
15 2.	Ref: 634 (Private Individual)	<p>Work Spaces/ Artist studios Identified frames for B1 spaces and presumably artist studios don't recognize the actual needs of artists. Ground floor studios are more appropriate for shops and cafes, but not necessary good for artists or creative businesses. For a lot of artist their work is an intimate process and doesn't make them feel good to be exposed at the ground floor. Also on a ground floor usually is not enough light due do</p>	<p>The Local Plan is considered to present a clear strategy for employment land and employment space which includes the role of the Cultural and Creative business. The Employment Space Study published alongside the draft SPD and reflected within its guidance, also provides</p>	<p>No consequential changes proposed.</p>

		<p>permanent shadow from neighbouring buildings. By replacing a whole house of studios with a development where only small fraction of the ground floor will be assigned to artists or creative businesses, clearly will not meet the demand, replace quantities what are needed to preserve the existing artist community. So in another words the artist community will be destroyed.</p> <p>There are also no policy or schemes how to help artist who are made to leave due to new developments to be able to return to the area once the development are finished.</p> <p>There is a significant lack of the site relevance. It looks the minds who have written this document have done very little or not enough of actually getting to know what is the current infrastructure, what is the local community and what are their needs. How could you otherwise explain what there is no Chapter about artist community, which is very Unique for this location and has been identified as the biggest most dense artist communities in Europe.</p> <p>Also the areas with relatively new development are colored as industrial areas near wick lane Fish island South.</p> <p>Hackney Wick and Fish Island has prevailing winds from South South West, but still LLDC fails to integrate this knowledge in their local plan policies. All the industries located in this site at the south of area should be zero air pollution policy. So the new build residential and other areas in London wouldn't suffer from bad air quality.</p> <p>Also by seeing the school placed next to High</p>	<p>guidance on the typologies of business space that could be appropriate for creative businesses. It is considered that the type and level of guidance provided is appropriate to the role of planning and is consistent with the approach taken within the adopted Local Plan policies.</p> <p>The identification of industrial and other employment areas in Fish Island South replicates the policy designations for Strategic Industrial Land (SIL) and Other Industrial Land (OIL). It would not be appropriate to amend these as these designations can only be changed through a formal review of the Local Plan itself.</p> <p>With respect to pollution, the Local Plan includes relevant policies against which planning applications for development will be assessed. The Local Plan is the adopted Local Plan and the SPD cannot change policies, designations or site allocations within the Local Plan.</p>	
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			way at Neptune developments shows, how little LLDC as planning authority has concerns about the children and their health.		
15 3.	Ref: 634 (Private Individual)		<p>Bridges</p> <p>In the main Local plan LLDC points out of enhancing healthy living, more pedestrian areas, but in actual plans it is contradictive. By creating the motor bridge and therefore diverting some traffic through the fish Island it does exactly opposite. Fish island potentially can be created as 0 car area.</p> <p>Bridge 16 is not needed and destroying the Center where local people can meet for the workshops, activities are not justified to me for a loss of value what Vittoria Wharf was and could bring to the local community.</p>	Comments noted. A detailed response to the matters raised in respect of Bridges H14 and H16 are provided in the separate table addressing the 'Save Hackney Wick' proforma response.	No consequential changes proposed.
15 4.	Ref: 653 (Private Individual)		<p>I support the comments raised by [REDACTED] Chair Association of Ironworks Residents (AIR):</p> <p><i>Page 29: HERITAGE AND TOWNSCAPE I am in favour of the following strategies for heritage-led regeneration:</i></p> <p>Policy BN.1 <i>Responding to Place – including respecting existing typologies in the urban fabric, including those of heritage value.</i></p> <p>Policy BN.10 <i>Proposals for Tall Buildings – proposals need to preserve or enhance heritage assets and the views to/from these and positively contribute to their setting (including conservation areas).</i></p> <p>Policy BN.16 <i>Conserving or enhancing heritage assets - a need to conserve or enhance heritage assets and their settings, including incorporation</i></p>	Comments noted.	No consequential changes proposed.

			<p><i>of viable uses consistent with their conservation and with heritage led regeneration.</i></p> <p>Policy 1.4 <i>Preserving or enhancing heritage assets in Hackney Wick - preserve or enhance the special architectural or historic interest; enhance and reveal the significance of heritage assets; reference the architectural and historic interest within design of new development, retain or reprovide street trees where appropriate.</i></p>		
15 5.	Ref: 653 (Private Individual)		<p><i>HERITAGE ASSETS Swan Wharf is identified as a heritage asset (no. 35) within Figure 3, to which Policy BN.16 applies.</i></p> <p><i>Any demolition or partial demolition of Swan Wharf's multi-storey stable block would destroy the historic fabric of the building, dramatically diminishing its legibility and significance to the Fish Island and White Post Lane Conservation Area.</i></p> <p><i>Building over the yard at Swan Wharf would create a barrier at the canal edge, obscuring the existing visibility into and out of the conservation area and presenting an unattractive and incongruous vista from its protected waterways.</i></p> <p><i>The Fish Island and White Post Lane Conservation Area Appraisal (November 2014) identifies the Swan Wharf stable block as being a heritage asset within the 'Dace Road Cluster', described as "a rare surviving group of transitional structures (from cast-iron and timber to steel and concrete). They form a coherent and complementary group of medium to high heritage significance ... due to their architectural and historic interest, and every effort should be</i></p>	<p>Comments noted. The SPD does not seek to specifically address proposals for individual sites but rather provide guidance that can be used in developing proposals that meet the policy requirements of Local Plan policy.</p> <p>With respect to the Map at page 30, while comments with regard to the Forge at Crown Wharf are noted, the map shown in reproduced from the adopted Local Plan and so cannot n itself be changed.</p>	No consequential changes proposed.

			<p><i>made to preserve or enhance them, as they contribute positively to the character and appearance of the conservation area.”</i></p> <p><i>Any demolition of the Swan Wharf stable block would create a precedent which threatens the future of all other heritage assets within the ‘Dace Road Cluster’. Its loss would cause substantial harm to the Fish Island and White Post Lane Conservation Area, weakening its integrity and leading to its eventual demise. It would be of more benefit to the growing local community and a far greater asset to the conservation area for Swan Wharf to be retained and restored to enhance its current creative, cultural, hospitality and leisure uses.</i></p> <p><i>The Forge at Crown Wharf is shown as an unidentified heritage building within Figure 3 (the small purple block by the waterway in front of numbers 34 and 35 within the conservation area). The Forge does not form part of any other development and so should be identified and numbered in its own right.</i></p>		
15 6.	Ref: 653 (Private Individual)		<p>Page 33: PUBLIC REALM – MIXED USE AREAS</p> <p><i>I am in favour of the Key Design Objectives</i></p>	Support welcomed.	No consequential changes proposed.
15 7.	Ref: 653 (Private Individual)		<p><i>Although not within the Local Plan, I have serious concerns with regard to applications for four factories (cement and asphalt) to be situated nearby on a 6.0 hectare triangular plateau which was used as the warm-up track for the 2012 Olympics. The site is situated on the southwest boundary of the London Borough of Newham at its junction with the London Borough of Tower Hamlets; it is bordered to the</i></p>	Comments noted.	No consequential changes proposed.

