

# Hackney Allotment Society

Registered Charity no. 294128

c/o 50 Milton Grove, Stoke Newington, London N16 8QY

Steve Andrews  
Planning Officer  
Hackney Council Planning Department  
1 Hillman Street  
London E8 1DY

3 Jan 2011

Dear Mr Andrews,

## **Planning application reference no 2010/2456 at 52A Albion Rd.**

I am writing in my capacity as Chair to Hackney Allotment Society. I have recently been notified by a local resident that a planning application has been made that will have a seriously detrimental impact on our Church Walk allotment site.

### **Lack of proper consultation: formal complaint**

No notice of this application was made to any officer of the Society in writing and no public notice of the application was posted up near the site affected. I only became aware of this application during the Christmas holiday period and have recently been informed that the deadline for comments is 10 January 2011.

On both these grounds, I wish to lodge a formal complaint about the inadequacy of the consultation process. Hackney Allotment Society is the tenant of the land next door to the proposed development (the owner being Hackney Council). We should therefore have been notified directly of this application. The fact that the formal address of the development is Albion Road and the formal address of the allotments is Church Walk does not mean that this application can be considered without full and proper consultation with Church Walk tenants or residents who, in any case, will be more directly affected than those on Albion Road. That the application has been listed on the website over the holiday period when many people are away or may not have had time to make more than quick responses gives the impression that this development is being pushed through without sufficient time for adequate consideration. I would therefore ask that the Council log this letter as a complaint about planning procedures and issue a formal response. In addition, and at the very least, I would also ask the Council to extend the deadline for comment.

### **Objections**

On its website Hackney Council calls itself the greenest borough in London and is lucky to have a number of allotment sites. Hackney Allotment Society (a registered charity) is delegated by Hackney Council to manage nine sites across the borough, some 125 plots in total. We have undertaken this role for over 30 years now and Church Walk allotment site has been in constant use since we first began. Today, demand for allotments in Hackney has exceeded all expectations and the Society has had to close its waiting list with over 140 people queuing for a plot. Those on the list can express a preference for a particular site, and Church Walk is one of the most popular.

The extent of the overshadowing by the 9m high elevation will be drastic throughout the year and, because it is due south of the site, will mean some of the plots will receive no direct sunlight during a number of months of the year. If the Council allows the construction of a 3-storey private residential unit in the back garden of 52A Albion Rd, at least two of the eight plots on the Church Walk allotment will be rendered largely unfit for purpose as growing land because of this massive disruption to sunlight reaching the site. Two more may also be very severely affected; and the whole site will be affected in some respect. Recently Hackney Council has been keen to publicise the initiatives being developed in the borough under the Capital Growth project where small pockets of unused land are turned into growing space. It would be very ironic if, at the time when demand for allotments is at an all-time high, the Council permits such an out-of-scale private development to go ahead and blight one of its longstanding, well-used "official" allotments sites!

It would seem that the developer has given no consideration to the use of the adjacent site by members of the Hackney community as allotment plots. As publicly-owned land, these allotments are a vital resource for residents of Hackney and one which we hope that the Council would wish to

safeguard. Hackney Council's website holds a document called a Planning Application Validation Checklist which tells applicants what they should submit when making an application.

In the Section on local requirements, this checklist states that applicants should supply a biodiversity report, if the proposed development might have an effect on biodiversity and wildlife. The guidance notes suggest that if an allotment is affected, this is applicable. Allotments contribute greatly to the biodiversity and wildlife in the borough, particularly in such a heavily built-up area.

The Validation Checklist further requires for daylight/sunlight assessment reports if a proposal is likely to have an adverse effect on levels of light to adjoining sensitive land uses. As noted above, in terms of biodiversity/wildlife, allotments are classified as such sensitive sites. The construction of a 3-storey private house in the garden of what is already a densely built-up area will block out or reduce light for a number of residents in adjacent properties, as well as for the allotments. I understand that one of the allotment plot holders affected, calculated that at the winter solstice, the shadow cast by the building would shade the entire width of the Church Walk allotment site, (plots 3, 4, 5 and 6) from direct southern sunlight. At the Spring equinox (when light is at its most important for seed germination) the shadow cast by a 3 storey building would shade two plots entirely (plots 3 and 4) and may partially shade a portion of a further two (plots 5 and 6) at least from direct southern sunlight. As we understand it, the applicant should have been asked to provide a Sunlight/Daylight report or at least a Transient & Permanent overshadowing assessment. This would allow proper consideration of the impact on the allotment site prior to a decision being made.

However, no daylight plan or survey was provided with the documents loaded on the website. On these grounds alone, this plan must be rejected because the developer has failed to provide supporting material in accordance with Hackney's guidelines.

As recently as 2006, Hackney Council stated in its Local Development Framework (planning contributions supplementary document) that it will seek to retain allotments as open space, that it will resist the loss of allotments and extend provision wherever possible. In a 2009 report entitled "Joint Strategic Needs Assessment", it was stated that "gardening work such as allotments... benefit mental health". We hope that the situation has not changed in 2011 and that the planning department will weigh up the wider needs of the community against this request from a private individual.

In summary therefore, Hackney Allotment Society works to promote horticulture in the borough so that the residents of Hackney can produce and enjoy healthy and locally grown food. The development of the property at 52A Albion Road will reduce our ability to do this because it reduces the number of good plots we have available. We would urge Hackney Council's officials to recognise the adverse effect this development will have on its local environment and to reject this application.

Yours sincerely

A handwritten signature in dark ink, appearing to be 'Penny Miller', written in a cursive style.

Penny Miller  
Hackney Allotment Society Chair