

Title of Report	Draft Future Shoreditch Area Action Plan Public Consultation (Regulation 18)	
Key Decision No	CHE 278	
For Consideration By	Cabinet	
Meeting Date	22 January 2024	
Cabinet Member	Cllr Nicholson, Deputy Mayor for Delivery, Inclusive Economy & Regeneration	
Classification	Open	
Ward(s) Affected	Hoxton East and Shoreditch, Hoxton West, Haggerston	
Key Decision & Reason	Yes	Significant in terms of its effects on communities living or working in an area comprising two or more wards
Implementation Date if Not Called In	31 January 2024	
Group Director	Rickardo Hyatt, Group Director of Climate, Homes and Economy	

1. Cabinet Member's Introduction

- 1.1. Shoreditch has experienced extraordinary economic success over the past 25 years. Its popularity as a destination has taken the neighbourhood from a place that was seen as a fringe to the city to a destination that is recognised as a global destination for work, play and living.
- 1.2. Today Shoreditch plays host to one of London's main economic destinations for innovation and creativity, it has capitalised on its proximity to the Square Mile to the degree that it has seen some of the most sustained and rapid economic growth over the last ten years than any other part of the UK. This growth is recognised in Hackney's Local Plan, LP33, and its London Plan designation as an Opportunity Area.

- 1.3. This growth has generated a deal of competition for space between different activities and this competition is often played out through the Planning process. Shoreditch hosts a range of enterprising and successful retail, leisure, employment and residential activities. It has a daytime economy that continues into the evening and night-time, it is rapidly becoming London's 24 hour neighbourhood. These competing pressures and intensity of uses are placing a strain on the character of Shoreditch and its ability to cater to this eclectic and diverse range of activities which, if balanced well, actually complement each other and lead to a sustainable and thriving future.
- 1.4. To this end an area action plan, the Future Shoreditch Area Action Plan, is being developed for Shoreditch. The plan sets out how investment, development and growth can still be supported whilst also protecting the existing communities and the character of Shoreditch.
- 1.5. The Future Shoreditch Area Action Plan sets out to describe a mixed use vision for Shoreditch to take the neighbourhood through to 2040. It describes the Planning policies and objectives alongside identifying the specific site allocations to guide and manage future development and investment in the area. Once adopted, this plan will be an important document informing Planning recommendations and decisions in Shoreditch.
- 1.6. The first Draft Future Shoreditch Area Action Plan went out to consultation in 2019 prior to the 2020 Covid lockdowns. As with many aspects of daily life, progress on the draft Plan slowed down over the course of 2020 through to 2022 as the UK went through phases of lockdowns and restrictions. The legacy of this period has and is profoundly influencing the very nature of Shoreditch.
- 1.7. This profound influence meant that once the responses from the 2019 consultation had been collated and incorporated, all were looking at a different Shoreditch. None the less enterprising or appealing as a destination for investment and economic growth, but the nature of both have evolved from pre pandemic days.
- 1.8. To this end additional evidence and observation gathering work has been commissioned and the Council is now ready to re-engage with the business and residential communities that make up Shoreditch so they can contribute and help shape the future of Shoreditch.
- 1.9. I commend this report to Cabinet.

2. Group Director's Introduction

- 2.1. This report seeks Cabinet's approval of a draft Future Shoreditch Area Action Plan (AAP) for consultation.
- 2.2. The Future Shoreditch AAP is an important document which will respond to the challenges and opportunities in this part of the borough, identified through consultation and evidence gathering that has been carried out since 2017.
- 2.3. The Future Shoreditch AAP will sit alongside the borough wide Local Plan 2033. Once adopted, it will form part of the Council's Statutory Development Plan and will be used to determine planning applications in the Shoreditch area, as well as a blueprint for other Council service areas and external stakeholders.
- 2.4. Approval is sought to consult Hackney's residents, businesses, stakeholders and statutory bodies on the draft Future Shoreditch AAP.