			<i>north by the embankment of the Jubilee Greenway (pedestrian and cycle routes), with the London–Docklands Light Railway(DLR), Norwich mainline railway and Crossrail line to the southeast.</i>		
15 8.	Ref: 657 (Private Individual)		Today I attended the Launch of Mayor Sadiq Khan’s London Plan Document “A City for All Londoners” which shows the Mayor’s new emphasis on culture, Social mix and quality of life. As a Mayoral Development Corporation the LLDC’s policies should surely exemplify the Mayor’s Aims for London. The LLDC has a unique chance to Create a liveable city and ensure that the culture, social mix and Employment opportunities of the Area are attended to. I feel that these are currently lacking in the Plans for Hackney Wick Fish Island.	Comment noted. The content of the draft SPD has been developed to provide further guidance to the policies, site allocations and designations within the adopted Local Plan which sets out the overall planning strategy for Hackney Wick and Fish Island.	No consequential change proposed.
15 9.	Ref: 657 (Private Individual)		Vittoria Wharf and Stour Space should feature in the SPD, including Their contribution to the provision of youth space and the provision of “Cultural Capital”. Community spaces should be included in the Plan and recognised as a key contribution to “liveable neighbourhoods”.	Comments noted. It is proposed to add a reference to Stour Space and Vittoria Wharf as an Asset of Community Value listed by London Borough of Tower Hamlets.	Add Stour Space/Vittoria Wharf to map of social infrastructure within new category of “Asset of Community Value”.
16 0.	Ref: 657 (Private Individual)		The Mayor also emphasizes community involvement, needed for a city for all Londoners. The H16 Bridge and Monier Road bridges should not be listed in the SPD unless a justified case for them has been backed by the local community. There should be progressive moves Towards car---free living in HWFI instead of forcing many through---routes across new residential areas.	Comment noted. See response at no.57 in reference to bridges H14 and H16.	See response at no.57 for new text in relation to bridges H14 and H16.
16 1.	Ref: 657 (Private Individual)		While some care is being taken with the proposals for Hackney Wick town centre, the area is also being treated by some as something similar to a cleared site for new---build. There must be stronger protection for the historic	Comments noted. Development proposals are required to be acceptable in terms of the heritage policies within the Local Plan and take	No consequential changes proposed.

			<p>buildings and for the provision of genuinely affordable and suitable workspace, often found in these same buildings</p> <p><i>Fish Island White Post Lane Conservation Area Appraisal</i> sets out clearly the merits of the conservation area, including the waterways, and should be referred to more explicitly in the SPD. The HWFI area is unique to London because of its industrial history and could be a significant draw for the area. Mayor Sadiq Khan says: "it is vital we preserve the intrinsic character of historic London to highlight our valuable differences and our unique culture".</p>	<p>account the conservation area assessments and management guidelines where these are appropriate. No specific change within the drafting of the SPD is considered necessary to achieve this outcome.</p>	
16 2.	Ref: 657 (Private Individual)		<p>The LLDC should never have agreed to the removal of Stour Space and Vittoria Wharf from the Conservation Area in 2014 by a single landowner for his personal gain. The Conservation Area map is as a result an incongruous shape. However, the merits of those buildings have been established through their role as an Asset of Community Value.</p>	<p>Comment noted. See response at 159.</p>	<p>No consequential changes proposed.</p>
16 3.	Ref: 657 (Private Individual)		<p>Loss of open space is too easily accepted and allowing high buildings right up against the canal will be detrimental to the waterways, causing harm to the feeling of open space that they afford. I also support the comments on the SPD by Save Hackney Wick.</p>	<p>Comment noted. See separate table for detailed response to the proforma response by 'Save Hackney Wick'.</p>	<p>No specific consequential changes proposed.</p>
16 4.	Ref: 680 (Private Individual)		<p>1. The H16 Bridge and Monier Road bridges</p> <p>I strongly object to both of these bridges. I believe current pedestrian bridge serves the area well and the proposal for a "upgrading the bridge" is to facilitate traffic associated with the proposed concrete factories (see below).</p>	<p>Comment noted. See response at no.57 in reference to bridges H14 and H16.</p>	<p>See response at no.57 for new text in relation to bridges H14 and H16.</p>
16 5.	Ref: 680 (Private Individual)		<p>2. Concrete factories</p>	<p>Comment noted. These proposals are subject to</p>	<p>No changes proposed.</p>

			<p>Hazardous Pollution / Hazards to Cyclists & Pedestrians</p> <p>I think the proposal for the concrete factories is scandalous. Granted, this area of land was once designated an industrial area. However, this was pre-2012 and prior to many consents being granted for housing developments in the area, therefore the area has effectively been re-zoned and is now primarily park land and residential in use. To place heavy industry in this location is ludicrous. The associated pollution and traffic (estimated 900 HGV movement a day) poses a deadly health risk of terms of particulate matter pollution and also pitting cyclists, pedestrians and HGVs in close proximity. Sadly, cyclists are dying on our roads on regular basis, this proposal makes the problem worse in area of "Olympic Park" land where cyclists and pedestrians should feel safe. What has happened to the "legacy of the Olympics", how is this in keeping with it? These proposals are a horrific backward step in so many ways.</p> <p>I have lived in the area and Omega Works (adjacent to above proposals for over 10 years). I work for a property developer and I am not naive to the need to develop the area but this has to be done sensibly and without risking lives and health of local residents.</p>	current planning applications but also fall outside of the area covered by the draft SPD.	
16 6.	Ref: 680 (Private Individual)		<p>3. Affordable Housing/ workshops - Peabody Development</p> <p>It is a known fact that artists colonise areas which are cheaper/industrial, "edgy" etc. Then, after a time these areas become fashionable, property developers move in, create developments drawing upon the "cool factor"</p>	Comment noted	No consequential changes proposed.

			<p>embodied in the area - and capitalise. Prices are driven up pushing renters out as well the original artists and local businesses. Tough - that's gentrification, you might think, but there are ways of doing it, differently. Supposedly.</p> <p>It is nice to see seemingly that that the need for affordable housing/space for creative companies/light industrial is being catered for by the Peabody/ Hill Development. I would like to see more of this. Does it go far enough - probably not.</p>		
16 7.	Ref: 680 (Private Individual)		<p>5. HGV movements</p> <p>I doubt very much that any of the people that are promoting/accepting of the above concrete factory/bridge schemes live the area? Do correct me if I am wrong! Would they want 3 huge concrete factories, 900 lorry movements a day on their doorstep? Even if these lorry movements are reduced overall, they will still be substantially increased at certain times of day, again posing a risk to pedestrians and cyclists what is now a predominantly residential area.</p> <p>To reiterate, I think the proposal for the bridge and concrete factories is disastrous and I would like to see it completely axed, rather see LLDC regroup, and regroup again up to come up with trivial concessions.</p>	Comments noted. See above for response to these points.	No consequential changes proposed.
16 8.	Ref: 680 (Private Individual)		<p>I also strongly object to the destruction of Vittoria Wharf and Swan Wharf. These buildings are of historic/significant architectural value and to lose them would the destroy the character of the area. For example, I understand Swan Wharf already houses studios and a bar, why demolish these handsome historic building to substitute characterless pseudo-period new-builds</p>	Comments noted. No specific changes to the SPD are proposed as it does not deal with specific development proposals but rather provides wider guidance on meeting the requirements of Local Plan	No consequential changes proposed.

