

OD6

Matter 12 - Site Allocation 3.4 Greater Carpenters District - note requested by inspector on Neighbourhood Forum Site Options Report (October 2017, AECOM) with report appended.

At the hearing session for Matter 12 on Thursday 19th September, representatives of the Greater Carpenters Neighbourhood Forum (Forum) highlighted the Forum's Site Options Report prepared on their behalf by AECOM to provide supporting evidence to their draft Neighbourhood Plan on available site capacity within the Neighbourhood Area. It was also requested that the document be added to the Examination Library. At the hearing session, LLDC suggested that there were deficiencies in the report which meant that it considered its conclusions on sites and capacity to be inadequate. This note briefly outlines the factors that underlie the LLDC's view.

Scope and brief for the report

The section on the brief for the report is unclear as to what that brief was (see page 8 of the report). It is implied that site identification had previously taken place and that those identified sites are the ones factored in to it. However, there is no specific information on that previous work and how the sites have been identified and filtered. For example, reference is made to a Site C which had been removed for reasons of feasibility but the site is not identified and no reasoning for the lack of feasibility is provided. It is difficult therefore to determine whether the scope and methodology used is appropriate. The scope of the report is specifically described as being aimed at examining how 500 new infill homes can be achieved, which would appear to significantly constrain the remit of the consultants carrying out the study. It is worth noting that none of the considered options of up to 650 homes provides a rationale behind the increase from the number of 500 new homes identified in the scope.

Does not consider all potential available sites

Five sites are identified as being available for new housing delivery, in some cases for mixed use development, where there are existing community or business premises currently on those sites. It is unclear as to what criteria have been used to identify sites.

LLDC is aware that several other sites or locations are either known to be available during the Plan period or to be worth considering in any feasibility exercise. These would have the potential to significantly boost housing delivery within the Site Allocation area and should have been explored in order to determine their potential. These include:

1. the site of the temporary games area at Warton Road that has an extant outline planning permission for approximately 45 units;
2. the TfL Triangle site in the area of the planned new south-western entrance of Stratford Station, identified by TfL as available within its consultation responses to the LLDC Local Plan;
3. the yard site adjacent to railway lines and accessed from Stratford High Street that has been subject to a previous significant development proposal.
4. the car parking areas within the Carpenters Estate which represents a significant option for providing development land given the high levels of public transport accessibility within the Site Allocation area.

It is additionally noted that no consideration is given in the report to other sites that may or may not be available for redevelopment that could include housing and re-provision of their existing use, for example the site of Carpenters Primary School and that of the Building Crafts College. While it might be that such sites would subsequently need to be discounted, the report would be expected in the view of the LLDC, to consider those options and explain why they have been discounted.

Lack of information on methodology for determining the recommended housing numbers from the identified sites

The report moves from a broad assessment of each of the five identified sites to an area wide assessment of the overall housing capacity of all of the identified sites taken together. There is no information provided on the methodology used in calculating these numbers. For example, it is unclear what density and height constraints have been adopted in arriving at the suggested figures and no information on what housing mix assumptions have been factored in to this, or whether a standard size of housing unit has been used.

Information on availability and deliverability

While it is acknowledged that the report's purpose is to determine technical housing capacity, it is not evident that actual site availability has been taken into account within this work. For example in terms of there being a willing landowner associated with each site or whether there are leasehold matters that would affect timing of availability where the occupier is not the owner. Where land is owned by the Council, while there can be a working assumption that there is a willing landowner where these sites align with its estate regeneration plans, there is currently no evidence of buy-in from the Council in respect of availability of the relevant sites. Ultimately, it is likely that delivery would primarily depend on the willingness of the Council as majority landowner.

Conclusion

The LLDC consider that there are a number of deficiencies in the methodology and approach to the study report when applying it to current circumstances, with the report providing insufficient information for it to be able to determine whether its conclusion is robust. There is limited description of the scope of the study and what is expressed appears to significantly constrain its outcome. There are a number of other sites and locations which should have been factored into the study but have not been. It is therefore the LLDC's view that a more robust study would have the potential to identify significantly greater capacity for new housing within the Site Allocation/Neighbourhood Area than the maximum of 650 homes that have been identified in the submitted draft neighbourhood plan.

On a broader point, LLDC contends that AECOM's report cannot be relied upon to justify the setting of strategic policies at a neighbourhood level. As per paragraph 65 of the NPPF, strategic plan-making authorities should *"set a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. Once the strategic policies have been adopted, these figures should not need re-testing at the neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirement."* Put simply it is not for the draft neighbourhood plan to set strategic policies. As per paragraph 69 of NPPF, neighbourhood planning groups may *"consider the opportunities for allocating small and medium sites (1 ha or less) suitable for housing in their area"*. Whilst each of the five sites considered in AECOM's report is less than 1ha, the findings of the report are relied upon by the Forum to justify an overall target figure of 650 new homes for the entire

neighbourhood area. This is contrary to the national policy position that neighbourhood planning should not be responsible for setting the housing capacity for its area.



GREATER CARPENTERS SUPPORT

October 2017

SITE OPTIONS REPORT

Prepared for Greater Carpenters
Neighbourhood Forum

My Community  locality

AECOM

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Project Manager	Neha Tayal	Associate Director, Urban Design	Drafting of report Drawings	Vanessa Adams	30.09.17
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Qualifying Body					
Project Coordinator					
Locality					

PLEASE NOTE: THIS REPORT IS DESIGNED TO BE PRINTED DOUBLE-SIDED AT A3 SIZE

Our brief for technical support

Through the Department for Communities and Local Government Neighbourhood Planning programme, Greater Carpenters Neighbourhood Forum (GCNF) requested technical support via Locality to assist them with a capacity exercise for 'selected sites' (five in total) as shown on the adjacent figure, focusing on design aspects. This was carried out by AECOM as Locality's technical consultants.