3. Recommendations

3.1. Cabinet is recommended to:

- 1. Approve the draft Future Shoreditch Area Action Plan, including the Direction of Travel document (Appendix 2), for public consultation.**
- 2. Delegate authority to the Group Director of Climate Homes and Economy to make minor changes ahead of consultation.**

4. Reasons for Decision

- 4.1. Consultation and engagement with stakeholders and the public is integral to producing an Area Action Plan. Consultation on the draft Area Action Plan is required in line with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and will help inform and influence the final version of the Area Action Plan.

5. Details of the Alternative Options Considered and Rejected

- 5.1. Consultation on a draft Future Shoreditch Area Action Plan is required to comply with Government regulations.

- 5.2. The alternative was to move onto a Regulation 19 consultation. This was considered to not provide enough opportunity for communities to feedback on the plan before adoption.

6. **Background**

- 6.1. Shoreditch is identified as a key growth area in the Local Plan 2033, and is designated as part of the 'City Fringe/Tech City Opportunity Area' in the London Plan. The area is facing significant change and experiencing development pressure. Without an appropriate planning response, incremental and uncoordinated development threatens to substantially change the character and identity of the area, resulting in a lost opportunity to deliver appropriate capacity and growth in a sustainable and properly planned manner.
- 6.2. The Future Shoreditch Area Action Plan (AAP) will provide a coherent strategy for guiding development and investment in Shoreditch. The Plan presents an opportunity to respond to these challenges and help drive forward inclusive growth by promoting positive and sustainable development, shaped directly by the ambitions of local people and businesses, that delivers improvements both within the AAP area and also to immediately adjacent areas which are impacted by growth and development taking place in Shoreditch. Once adopted the AAP will form part of the Council's Local Plan and will be used to determine planning applications.
- 6.3. The Future Shoreditch Area Action Plan was consulted on for the Regulation 18 stage of consultation in 2019. The responses were collated and were being worked through in 2019/2020.
- 6.4. Since 2020 there have been events that have significantly impacted and continue to do so in the Shoreditch area. Climate change has fed into increased extreme heat episodes and increased flooding events. Overheating is experienced strongly in urban areas such as Shoreditch due to the Urban Heat Island effect, and the lack of green space reduces the area's ability to deal with excessive rain events.
- 6.5. The Covid pandemic began in 2020, and it impacted on the Shoreditch area strongly and the long term implications of this significant event continue to be assessed. Green and healthy spaces have become even more valued by residents and workers. This is particularly relevant to Shoreditch where there is a lack of open space. In economic terms, the demand now is for better quality office floorspace, with higher sustainability credentials. Fewer days are spent in the office, there is more mid-week attendance, and companies need less office floorspace overall because of working from

home. This has affected the workspace demand in Shoreditch, and the number of workers coming to the area.

- 6.6. In January 2020, the UK left the EU, and this created a time of uncertainty for workers from the EU. After the first covid lockdown, many EU nationals left. This particularly affected the hospitality industry in which younger EU professionals tended to work.
- 6.7. The economy was severely affected by the Covid pandemic and leaving the EU. The economy has become smaller and lower growth is forecast. Residents of Shoreditch are now facing a cost of living crisis. The cost of living for residents across Hackney has increased substantially over the last two years, and that brings more economic uncertainty.
- 6.8. There is also an acute and growing housing crisis across London. There are not enough homes in general, and particularly affordable homes, to meet demand. Market housing is increasingly expensive and unaffordable for buyers and private rent exceeds the average income.
- 6.9. To ensure that the Future Shoreditch Area Action Plan captures and responds effectively to the changes that have happened in Shoreditch, the draft Future Shoreditch Area Action Plan is being consulted on again at the Regulation 18 stage. The proposed Direction of Travel (DoT) for the next iteration of the plan is also set out. This gives the community the chance to fully respond to the plan at Regulation 18, in this post covid time, both as the plan currently is and as the Council proposes to develop the plan.