			<p>providing the same use? Again it's ludicrous. Possibly, these buildings are expensive to refurbish rather than knock down/rebuild. It is a shame that the same principles that were applied to saving some of the waterfront buildings in Canary Wharf and which preserve the character of that area are not being applied here. It's a travesty and frankly it adds insult to injury, combined with the outrageous proposals detailed below.</p>	<p>policies, site allocations and designations.</p>	
16 9.	Ref:729 (Private Individual)		<p>I am writing to strongly object to the current proposals on Fish Island, Hackney Wick.</p> <p>Whilst Hackney Wick is a fantastic opportunity to build in and around, it should not come at the cost of destroying what makes the area interesting for people to live, work in and visit. The buildings that would be affected are some of the most interesting buildings in the area and I urge the council to encourage more positive redevelopment of the existing built environment (here and elsewhere in the borough).</p> <p>The proposed development at Vittoria Wharf succeeds in building new homes only, the actual development would remove character and the identity of the area which is fundamental to good town planning and identity. So much has already been lost in this area, as well as the rest of the East End, surely new developments must learn from the mistakes of the past? Creating unsympathetic, dull and lifeless neighbourhoods should be a thing left in the 1960s. There is an opportunity here to infill areas around Hackney Wick with development that ENHANCES the local area, complimenting the neighbourhood. Not just muscling in on and destroying what is already successful and unique.</p>	<p>Comments noted. Specific responses to the 'Save Hackney Wick' proforma consultation response are provided within a specific separate table which is appended.</p>	<p>No consequential changes.</p>

			<p>Also, I support the comments of Save Hackney Wick on the Hackney Wick Fish Island SPD</p> <p>https://savehackneywick.org/hwfi-local-plan/our-objections</p>		
170.	Ref: 738 - AMA Associates on behalf of McGrath Bros Waste Control (Hackney) Limited		<p>SPD should not unnecessarily duplicate existing planning policy documents, impose policy by the back door and should serve to have an effective role in supplementing formal DPD's.</p> <p>We are not convinced that the draft SPD satisfies these requirements. A significant proportion of the draft SPD repeats policy and contextual information already set out in some detail within, for example, the adopted Local Plan; which has a chapter specifically dedicated to HWFI.</p> <p>HWFI is both a complex and sensitive location, yet is identified within the development plan as a key area within which development plan delivery targets and key environmental, social and economic aspirations will be achieved. Despite this, the SPD fails to take the opportunity to address key matters relating to delivery, such as addressing how local infrastructure will be brought forward or assisting in addressing area and site specific issues. One therefore has to question whether the SPD offers a valid addition to the suite of DPD and supporting documents. Further, the guidance within the SPD appears to be principally a <i>'design compendium'</i> disguised as an area-based SPD, a fact potentially given away by the title of a preceding draft <i>'HW&FI Planning and Design Guidance'</i>.</p> <p>Effectively 50% of the SPD represents generic design guidance. We would suggest that the</p>	<p>Comments noted. However, no evidence is offered to identify what in the draft SPD would represent new policy rather than guidance further to the existing adopted policy within the Local Plan. The SPD is written specifically as guidance further to policies, site allocations and designations within the adopted Local Plan.</p> <p>It is considered appropriate the SPD provides design guidance to aid development of schemes within the SPD area. In respect of Appendix 2 in the draft SPD, it is proposed to remove this and review and update the relevant sections within the body of the SPD.</p>	Appendix 2 in the draft SPD has been removed and design guidance in the 'Heritage, Townscape and Public Realm' section of the SPD reviewed and some amendments made.

			SPD is re-visited. It should not be used as a 'trojan horse' for introducing an additional 'layer cake' of unnecessary design guidance. Equally, it should be more positively focussed on addressing local constraints to delivery and therefore to making a more positive contribution to supporting the achievement of Local Plan policies.		
17 1.	Ref: 738 - AMA Associates on behalf of McGrath Bros Waste Control (Hackney) Limited	Pages 7-20	Area – Priorities To a great extent, a significant proportion of this section involves unnecessary repetition of the Local Plan policies without setting out area based responses.	It is considered helpful for the guidance within the SPD to be prefaced with reference to the Local Plan policies to which it relates.	No consequential changes proposed.
17 2.	Ref: 738 - AMA Associates on behalf of McGrath Bros Waste Control (Hackney) Limited	Pages 7-9	Employment character There is no acknowledgement that some specific existing uses have a highly detrimental impact upon the existing and planned character of the area and need to be addressed. The McGrath site should be identified as a negative impact on the area and it's relocation should be identified as a priority.	Local Plan policy sets a framework for determining proposals that include change from current employment/business uses. The McGrath Hepsocitt Road site is also a site allocation within the Local Plan identifying its potential for change. In this context it is considered that the draft SPD approach is appropriate.	No consequential changes proposed.
17 3	Ref: 738 - AMA Associates on behalf of McGrath Bros Waste Control (Hackney) Limited	Fig.2	Housing Locations Site allocations containing housing should be identified within the SPD and as priorities, as they represent significant elements of the Local Plan's housing strategy.	Pages 5 and 6 of the draft SPD identify the site allocations within Hackney Wick and Fish Island with cross referencing to the Local Plan to enable identification of the site allocation policies which define the appropriate approach to the balance of uses in each case. Given the detail provided in each of the Local Plan site allocations it is not considered to be efficient	No consequential changes proposed.

				or necessary to replicate these within the SPD.	
17 4.	Ref: 738 - AMA Associates on behalf of McGrath Bros Waste Control (Hackney) Limited	Infrastructure - connectivity	Key Connectivity Projects The route network identifies the new/enhanced connection over the canal (3). The SPD should identify in greater detail how the delivery strategy for key infrastructure such as the bridge will be addressed.	It is considered that the approach taken within Table 2 of the draft SPD is appropriate in this instance as flexibility in delivery options remains appropriate at this stage of the project development. It is expected that LLDC will seek planning permission for bridge design as a first step in due course.	No change proposed.
17 5.	Ref: 738 - AMA Associates on behalf of McGrath Bros Waste Control (Hackney) Limited	Heating & Cooling	Heat Network The SPD should demonstrate how the LLDC will prioritise the certainty associated with this key piece of infrastructure.	The SPD provides a preferred option and potential alternatives. It would not be appropriate for this to dictate commercial arrangements for delivery of heat network services to specific developments where this proved feasible and viable. The approach to this section of the SPD is considered therefore to remain appropriate.	No consequential changes proposed.
17 6.	Ref: 738 - AMA Associates on behalf of McGrath Bros Waste Control (Hackney) Limited	Emerging Open Space	The diagram broadly reflects open space within the emerging Wickside Scheme, but it fails to note, for example, the role of the proposed N-S route as valuable public open space. As an indicative diagram this is acceptable, but the N-S route's contribution should be added.	The diagram is not designed to be definitive but rather indicative and so does not prevent a specific development scheme meeting the open space requirements of the scheme in combination with the north-south route if designed in an appropriate manner.	No specific change proposed.
17 7.	Ref: 738 - AMA Associates on behalf	Youth Space	Item 7 in the table refers to HW South, but the following plan shows No.7 within FI North ?	While correct to identify that the SA1.3 site allocation does	No specific change proposed.