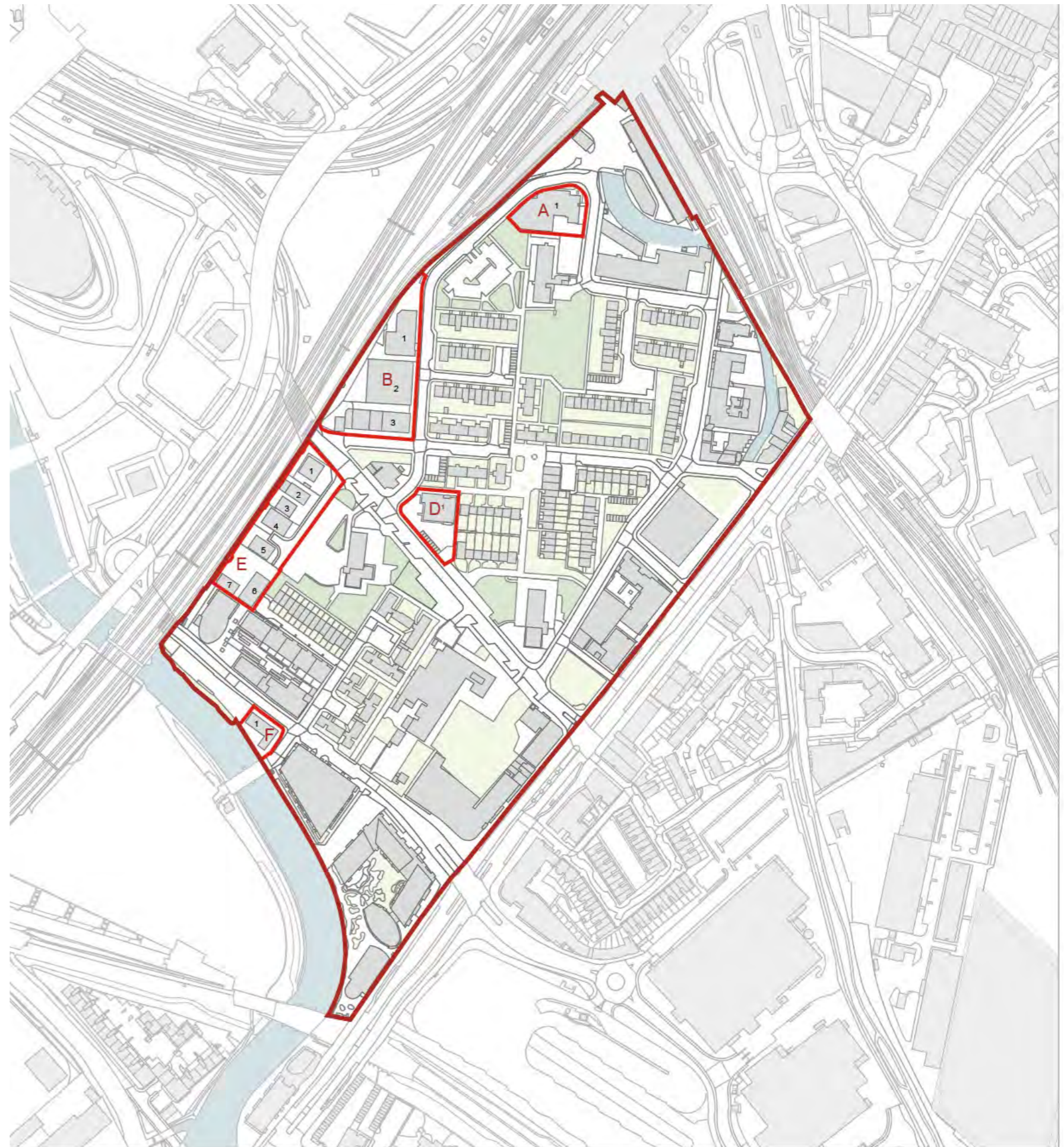
The previously proposed sites (six in total) that formed part of the brief were reviewed and a site C was removed due to initial feasibility issues. Our focus is exclusively these sites - we make no comment about any wider plans to redevelop any current housing sites.

This technical support aimed to provide GCNF with information (evidence) relating to the possibilities of sensitive infill of housing within the sites suggested. This document puts forward options for GCNF to consider but is by no means definitive in that it is a 'high level' strategic analysis of the area and its potential, rather than a detailed proposal. This document provides impartial technical support and explores possible policy directions to inform the GCNF neighbourhood plan-making process and to inform the group's discussions with the local community.

This document brings together the baseline position based on primary data (from site visits and consultation with Locality) and secondary data (previously collected by LLDC). It also builds upon the work already carried out by GCNF independent planning consultants that formed the brief for this report.

This brief proposal suggested by Greater Carpenters Neighbourhood Forum includes:

- Housing Refurbishment: 500 new homes at a height threshold of 8 storeys, target 50% of new home as community led and social rented housing
- Retention of equivalent employment floor space and redevelopment of the Carpenters and Docklands Centre

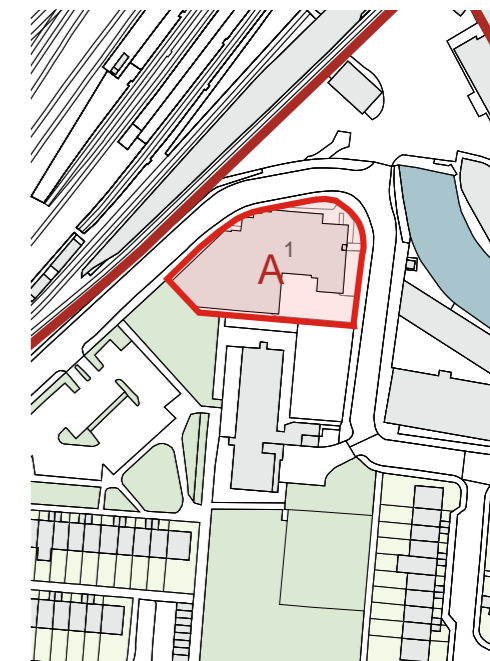


Development Site A : Carpenter’s and Docklands centre

Site A is situated on the North-East corner of Greater Carpenters neighbourhood on 98 Gibbins Road. The existing site is occupied by a two-storey building used for community, leisure and sports facilities.

The community centre is an asset for the community and highly used, although the site is under-utilised owing to its prominent location next to Stratford Regional station. Although the site can be redeveloped to capitalize on prominent location and provide more accommodation on it, the community centre will need to be re-provided on the lower floors. The existing community center also houses some businesses that will be re-provided on site within the new development.