7. Policy Context and Impacts

- 7.1. An Area Action Plan (AAP) is a statutory land use and development plan which covers a particular part of a Local Planning Authority's area. Future Shoreditch Area Action Plan will sit alongside the borough-wide Local Plan 2033 and the London Plan.
- 7.2. The draft Future Shoreditch AAP sets out a vision for the area in 2040, draft objectives and a range of policies to guide and manage future development and investment in the area.

Delivering growth that benefits all

- 7.3. The Plan has a key role in supporting a sustainable and cohesive community in Shoreditch, balancing the needs for housing, office and retail. To respond proactively to the demand for growth in the area, and harness the benefits of development, the draft Plan seeks to maximise the potential of underutilised sites and the contributions they can make to the overall

environment and the business/ residential community in Shoreditch and nearby established residential areas.

- 7.4. The draft Plan supports new jobs in Hackney's main employment cluster and promotes mixed use development that reflects a range of land use needs and the unique character of Shoreditch.

Tackling affordability

- 7.5. The draft AAP reinforces the approach to affordable and low cost workspace as set out in the Local Plan 2033 to maintain the rich mix of creative, tech industries, small businesses and starts-ups which help define the area's appeal.
- 7.6. The draft AAP policies also seek to maximise the delivery of genuinely affordable housing in Shoreditch with a focus on social and affordable intermediate tenures, to sustain mixed and balanced communities in Shoreditch.

Supporting a Vibrant, Diverse and Accessible Day, Evening and Night-Time Economy

- 7.7. To support the dynamic and continually evolving nature of the area, the draft AAP reinforces the London Plan designations for Shoreditch as a specialist cluster for arts, culture and entertainment and a CAZ retail cluster by including policies to maintain and enhance these uses.
- 7.8. The draft AAP seeks to diversify and enhance Shoreditch as a destination for the evening and night-time economy, whilst balancing this with the needs and amenities of people who live and work in Shoreditch, reflecting new licensing policy. The Plan defines key retail and leisure frontages for protection.

High Quality Buildings and Places

- 7.9. To ensure that all development in Shoreditch in a way that reinforces the area's unique sense of place, the draft AAP sets out guidance regarding the appropriate location and sensitive design of development.
- 7.10. The draft Plan also includes sub-area 'neighbourhood' guidance to help to ensure that development in Shoreditch delivers high quality urban design that enhances the distinct local character and setting of its varied heritage assets including Conservation Areas, Scheduled Monuments, Listed Buildings and Locally Listed Buildings.

Promoting more sustainable and improved public realm

- 7.11. The draft AAP seeks to improve the environmental quality of Shoreditch and promote the choice of sustainable travel options by identifying traffic management measures and key public realm improvements/ projects.

Neighbourhood Guidance

- 7.12. The draft AAP defines a number of 'neighbourhoods' within Shoreditch and sets out a vision and policies for each neighbourhood to help guide development within each area. The boundaries of these neighbourhoods have been defined based on analysis of their varied respective built and land-use characters including prevailing urban grain, building heights, heritage assets and land use.

- 7.13. The neighbourhoods identified include:

- The Edge of the City neighbourhood;
- Central Shoreditch neighbourhood;
- City Road neighbourhood; and
- Shoreditch High Street and Hackney Road neighbourhood.

Site Specific Guidance

- 7.14. The draft AAP identifies 11 Opportunity Sites within the AAP boundary. For each site, the draft AAP sets out guidance in relation to the appropriate land use mix, building heights and includes development principles to guide future development that comes forward.

8. Equality Impact Assessment

- 8.1. The Draft AAP has been informed by a draft Integrated Impact Assessment which includes an Equalities Impact Assessment that demonstrates compliance with the public sector duty in the Equality Act 2010 by having due regard to:

- eliminating discrimination; harassment and victimisation,
- advancing equality of opportunity between persons who share a protected characteristic and persons who do not share it; and
- fostering good relations between persons who share a relevant protected characteristic and persons who do not share it.

9. Sustainability

- 9.1. A Strategic Environmental Assessment and Sustainability Appraisal (SA) has been undertaken as part of the Integrated Impact Assessment to ensure that the plan meets agreed sustainability objectives.

