Appendix 3

London Borough of Hackney

Permitted Development Rights for Change of Use from Commercial, Business and Services to Residential

District Centres and Local Shopping Centres

Contact

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Summary

This Report sets out the evidence and justification for making an Article 4 Direction for Hackney's District Centres and Local Shopping Centres that would remove Class MA permitted development (PD) rights between Class E uses (commercial, business and service) and Class C3 (residential) that came into force on 1 August 2021.

It recognises the local role of Hackney's district and local centres, in terms of the services it provides to residents, and its contribution to the economy and employment. The evidence demonstrates the importance of the centres as retail, commercial, leisure and community hubs of the borough.

The impact of the PD right, to change from Class E use to residential using prior approval, is too early to establish, but there would be a loss of commercial, and in some areas, office floorspace to residential in some of the borough's locally important commercial and employment areas. It could affect the economy, employment and health and well-being of the community, and, conversely, make the borough a less attractive place to live. It would also adversely affect the holistic delivery of strategies and plans for the delivery of an inclusive economy.

The A4D does not mean that there will be no residential in the affected area, rather it will allow the Council to consider and determine planning applications in line with the existing and emerging policies. In some circumstances, changes of use to residential may be justified and acceptable.

- On 1 September 2020, a new use E (Commercial, Business and Services) merged a number of uses including retail (A uses), office / light industrial (B use), some community (D1 use) and some leisure uses (D2 use) into a single use class.
- This means that operations within `E' use can change between uses without requiring a change of use planning approval.
- On 1 August 2021, a new permitted development right (PD) right will be exercisable to enable a change of use from class E to residential (C3 use).
- Applicants wishing to exercise the PDR need to go through the prior approval process rather than having to apply for full planning permission.
- The impact of the two recent amendments means that the Council as the planning authority is less able to influence and manage changes in the key commercial areas of the district and local town centres. This will significantly undermine our work in delivering an inclusive economy.
- The new permitted development rights will also have a financial impact leading to a reduction in Community Infrastructure Levy / S106 contributions.

1. Introduction

1.1. As part of reforms to the planning system centered around the Planning White Paper (titled "Planning for the future" and published in August 2020), the Government has made and is proposing a number of amendments to the Town and Country Planning Use Classes Order 1987 (UCO), the Town and Country Planning (General Permitted Development) Order 2015 (GPDO) and the National Planning Policy Framework (NPPF).

1.2. This Reports seek to justify the Council proposal for an Article 4 Direction (A4D) for the new permitted development (PD) right under the General Permitted Development Order (GPDO) Class MA which will allows all uses within Class E (commercial, business and service) to change to use Class C3 residential under a new class MA in the General Permitted Development Order (GPDO). Appendix 1 sets out the new class E, and the PD right class MA in more detail.

1.3. In March 2021 Government published legislation that introduced a new PD right, Class MA which came into effect on 1 August 2021 for the change of use of properties in the Commercial, Business and Service use class (Class E) to residential, subject to a range of conditions and limitations. Under the transitional arrangements, where there are existing A4D relating to *office to residential* PD rights, these will remain effective until 31 July 2022, other local A4Ds affected by the new class E fell away on 31 July 2021.

1.4. The Government made a statement on 1 July 2021 clarifying its position in respect of A4D and amending the National Planning Policy Framework (NPPF) accordingly. Paragraph 53 now states that,

"The use of Article 4 directions to remove national permitted development

rights should: where they relate to change from non-residential use to residential use, be limited to situations where an Article 4 direction is necessary to avoid wholly unacceptable adverse impacts (this could include the loss of the essential core of a primary shopping area which would seriously undermine its vitality and viability, but would be very unlikely to extend to the whole of a town centre) in other cases, be limited to situations where an Article 4 direction is necessary to protect local amenity or the well-being of the area (this could include the use of Article 4 directions to require planning permission for the demolition of local facilities) in all cases, be based on robust evidence, and apply to the smallest geographical area possible."

1.5. The Council considers it important to protect key employment and commercial locations that may be directly impacted by the change in the PD rights. The Council therefore proposed an Article 4 Direction not only to allow more time to monitor and understand the resultant situation and ensure that longer term objectives remain on track, but also to allow time to assess the impact of a change of use on the vitality and viability of the centres. The PD rights threatens the unplanned loss of Class E premises from locations within the Borough that make significant contributions to the local economy, employment, health and well-being of our residents.

1.6. The A4D replaces the arrangements for two existing A4D that currently removes the PD rights under class O (Class B1(a) Offices and Class C3 (residential)) and class M (Class A1 (shop) and A2 (financial and professional services) and C3 (residential).

1.7. For Hackney it is proposed that separate A4Ds cover the same PD right but *different geographical areas*, i.e the designated district and local centres, and employment areas in the borough. Each A4D area needs to be justified by supporting evidence. This A4D relates to the District and Local centres, which are important in terms of amenity, health and well being for local communities.

1.8. The Council considers that the Article 4 Direction fulfils national policy set out in Paragraph 53 (as revised on 1 July 2021) of the National Planning Policy Framework (NPPF) on the use of Article 4 Directions, and it is in accordance with the guidance set out in the National Planning Practice Guidance. The evidence submitted justifies the Article 4 Direction which is necessary to support the local economy and the continued vitality and viability of Hackney's retail hierarchy, thus the well-being of the area. The discreet boundaries of the areas in question have been drawn up from a robust borough-wide assessment of the quality and location of commercial land in the borough.

1.9. The purpose of this report is to provide context and local evidence to support the Article 4 Direction made by the London borough of Hackney.

1.10. The report draws on the Mayor of London's 2021 Strategic evidence to support London Boroughs in making Article 4 Directions (commercial to residential), supplemented by robust local evidence and data.

2. London Borough of Hackney Evidence

2.1. The impact of the new PD right is uncertain, but this paper will consider the likely implications of the PD right for Hackney in terms of :

- The services provided by the district and local centres
- The local economy
- Employment opportunities
- Attractiveness, health and well being of the main town centres

2.2. The Class E to C3 A4D is justified by up to date evidence, a number of strategic and local documents and sources including but not limited to :

- The GLA Strategic Evidence for A4Ds Report (July 2021) https://www.london.gov.uk/sites/default/files/strategic_evidence_to_support_commercial_to_residential_article_4s_in_london_july_2021_final_report.pdf
- Hackney Economy, Workspace and Social Value Study (2019) 01 Hackney Economy, Workspace and Social Value Study - Main Report.pdf
- Hackney Employment Land Study (2017) hackney-employment-land-study-main-report-1-…
- Hackney Retail Needs Assessment Report (2017) Appendix 1 Town centres appendix
- Hoxton Social Economic Insight Study (2021) Hoxton Socio-Economic Insights Study - Fin…
- Hackney monitoring data
- Survey of the local centres Excel / google sheet (2017)
- Experian Goad 2021 surveys of Stamford Hill and Stoke Newington
- Justification to GLA for Hackney Centre and Stamford Hill. additional-evidence-for-hackney-central-and-stamford-hill.pdf
- Shoreditch Covid-19 Economic Report Shoreditch Covid-19 Economic Report - Final Re…
- Examination letter https://drive.google.com/file/d/1ouTSe4eGmaMB2ZcEbnmMu5zTQIYgSxqI/view
- Rebuilding a better hackney (2020) https://hackney.gov.uk/rebuilding-a-better-hackney/#impa
- Hackney-Profile.pdf

3. The Proposed Geographical Area for the Article 4 Direction

The areas included in this A4D are set out in Fig 1.
The A4D includes the three district centres of Hackney and the 16 local shopping centres.

- The District Centres are:
  - Stoke Newington District Centre
  - Finsbury Park District Centre
  - Stamford Hill District Centre

- The Local Shopping Centres are:
  - Broadway Market Local Shopping Centre
  - Chatsworth Road Local Shopping Centre
  - Dunsmure Road Local Shopping Centre
  - Green Lanes Local Shopping Centre
  - Hackney Downs Local Shopping Centre
  - Hoxton Street Local Shopping Centre
  - Kingsland Road Local Shopping Centre
  - Lauriston Road Local Shopping Centre
  - Lower Clapton Road Local Shopping Centre
  - Manor House Local Shopping Centre
  - Oldhill Street Local Shopping Centre
  - Stoke Newington Church Street Local Shopping Centre
  - Stoke Newington Road Local Shopping Centre
  - Upper Clapton Road Local Shopping Centre
  - Well Street Local Shopping Centre
  - Wick Road Local Shopping Centre

3.1. These are the same geographical areas that the Government granted an A4D for retail to residential PD rights in 2016.
The overall area of the district centres and local centres in Hackney is 39.9733 hectares. The borough of Hackney is 1,906.6942 hectares. The area indicated in the A4D is the equivalent of 2.1% of the borough. This is a small percentage of the borough in geographical terms but these are the heart of the communities, with these successful centres having a huge impact on everyday life for residents.

