

London Legacy Development Corporation – Local Plan Review Examination

Matter 12: Sub Area 3 – Central Stratford and Southern Queen Elizabeth Olympic Park:

12.1 Do **policies 3.1** (Metropolitan Centre); **3.2** (Stratford High Street Policy Area) and **3.2A** (improving connections around central Stratford), together with **Site Allocations SA3.1** (Stratford Town Centre West); **SA3.2** (Stratford Waterfront North); **SA3.3** (Stratford Waterfront South); **SA3.4 (Greater Carpenters District)**; **SA 3.5** (Bridgewater Road); and **SA 3.6** (Rick Roberts Way), justified, effective and consistent with national policy and the relevant policies in the London Plan, especially in relation to:

- (i) Meeting the overall needs of the LLDC area;
- (ii) Environmental/heritage impact;
- (iii) Impact on the living conditions of existing and/or future residents/occupiers;

(Most of our observations on Matter 12 would fall under this heading, so we will list them here, though some may be relevant to other headings).

18. The Neighbourhood Plan is well aligned with the existing site allocation. It increases residential capacity, brings empty homes back into use, improves transport connections and movement and achieves extensive mixed-use development with additional employment and community facilities floorspace. The submitted Neighbourhood Plan should be supported in site allocation 3.4

19. The Neighbourhood Forum has submitted a Basic Conditions Statement which sets out how its Neighbourhood Plan conforms with strategic policies in both the existing London Plan and the new London Plan. We would like to include this in the Examination Library as evidence, as Appendix 3.

20. The proposed site allocation of 2,300 new homes would require demolition of all existing homes, the loss of existing businesses and the loss of green and social infrastructure. In effect, the destruction of the existing character of the area with severe social, economic and environmental impacts. Our view is that the revised housing target is not in conformity with national policy nor with other policies in the Local Plan. It would also be very difficult to achieve given the new policy requiring the consent of existing residents through a ballot.

21. In contrast with the careful identification of housing sites by the Forum, the Local Plan provides no information to justify the allocation of 2,300 new homes. A blanket justification is given – the achievement of wider regeneration objectives – but these have to be tested against national and local planning policy. Regeneration cannot mean just imposing the maximum amount of housing on a site in order to achieve an authority-wide target, without regard to whatever already exists in a neighbourhood.

22. Our Neighbourhood Plan successfully strikes a balance between supporting new housing delivery and maintaining local character and is much more closely aligned with the key driver of sustainable development than the revised site allocation.

23. The Forum has always accepted the urgent need for more housing in London, and we understand why our area is seen as suitable for large numbers of new build. That is why our Neighbourhood Plan provides for 650 new build homes on five sites identified as suitable for sensitive infill. We do not accept this proposed new site allocation of ‘a minimum of 2,300 new homes (gross)’ for the Greater Carpenters District, as this would necessitate demolition of existing homes, very possibly of all existing homes on the Carpenters estate.

24. The Forum can foresee a possibility of more than 650 new builds, subject to a consultation of residents and stakeholders, especially in light of the identification of an additional site, the triangle owned by Transport for London adjacent to Stratford Station. But we would accept additional new builds only to the limit of what is reasonably possible by developing (i) on the five sites already identified as suitable within Greater Carpenters District, plus (ii) the northern TfL-owned triangle which is newly identified in the Local Plan draft update as suitable for high rise development due to being part of the Stratford Town Centre area, plus (iii) any other site which may be identified by the Forum as suitable for sensitive infill. Greater Carpenters Neighbourhood Forum emphasises the highest priority of preserving and, where appropriate, refurbishing all existing homes in Carpenters estate.

25. The Forum appreciates the importance of our Neighbourhood Plan fitting in with local planning policy. However, this proposed change drastically alters the boundaries within which the Forum has been working over the last many years within the Neighbourhood Planning process, which is supported by government.

26. Regarding the affordable housing threshold of 35%, or 50% on public sector land, the Forum welcomes this improvement over previous proposals

made for the estate. However, we would like assurance that a large percentage of new build homes would be specifically social housing, and separately that a large percentage would be for genuinely-affordable rent. We appreciate that a large proportion of new build needs to be for private leasehold sale, in order to help fund development, but we would like to see solid assurances that the proportion of genuinely affordable and social homes is not reduced under pressure from developers at a later stage, as has happened in previous developments in London in recent years. We deplore any net loss of social housing. We want to have existing social housing preserved in preference to new build, as average rents for new build are higher and sizes smaller, and we know many social housing residents are unhappy to lose their present homes in exchange for the smaller, more expensive new builds. It is a false idea that all social housing tenants are eager to move from their existing homes into new builds, as our consultation with residents has found.

27. The Forum has been working to preserve all existing homes on Carpenters estate. The three high-rise Council-owned tower blocks appear particularly threatened with demolition. We think an observation made by the Examiner at the Examination of the previous version of the LLDC Local Plan in 2015 is still of relevance here. The Examiner (Jill Kingaby) wrote:

“72. Policy 5.4 of the London Plan states that Boroughs should develop policies for the sustainable retrofitting of existing buildings. My attention was drawn to a study by Anne Powers from the London School of Economics which found that estate or tower block refurbishment could be cheaper and less damaging to the local environment in many cases. In addition to contributing to reduction in carbon emissions, retrofitting could boost the small building industry and local jobs. In contrast to demolition and rebuilding, retrofitting could enhance the physical and mental health of affected local residents, thereby contributing to convergence. I recognise the importance of these potential benefits but, as it is not a Local Authority, the Corporation lacks direct powers to improve old buildings and housing infrastructure. In paragraph 8.7, it commits to producing a carbon off-setting supplementary planning document which should cover retrofitting of local buildings and structures where appropriate. This approach is realistic and consistent with Policy 5.4 of the London Plan.”

We have attached the entire report for reference, as Appendix 2. The extract above is found on page 20, para 72.

28. Also on the subject of the future of these three tower blocks, Newham Council recently shared figures relating to costs of options with residents of Carpenters estate at public meetings. They quoted a cost of £70 million to

refurbish all three blocks. We (and other relevant professionals we consulted) found these costs extremely and implausibly high. Residents have requested the details of how the costings were arrived at from Newham Council, but they have refused to share them. We strongly urge the Examiner at this Review to request them from the Council, to inform their decisions and so that legitimately interested parties such as ourselves may challenge them if appropriate. Our suspicions are increased by such evidence as the fact that Rydons, the construction company, give a cost of £8.5 million for one similar block of similar age and size, Ferrier Point in Newham (link: <http://www.rydon.co.uk/what-we-do/refurbishment/case-studies/refurbishment-case-studies/ferrier-point>). We wonder what characteristic the three Carpenters blocks have that would make them over three times more expensive to refurbish? Newham Council has provided no meaningful explanation.

- (iv) Safe and acceptable vehicular access and parking considerations;
- (v) Whether there are willing land owner(s) for all the land concerned;
- (vi) Flood risk;
- (vii) sustainability, including access to convenient and reliable public transport (high PTAL rating), access to shops, schools, health care provision, equipped and informal play/recreation space, and other community facilities; and
- (viii) Any other relevant infrastructure, planning, marketing or viability constraints?