	of McGrath Bros Waste Control (Hackney) Limited	Projects	This should be clarified. The site allocation for SA1.3 does not include a specific requirement for youth play.	not include a specific requirement for youth play, a site of this scale would be expected to consider the principle of integrating opportunities for youth play as part of any wider policy compliance play space or public realm provision. In this respect the table on page 25 of the draft SPD refers to no.7 as 'recommended' which rather than 'planned'. This approach is therefore considered to be appropriate.	
178.	Ref: 738 - AMA Associates on behalf of McGrath Bros Waste Control (Hackney) Limited	Townscape and Character	The level of design and townscape guidance that the LPA seeks to introduce through the SPD is both unnecessary and prescriptive and is contrary to NPPF	Disagree that providing design guidance as 'guidance' is contrary to the NPPF. However, see detailed response above at 170.	No consequential change proposed.
179.	Ref: 738 - AMA Associates on behalf of McGrath Bros Waste Control (Hackney) Limited	Fish Island Mid	<p>This section should address the need to adopt positive strategies to address non-conforming uses such as the McGrath waste facility.</p> <p>Without such a strategy being successfully implemented, the SPD would need to advise that sensitive uses such as residential and open space could not come forward within the vicinity of the waste operation until such time as it is fully relocated.</p>	Comment noted. The Local Plan site allocation includes recognition that the matter of waste operation at the site requires resolution to enable the site to be brought forward with the range of uses and functions that are sought by the site allocation text. That future is highlighted in the 'Sites and Uses' part of the Fish Island Mid section of the draft SPD. However, the level of detail within the SPD and its key areas of guidance do not allow the detail of individual site delivery issues to be rehearsed. IN this instance the detail of the Local Plan site	No specific change proposed.

				allocation is considered to be sufficient.	
18 0.	Ref: 738 - AMA Associates on behalf of McGrath Bros Waste Control (Hackney) Limited	Projects - Hertford Union Replacement Bridge	The bridge is identified, but nothing more, the SPD makes no attempt to address how such a key piece of local infrastructure will be brought forward.	The LLDC is planning to take forward design of the bridge through submission of a planning application. The project is included within no.4 in Table 2 Identified Infrastructure on page 55 of the draft SPD. This is considered to provide sufficient information on the overall delivery strategy.	Add the following to no.4 of the Identified Infrastructure table (page 55 of draft SPD): <u>“Submission of planning application for the bridge planned for 2017.”</u>
18 1.	Ref: 738 - AMA Associates on behalf of McGrath Bros Waste Control (Hackney) Limited	Implementation & Delivery Infrastructure	The failure to include the Hertford Union Crossing as a project that would be supported by CIL is unfortunate. The risk of placing reliance upon one developer to deliver the bridge risks threatening the viability and deliverability of SA 1.3.	Disagree that CIL would currently provide the appropriate route to deliver as opposed to S106. Any specific relevant application scheme would need to consider this matter in the round in terms of viability and other matters such as affordable housing delivery. Future reviews of the LLDC Infrastructure Delivery Plan and the Regulation 123 list will enable consideration of delivery through CIL should this become necessary in the future.	No change proposed.
18 2.	Ref: 738 - AMA Associates on behalf of McGrath Bros Waste Control (Hackney) Limited	Appx 1	Relocation Strategies As before, there is no recognition of the need to re-locate specific bad-neighbour uses that will otherwise prejudice the successful delivery of the Local Plan strategy for the area.	See response at 179	No specific change proposed.
18 3.	Ref: 738 - AMA Associates on behalf of McGrath Bros	Appx 2	Design Guidance It would appear that the true purpose of the SPD is revealed in this substantial and disproportionate section, whereby almost 50%	Disagree that design guidance is inappropriate within an SPD. However, see response at 170 for detailed approach and	See response and changes at 170.

	Waste Control (Hackney) Limited		<p>of the SPD is devoted to relatively prescriptive views on detailed matters of design. We do not propose to comment in detail on each and every section of the design guidance, but would highlight that, for example:</p> <ul style="list-style-type: none"> • the balance of the SPD which is focussed upon design guidance is disproportionate – in effect the SPD hides a ‘design compendium’ • the SPD should be more focussed upon matters of delivery and implementation, addressing issues to delivery rather than design • if the LPA seeks to promote a design guide, it should be justified as a separate document to the SPD • much of the guidance is generic, seeks to cover too many scenarios and areas of different character and so comes across as a generic design guide – for which there is no purpose or need within such an SPD • many other comments offer far too detailed guidance and so are unnecessarily prescriptive • to offer several pages on materials is unhelpful when the variety of context across the SPD area changes dramatically • guidance such as internal workspace and retail layouts is unnecessary. 	changes in final version of the SPD	
18 5.	Ref: 739 Deloitte Real Estate on behalf of Here East	General	Broadly, Here East is supportive of the strategic aims and objectives of the SPD. The remainder of this letter comments on the draft SPD policies in more detail.	Support welcomed.	No consequential changes proposed.
18 6.	Ref: 739 Deloitte Real Estate on behalf of Here East	Area Priorities & Development Potential (p.4)	Here East supports the SPD’s objectives for at least 30,000 sqm of new employment (B Use Class) space and the protection and intensification of Strategic Industrial Land areas. The Hackney Wick Fish Island area has the potential to be a leading contributor to economic growth with the LLDC area and Hackney,	Support welcomed.	No consequential changes proposed.

			therefore the development of business space should be actively encouraged.		
18 7.	Ref: 739 Deloitte Real Estate on behalf of Here East	Area wide priorities – employment uses and locations (p.7)	<p>As one of the major generators of jobs on the QEOP, Here East strongly supports the intention of the SPD to support development and growth of technology, broadcast and higher/ further education use at Here East.</p> <p>As one of the first commercial Legacy developments on the QEOP, Here East welcomes the further regeneration of Hackney Wick and Fish Island and the opportunities which this will give to the local community. Here East recognises and appreciates the ambition of the LLDC to deliver change whilst retaining valuable opportunities for low cost creative workspace and maintaining the existing cluster of cultural and creative industry businesses.</p> <p>The SPD and the recently submitted Hackney Wick Central masterplan will significantly increase the B1a office employment floorspace within Hackney Wick, which should complement Here East, which will establish a major digital and creative campus. Given the potential synergies and opportunity for a genuine cluster, Here East will work with the LLDC to promote interaction and collaboration so that the area becomes well known for dynamic new workspace and retail opportunities. With the common goal of promoting convergence and redevelopment, it is in the interests of Here East, the LLDC and the London Boroughs of Hackney and Tower Hamlets that development in the SPD area is complementary.</p>	Comments noted.	No consequential changes proposed.
18 8.	Ref: 739 Deloitte Real Estate on behalf of Here East	Infrastructure – Connec	Here East supports the primary focus to deliver new or improved cycling routes and an accessible public realm. Here East expects the majority of its workspace to travel to and from the site by bicycle and would encourage the	Non-residential ground floor frontage along southern edge of the MPC: this reflects the extent of this description shown on the SA1.7 site	Amend the 'Local Service route' to the southern edge of the IBC building at Here East shown on Route Network

		<p>tivity (p.13)</p>	<p>LLDC to invest in cycling infrastructure wherever possible.</p> <p>On p.14 of the SPD is a diagram showing the Emerging Connectivity within the area. Here East requests some amendments to this diagram to more accurately describe the situation.</p> <p>Firstly, the 'non-residential ground floor frontage' that runs along the Canalside of the MPC building at Here East should continue along the southern edge of the MPC.</p> <p>Secondly, Here East does not agree with the allocation of the route along the southern edge of the IBC building as a "local/service route". This route will become an important link between Canalside and Waterden Road and should be recognised as a "secondary route."</p>	<p>allocation in the Local Plan. It is therefore not considered appropriate to amend this.</p> <p>Local service route indicated along southern edge of IBC building – amend this to show a secondary route as requested.</p>	<p>map (page 14 of draft SPD) to a 'Secondary route'.</p>
189.	Ref: 739 Deloitte Real Estate on behalf of Here East	<p>Public Realm, Open Space and Waterways (p.21)</p>	<p>Here East questions the labelling on the diagram on p.22. This diagram appears to label designations at Here East that are incorrect: two areas of play space; a Primary School; and an All Through School. These appear to be an error and should be corrected or clarified.</p> <p>On p.24, when discussing Enhancing Green Corridors, the plan identifies that the Eastern Bank Interface offers opportunities for compatible canalside activity. The definition of compatible could be clarified. The eastern bank outside the MPC building at Here East is where the Canalside food and drink retail offer is located. Since opening this summer, Canalside has been a tremendous success if offering amenity for the workforce of Here East as well as local residents of Hackney Wick and those passing through the QEOP. The eastern bank offers spill out space for the retail units as well as dwell space – these uses should not be restricted.</p>	<p>Agreed that some elements of labelling of diagram on page 22 require correcting.</p> <p>Eastern Interface within green corridors map on page 24 of the draft SPD. It is noted that the canalside food and drink offer in this location at Here East utilises many elements of this zone and has the requisite planning permission. This is not considered to be incompatible with the label that indicates "Buildings generally away from canal edge to maintain environmental buffer and movement corridors" and so no change is suggested in this instance.</p>	<p>Correct labelling of mapping on page 22 of the draft SPD to remove "All through school indication" and place "primary school" label in the correct position for the East Wick Primary School.</p>

