

## London Legacy Development Corporation – Local Plan Review Examination

### Matter 5 – Section 5 – Providing Housing and Neighbourhoods

**5.1 Overall housing need and provision: Objective 2** of the Plan aims to deliver more than 22,000 new homes between 2020 and 2036 (i.e. 1,375 dwellings per annum (dpa)) within a range of sizes, types and tenures, which are accessible and affordable to a 'broad spectrum' of the community together with the fast delivery of at least two new primary schools and the delivery of sufficient new health and general community meeting spaces, including space suitable for faith use. **Strategic policy SP2** (maximising housing and infrastructure provision within new neighbourhoods), however, commits to delivering in excess of the emerging London Plan target of 2,160 dpa on suitable and available sites.

Given the extent of the housing need for the LLDC which is set out in the emerging Draft London Plan and with reference to section 5 of *the Framework* (Delivering a sufficient supply of homes):

(i) Does the submitted Plan accord with the Government's **prioritisation of the delivery of new homes**, as expressed in its recent White Paper and in *the Framework*, for example in paragraph 59, or is the Plan unnecessarily cautious in terms of housing delivery?

7. There appears to be a contradiction between the figure of 1,375 new dwellings per annum in Objective 2, and the 2,160 dpa in Strategic Policy SP2, as shown above. We support the lower figure of 1,375. We recognise the great need for new homes in London, but the higher figure is not realistic. For example, a total of 2,300 homes in Carpenters estate would lead to destruction of existing homes, community and infrastructure. It must be deliverable. Such dense development is in danger of failing to gain community support, like previous plans for Carpenters estate. Numbers such as that set out in our Neighbourhood Plan, for 650 new homes on five identified sites, are more realistic and achievable (at least one other site, the Transport for London-owned 'triangle' at the very north of the estate, beside Stratford Station, provides further possibility. As it's been identified as suitable for high rise, it could yield a possible 100 to 250 extra new homes).

8. The two different figures appear to be due to a recognition that many of the homes foreseen may not be deliverable, and the higher figure may include schemes that do not come forward. This in itself indicates a weakness in the update of the Local Plan.

9. When Lend Lease pulled out of the deal to construct the Village, now East Village, the Olympic Delivery Authority decided it could not afford to build as many units and reduced the total of 3,500 homes to 2,818. A considerable part of the area known as Marshgate Wharf was turned over to a cultural zone, known at different times as Olympicopolis, the Cultural Quarter and now East Bank. The effect of this on housing provision was to further reduce the amount of housing which would be made available to local people by approximately another 2,000 units.

The alterations within the Olympic Park and the loss of housing at East Village have increased pressure on sites outside the Park. The decision to create a cultural quarter, housing elite institutions such as the V&A, the BBC, Sadlers Wells and University College London, has resulted in the loss of housing inside the Park thus putting greater stress on a site like the Carpenters Estate. A resident has made FOI requests which show how the housing figure for the Olympic Park has reduced over time. (we attach the most recent FOI as evidence, as Appendix 4).

10. The schedule of changes, under C17, gives priority projects for housing delivery for c. 2,400 new build homes at Chobham Manor, East Wick and Sweetwater. In the light of these densities, a total for 2,300 in the Carpenters estate seems unnecessary and inappropriate.

11. Incidentally, C66 mentions support for 'over-station development' as an innovative means of delivering more housing. If this refers to the 'triangle' site mentioned above, which has been deemed suitable for high rise development, the Forum would be open to work with the LLDC to explore possibilities for this site.

(ii) Should the overall housing need figure for LLDC remain as set out in the **submitted Plan**, in accordance with the provision of the **emerging London Plan** (or Draft London Plan – DLP);

12. Yes, but at the lower of the two conflicting figures, for the reasons mentioned at (i) above.

(iii) Does the Plan provide sufficient evidence to demonstrate that its target of greater than 2,161 dpa can be implemented over the plan period, i.e. **is the Plan is realistic?**

13. No, as stated under (i) above, we believe there is not sufficient evidence, the necessary work for this has not been done. In our calculations for a possible 650 new homes in the Carpenters estate, for example, a great deal

of work was done in arriving at this figure, including surveys of possible sites and extensive consultation with the local community.

- If not, is there an argument for **greater intensification**, e.g. in areas of previously developed land (PDL) and other areas of opportunity?

14. Possibly, for example, in the TfL-owned 'triangle' mentioned above. Most other possibilities within the Carpenters estate, apart from the five sites we have already identified, would be in danger of encroaching on the existing community. We are opposed to any displacing of the existing community, but we are willing to explore possibilities with the LLDC, Newham Council or relevant agencies.

- Paragraph 5.3 of the Plan summarises the component sources of the Plan's housing supply; a more detailed statement from the LLDC, entitled '**Housing Delivery Explanatory Note**' (Examination Document LD27), goes some way towards providing the required level of detail, but falls short of providing data showing realistic yields from each source.

15. We agree. The numbers of new dwellings proposed are not realistic for our area.

- A **Statement of Common Ground** between the LLDC and the principal housing developers and consultants, covering the realistic yields from each source and the reasons for the areas of disagreement, would be helpful in assisting the Examination in relation to a critical soundness consideration of the Plan.

16. We agree this may be helpful. The Forum may like to be represented or contribute to any Statement. Exclusion of residents' and stakeholders' views from previous plans have led to their ultimate failure. Our participation may help avoid this in future.

(v) Is the **housing trajectory** realistic, and should the Plan set out the anticipated rate of development for specific sites, as mentioned in paragraph 73 of *the Framework*?

17. The trajectory appears not to be realistic, due to lack of detail.