- 9.2. The analysis in the Sustainability Appraisal did not find that there were any significant negative impacts from the draft AAP policies. In the instances where negative impacts were identified, these have been mitigated.
- 9.3. The Area Action Plan supports employment uses within the AAP area. The retention of office, retail and other commercial floorspace in this key location provides jobs and has an important role to play in achieving sustainable and resilient neighbourhoods by providing employment opportunities to support a growing population.

10. **Consultations**

- 10.1. Consultation was previously undertaken on the Future Shoreditch Issues and Options document in 2018, and the draft Future Shoreditch Area Action plan was consulted on for Regulation 18 in 2019.
- 10.2. The comments received have informed the production of the Direction of Travel document attached to this report. Consultees will be asked to provide views on this document and given a further opportunity to make additional comments on the 2019 Draft Plan. The responses from this process will inform the production of the Proposed Submission version of the AAP, which will be published in the Autumn of 2024 for a final round of consultation, before being submitted to the Government for examination by an independent planning inspector.
- 10.3. Consultation on the Draft Plan and Direction of Travel will be undertaken in accordance with the methods set out in the Consultation Strategy, which has been developed to comply with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), Hackney's Statement of Community involvement and will be guided by the Future Shoreditch Community Panel and Member Steering Group.

11. **Risk Assessment**

- 11.1. A full risk assessment has been carried out as part of the project plan produced for the Plan.

12. **Comments of the Interim Group Director, Finance**

- 12.1. This report seeks Cabinet's approval of the draft Future Shoreditch Area Action Plan (AAP) for consultation. The Planning Service expects that the AAP will be adopted in 2025/2026.

12.2. The cost of preparing the AAP spanning two financial years from 2024 to 2026, relates to staff involvement in meetings, consultations, publications and examination by the Planning Inspectorate. This expenditure will be met from the existing Planning Service revenue budgets.

13. **Comments of the Acting Director of Legal, Democratic and Electoral Services**

13.1. Cabinet's authority to approve the recommendations -

13.2. This report relates to the initial stage in developing the AAP, which following adoption, will comprise part of the suite of the Council's statutory Local Plan policy documents and will provide specific planning policy and guidance for development in the area identified in the AAP.

13.3. Cabinet is authorised to approve the recommendations in Section 3 of this report pursuant to the Mayor's Scheme of Delegation in the Council's Constitution (See the section on 'Policy Framework' which grants Cabinet the responsibility for making recommendations to the Council on the Local Development Framework and Local Area Action Plans).

13.4. The AAP is a statutory planning policy document as described in regulation 5(1) of the Town and Country Planning (Local Planning) (England) Regulations 2012 ('the 2012 Regulations') and contains statements regarding the development and use of land which the planning authority wish to encourage in the area for an identified period of time. Once adopted, the AAP will sit alongside and complement the borough wide Local Plan 2033 and will be used to determine planning applications in the area identified in the AAP.

13.5. Pursuant to regulation 18 of the 2012 Regulations, the Council is obliged to notify and seek representations from the statutory Consultation bodies, appropriate stakeholders, residents, businesses and communities and take any representations received into account when preparing the AAP.

13.6. In addition to complying with the consultation requirements prescribed in the 2012 Regulations, the Council must also comply with the consultation requirements in its Statement of Community Involvement ('the SCI'). The SCI is a document prepared pursuant to section 18 of the Planning and Compulsory Purchase Act 2004. The SCI sets out the Council's policy for consulting and engaging with individuals, communities and other stakeholders, both in the preparation and revision of local planning policies including those comprising the Local Plan. The requirements in respect of Local Plan documents (including Area Action Plans) are set out in section 3 of the SCI.

- 13.7. Once the AAP has been drafted it will be published for further public consultation before being submitted to the Planning Inspectorate for examination, subject to which it will then be adopted and take effect.

APPENDICES

Appendix 1 - Draft Future Shoreditch Area Action Plan Regulation 18 (April 2019)

Appendix 2 - Direction of Travel for Future Shoreditch AAP 2024

BACKGROUND PAPERS

None

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