19 0.	Ref: 739 Deloitte Real Estate on behalf of Here East	The Legacy Development Area (p.51)	<p>P.51 describes Here East as: “a major technology focused employment hub incorporating research and development, education and broadcasting, providing opportunities for a range of businesses types and sizes. Elements are already operational with conversion and fit out continuing during 2016.” Here East has no comments on this description. P.52 of the plan recognises that the relationship to the Lee Navigation and the West is the most important developing relationship with the Canal Park and towpath along the east of the Lee Navigation. Here East agrees with this and would strongly encourage the LLDC to significantly improve transport connections in this area, to build upon the recently approved Wallis Road/ H10 bridge cycle link. It is important that these proposals capitalise on this opportunity and develop effective cycle connections and infrastructure from Hackney Wick Station into the QEOP.</p> <p>Here East has made significant investments in cycle infrastructure, including two TfL cycle docking stations which will open shortly. Here East hopes that similar investment in sustainable transport options is made in other parts of the Hackney Wick SPD area to cement the connectivity between the Legacy Area and Hackney Wick/ Fish Island.</p>	Comments noted.	No consequential changes proposed.
19 1.	Ref: 739 Deloitte Real Estate on behalf of Here East	Implementation and Delivery (p.53)	Here East strongly supports the investment in and implementation of public transport improvements and improvements to the cycle network across the SPD area.	Support noted and welcomed.	No consequential changes proposed.
19 2.	Ref: 739 Deloitte Real Estate on behalf of Here East	Appendix 2: Guidance on	Appendix 2 contains information from the recently submitted Hackney Wick Central outline application design code. Here East does not have comment on this guidance so far as it	Comment noted. Appendix 2 as design guidance has been removed and design guidance within the body of the SPD	Appendix 2 as design guidance deleted. The ‘Heritage, Townscape and Public Realm’ section of the

		<i>Townsc ape and Public Realm</i>	relates to the Hackney Wick masterplan area; however, it should be clarified that the guidance does not apply to the Legacy Development Area and/ or specifically Here East. For example, p.65 discusses brick and masonry being the primary facing material for new development. Clearly this is not applicable to Here East, either now or in the future. Please can this be clarified?	reviewed with some amendments made.	SPD has been reviewed with some revisions.
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Save Hackney Wick Proforma Responses

A large number of proforma responses to the SPD consultation were received in conjunction with the 'Save Hackney Wick' Campaign. The majority of those who responded were private individuals and to ensure privacy and protection of personal data these are listed by their representation numbers.

The following are the representation reference numbers of those who have submitted this standard response (accounting for 699 of the 739 responses received):

12-24, 126-131, 139-232, 234-253, 255-266, 268-286, 288-313, 315-443, 445-468, 470-516, 528-571, 518-526, 528-571, 573-588, 590-617, 619-622, 624-633, 635-652, 654-656, 658-679, 681-728, 730-752.

No.	SPD section/issue	Summary of consultation comment/issue	Response to comment	Changes proposed to SPD
1.	Introduction/General	<p>1. Introduction</p> <p>The starting-point for our comments on the SPD is a prevailing sense that the “comprehensive redevelopment” of the area is failing to recognize or safeguard the positive and successful assets that exist in Hackney Wick / Fish Island. The plan lacks a true description of the character of the area that has developed post-Olympics, specifically the growth of the thriving artistic community alongside the existing and thriving independent business community, often housed in historic industrial buildings. Vittoria Wharf, which with Stour Space is an Asset of Community Value, play key roles. Without the acknowledgement of the area’s current assets the SPD is not justified and development will be sanitised and unsuccessful.</p> <p>In the London Plan social capital and diversity are emphasised, for example in the policy on Lifetime Neighbourhoods (7.1). So too is the preservation of historic buildings (7.9) which are scarce, and with</p>	<p>The SPD does not create new policy or allocate land or sites for development or protection but rather reflects the strategy, vision, objectives, policies and site allocations that are within the adopted Local Plan. It provides an overview of these as they apply to Hackney Wick and Fish Island and is accompanied by guidance that supplements this, for example on relocation strategies and provision of design guidance.</p> <p>Assets of Community Value are formally listed by the relevant local authority rather than the Legacy Corporation. It is accepted that the SPD can provide an indication of the location of any such listed assets.</p>	<p>Add paragraph before the ‘Vision’ section at the start of Section 2:</p> <p><u>“Hackney Wick and Fish Island straddle the Lee Navigation/Hackney Cut in the north and River Lee in the south. Originally a predominantly industrial area, with a residential community in the northern part of Hackney Wick around and in the Eastway and Trowbridge Estate, much of the area is undergoing a significant change with the delivery of the post 2012 Games Legacy Development at East Wick and Sweetwater underway that will become entirely new communities with homes and new schools, community space, business and retail space being built, with the reinvention of the Olympic press and broadcast facilities as Here East now also providing a significant employment and education hub. To the west of the waterways that run through the centre of the area, a more mixed transformation is now</u></p>