DEVELOPMENT SITE A	
Site Area	1,860 sq m
Building Footprint	1,230 sq m
LAND USE	GFA
Community Facilities	1,845 sq m (TBC)
TOTAL	

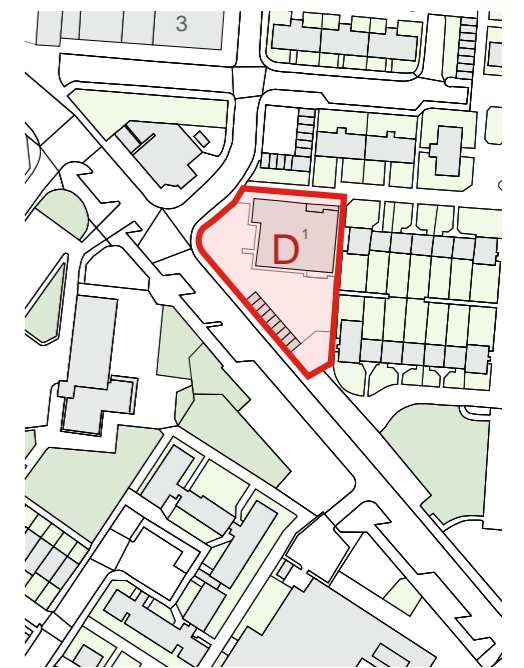


Development Site D : Former Carpenters Estate Tenant Management Org. Ltd office / Community centre

Site D is very central to the neighbourhood situated on Carpenters Road. The existing site is occupied by a one-storey building used for estate management purposes and a community facility.

The community centre is an asset for the community and highly used, although the site is under-utilised owing to its prominent location next to main street connecting North to the Olympic Park. Although the site can be redeveloped to capitalise on prominent location and provide more accommodation on it, the community centre will need to be re-provided on the lower floors.

DEVELOPMENT SITE D	
Site Area	1,780 sq m
Building Footprint	547 sq m
LAND USE	GFA
Community Facilities	547 sq m



Development Site B : Gibbins Road

Site B is situated along the North edge of Greater Carpenters neighbourhood, to the East of Carpenters road. The existing site consists of two to three storey buildings occupied by storage facilities serving as warehouses . Some of these have been converted into commercial/ retail frontages with model-makers, gyms etc. as occupants. An extension of the Building Crafts College is also housed in the building on extreme east. The college site consists of a building with open space used to experiment with building material and construction technology.

This site has potential for redevelopment by re-housing commercial facilities on ground floor and providing residential above. The Craft college could be re-provided either on the same site or elsewhere. Variants for the above are discussed in the next chapter.

DEVELOPMENT SITE B	
Site Area	5,764 sq m
Building Footprint	2,835 sq m
LAND USE	GFA
Community Facilities (Buildings Crafts College)	697 sq m(TBC)
Office, Warehouse, Storage	3,383 sq m (TBC)
TOTAL	4,080 sq m





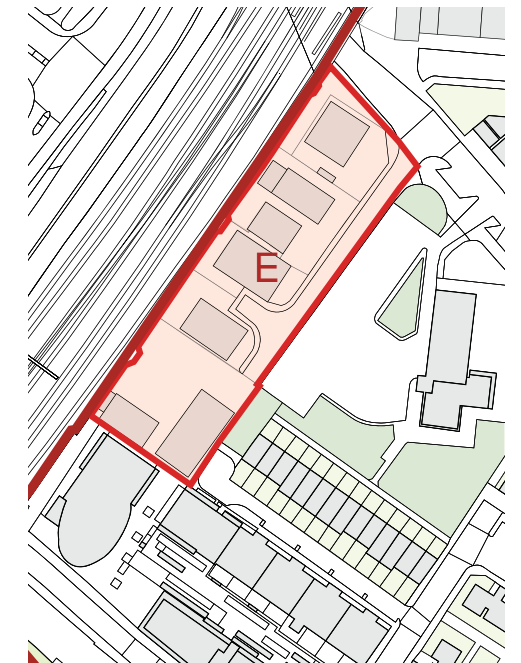
Development Site E : Rowse Close

Site E is situated on the North-edge of the neighbourhood. The existing site is occupied by a one to two-storey buildings commonly used for storage facilities. These either serve as warehouses or industrial units such as a car repair shop. The buildings are not in the best condition and some of them previously abandoned-are being used as artists' studios currently.

Owing to its location, on the edge of an elevated rail line, the buildings tend to back on the North. The frontage on Rowse Close is not very good with walls and fences separating the properties. The access road is then divided from the rest of the area by a wall.

Recent new developments on the West edge of the site, fronting Warton Road are evidence that there is potential for this area to be redeveloped to provide more accommodation in the form of residential uses. The employment and industrial uses could be re-provided on same sites or other sites, as appropriate.

DEVELOPMENT SITE E	
Site Area	5,152 sq m
Building Footprint	1,566 sq m
LAND USE	GFA
Office, Warehouse, Storage	2,243 sq m (TBC)
Building being used as artists studios	750 sq m (TBC)
TOTAL	2,993 sq m

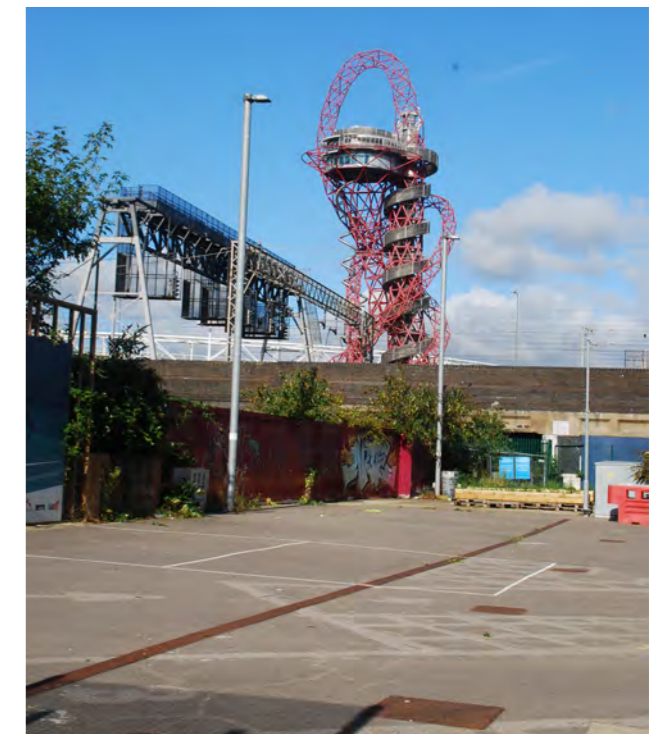
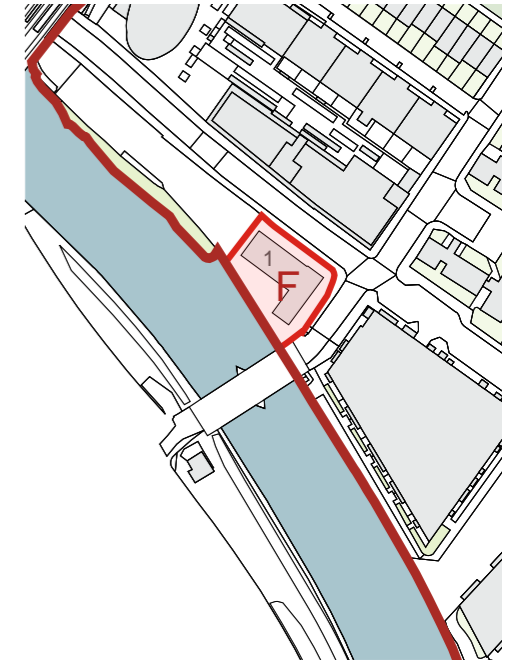


Development Site F : Wingate House

Site F is situated on the edge of Waterworks river fronting Warton Road. Existing site is occupied by a dilapidated, vacant, unused building. This is an opportunity to complete the river frontage on the North by redeveloping the site for residential with commercial/ retail ground floor frontage towards the river.