3.2. LB Hackney has a hierarchy of town centres (Major, District and Local centres) reflecting a diverse retail character with a strong emphasis on small and independent shopping. These centres provide a diverse range of services, including everyday essential services, to meet local needs.

3.3. The three district centres, Stoke Newington, Finsbury Park and Stamford Hill provide retail, leisure and service floorspace, and convenience goods and services for local communities. The 16 local centres serve a localised catchment, mostly for convenience goods and other services. Together with District centres they play a key role in providing the local community with retail and other services.

3.4. Strategic evidence and justification for making an Article 4 Direction for these areas has been set out by the Mayor of London in his statement, ‘Strategic evidence to support London borough Article 4 Directions (commercial to residential)’, issued on 7 July 2021. It provides strategic support to local authorities for targeted Article 4 Directions, to remove Class E to residential PDR from strategically significant office locations, within the Central Activities Zone (CAZ), town centres, high street and locally shopping areas.

3.5. This report has full regard to both statements, aiming to apply the Article 4 Direction to areas where wholly unacceptable adverse impacts are likely to occur without such measures, and in doing so, limiting this to the smallest geographic areas possible.

3.6. A full list of the areas to which the Article 4 Direction applies is set out as part of the Direction made by the Council.

FIG 1: District Town Centres and Local Shopping Centres

4. Planning Policy Context

NPPF

4.1. The NPPF 2021 makes clear that the purpose of the planning system is to contribute to the achievement of sustainable development. In achieving sustainable development, the government sets out three objectives including an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity.

4.2. The NPPF also recognises the role of the planning system in supporting the vitality and viability of town centres and promoting healthy communities. Paragraph 86 of the NPPF states that town centres are at the heart of their local communities and LPAs should pursue policies to support their viability and vitality.

London Plan, 2021

4.3. The London Plan also recognises the importance of London's high streets as one of London's most characteristic urban features which play an important role in terms of local economic and social infrastructure, providing employment opportunities and promoting community and cultural exchange. Policy SD6 of the London Plan looks to ensure that town centres are the primary locations for commercial activity and are important contributors to the London and local economies. Whilst housing is an important element of a town centre, and can be provided in a diverse format, the policy states that it is best provided to ensure active frontages are maintained and is appropriate outside of primary shopping areas and primary and secondary frontages where the character and diversity of town centres is not undermined.

4.4. London Plan Policy SD7 delegates the definition of town centre boundaries to Development Plans, and promotes the identification and protection of out-of-centre high streets to enable the protection and sustenance of these areas in fulfilling their local role (criteria C(2)). Policy SD8 recognises the role played by the town centre network in providing day-to-day services for local populations within walking distance of their homes. Through these policies, and Policy SD9, the London Plan recognises the unique nature of each of London's town and district centres, and the contribution made by centres and high streets that provide a local role. It promotes local management and local, distinct strategies for their management, using local evidence. It also advocates the use of Article 4 Directions as a tool to ensure that development is undertaken in accord with the overall plan (criteria D(1)).

4.5. London Plan policy SD8 Town Centre Network sets out that 'District centres should focus on the consolidation of a viable range of functions, particularly convenience retailing, leisure, social infrastructure, local employment and workspace, whilst addressing the challenges of new forms of retailing and securing opportunities to realise their potential for higher density mixed-use residential development and improvements to their environment'.

4.6. In the London Plan Town Centre Network, Stamford Hill is identified as having a medium level of commercial growth potential and residential growth potential. Stoke Newington is indicated as having a NT3 night time economy, with low commercial growth potential and medium residential growth. The whole of Finsbury Park has a night time economy of NT3. It has the potential for medium level commercial growth, and high residential growth. All three district centres are strategic areas for regeneration.

4.7. The Council identifies local shopping centres in the retail and service sectors (see Appendix 1), beyond the town centre hierarchy and designated town centres, recognises that these locations are more vulnerable to the new PDR, in the absence of targeted Article 4 Directions, and could undermine the adaptation of London's town centres and high streets as vibrant, successful locations for a range of business, culture, civic and community activities complemented by well-planned housing and mixed-use development.

LP33 Hackney Local Plan

4.8. The Hackney Local Plan (LP33), adopted July 2020, is the development plan for the London Borough of Hackney and it sets out an ambitious strategy that will enable the delivery of the Borough's Community Strategy, Hackney A Place for Everyone, and realises the Council's vision for a fairer, safer, and more sustainable Hackney. It links and supports the delivery of the Council's portfolio of secondary strategies, and sets out a physical growth strategy and an approach to managing land uses, alongside Planning policies and Planning guidance for the Borough.The Plan covers the period 2018 to 2033, and it will direct development and investment in the Borough and help to shape regeneration plans for neighbourhoods.

4.9. Hackney Central and Dalston Town centres are designated as the major town centres in LP33. There are three designated district centres, Stoke Newington, Finsbury Park and Stamford Hill, and 16 local centres. These district town centres and local centres contain important clusters of Class E uses including shops, financial and professional services, offices, and community spaces.

4.10. The town centres of Hackney were reviewed as part of the development of the Hackney Local Plan. All centres were performing well and based on the evidence, Hackney updated its town centre hierarchy. Stamford Hill became a district centre based on its importance, and 4 new local centres were identified - Oldhill Street, Dunsmure Road, Green Lanes and Hackney Downs. These redesignations and the policy approach set out in policies LP32 - LP35, directs new retail uses to town centres and seeks to protect existing retail uses within town centres, to meet retail needs over the plan period.

4.11. LB Hackney has also preparing an Area Action Plan (AAP) for Stamford Hill. The District Centre of Stamford Hill and two local centres, Oldhill and Dunsmure Road, are included within the AAP area.

4.12. The Stamford Hill Area Action Plan is a key planning document for Hackney which will provide a comprehensive framework for Stamford Hill for the next 15 years. The plan is at Regulation 19 stage of its development. The Plan will manage existing development pressures and shape future growth in a sustainable manner. Within the plan, sites for planned development have been identified. This links to strategic growth plans within Hackney.

4.13. The Plan provides a framework for growth which safeguards the area's unique character and will deliver real benefits to the community. The PD right undermines this work around maximising the supply of large family homes, improving public space and public realm, providing new schools and community facilities and improving local shopping centres in Stamford Hill.

Hackney’s Policy Approach to Retail

4.14. The Council’s retail policies are based on robust evidence which has been found sound as part of the Examination in Public to the Council’s Local Plan which was adopted in July 2020. These policies are responsive to Hackney’s local context while being consistent with the regional aspirations of the London Plan, and the requirements of the NPPF.

4.15. LP33 sets out that in order to maintain a range of retail services and community uses within the district centres, shops should constitute at least 55% of all units, and within the Local Shopping Centres, shops should constitute at least 50% of all units. Any proposed change of use that would result in the proportion of retail units falling below these thresholds is required to provide marketing evidence to demonstrate that there is no demand for retail in this location.

4.16. The Council’s planning policies are flexible in that they, firstly, seek to protect a core of retail uses, while allowing for a range of other uses (e.g. financial services, restaurants) to ensure a balanced offer; and secondly, they take account of market signals through the requirement for the submission of marketing evidence when seeking to release retail floorspace and other uses.

4.17. The Council recognises the importance and significance of town centre uses to meet the needs of local communities throughout the Borough. The retail policies do not preclude housing within the town centres, but means that the local centre retail offer is not diluted to a point whereby it is no longer useful for the community in terms of services and uses.

Hackney’s Policy Approach to Employment Land

4.18. The District centres and four of the Local Centres, Hoxton Street, Well Street, Upper Clapton and Lower Clapton contain workspace.