		<p>the historic waterways have an important part to play in the character of the area. Existing and incoming residents should all be able to benefit from these community assets in Hackney Wick Fish Island. They should be nurtured and expanded, adding value to the area's legacy.</p>		<p><u>underway, particularly in the central areas around Hackney Wick Station and Fish Island Mid. The change from an industrial zone has been underway for some time and the Local Plan envisages this as a mixed use central area retaining significant amount of employment floor space, providing opportunities for a range of business uses but with an emphasis on the creative, making and other SME business that have developed in the area over time. The nature and scale of the development that is envisaged or already has planning permission is tempered in scale and form by the context of two conservation areas and related heritage assets while also being influenced in many locations by a waterside environment and in some cases by flood risk. The Local Plan designates a new Neighbourhood Centre which will become a focus for the retail, leisure and service uses and a location for the office focused business uses; a hub for Hackney Wick and Fish Island around the new Hackney Wick Station, the neighbourhood centre has the potential to provide a focus for a future wider area designation as a Cultural Enterprise Zone.</u></p> <p><u>In the south, primarily in Fish Island South, a significant area of industrial use and activity remains and continues to be protected by the land-use designations and policies in the</u></p>
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			<p><u>Local Plan. This provides both a strategic and local resource for uses that are less likely to be compatible with residential development which take advantage of the proximity of the strategic road network.</u> <u>The Local Plan sets out a specific vision for the sub-area which is also included below.”</u></p> <p>Add text to ‘Infrastructure – schools, libraries, health facilities, meeting space’ section: <u>“Hackney Wick and Fish Island currently benefit from a range of existing social infrastructure, including the Gainsborough Primary School, the newly opened East Wick Primary School and the community meeting space and resource at Hub 67 on Rothbury Road. A new primary school is under construction as part of the Sweetwater development area and the land for a further primary school is secured as part of the Neptune Wharf development. New space for a medical facility and for a library forms part of the wider plans for Sweetwater. As the Neighbourhood Centre develops its new role it is envisaged that a range of services will develop as part of the retail, leisure and services, primarily around Hackney Wick Station and the area immediately to the north of the Copper Box but also immediately to the south of the Kings Yard Energy Centre. Other facilities in the area</u></p>
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				<p><u>provide wider contribution to the existing and developing communities, including the complex at St. Mary of Eton Church and the Old Baths at 80 Eastway, while Stour Space and Vittoria Wharf have been listed as an “Asset of Community Value” by London Borough of Tower Hamlets.”</u></p> <p>A separate map of existing and planned social infrastructure has been included within this section. This includes formerly listed assets of community value.</p>
2.		<p>2. H16 and H14 Bridges Save Hackney Wick has been in extensive dialogue with the LLDC about the proposed new Monier Road bridge (H14) and H16 bridge and we do not think either bridge is justified.</p> <p>References to the delivery of these bridges in the SPD (eg pp 13, 14, 44,46) should be removed or include the caveat: “subject to effective consultation, local agreement, feasibility and viability.” “Fish Island Mid” is recognised as a quieter area and is being marketed as such by developers, but the addition of a vehicle through-route will completely change its character and create unnecessary pollution levels, contrary to the strategic transport objectives of prioritizing pedestrian-friendly environments that are successful elsewhere in the LLDC area. Research by St George’s University of London recently published in the BMJ (Evening Standard 28/10/16) finds the Olympic Village with</p>	<p>Bridges H14 and H16 are identified as ‘Principle Connection improvements’ and as a ‘Key Connection on-road’ and ‘Key Connection Off-road’ within the adopted Local Plan. These are also bridges that have outline planning permission as part of the Legacy Communities Scheme planning permission (Application reference 11/90621/OUTODA). Planning applications for the detailed design of the bridges have now also been approved (application references (16/00587/REM, 16/00588/REM). While opposition to the construction of those bridges is acknowledged, these remain a key element of the local infrastructure strategy within the Legacy Communities Scheme and the Local Plan. It is therefore considered inappropriate to remove reference to the bridges from the SPD.</p>	<p>Update text on Bridges H14 and H16 at page 46 of the consultation draft SPD.</p> <p>“Bridge H14 (Monier Road Bridge) replacement- Planned replacement of temporary walking and cycling route bridge to provide a road bridge access as part of the Legacy Communities Scheme. A requirement of the Legacy Communities Scheme planning permission.</p> <p><u>A multi-modal bridge that will replace the temporary pedestrian and cycle bridge from the Sweetwater development area to Monier Road. Delivery of the bridge is a requirement of the Legacy Communities Scheme planning permission. This permitted the parameters for the bridge which now has approval for its detailed design.</u></p>

		<p>its car-restricted environment is a successful model for healthy living. A high and wide bridge as proposed would also destroy the open character of the canal junction and the long views on the canal, part of the conservation area.</p> <p>The H16 bridge entails the unnecessary demolition of Vittoria Wharf unless Option 1 were to be chosen. We object strongly to the destructive plans for Vittoria Wharf, which along with Stour Space is an Asset of Community Value.</p> <p>Note: The H16 bridge is mis-spelled and called “Beechy Road” throughout the SPD, showing limited knowledge of the area.</p>		<p><u>The design includes ducting that will allow the Heat Network to extend to areas to the west of the canal in the future.”</u></p> <p>“Bridge H16 (Beachy Road) new pedestrian and cycle bridge to Sweetwater.</p> <p>Planned new pedestrian and cycle bridge to provide link between Beechy Road and the planned Legacy Communities Scheme Sweetwater development. A requirement of the Legacy Communities Scheme planning permission.</p> <p><u>Providing a new pedestrian and cycle connection between the Sweetwater development area and Beachy Road, this will also provide an access route to the new Sweetwater school. The parameters of the bridge were approved as part of the Legacy Communities Scheme planning permission and the detailed design of for the bridge now has approval.”</u></p>
3.		<p>3. Existing community assets</p> <p>P88 mentions in passing that the area is highly valued by the local community and a hive of creativity and production but this is not expanded upon or reflected in any specific policy in the SPG. Vittoria Wharf and Stour Space were described by LLDC’s head of design as “An essential hub in the area which truly meets the needs of the diverse range of local communities and visitors” and “would be</p>	<p>Specific provision of community infrastructure and other infrastructure are set out in the adopted Local Plan, along with policy against which changes proposed to community facilities will be judged where these are the subject of a planning application. The SPD simply reflects this approach and provides additional guidance on the adopted policies where this is appropriate.</p>	<p>Insert following new text at start of the ‘Infrastructure – schools, libraries, health facilities, meeting space’ section (including identification of assets of community value within text and map):</p> <p><u>Hackney Wick and Fish Island currently benefit from a range of existing social infrastructure, including the Gainsborough Primary</u></p>