The open space next to the building is occupied by leisure and community uses such as football, handball cages.

DEVELOPMENT SITE D	
Site Area	795 sq m
Building Footprint	308 sq m
LAND USE	GFA
Derelict	1,232 sq m



Existing Site Context

The Greater Carpenters Neighbourhood Plan seeks to uplift housing provision within the Neighbourhood Area. As explained previously, six sites were identified initially to explore the potential for this out of which one of the sites (Site C) has been removed after initial testing. We have designated these sites from A to F in the accompanying table and diagram. Existing land use and GFA provision on the sites is calculated in the table below. The adjacent plan shows the land use (colour-coded) and sites.

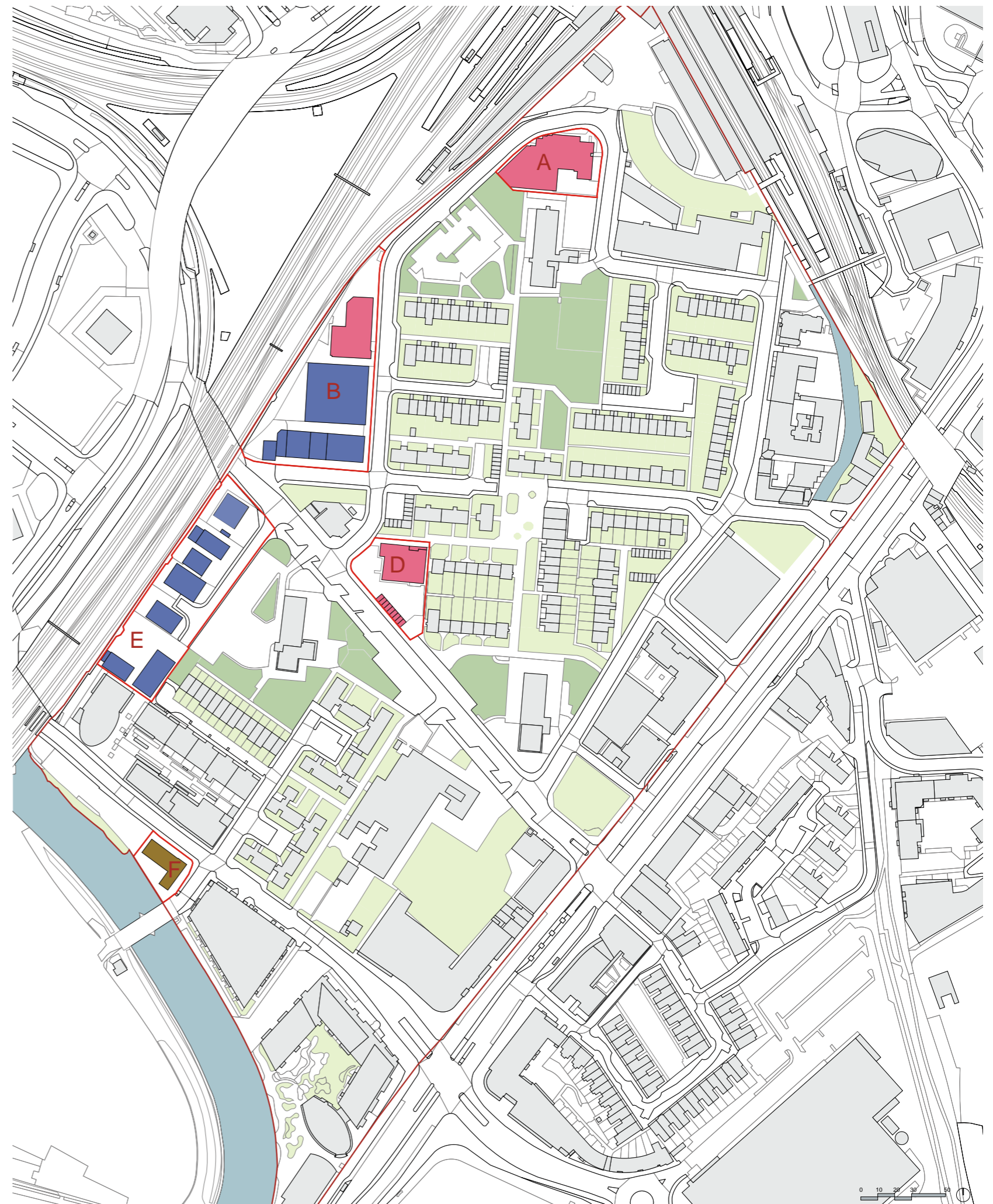
A brief description of each site and existing context is provided in previous chapter. As per the table below, there isn't any existing residential provision on the five selected sites. Two community centres on sites A and D will need to be re-provided. The employment/ commercial uses, currently serving as warehouses, storage, MOT and a few other retail uses will also need to be re-provided as appropriate. In addition, the brief from GCNF is seeking to provide additional 500-600 homes on these sites.

Existing Sites Consists of	
Type	sq m
Residential Area	0
Community Facilities	3,089 sq m approx.
Commercial / Business / Storage Area	6,376 sq m approx
Derelict Buildings	1,172 sq m approx
TOTAL	10,637 sq m approx

Typology Plan

Key

- Sites - Area of Change
- Residential Buildings
- Community Facilities
- Business / Commercial
- Derelict Buildings



OPTION 1a - Maximum Intervention

Option 1 is a moderate to high density option, providing a good mix-use active ground floor frontage and residential use above. In this option, all building height is limited to 8 storeys, as summarized below and as calculated in the table below.