4.19. The Council's employment policies are based on robust evidence which has been found sound as part of the Examination in Public to the Council's Local Plan which was adopted in July 2020. These policies are responsive to Hackney's local context while being consistent with the regional aspirations of the London Plan, the requirements of the NPPF and ensuring enough employment land remains in the borough.

4.20. The Council's NPPF-compliant policies are flexible in that they take account of market signals through the submission of marketing evidence when seeking to release employment land; requiring a marketing strategy to ensure any new employment floorspace is designed with end users in mind and therefore will be let, as well as wider issues around economic viability.

5. Existing Article 4 Directions within LB Hackney

5.1. Hackney Council had an existing Article 4 Directions regarding Retail to Residential A4D (2016) use to the C3 residential that fell away in 2021. In addition, the Council has an office to residential A4D covering the designated employment areas and town centres outside of the `exemption area' A4D above, A4D Office to Residential Employment Areas and Town Centres . The Council expanded two existing Article 4 Directions to take account of the new local centres designated in LP33. Both extensions came into effect in January 2019.

- Retail to Residential Use (in all of the Borough's Major and District Town Centres and in the Local Shopping Centres).
- Flexible Town Centre Uses (in all of the Borough's Major and District Town Centres and the Local Shopping Centres).

5.2. Until 31 July 2022, the borough will continue to benefit from existing Article 4 Directions that remove the PDR to change use from office to residential. They will not be affected by the new PDR until the transitional period has lapsed at the end of July 2022. Many of the reasons for the making of the Article 4 Directions in 2019 remain.

5.3. These new PDR changes have been introduced at a particularly uncertain time. Whilst long-term changes in the way we shop and receive services are well documented – particularly the increasing reliance on the internet and home delivery – the pandemic and lockdown have also changed the way people seek goods and services. One notable element of this is the success that some local centres have had in meeting the needs of people within their catchment who are choosing to walk and cycle from home to their nearest centre, and the struggle some larger centres have had, partly due to the absence of office workers and visitors / tourists, removing large parts of the spend they were previously reliant on. The Council is concerned that the issues they can consider when determining a prior approval application are too narrow, and will lead to the loss of retail floorspace within Hackney's District Centres and the Local Centres. This loss will have a negative impact upon the vitality of our town centres, the local economy and upon valued local services. It will be to the disadvantage of the communities who use these centres day-to-day.

5.4. The Council has therefore made an Article 4 Direction not only to allow more time to monitor and understand the resultant situation and ensure that longer term objectives remain on track, but also to allow us to assess the impact of a change of use on the vitality and viability of our centres and parades. The PDR threatens the unplanned loss of Class E premises from locations within the borough that mean so much to the health and well-being of our residents, employees and visitors. The Article 4 direction in the areas we have been able to define through our robust evidence will allow time to manage these impacts properly through the spatial strategy and policies we have already adopted in the Local Plan.

5.5. The forthcoming Article 4 Directions will replace the two existing A4D that currently removes the PD rights under class O (Class B1(a) Offices and Class C3 (residential) and class M (Class A1 (shop) and A2 (financial and professional services) and C3 (residential). The Article 4 Direction continues and extends the arrangements for the existing Article 4 Direction that currently removes the PDR under class O (i.e. between Class B1(a) Offices and Class C3 (residential), and brings in district and local shopping centres to provide a comprehensive approach to regeneration and growth objectives of the council.

6. Council programmes and partnerships

6.1. Supporting the town centres is a fundamental strand of Hackney Council's work. There are a number of strategies that utilise the town centres as a means to create opportunity for residents.

6.2. The Hackney Community Strategy 2018-2028 provides 5 key, cross- cutting themes:

- A borough where everyone can enjoy a good quality of life and the whole community can benefit from growth
- A borough where residents and local businesses fulfil their potential and everyone enjoys the benefits of increased local prosperity and contributes to community life
- A greener and environmentally sustainable community which is prepared for the future
- An open, cohesive, safer and supportive community
- A borough with healthy, active and independent residents

6.3. The Hackney Labour manifesto (2018) sets out that the Council will continue to support Street Markets, town centres and shopping streets, working with the Borough’s shopkeepers and market traders to ensure that Hackney’s shopping high streets and markets thrive and prosper and become known for their diversity, value and quality.

6.4. The Mayor of Hackney’s priorities for 2018-2022 focus on making Hackney economically and environmentally sustainable with strong, diverse communities; a place where everyone can feel safe in our town centres, local neighbourhoods and when they are at work.

6.5. Ensuring the local economy is inclusive is central to the Mayor’s vision for Hackney and therefore one of the biggest areas of focus for the Council. Hackney has seen more rapid social and economic change than almost anywhere else in the UK over the last 15 years. This has brought many new economic opportunities for local people and residents, but many have told the Council that they feel not everyone is benefiting equally from these opportunities and they feel excluded from the prosperity that they see around them.

6.6. There is a growing recognition that economic growth, left to its own devices, doesn’t work for everyone, wastes the potential of residents and businesses and puts everyone’s wellbeing at risk.

6.7. The Inclusive economy 2019-2025 sets out 3 strategic priorities for addressing these issues. Priority 1 is ‘*Support local neighbourhoods and town centres to thrive and to be inclusive and resilient places’.* This priority highlights the importance of town centres within Hackney as a means to build an Inclusive Economy. It ensures local employment opportunities and affordable shopping options for residents.

6.8. The Corporate Plan (2018-2022) sets out how the Council will tackle inequality and poverty, maintain and celebrate the borough's rich diversity and maximise affordable homes. The Council has identified that local neighbourhoods and town centres need support to thrive and to be inclusive and resilient places. Looking forward, the Council is making sure local places work for local people and making the most of the assets, jobs and investment opportunities available through the Council and partners.

6.9. It is essential that the Council's work, to shape an economy that is inclusive, benefits local people and increases access to economic opportunities, continues. The town centres are a focal point for much of this work, providing local shopping and community spaces, but also opportunities, jobs and skills for residents. Hackney planning policies support this essential work, and provide valuable retail areas in which residents can work and upskill. The erosion of these areas by allowing unregulated residential changes through PD rights will not benefit the community.

7. Retail and leisure

7.1. The Hackney Town Centre and Retail Study 2017) identified the need to deliver 34,000sqm of new retail and leisure floorspace by 2033. This includes up to 19,500sqm of comparison goods floorspace and 11,200sqm of convenience goods floorspace.

7.2. The Hackney Employment Land Study 2017 identified a requirement for up to 117,000sqm of new business floorspace over the plan period.

7.3. Hackney's town centres operate as a network and perform different roles and functions – larger town centres provide more shops for durable comparison goods with smaller centres meeting the day to day needs of neighbourhoods. Hackney's town centres are the focus for development of new convenience and comparison retail, as well as accommodating other appropriate town centre uses including commercial, community, leisure, culture, tourism and civic uses. An appropriate mix of uses and services is needed in order to retain and further improve the vibrancy and vitality of the town centres, and policy achieves that.

7.4. Town centres remain the main shopping channel in Hackney, however the growth of e-tailing (online shopping) and m-tailing (shopping through mobile phones, tablets etc.) means that for centres to remain viable they must provide an attractive shopping and leisure experience to increase the amount of time people spend on the high street.

7.5. Hackney Central and Dalston Town centres are identified as major centres within the London Plan retail hierarchy. Hackney also has three district centres, Stoke Newington, Finsbury Park and Stamford Hill, which provide retail, leisure and service floorspace, and convenience goods and services for local communities. There are 16 local centres which serve a localised catchment, mostly for convenience goods and other services. Together with District centres they play a key role in providing the local community with retail and other services.

7.6. These shopping areas are geographically evenly spread across the borough, and are located in almost all Hackney wards. These areas are highly accessible by the Borough's residents and visitors. These district town centres and local centres contain important clusters of Class E uses including shops, financial and professional services, offices, and community spaces and are very important and significant in meeting the needs of local communities.

7.7. The GLA Strategic Evidence (Strategic evidence to support commercial to residential Article 4s in London, July 2021) outlines the strategic importance and value of the town centres and high streets of London.

7.8. It is estimated that 90 per cent of London's population live within a ten minute walk of a town centre or high street. Almost half of all businesses outside central London are on a high street and 1.45 million employees work on or within 200 metres of a high street. Research shows how much Londoners value them as places to meet, socialise, access services, shop, work and live.These vital public places boost wellbeing and benefit many different communities, making them some of London's most important spaces. They play an important role in civic and community life and are vital for London's economy success.