		<p>lost without a proper consideration of the impact this would have on the local community". As already mentioned, Vittoria Wharf and Stour Space is an Asset of Community Value.</p> <p>Therefore a proper description of the existing community assets should be included. P.22 Should also feature Vittoria Wharf and Stour Space as a community hub on the map of Community Infrastructure. Fish Island Mid section (p.43) should make reference to it as an "opportunity".</p> <p>The London Plan (3.16) states: It is therefore essential to plan for high quality social infrastructure alongside development, particularly in major new development and regeneration areas. Community spaces are part of "liveable areas" promoted by the London Plan. The NPPF at paragraph 58 states that good design via local plans will be achieved through "an understanding and evaluation of [an area's] defining characteristics." Paragraph 69 highlights the advantages of social interaction to create a healthy community. It goes on: "Local planning authorities should create a shared vision with communities of the residential environment and facilities they wish to see. To support this, local planning authorities should aim to involve all sections of the community in the development of Local Plans and in planning decisions, and should facilitate neighbourhood planning." At Paragraph 70 the NPPF states planning policies should "Guard against</p>	<p>Stour Space and Vittoria Wharf have been listed as an asset of community value by London Borough of Tower Hamlets. This listing provides an opportunity for the community to purchase a listed asset where that asset becomes available to purchase. However, no land ownership changes are known to be proposed here and the changes proposed have an extant planning permission.</p> <p>It is considered appropriate to include an indication of existing registered assets of community value within the SPD.</p>	<p><u>School, the newly opened East Wick Primary School and the community meeting space and resource at Hub 67 on Rothbury Road. A new primary school is under construction as part of the Sweetwater development area and the land for a further primary school is secured as part of the Neptune Wharf development. New space for a medical facility and for a library forms part of the wider plans for Sweetwater.</u></p> <p><u>As the Neighbourhood Centre develops its new role it is envisaged that a range of services will develop as part of the retail, leisure and services, primarily around Hackney Wick Station and the area immediately to the north of the Copper Box but also immediately to the south of the Kings Yard Energy Centre. Other facilities in the area provide wider contribution to the existing and developing communities, including the complex at St. Mary of Eton Church and the Old Baths at 80 Eastway, while Stour Space and Vittoria Wharf have been listed as an "Asset of Community Value" by London Borough of Tower Hamlets.</u></p> <p>Add text to reference new separate community infrastructure map:</p> <p>"Key Priorities Delivery of the identified new schools and other social infrastructure (see Table 1 below). <u>The map on page 24</u></p>
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		the unnecessary loss of valued facilities and services”.		<u>indicates the location of existing and planned community infrastructure.”</u>
4.		<p>4. Youth Space Community spaces such as Vittoria Wharf / Stour Space can include youth space and this should be acknowledged. Throughout the SPD there is scarce mention of space dedicated to youths, older people and local people. This is contrary to the Local Plan’s Purpose (p 3.2) of providing “opportunities and transformational change for local people”.</p>	<p>Pages 25 and 26 of the consultation draft SPD includes specific guidance on the provision of youth space within new development. This is accompanied by a wider separate ‘Youth Play Space Study 2016’ report available on the Legacy Corporation website http://www.queenelizabetholympicpark.co.uk/-/media/youth-space-(2016).ashx?la=en</p>	No change proposed.
5.		<p>5. Small / independent businesses The SPD should define and promote small independent businesses and set out how they will be accommodated in the new areas. On Page 9 under Retail and Community Uses it states: It will be important that schemes achieve a neighbourhood centre that is both liveable and is a practical place to operate a business. But that all depends on what sort of a business this refers to and what ‘practical’ means. There is not enough clarity or detail here for any meaningful application of a policy to benefit small and independent businesses.</p>	<p>The SPD reflects the planning policies on business use and space within the Local Plan which have been tested at the Local Plan Examination as appropriate to the extent to which those policies can seek and promote the provision of business space that would be appropriate for occupation by a range of businesses of different sizes. It would not be appropriate for a planning document to promote a single specific business model. Links are also provided in the SPD to the ‘Employment Space Study 2015’ which provides guidance on the practical requirements for a range of business space sizes and types and includes guidance on compatibility of those uses/spaces with other uses such as residential. The SPD considers the range of such uses and there generally appropriate locations across Hackney Wick and Fish Island as a whole rather than only the Neighbourhood Centre.</p>	<p>Add the following paragraph to Employment Uses and Locations text at page 7 of the consultation draft SPD following the ‘employment strategy’ section:</p> <p><u>“Promoting the future of making, creative and cultural uses in Hackney Wick and Fish Island</u></p> <p><u>The Legacy Corporation is working with the Mayor of London to explore the potential for the establishment of a Cultural Enterprise Zone that could include core parts of Hackney Wick and Fish Island. The definition and extent of this potential CEZ will be explored and may be developed as the Local Plan undergoes its review which starts in 2017.</u></p> <p><u>Working with the boroughs of Hackney and Tower Hamlets to coordinate the letting of existing and provision of new workspaces to those businesses seeking to locate or stay</u></p>

				<p><u>within Hackney Wick and Fish Island is a priority for the Legacy Corporation. To this end, the Legacy Corporation is also working with the Mayor to explore the options that might be available through his proposal for establishment of a Creative Land Trust that would be able to take on and manage workspace, including low-coast workspace, to meet the needs of a range of businesses, including those within the making, creative and cultural sectors.”</u></p>
6.		<p>6. Fish Island Mid - loss of employment space “Smaller scale mixed-use development replacing existing employment floorspace and providing new residential development in accordance with Local Plan policies and in the context of the Fish Island Conservation Area.” (p43) We do not support the loss of employment areas and this paragraph is far too generalised and provides no useful information about which employment areas would be replaced, and why. It goes against the LLDC’s aim to create a strengthened and diversified employment base (eg Local Plan p 11). Existing historic industrial buildings are eminently suitable for every type of industrial and creative business and employment activity. But the kind of new-build employment space being built within mixed-use developments is often unusable and does not mitigate the loss of these original workspaces. The LLDC</p>	<p>Agree that the ‘Strategy’ paragraph requires updating to provide clarity including deletion of reference to ‘private ownership’.</p> <p>The strategy section does reflect the policy approach and the site allocations within the Local Plan but the text should be reworded to ensure this is set out more clearly demonstrating the wider intent to deliver the diversified employment base sought within the strategy underlying the policies and proposals in the Local Plan. The now approved Hackney Wick Masterplan (ref: 16/00166/OUT) as an LLDC scheme, seeks to providing no less than 29,908 sqm of commercial floorspace (Use Class B1a, B1c), with no less than half of this ‘to be provided as Use Class B1c’. It also seeks to re-use heritage assets for employment and community uses. , providing no less than 29,908 sqm of commercial floorspace (Use</p>	<p>Make the following changes to the ‘Strategy’ section:</p> <p>“Strategy</p> <ul style="list-style-type: none"> • <u>Preserving or enhancing the special architectural or historic interest associated with the conservation areas and heritage assets;</u> • With all sites in private ownership, delivery of major mixed use development within the site allocation areas <u>in accordance with site allocation policy;</u> • while outside of the site allocations and conservation areas, <u>achieve generally</u> smaller scale mixed-use development <u>retaining or replacing existing with appropriate new</u> employment floorspace and providing new residential development in

		<p>should seek to preserve the area's historic buildings for continued or repurposed use as employment space. "With all sites in private ownership..." What is the reason for the inclusion of this information? Does it mean that the policy is tailored towards the needs of private owners? If so, in what way?</p>	<p>Class B1a, B1c), with no less than half of this 'to be provided as Use Class B1c'.</p>	<p>accordance with Local Plan policies; and in the context of the Fish Island Conservation Area.</p> <ul style="list-style-type: none"> • Securing delivery of the north-south link route, the all-modes <u>H14 Monier Road Bridge to Sweetwater, the H16 pedestrian and cycle bridge to Beachy Road,</u> general public realm and canal frontage improvements and delivery of the Neptune Wharf Primary School."
7.		<p>7. Heritage Assets Hackney Wick Fish Island is unique in that it contains built fabric based around London's industrial history, making it very distinct from the large zones of cleared or redeveloped land within the LLDC boundary. While the Plan is generally positive about Heritage Assets playing a part in the future of HWFI there is not sufficient detailed wording to support this in the document. We are concerned that HWFI is being seen by some as just another location for high density new-build. On p29 the text says that where an application involves a heritage asset its worth will be assessed, with responsibility shifted to Historic England. We are concerned that each new planning application will potentially put heritage assets at risk, as there is not sufficient determination in the SPG to assess and safeguard at least the list of buildings on page 30.</p>	<p>It is considered that the use of 'preserve or enhance' accurately reflects Local Plan Policy 1.4, in particular sub paragraph 1 of the policy.</p> <p>It is agreed that a reference to Policy 1.1 should be included in the Key Local Plan Policies list within the Heritage and Townscape section of the SPD.</p> <p>The text in reference to Historic England does not imply that responsibility will be shifted to Historic England but simply highlights the importance of the Historic England guidance for both the applicant and planning authority in considering and assessing any development proposal. No change is considered necessary.</p> <p>For both Hackney Wick and Fish Island it is not considered necessary for the SPD to repeat the strategy and approach within the Local Plan and the conservation area assessments and</p>	<p>Insert the following text into the Heritage, townscape and public realm section of the SPD (previous title of the section in the consultation draft SPD 'Heritage and townscape'):</p> <p>"Strategy - heritage-led regeneration A strategy of heritage-led regeneration is identified in the Local Plan for the core areas of change within Hackney Wick and Fish Island, integrating new mixed use development into the established street and waterway pattern and heritage assets that underlie the character of the area, in particular that of the two conservation areas and their surroundings.</p> <p><u>The retention, repair and re-use of heritage assets where this is possible is encouraged as a key part of this approach. Where significant development schemes are proposed</u></p>