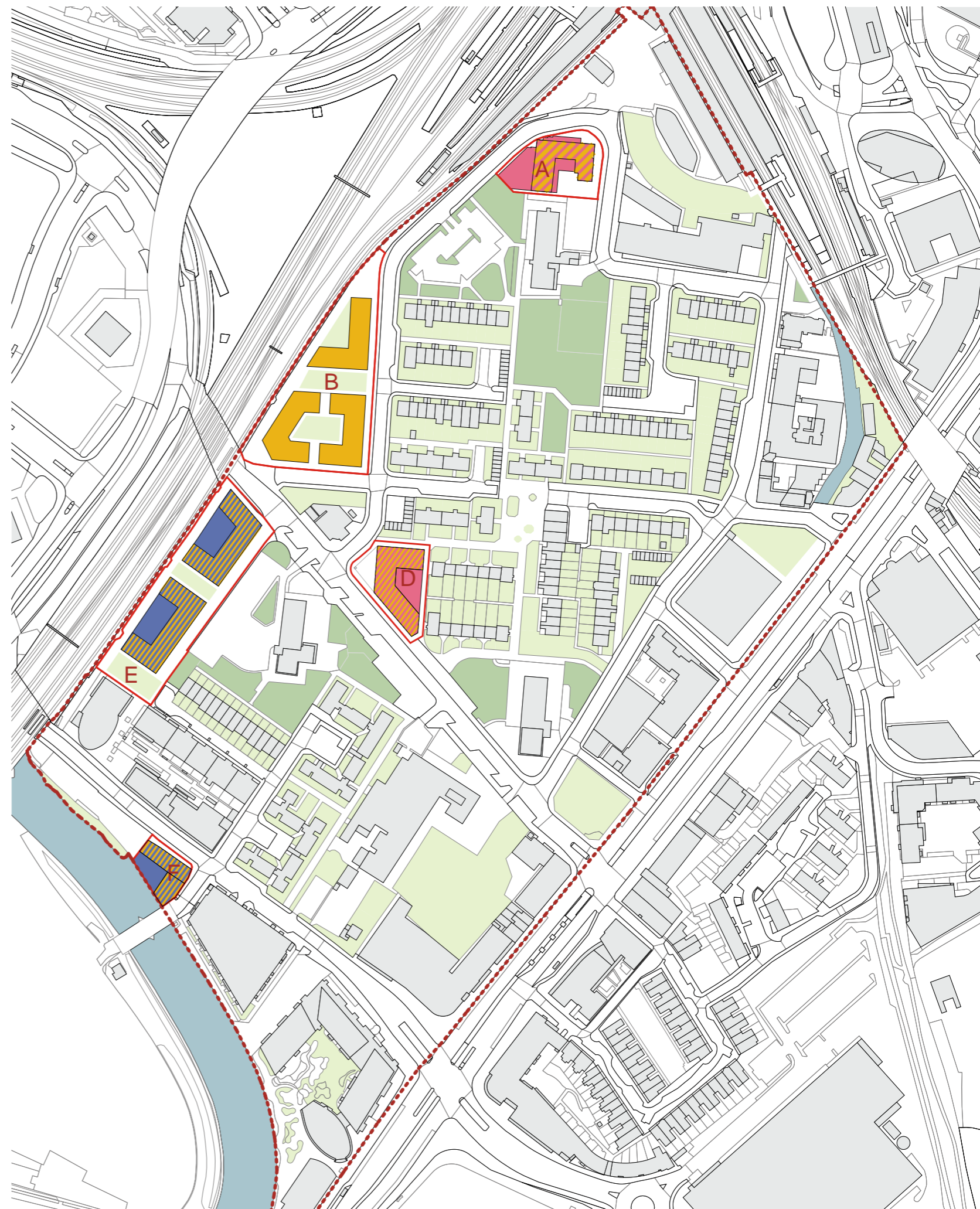
This option was set out to achieve up to 600 units which is an uplift on the brief as a maximum intervention. The strategy for this option is to rebuild the community centre on Site A with residential above. Site B will be purely residential with 8 storey buildings. The community centre on Site D is also re - built on site with residential above. Sites E and F are mix use sites with commercial/ employment / retail uses on ground floor (as appropriate) with residential above. This is in consideration with the existing uses on these sites. Site F is extended to take in the existing sports facilities on site and new retail/ cafe units are provided along the river frontage.

Proposed provision per land use:	
Type	sq m
Residential Area	600 Units
Community Facilities	4,800
Commercial / Business / Storage Area	3,100

Typology Plan

Key

- Sites - Area of Change
- New Residential Buildings
- New Residential Units Above Existing Buildings
- Community Facilities
- Business
- Mixed Use Building - Business with Residential Units above
- Mixed Use Building - Community Facilities with Residential Units above
- Mixed Use Building - Business with Community Facilities above



OPTION 1b - Maximum Intervention (Variant)

Option 1b is an even higher density option increasing the number of units to 650 homes. In this option, all sites and buildings have been maximized with 8 storeys but this threshold has not been exceeded. However, the proposed massing may not be desirable even though it is limited to 8 storeys as there is no room for any articulation and lower volumes on any building.

A full redevelopment of Carpenters and Docklands Centre (Site A) is proposed, community facilities are proposed on the ground floor with residential above.