7.9. Strong employment and increasing population has increased use of town centres and high streets within London. The overall growth in town centre and high street outlets was driven mainly by growth in service retail, leisure and convenience outlets. By contrast, comparison goods retail shops are showing signs of gradual decline in town centres and high streets by around 1 per cent per annum between 2015 and 2019. It is likely that the growth in e-commerce has been a key factor behind these trends. Vacancy rates within the town centres and high streets are lower than in other parts of the country, indicating their general health and adaptation to changing spending habits.

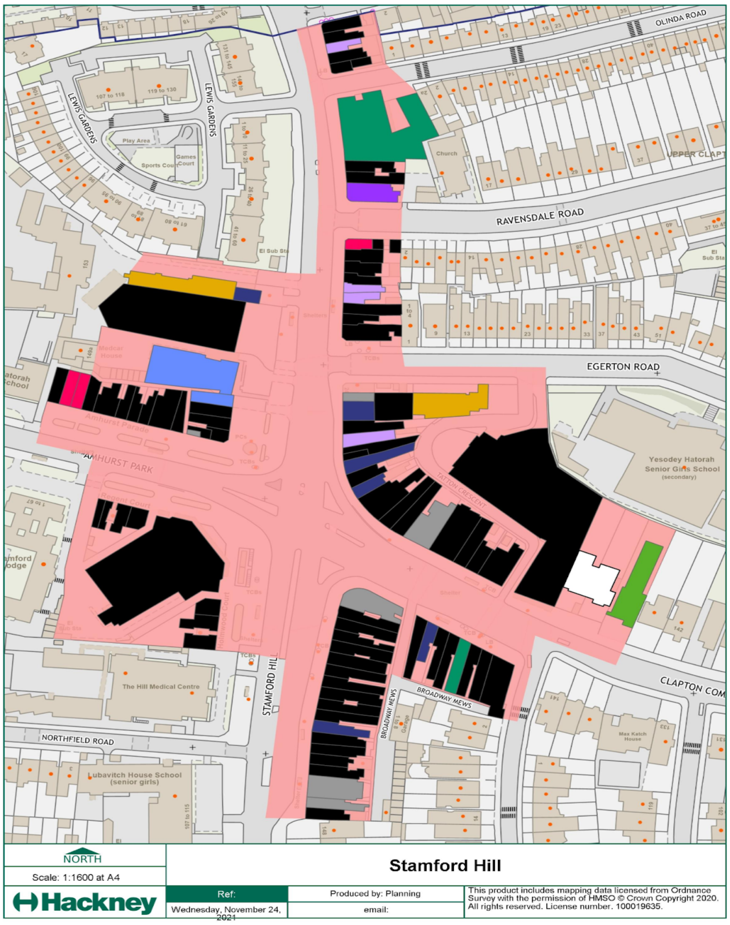
District Centres

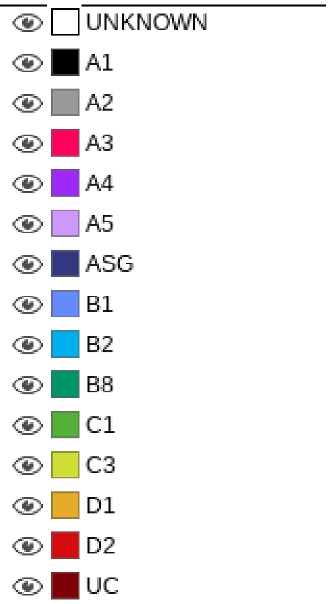
7.10. Vacancy rates in London's town centres and high streets are typically well below those experienced in other parts of the country. In 2019 the London average shop vacancy rate was 9 per cent compared to an average of 12 per cent for Britain as a whole. The Hackney Town Centre & Retail Study 2017 assessed the existing district town centres in Hackney, and provided an overview of the function and make-up of each centre, provided below.

7.11. **Stamford Hill** is located on the northern edge of the borough of Hackney and also serves the community of South Tottenham in Haringey. Stamford Hill has 120 retail units across the wider Stamford Hill Area Action Plan area, (2021 GOAD Report) and contains over 19,000sqm of retail, leisure and service floorspace. Stamford Hill has a very low vacancy rate. Out of the 99 retail and service units within the town centre boundary, only 4 were vacant in the latest GOAD Study. That is far below the average for vacancies in town centres. Convenience and comparison shopping far exceed the average, and a buoyant range of goods and services cater to the needs of the community.

7.12. The retail emphasis in Stamford Hill is on food and other convenience goods, and the centre also supports a wide range of comparison goods outlets and other essential services. Stamford Hill achieves a comparison goods turnover of £30.8m, which can be considered a particularly strong performance for a local shopping centre (2017 Retail Study). Two large supermarkets, Sainsbury's and Asda, anchor the centre and there is a range of outlets including a pharmacy, public house, bakery, butcher, optician, and a beautician.The centre at Stamford Hill is supported by two adjacent local centres in close proximity - Oldhill Street and Dunsmure Road - which cater for the day-to-day needs of the Charedi Community living in Stamford Hill.

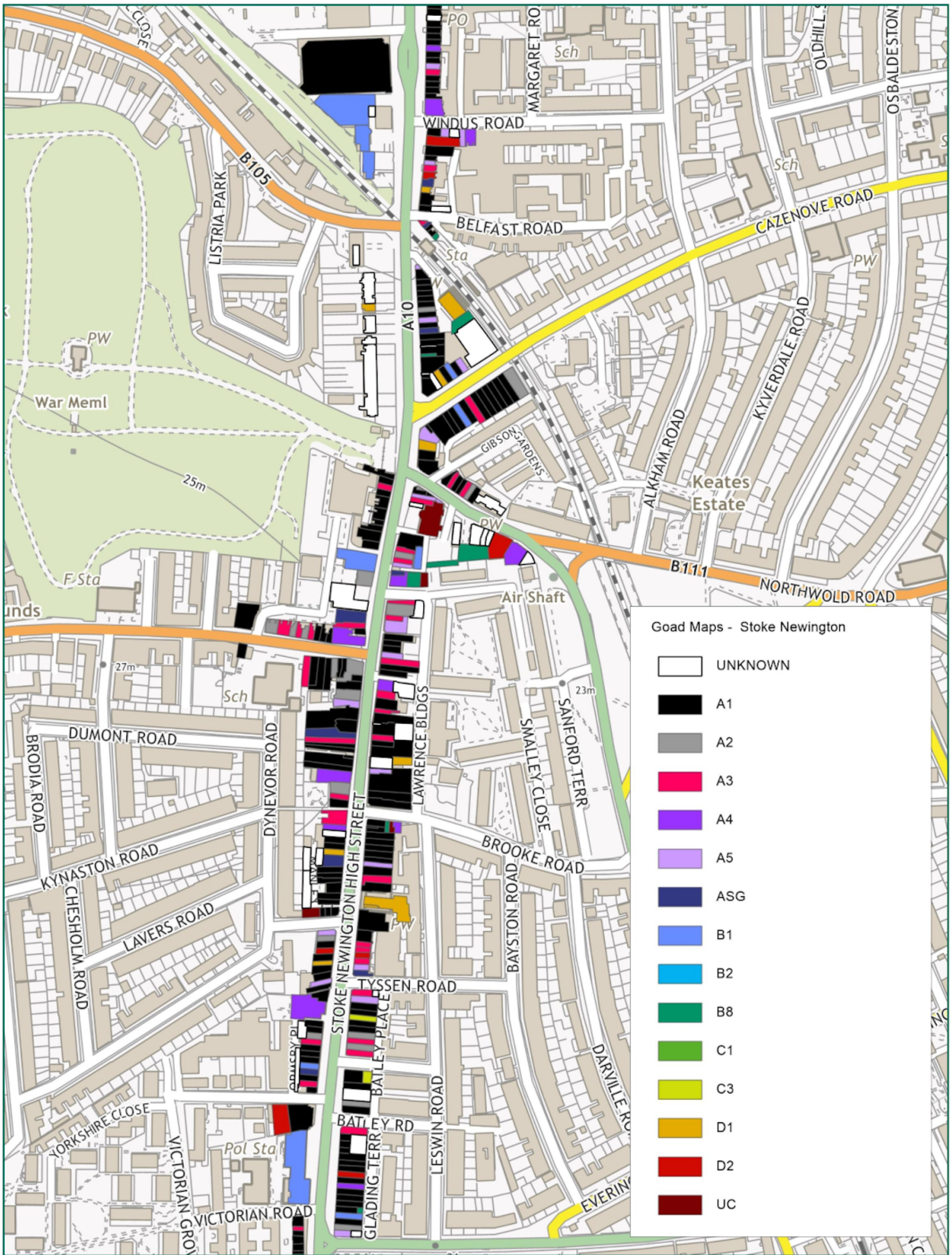
3.8





7.13. The 2017 Retail Study identified that **Stoke Newington** is a popular comparison goods shopping destination, achieving a comparison goods turnover of £52.5m, just £5m shy of that of the major centre of Dalston. Stoke Newington's more specialist / upmarket comparison goods offer than the other higher-order centres in Hackney and this is likely to help explain its strong performance. The 2017 Study identified that 60.0% of the primary shopping frontage in the centre was given over to class A1 retail use, the highest proportion of any of the major / district town centres in the Borough, and 51.3% of the secondary frontage was also occupied by class A1 retail. The centre's retail offer makes an important contribution to its overall vitality and viability.