		<p>On the same page, Key Local Plan Policy 1.4 Should read “ Policy 1.4 Preserving or enhancing heritage assets in Hackney Wick and Fish Island ”</p> <p>The key words “restore and reuse” from Local Plan policies 1.1 and 1.4 should appear within this text.</p> <p>- Fish Island Heritage Assets While Hackney Wick Town Centre has a map of Heritage Buildings to be retained, Fish Island does not, and this is inconsistent. Hackney Wick also has a master plan and Fish Island does not. Fish Island in fact has more important and a higher number of heritage buildings, including the oldest historic industrial building, part of Vittoria Wharf. We are concerned that without a considered plan for Fish Island the result will be the incremental loss of its fabric. The wording of the overall strategy for Fish Island Mid referred to above (“With all sites in private ownership...”) is not altogether clear. We believe the strategy needs more work and should be revised and expanded.</p> <p>- Built form There is no mention of appropriate building heights in the SPD.</p>	<p>management guidelines in detail within the SPD as references and links to these are provided. However, some minor text changes are proposed to clarify the importance of these when developing or assessing development proposals. Reference to the Historic England advice notes and criteria will also be included.</p> <p>In respect of references to height of the built form within this section additional text is proposed for inclusion in the Key Local Plan Policies section for Policy BN.10.</p>	<p><u>that have an impact on identified heritage assets, the preparation of a heritage strategy in line with Historic England Guidance is also encouraged.</u></p> <p><u>Not all of the SPD area is within a conservation area or identified for new mixed use development. However, where development is proposed the guidance in the following sections is intended to help achieve design solutions that are both relevant to the context of that specific location and meets the requirements of the relevant Local Plan policies.</u></p> <p>Key Local Plan Policies Policy BN.1 Responding to Place - including respecting existing typologies in the urban fabric, including those of heritage value.</p> <p><u>Policy BN.2 Creating distinctive waterway environments positively addressing the ecological, drainage, recreational and commercial opportunities provided by waterways.</u></p> <p><u>Policy BN.3 Maximising Biodiversity</u> <u>Protect and enhance biodiversity, providing a net gain in extent of habitat and including compensatory habitat where original habitat is lost</u></p> <p><u>Policy BN.10 Proposals for Tall Buildings</u> - proposals need to preserve or enhance heritage assets</p>
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				<p>and the views to/from these and positively contribute to their setting (including conservation areas). <u>For Hackney Wick and Fish Island, the Local Plan sets a height of 20 m above ground level above which development proposals will need to demonstrate that they meet the tests set out in the Policy. Meeting the tests within the policy will be of importance in demonstrating that any built height greater than this - would not be significant enough to harm the character of the sub area or immediate surroundings.</u></p> <p><u>Policy BN.12: Protecting Archaeological interest</u> - much of the Hackney Wick and Fish Island area is within an <u>Archaeological Protection Area (APA)</u>. A current APA map should be consulted along with any potential for archaeological interest should be considered when defining the level of evaluation that would be need for a specific development proposal. Consultation with Historic England is advised at an early stage in order to support the approach taken.</p> <p><u>Policy BN.16 Conserving or enhancing heritage assets</u> - a need to conserve or enhance heritage assets and their settings, including incorporation of viable uses consistent with their conservation and with heritage led regeneration.</p>
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				<p><u>Policy 1.1: Managing change in Hackney Wick and Fish Island</u> – seeks to maintain overall amount of employment floorspace and restoration and re-use of heritage assets for employment or other uses within Hackney Wick and Fish Island.</p> <p>Policy 1.4 Preserving or enhancing heritage assets in Hackney Wick - preserve or enhance the special architectural or historic interest; enhance and reveal the significance of heritage assets; reference the architectural and historic interest within design of new development, retain or re-provide street trees where appropriate.”</p> <p>In the Heritage section – add following text to second paragraph:</p> <p>Conservation Areas There are two conservation areas within Hackney Wick and Fish Island. Figure 3 shows the extent of each and the location of heritage assets, <u>with both also embracing the canals within their boundaries</u>. The conservation area appraisals and the management guidelines for each can be found on the Legacy Corporation <u>website</u>.</p> <p>“The management guidelines contain specific guidance, <u>including design guidance</u>, relevant to new development within or in the vicinity</p>
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				<p>of the conservation areas which is not specifically repeated within this SPD.”</p> <p>Also add the following text to the end of the section:</p> <p><u>“Early engagement with the local planning authority will be particularly important where a proposed scheme might include a heritage asset or is within or adjacent to one of the two conservation areas.”</u></p>
8.		<p>8. Protection of the character of the waterways</p> <p>P.21 should mention that the waterways themselves are part of the Fish Island White Post Lane Conservation Area.</p> <p>P.31 final paragraph “Canal facing buildings”: this paragraph is written in a confusing way and needs to be made clearer. The policy should aim to avoid the build-up of tall facades adjacent to the canals and waterways, as this will undermine the role of the waterways to provide open space and have the positive effects of green infrastructure as set out in Local Plan policy (page 21). It is unclear what is meant by “Elevations...should be characterised by large-scale articulation”. This should instead be avoided.</p> <p>Projecting balconies should specifically be avoided over the tow paths of the waterways as they encroach on these significant public spaces.</p> <p>P32 “Façade Design”. It is not clear why “unnecessary complexity” is to be avoided as this would seem to encourage</p>	<p>A reference to inclusion of the waterways within Fish Island and White Post Lane Conservation Area boundaries is proposed within the Conservation Area paragraph of the Heritage section (see changes outlined at 7. above).</p> <p>Canal facing buildings response text</p> <p>Façade Design – this text is provided in reference to the approach to integrating environmental mitigation elements of the design to ensure that these do not appear as incongruous or add-on elements to buildings. It is not seeking regularisation or regimentation of building facades. Therefore no change is proposed</p>	<p>Reference to the inclusion of the waterways within the conservation area boundaries is included in the proposed changes at 7. Above.</p> <p>No change is proposed in the text approach in respect of canal facing buildings. However, this section has been reviewed with some revisions as a result of the removal of appendix 2 of the consultation draft SPD.</p>

		regularized, regimented facades along the canal, which will not enhance them. P43 lists "Significant lengths of waterway site frontage" as an Opportunity. Does this mean that every part of Hackney Wick and Fish Island is to be developed? How will this safeguard the character of the waterways? There is not enough clear information here.		
9.		<p>9. Loss of open space</p> <p>With so little open space to cater for an increasing density, the loss of further open space should be ruled out in the SPD.</p>	Areas of Local Open Space and Metropolitan Open Land are identified along with specific policies providing protection within the adopted Local Plan. Site allocations SA1.3 Hepscoth Road, SA1.5 Wick Lane and SA1.6 Neptune Wharf include specific requirements for new open space provision. The SPD as drafted reflects that approach and is not considered to require specific change.	No specific change is proposed to the SPD
10.		<p>10. Fish Island South: No to concrete production</p> <p>The LLDC is by now fully aware of the widespread objections to the concrete and asphalt factories due to environmental damage and public health. Plans for residential areas at Wick Lane (p47) in Fish Island South should not be included in the plans with the possibility of concrete facilities nearby. The facility contradicts all the principles in the Local Plan, London Plan and NPPF that development improves, not detracts from, environmental conditions.</p>	The plans referred to within this comment are the subject of individual planning applications for parts of the Bow Goods Yard East which is outside of the SPD Area. An existing concrete facility operates within a site at Fish Island South Strategic Industrial Land area and there are no known plans for this to cease operating.	No specific change proposed to the SPD