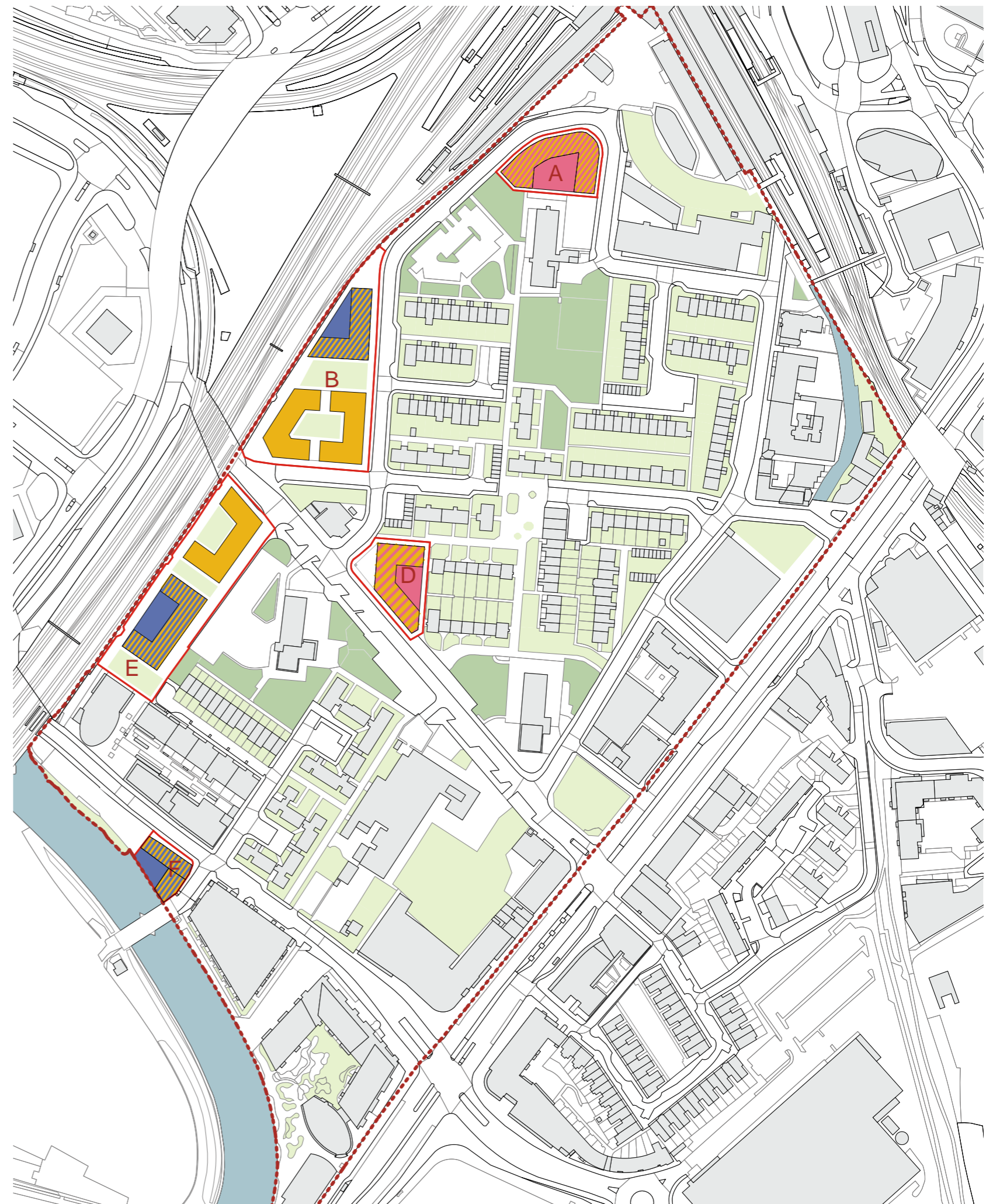
The Craft college has been re-developed on the same site within Gibbins Road (Site B) with residential uses above. Other commercial functions from this site are re-located on Rowse Close (Site E) Ground floor with residential above. The Ex-TMO building is proposed with full redevelopment on site D with first three floors housing community functions and residential above. Commercial facilities have been retained on ground floor of Wingate House (Site F) and additional commercial/ retail units provided that can be used for cafes or artists' units along the canal frontage.

In this option, all sites are proposed as mix-use sites whether it is community functions on ground floor an residential above or commercial frontage on ground floor with residential above.

Proposed provision per land use:	
Type	sq m
Residential Area	650 Units
Community Facilities	4,900
Commercial / Business / Storage Area	2,850

Typology Plan Key

- Sites - Area of Change
- New Residential Buildings
- New Residential Units Above Existing Buildings
- Community Facilities
- Business
- Mixed Use Building - Business with Residential Units above
- Mixed Use Building - Community Facilities with Residential Units above
- Mixed Use Building - Business with Community Facilities above



OPTION 2a - Minimum Intervention

Option 2a is determined by minimum intervention on few sites in order to help with retention of certain facilities and a phased approach to the development coming forward. This approach is also sensitive towards the existing urban grain of the area.

In this option, all building height is limited to 8 storeys, as summarized below and as calculated in the table below. This option provides up to 500 homes with re-provision of community facilities and employment/ commercial uses.

On site A, the community centre is retained as is, with residential footprint added above. This limits the height of new building on existing structure.

Site B is completely redeveloped but the previous urban grain is retained such as the building vs open space. The side fronting Gibbins Road is a mix use building with commercial on ground floor and community use above.

Site D is purely residential with 8 storey building which steps down towards the South the edge which is close to the existing 2-3 storey terraces.

Site E is completely redeveloped with two buildings accommodating commercial on ground floor and residential above.

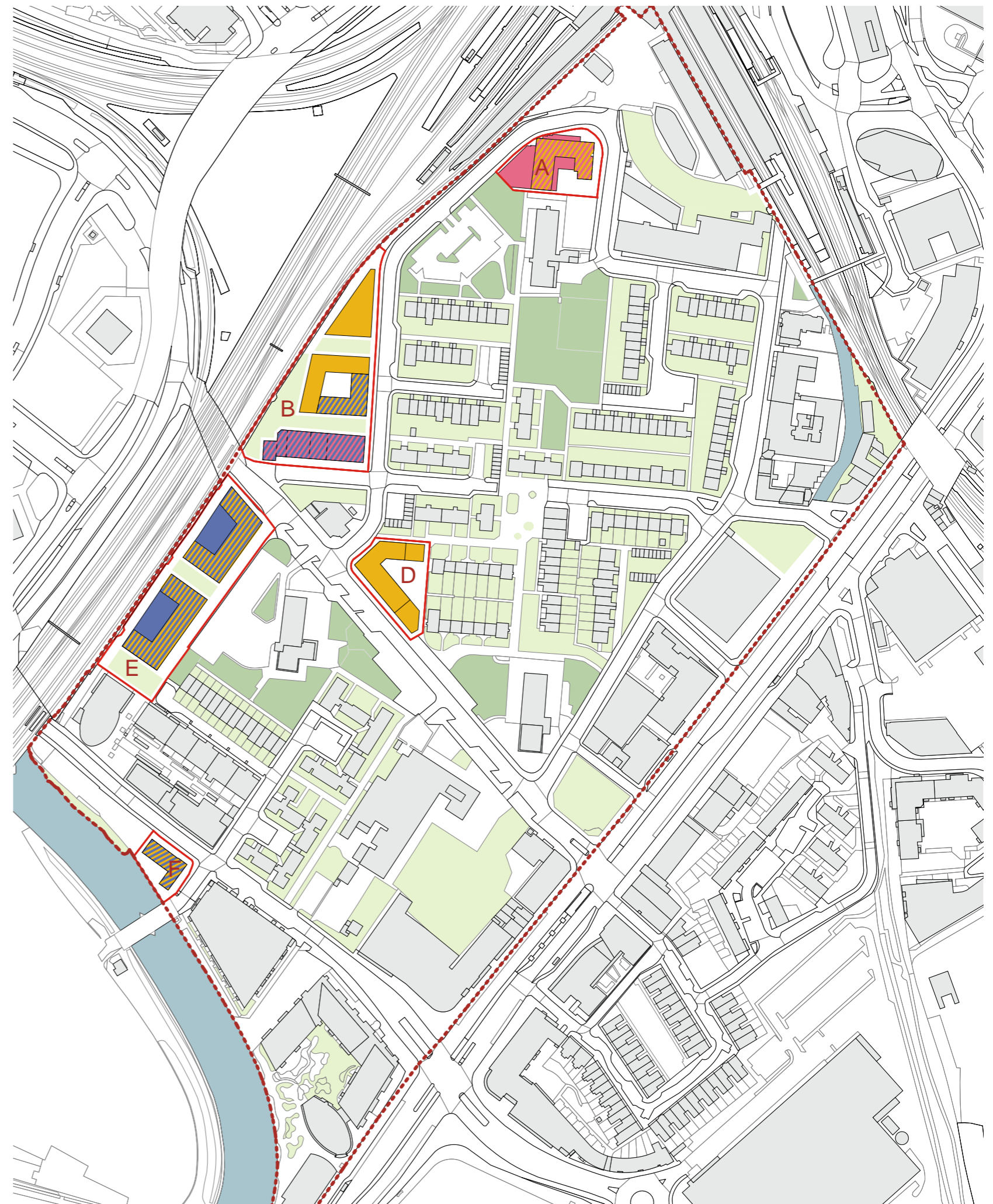
Site F is provided with a residential building on the existing building location.