7.14. The recent 2021 GOAD survey identified that Stoke Newington District Centre has 278 units. Out of these, only 27 were vacant at the point of survey. This is a lower rate than average, showing how well supported the centre is and supported by the 2017 Retail Study that Stoke Newington was reflective of the UKs growing 'cafe culture' in developing its own identity as a cafe/restaurant hub. This remains the case in 2021, with the Stoke Newington GOAD study indicating that cafes are 14,400 sq ft, above the average at 119 on the index, and restaurants are 173 on the index with 30,800 sq ft.



NORTH

Scale: 1:4300 at A4

Hackney

Stoke Newington District Centre

Ref:	Produced by: Planning	
Friday, December 3, 2021	email:	

7.15. Finsbury Park district town centre falls within the jurisdiction of three london Boroughs- LB Hackney, LB Islington and LB Haringey. The LB Hackney area of Finsbury Park offers a range of retail shops, restaurants and services. In 2021, there are 37 units operating with 2 units vacant. It provides a bank, post office, and chemist. In addition, there are grocers, butchers, newsagents, dry cleaners, barbers. The overall offer of cafes and restaurants is good. From the 2017 GVA's survey Finsbury Park town centre predominantly serves local needs and commuters as opposed to encouraging individuals from further afield.

7.16. GOAD map for Finsbury Park on order

Local Centres

7.17. Hackney's Local Shopping Centres provide a range of retailing and community services to meet the day-to-day needs of all members of the local community within reasonable walking distance. The local centres within Hackney are distinct, with differing offers and services. These centres are particularly important for less mobile members of the community and those who may not wish to travel far. See Appendix 1.

7.18. Structural changes in the retail sector, such as the long-term changes in the way we shop and receive services are well documented – particularly the increasing reliance on the internet and home delivery – the pandemic and lockdown have also changed the way people seek goods and services. Prior to the global pandemic that began in late 2019 and escalated into a global shutdown, the changing nature of town centres and the role of retail uses within them was high on the agenda. Changing ways in which people use shops and services had led to the high-profile closure of long - established high street brands, and the proliferation of personal smart phones and networks of home delivery structures has brought into question the future of 'high streets' and 'town centres.

7.19. The GLA High Streets Data shows that in 2020, local High Streets outside Town Centres recovered better after restrictions were lifted than the larger Metropolitan Town Centres. This is true of the local centres in Hackney. In addition, The GLA's Datastore evidence around high streets and town centres shows that in Hackney the district centres and local shopping areas have all increased their consumer spending, looking from early January 2019 to November 2021, . This could be, in part, potentially due to people keeping local more or switching from cash to card.

7.20. Hackney high streets are likely to need support more than before. The Council understands this and launched the Love Hackney, Shop Local campaign in November 2020 alongside an online business directory that now has over 600 Hackney businesses listed. The campaign and business directory supports and promotes local businesses and aims to encourage more footfall in our high streets and town centres as well as publicising online sales opportunities for businesses.This means that the strengths of Hackney's existing local offer in town centres and the smaller commercial areas should be built on, especially as those home workers are more likely to want a local centre that provides multiple services and various uses. It is an important point to establish, we should not be eroding the very centres that have proved essential to residents during Covid.

7.21. The new PD rights for the loss of these uses without management through the planning system could undermine the operation of the retail planning policies for the proper planning of the Council's area as they may inhibit the Council's ability to ensure that Town Centres and Local Shopping Centres retain a sufficient critical mass of retail provision accessible by walking, cycling and sustainable transport modes. This is particularly important in the context of a growing population, affordability and climate change. The impact of this PD right in Hackney will be to the detriment of the town centres in the borough, and the communities they serve.

7.22. Current PDR for Class M (retail, takeaway or specified sui generis to residential) is limited to 150sqm of floorspace and does not apply in conservation areas, (i.e. it only applies to those that were in such a use on 20 March 2013), and where the building is located in a key shopping area, enabling the Council to consider whether the loss of the unit would have an effect on the sustainability of a shopping area.

7.23. Whilst the new PDR includes prior approval matters, the impact of the loss of retail and employment is a glaring omission; there is no consideration of the impact on the high street, its vitality and viability and/or economic recovery resulting from the pandemic. The introduction of this PDR risks undermining this as it could result in inappropriate change of use in Hackney, which would undermine its growth and regeneration strategy.

7.24. Notwithstanding the prior approval matters, the Council is concerned that these changes could impact detrimentally on town centres, local centres and any cluster of shops and services that the community relies upon, potentially undermining vibrancy, vitality, and viability. Smaller local centres, whilst unlikely to be the focus for substantial growth in retail uses given their relatively smaller size and intention to serve local communities, are particularly vulnerable to wholly unacceptable adverse effects under PDR where Class E uses are able to change use to residential without consideration against legitimately prepared and evidenced policy. This would be particularly damaging where communities are more distant from higher order services or have more limited choices or mobility and may be forced to make longer journeys by private transport. This provides strong justification for the Article 4 Direction in local shopping centres.

8. Employment

8.1. Hackney's town centres are an important hub for local civic, cultural and community life. They play an important role in helping to retain local money in the local area, and in turn, support small businesses and provide local jobs and training opportunities. The town centres identified in this A4D are an essential source of jobs for the community. There are 3,948 people employed within the registered businesses of Hackney's local centres. A further 1,137 people are employed through businesses in Stamford Hill, 2,730 in Stoke Newington and 175 in the Hackney part of Finsbury Park. Retail spaces and activities provide the majority of employment opportunities but the District Centres of Finsbury Park, Stamford Hill and Stoke Newington, and the local centres of Hoxton Street, Well Street, Upper and Lower Clapton also offer workspace provision, and these opportunities for local employment in a broader field are supported by the Council.

8.2. The Hackney Economy, Workspace and Social Value Study (2019) highlighted that businesses in the town centres are the most likely to have strong links with the local community, with prominent actions including paying the Living Wage, providing affordable space for the local community and working with local schools. Businesses assessed for the report were optimistic about their future, and identified a higher than average sense of permanency in that location (58% compared to 54%), creating a strong presence in those locations.

Employment forecasts

8.3. The GLA projections suggest the number of jobs in Hackney is expected to grow by 23,000 between 2018 and 2033, with a projected growth of 2,926 B class jobs (net)[1], which is considerably higher than the Experian projection of 11,900 new jobs. These figures are based on employment densities of 12-9 sqm per employee for new office floorspace.

8.4. Over this period, the 2014 London Office Policy Review (LOPR) projects that office jobs in Hackney will grow by 13,000 office-based jobs in Hackney from 2016 to 2041, which indicates the requirement for the delivery of 153,852m2 of additional office floorspace to meet demand.

8.5. The Hackney 2017 Employment study identifies a strong need for B1a offices (a minimum of 117,000sqm up to 2033).

8.6. Nomis' official labour market statistics 2021 identified 23,275 businesses within Hackney, small businesses between 0-9 people accounted for 21,320 employed. This means that 91.6% of all businesses in Hackney are small, which is a higher percentage than the average for London at 90.9%. These small businesses and social enterprises are at the heart of the local economy as they face a challenging and uncertain future as the economy rebuilds. The Council undertook a survey of businesses in mid-2020 and found that:

- 77% had been closed
- 95% had lost income
- 25% had staff who were self-isolating and unable to work
- 24% had made staff redundant

[1] GLA 2016 employment projections for Hackney, 2018-2033.