Proposed provision per land use:	
Type	sq m
Residential Area	500 Units
Community Facilities	3,900
Commercial / Business / Storage Area	3,900

Typology Plan

Key

- Sites - Area of Change
- New Residential Buildings
- New Residential Units Above Existing Buildings
- Community Facilities
- Business
- Mixed Use Building - Business with Residential Units above
- Mixed Use Building - Community Facilities with Residential Units above
- Mixed Use Building - Business with Community Facilities above



OPTION 2b - Minimum Intervention (Variant)

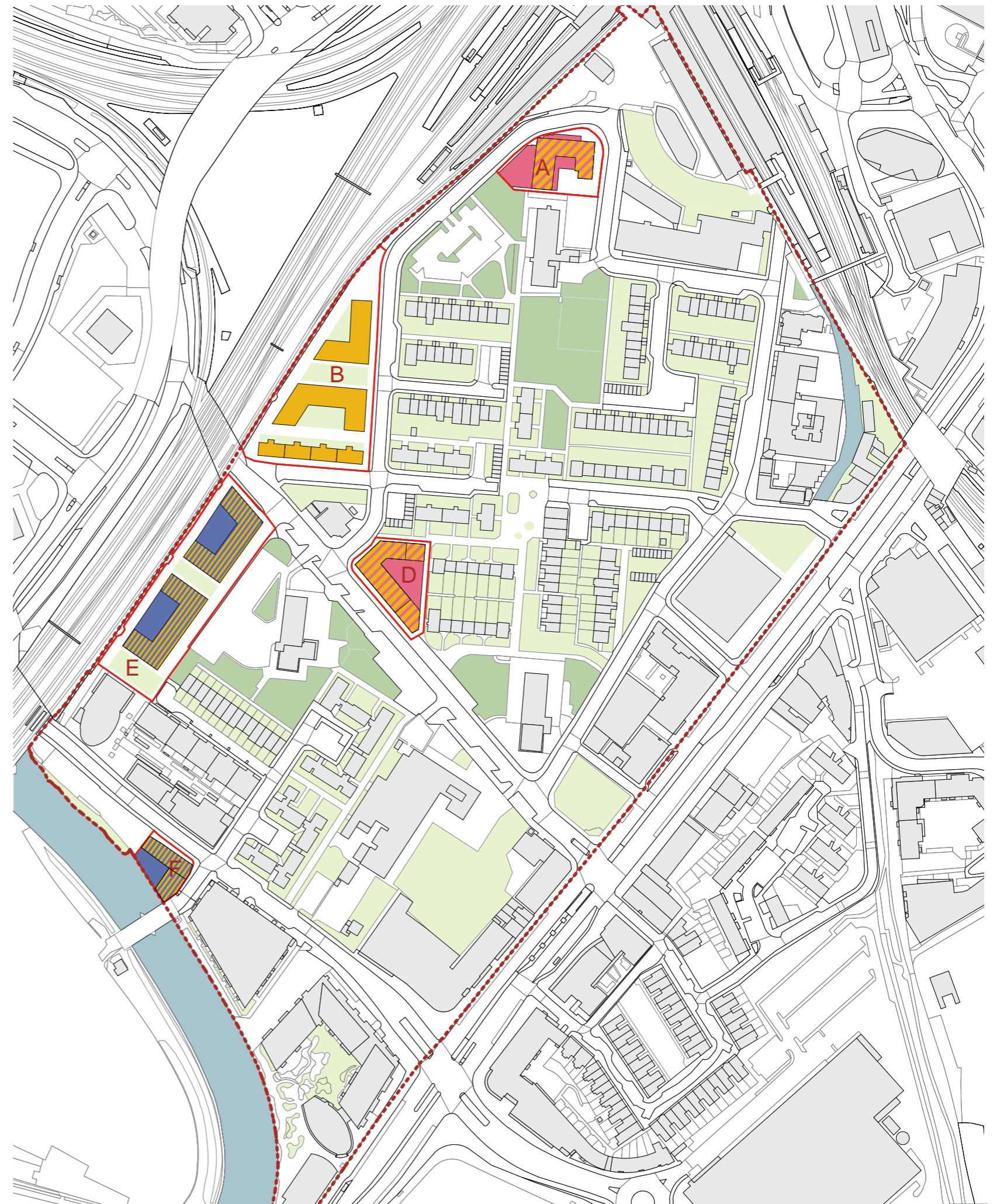
Option 2b is a moderate option as a variant to the minimum intervention, providing a good mix-use active ground floor frontage and residential use above. In this option, all buildings is limited to 8 storeys, and th number of homes provided is lifted to 530 as summarized below and as calculated in the table below.

This option has been developed further into a preferred approach in the next section upon consultation with client representatives.

Proposed provision per land use:	
Type	sq m
Residential Area	530 Units
Community Facilities	5,200
Commercial / Business / Storage Area	3,100

Typology Plan Key

- Sites - Area of Change
- New Residential Buildings
- New Residential Units Above Existing Buildings
- Community Facilities
- Business
- Mixed Use Building - Business with Residential Units above
- Mixed Use Building - Community Facilities with Residential Units above
- Mixed Use Building - Business with Community Facilities above



Preferred Option - Variant A

Option 2 was developed further with a view towards developing Site E as a residential-only site and Site B as a mix use site. In this option the Building Crafts College has been retained in its existing location with a provision for additional community facilities.