- 7.5% had staff who were scared to work because of infection risk
- 79% had furloughed staff
- 3 in 4 faced a loss of more than three-quarters of their income
- more than half cannot sustain further losses in income

9. Hackney and community

9.1. **Rebuilding a Better Hackney** (2020) set out how the enforced shutdown of many businesses and social distancing rules had a significant effect on Hackney's local economy and the ability of businesses to operate. Coronavirus has damaged the economy in Hackney, with residents put out of work, and the borough's many small businesses increasingly at risk. Despite the Council's attempts to support the town centres and businesses to encourage economic recovery, the Corporate Plan refresh (2020) identified that many companies in hospitality and the arts and culture, including social enterprises, were and are struggling with viability. These uses need to be supported to remain in town centres as part of the strong offering for the community.

9.2. A key priority of the Strategy is to also "reduce poverty by supporting residents into sustainable employment, and promoting employment opportunities." This overarching priority is further supported by outcomes to "substantially narrow the gap between Hackney's employment rate and the London's average and to 'increase employment for people in Hackney who are disabled or have a long-term health condition or mental health problems." For these reasons it is important to protect the Borough's town centres so that enough retail and local employment opportunities exist locally to support a growing population.

10. Housing

10.1. The Council has, in recent years, delivered about 98% of its housing targets, and has sufficient allocated sites to meet future targets. This planned housing growth will be accompanied by planned investment in infrastructure to meet the need created by the growth.

10.2. The Council's Local Plan has adopted a policy that seeks affordable housing contributions either on site or payment in lieu. This applies to both large sites and small developments. This policy is no longer enforceable under the new PDR, and this will negatively affect the Council's ability to provide affordable housing within the borough. There will also be a loss of CiL contributions. Using the last complete available data, Hackney reached 98% of its housing target over 5 years from FY2015-2019.

Housing delivery 2015-2019

Tenure	FY2015	FY2016	FY2017	FY2018	FY2019	Total
Affordable Rent	45	63	36	10	31	185
Social Rented	94	20	97	15	1	227
Intermediate	107	147	128	119	107	608
Market	1223	944	890	1377	830	5264
Non-conventional supply	1029	-6	72	334	130	1559
Total	**2498**	**1168**	**1223**	**1855**	**1099**	**7843**
London Plan Target	1599	1599	1599	1599	1599	7995

AMR: Housing Delivery in Hackney FY2015-FY2019

10.3. Going forward for the period 2019 -2023 Hackney is projected to deliver approximately 7,159. This excludes the allocation for windfall sites which is Hackney is based upon the trend GLA housing completion returns for between 5-10 years. Table 3 shows that the Council is proactively designating land for housing through the site allocation section of the Local Plan, and the Council's estate regeneration programme. The identified sites would account for around 4000 dwellings, and around 2,800 from granted permission, thus only around 1,000 over 5 years being from non conventional housing and windfall sites. Delivery of 7915 is well above the 7188[2] dwellings required based on the London Plan housing target for hackney.

10.4. The emerging Stamford Hill Area Action Plan will identify and safeguard more sites that would be considered appropriate for housing or a mixed use scheme.

Table 3: Projected housing delivery (2019 – 2023)

Source	2019/20	2020/21	2021/22	2022/23	2023/24	Total of these years
GLA / LDD pipeline totals	397	377	667	664	660	2765
Housing regeneration	323	456	631	515	326	2251
Site allocations	122	120	510	515	515	1782
Pre-apps						50
Non-conventional	69	76	76	45	45	311

2 London Plan Target 1599 for years 2019 and 2020 and 1330 for years 2021, 2022 and 2023

Interim Housing	**911**	**1029**	**1884**	**1739**	**1546**	**7159**
Winfall included in years 3,4,5 only			252	252	252	756
Total						**7915**

Source LBH Authority Monitoring Report 2018

10.5. The Housing trajectory, utilising data available at that same point, showed that Hackney would exceed its target over the next 5 years.

11. Potential Impacts of the permitted development right

Town Centres

11.1. There is strong cross-party support for actions to mitigate the impacts of Class E to residential PDR on the economy and ecosystem of high streets in London. The London Assembly Regeneration Committee highlighted its concerns related to the impact of PDR in January 2021 and more recently the London Assembly Economy Committee presented views on the actions that should be taken to help London's high streets in the city's recovery from COVID-19. These actions included ensuring that the potential challenges of any changes to the PDR regulations are being properly considered and to ensure that commercial districts including town centres and high streets are not threatened by inappropriate residential development[3].

11.2. The introduction of piecemeal residential development on the ground floor in thriving areas will result in the loss of active frontages, and could lead to sterile and incoherent high street frontages, impacting on their sense of place, natural surveillance and weakening their function, resilience and attractiveness as places to visit, work and interact. The piecemeal loss of commercial space will reduce overall footfall, depriving other businesses and potentially driving the loss of a far more significant number of premises than those who chose to convert commercial to residential.

11.3. Once conversions to residential occur, the inherent flexibility of high street premises in commercial and community uses is lost, undermining the ability of the high street to adapt to future circumstances. In addition, direct employment and supporting sectors would be affected as commercial, business and services are turned into residential.

11.4. The latest survey from Experian Goad (June 2021) shows that the majority of Stoke Newington and Stamford Hill centres are in retail or other commercial use, with lower than national levels of vacancies. The district centres are important centres for retail, they provide services and

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activities which are vital for the well being of local communities, and without which, people would need to travel further afield.

Stoke Newington

Type	Units %	Baseline	Floorspace %	Baseline
Comparison	22.30	27.06	22.16	30.50
Convenience	17.27	9.18	25.55	15.38
Retail Services	16.91	15.64	12.73	7.16
Other Retail	0.00	0.07	0.00	0.04
Leisure Services	26.62	24.63	25.80	25.59
Financial and Business	7.19	9.11	5.41	6.89
Vacant	9.71	14.17	8.34	13.87

Stamford Hill

Type	Units %	Baseline	Floorspace %	Baseline
Convenience	17.17	**7.98**	**39.80**	**12.24**
Comparison	**37.37**	**23.46**	**22.36**	**24.24**
Retail Services	**12.12**	**13.58**	**6.53**	**5.70**
Other Retail	**1.01**	**0.06**	**69.31**	**42.22**
Leisure Services	**13.13**	**21.43**	**8.67**	**20.42**
Financial and Business	**8.08**	**7.91**	**10.33**	**5.50**
Vacant	**4.04**	**12.78**	**3.17**	**11.63**

Local Centres and Ptal ratings

11.5. In Fig 2 it is possible to see how ten of the local centres serve communities where access to public transport is poorer, underlining the value to the local community of accessible shopping areas. The loss of these areas as viable shopping centres would have a negative impact on the communities, and impact on accessibility and sustainability within the borough, as residents would have to travel further.

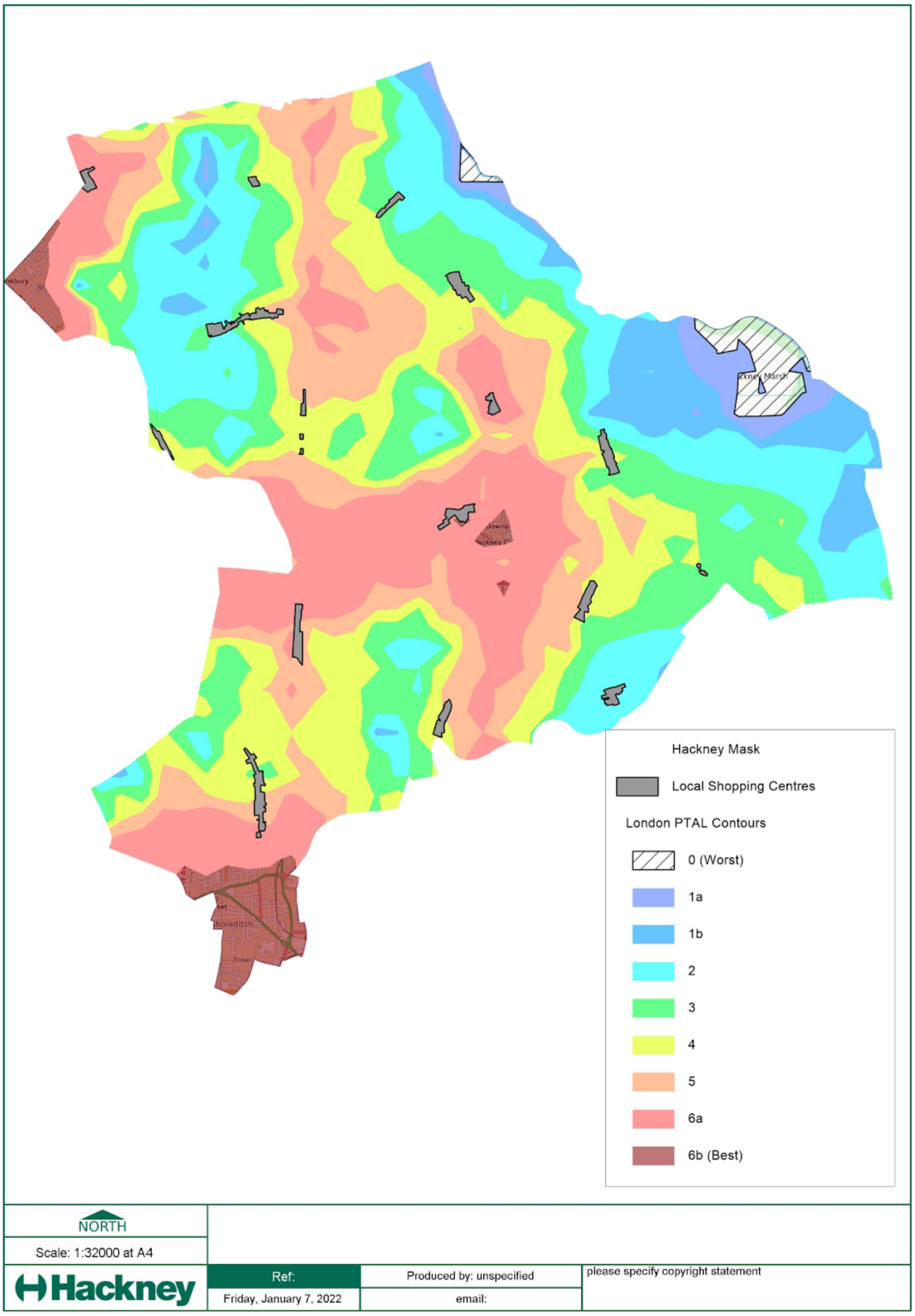

Fig 2: Ptal map and Hackney Local Centres

Employment impacts

11.6. Hackney's town centres are an important hub for local civic, cultural and community life. They play an important role in helping to retain local money in the local area, and in turn, support small businesses and provide local jobs and training opportunities. The town centres identified in this A4D are an essential source of jobs for the community.

11.7. There are 3,948 people employed within the registered businesses of Hackney's local centres. A further 1,137 people are employed through businesses in Stamford Hill, 2,730 in Stoke Newington and 175 in the Hackney part of Finsbury Park. Retail spaces and activities provide the majority of employment opportunities but the District Centres of Finsbury Park, Stamford Hill and Stoke Newington, and the local centres of Hoxton Street, Well Street, Upper and Lower Clapton also offer workspace provision, and these opportunities for local employment in a broader field are supported by the Council.

11.8. The Hackney Economy, Workspace and Social Value Study (2019) highlighted that businesses in the town centres are the most likely to have strong links with the local community, with prominent actions including paying the Living Wage, providing affordable space for the local community and working with local schools. Businesses assessed for the report were optimistic about their future, and identified a higher than average sense of permanency in that location (58% compared to 54%), creating a strong presence in those locations.

Retail - community

11.9. The Council's retail and employment planning policies in the Local Plan are based on robust evidence which establishes a need to protect employment and commercial uses to ensure the vitality and viability of Hackney's economy. The proportion of retail uses and other town centre uses that must be maintained in the town centres areas are set out in policy.

11.10. The loss of these uses without management through the planning system could undermine the operation of the retail planning policies for the proper planning of the Council's area as they may inhibit the Council's ability to ensure that the District Town Centres and Local Shopping Centres retain a sufficient critical mass of retail provision, accessible by walking, cycling and sustainable transport modes. This is particularly important in the context of a growing population.

Loss of planning contributions to fund infrastructure

11.11. A change of use from commercial, business and services to residential use puts pressure on the infrastructure needed to support such residential growth; for example school places, transport infrastructure, open space, and health facilities. However, as a permitted development, contributions normally secured through Section 106 to fund such strategic infrastructure and site specific impacts, will not be negotiated as no planning permission will be required.

11.12. The potential loss of S106 or CIL revenue will not only limit the ability to provide supporting infrastructure but could undermine the entire commercial market in Hackney as businesses will have no certainty as to whether or not their leases are likely to be extended. It also puts at risk Hackney's pipeline of non residential floorspace.

Impacts on design quality

11.13. Although the Council's planning policies support mixed-use in its employment designations and town centres, the inability of the planning system to oversee and manage development with the change in PD rights will mean that there is a high potential for inappropriate design which may be contrary to any localised design code. The long term effect of solely residential use in the designated employment areas and major town centres would erode those designations, meaning that they will not be able to perform their primary role of supplying commercial land, business and floorspace. Such inappropriate relationship of uses will lead to amenity impacts on residential occupiers, with subsequent regulatory and enforcement impact on the Council.

12. CONCLUSION

The key reasons why it is necessary to make the Article 4 Direction are:

- Planning for sustainable economic development including residential is in line with national, regional and local policies. It will allow the Council to consider and determine planning applications in line with the existing and emerging policies. In some circumstances, changes of use to residential may be justified and acceptable.

- The Council has an up to date adopted Local Plan (LP33, 2020) in in place, which sets out the spatial strategy for development up to 2033, and the related policies that aim to make the growth areas and town and district centres the focus of retail, commercial, leisure and cultural development and to provide and retain offices.

- Hackney's district and local shopping centres provide shopping facilities that are accessible and cater to a wide range of needs. This is essential for the communities in Hackney, having a positive impact on the health and well-being of the community.

- District and Local town centres are important for the local economy, and they provide job opportunities. Hackney is an area of growing economic opportunity and growth for London and the UK. This growth sits alongside significant deprivation. In 2019, the Index of Multiple Deprivation ranked Hackney as the 22nd most deprived local authority in England. In 2015 Hackney was ranked the 11th most deprived and the 2nd most deprived in 2010 and 2007. The loss of employment floorspace and other service uses will undermine the council's strategies for improved prosperity for its local communities, and delivery of the inclusive economy.

- It is essential that the Council's work, to shape an economy that is inclusive, benefits local people and increases access to economic opportunities, continues. The town centres are a focal point for much of this work, providing local shopping and community spaces, but also opportunities, jobs and skills for residents. The Hackney planning policies in place support this essential work, and provide valuable retail areas in which residents can work and upskill. The erosion of these areas by allowing unregulated residential changes through PD rights will not benefit the community.

- The Council's five year housing land supply is set out in the 2019/20 Authority Monitoring Report and shows the Council has a net housing delivery of 7,843 units, an average of 1,569 units per year over the 5-year period (2015/19) which demonstrates the borough's net delivery is 98% of the London Plan target[4]. Between 2019 and 2024 the borough will deliver a total of 7,917 homes. The Council's estate regeneration programme accounts for a large number of completions of the Council's overall housing target phased over a number of years. Hackney is aiming to deliver 13,455 during the next 10 year period. This is above the 10 year London Plan target of 13,300. Overall, the 5 year housing trajectory shows a healthy level of overall growth going forward with the long term outlook providing a strong foundation for future housing development.

- Finally, the global pandemic has redefined many aspects of the lives we lead - our increasing reliance on delivery and online services, technology advances, reconnecting locally with everyday services and access to facilities where we live, as well as having altered our ways of working and workplaces. Much of the data and evidence reflects this change, however, there are very few clear trends or patterns that can reliably predict how this will change in the coming years. The Article 4 Direction is therefore required to ensure that we can continue to protect land and buildings where necessary whilst the situation is monitored, and appropriate strategies can be prepared.

[4] LBH AMR, 2019/20- LBH will exceed the 5 year target if we apply 1330 from 2017, or even just 2019 which will give a return of 101% against the target.