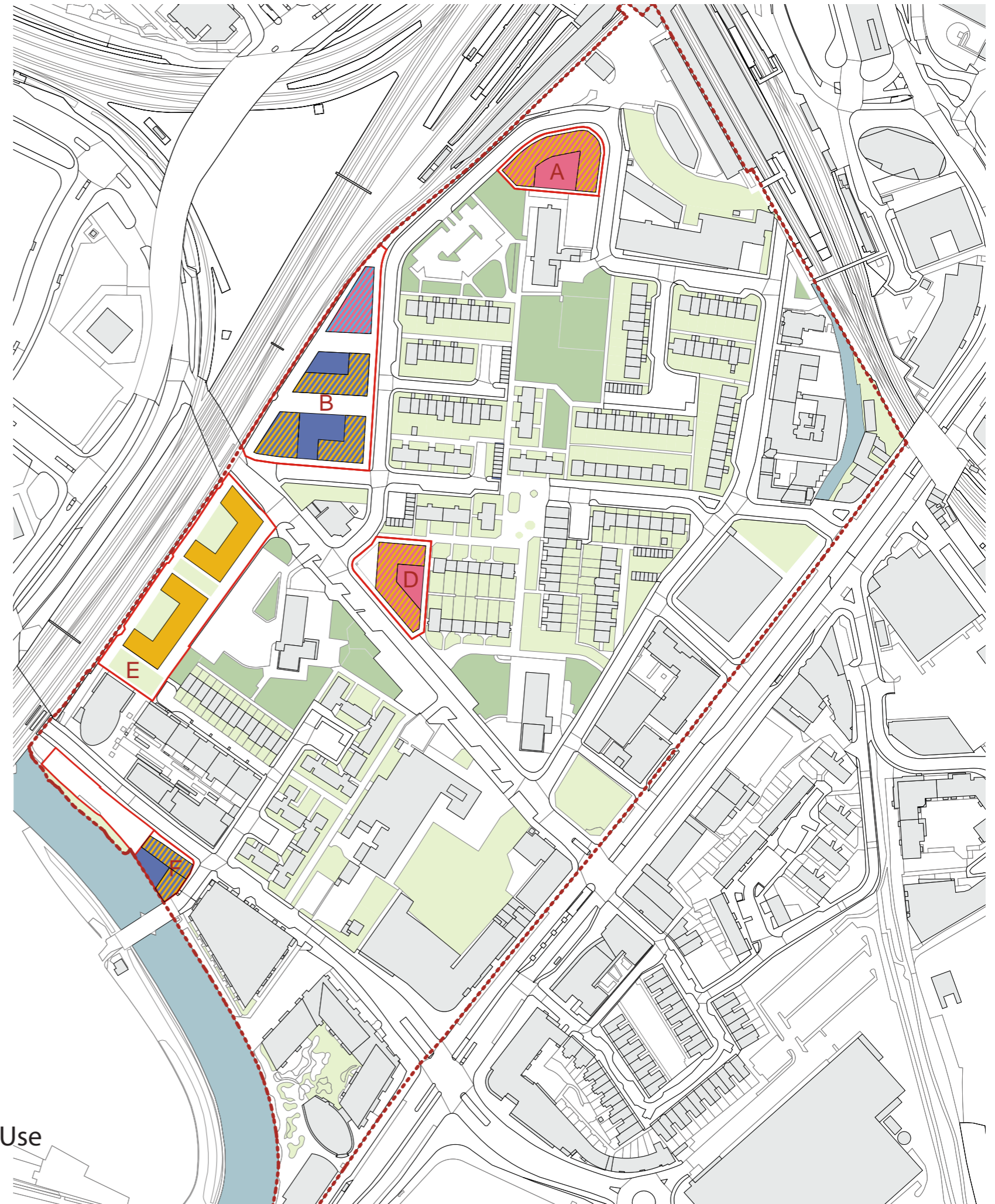
All building heights are restricted to 8 storeys only but there is potential for increasing the heights of portions of residential buildings in certain strategic locations.

The illustrations on the adjacent page show a comparison between existing and proposed conditions with regards to building heights. The view is taken from north of the site looking at the Greater Carpenters neighbourhood edge to the Olympic Park.

Proposed provision per land use:	
Type	sq m
Residential Area	550 Units
Community Facilities	4,600
Commercial / Business / Storage Area	5,650

Typology Plan Key

- Sites - Area of Change
- New Residential Buildings
- New Residential Units Above Existing Buildings
- Community Facilities
- Business
- Mixed Use Building - Business with Residential Units above
- Mixed Use Building - Community Facilities with Residential Units above
- Mixed Use Building - Business with Community Facilities above
- Mixed Use Building - Community Facilities with Business above



View of Greater Carpenters neighbourhood from Montfichet Road in the North
BEFORE - This image shows the existing edge to the railway line which is comprised of two-to three storey buildings.



View of Greater Carpenters neighbourhood from Montfichet Road in the North
AFTER - This image shows the existing edge to the railway line which is comprised of two-to three storey buildings.



Site A
Community Centre with
Residential above

Site B
Employment/ commercial/ retail
on ground floor with Residential
above. Building Crafts College is
retained on existing site

Site E
Only Residential buildings
8 storeys with potential for
accents in strategic location with
taller elements

Preferred Option - Variant B

Option 2 was developed further looking to maximize all sites with a higher density version of the preferred option, together with providing a good mix-use active ground floor frontage and residential use above. This option is dependent on demolition of certain buildings and rehousing the provision/facilities within. In this option, all building height is limited to 8 storeys except for articulated edges of 10 storeys.

Crucially, employment floorspace is increased in this preferred option, when compared to the options above and the current condition.

The illustration on next page shows a visualisation for how the mix use node around Carpenters Road and Gibbins Road on Sites B, D and E may come forward in the future.

Proposed provision per land use:	
Type	sq m
Residential Area	550 Units
Community Facilities	4,600
Commercial / Business / Storage Area	6,800

Typology Plan

Key

- Sites - Area of Change
- New Residential Buildings
- New Residential Units Above Existing Buildings
- Community Facilities
- Business
- Mixed Use Building - Business with Residential Units above
- Mixed Use Building - Community Facilities with Residential Units above
- Mixed Use Building - Business with Community Facilities above