Appendix 1: Evidence Base

- Survey of the local Excel / google sheet done in 2017
- Appendix 1 Town centres appendix
- Experian Goad - survey of Stamford Hill and Stoke Newington (Finsbury Park on order)
- Justification to GLA for Hackney Centre and Stamford Hill. https://drive.google.com/open?id=1PQuvy2RmvYjVAPEmlZ-ftaE84LaTIEeC
- Hoxton Insight
  Hoxton Socio-Economic Insights Study - Final …
- Shoreditch and Hoxton Area Regeneration Programme (2021) https://docs.google.com/document/d/1J_SmVdUC7froQ4nE0Qc7rGINtkuV83L5vJj3GpgXJbM/edit
- Hackney Economy, Workspace and Social Value Study (2019) https://drive.google.com/file/d/1J0eYZc8cQl3jLxQlp2zCSnDI_2Vk9tW-/view
- Covid/Shoreditch
- Examination letter https://drive.google.com/file/d/1ouTSe4eGmaMB2ZcEbnmMu5zTQIYgSxqI/view
- GLA evidence https://www.london.gov.uk/sites/default/files/strategic_evidence_to_support_commercial_to_residential_article_4s_in_london_july_2021_final_report.pdf

https://hackney.gov.uk/rebuilding-a-better-hackney/#impact

Appendix 2: Local Centres

Broadway Market is a busy local shopping centre which also serves as a 'destination' centre in the Borough. The centre's strength is in its cafe, bar and restaurant offer, which coupled with the popular Saturday street market, means the centre can draw from beyond its immediate local catchment. The strong bar/restaurant offer of the centre also means that it benefits from a good level of vitality and viability in the evening. The retail offer of the centre has a number of specialist comparison goods retailers, alongside a generally upmarket convenience goods offer. There are also day-to-day facilities such as a pharmacy, and Costcutter and Londis convenience stores. The proximity of the open space of London Fields is a further asset to the centre, and the vitality and viability of the centre is strong.

Chatsworth Road is a busy street, with a strong retail and leisure-led offering, aided by the re-opening of a Sunday market. Vacancy levels in the centre have reduced, and there is an emerging 'cafe culture'. The diversity of uses in the centre is reasonably strong, with some specialist shops, and there are convenience stores including Spar and Co-op. The Castle Cinema in the centre is evidence of its improving vitality and viability and supports the wider evening economy of the centre.

Hoxton Street is a local centre that runs through the heart of the area and provides a concentration of convenience, leisure and amenity uses, along with a clustering of cultural activities (Hoxton Insight).. The centre has two clear 'anchor' stores in the form of Poundland and Iceland, and appears to be performing generally well. There is a daily street market which is popular and well-supported. There is a low vacancy rate in the centre, and the overall vitality and viability is good. There is no bank in the centre and the nearest facilities of this nature are some distance away in Shoreditch and Dalston.

The Hoxton Insight Study (2021) identifies the value of Hoxton Street for the community, with the local centre seen as the heart of the community, a central point for people to come together, exchange ideas and interact. It is of particular value to the community because of the rapid changes that are happening to the south in Shoreditch. The Hoxton area, predominantly residential, comprises around 38,300 residents across around 17,000 households and is highly mixed.The area is home to a dense concentration of council housing, with 19 distinct estates in the area north of Old Street, South of the Regent’s Canal and west of the East London Line alone. These estates house around 40% of the population (12,000 residents) – a far higher figure than for Hackney and London, 23% and 13% respectively. Taking into account other social landlords, a total of 54% of the Hoxton population live in social rented accommodation.

Hoxton Street is a local centre that runs through the heart of the area and provides a concentration of convenience and amenity uses, along with a clustering of cultural activities. Hoxton Street acts as a hub for local services and amenities. It is the economic heart of the area, and an important service and amenity hub for local communities. There are an estimated 500 jobs spread across 100 businesses with the majority of space geared towards retail, food and drink and services uses.

Kingsland Road local shopping centre has historically developed around the 'Waste Market' which trades every Saturday in the centre although the influence of the market on the wider vitality and viability of the centre appears to be diminishing. A number of new upmarket retailers have opened in the centre in recent years, but the range of day-to-day uses in the centre also remains strong. There are a considerable number of take-aways present in the centre which can lead to the centre feeling a little 'closed for business' in the day. There are no supermarkets in the centre, but nearby Dalston major town centre is well-provided for in this respect.

Lauriston Road is an upmarket local shopping centre which benefits from close proximity to Victoria Park. The centre has an emphasis towards upmarket comparison goods boutiques and cafes, alongside specialist convenience goods retailers. The presence of a reasonably-sized Londis convenience store (which also includes a post office) anchors the centre and is important to its overall vitality and viability. The environmental quality of the centre is also positive.

Lower Clapton Road is a small local shopping centre to the north-west of Hackney Central district town centre, anchored by two supermarkets, which offer a good range of day-to-day convenience goods products. Other facilities present in the centre include a chemist and a laundrette. The centre includes some more upmarket retail units, including an organic cafe/deli and bicycle shop.

Manor House is a small local shopping centre, extending to around 20 units, offering a good range of day-to-day shopping facilities such as a dry cleaners, pharmacy, bakers, convenience store, and a pub. For the size of the centre, the range of facilities is sufficient. The location of the centre is close to the Woodberry Down regeneration project.

Stoke Newington Road (Shacklewell South) local shopping centre has a good range of shops and retail services. These shops are almost half a kilometre closer to Dalston along the A10, providing convenience shopping for residents located between the major centre and the district centre of Stoke Newington High Street District. The local shopping centre provides shops and retail facilities essential to the functioning of a local shopping centre and there is also a gallery, print shop, and a small number of restaurants and bars.

Upper Clapton Road local shopping centre is a small centre which offers a good mix of uses including a strong convenience goods offer anchored by a Tesco Express convenience store. There is a noticeable presence from good quality A3 café/ restaurant uses which help to lift the quality of the centre.

Well Street is a popular and well-used local shopping centre which sits to the south-west of Hackney Central district town centre. The centre is focussed around a Tesco Metro supermarket and an International Supermarket. There is a good mix of supporting uses and, in common with a number of the other local shopping centres in the Borough, the vitality and viability of the centre is supported by a street market.

Wick Road is a small local shopping centre of 17 units. Retail units are generally of a lower quality and include a sandwich bar, a dry cleaner, a small convenience shop, a café, four take away shops, an accountant, an estate agent, a pharmacy and a plumbers. There is no supermarket serving the centre. The environmental quality is poor due of the presence of the busy road, lack of public realm and shops frontages which require maintenance.

Dunsmure Road supports the function of Stamford Hill District Centre. The centre caters in part to the shopping needs of the local Hasidic Jewish community, with Kosher bakery and grocery stores present in the centre, for example. Other units in the centre cater to a range of day-to-day shopping needs including a dry cleaners, green grocers, housewares store, off licence, post office, pharmacy and café. The compactness of the centre lends it a noticeable bustle and the centre appears well used by the local community.

Oldhill Street caters to the Hasidic Jewish community in the Stamford Hill area. The centre contains a mix of non-retail uses including a community centre, and the two parades of shops which make up the potential centre are separated by a school. Uses in the centre include food stores, Kosher bakeries, a chemist, newsagent, Kosher wine shop, toy shop and take-away. The centre has a low vacancy rate.

Green Lanes is located on the western edge of the Borough and forms part of a wider concentration of shops and services which extends eastwards to Newington Green within LB Islington. The diversity of uses in the LB Islington part of the centre is relatively strong, anchored by a busy Tesco Express store and containing a number of day to day shopping facilities interspersed with coffee shops and restaurants. The Hackney section of Green Lanes contains a range of shops and other facilities in the area, including a post office, public houses and restaurants/cafes. The retail is geared towards a more specialist offer.

Hackney Downs is located on a major crossroads. There are around 50 commercial and service units, centred around 3 medium sized supermarkets. There is also a community Centre, a pub and Hackney Downs station. Newsagents, hairdressers, hot food takeaways, beauty salons. In conjunction with Mare Street, the local centre serves the housing estate that is located in the area.

The local centres of **Chatsworth Road, Hoxton Street, Kingsland Road, Broadway Market and Well Street** host regular markets, which create a draw into the local centre and have a reach beyond the local community.