

Andrew Mead BSc (Hons) MRTPI MIQ
 Examiner, Greater Carpenters Neighbourhood Plan

28th January 2020

Dear Sir,

Examination of Carpenters Neighbourhood Plan – examiners questions of 14th January 2020

I write further to the questions that you have issued in respect of the Examination of the Carpenters Neighbourhood Plan in your letter of 14th January 2020. In this you ask one question of the London Legacy Development Corporation. That question and the response to it are set out below.

Question: does LLDC have any comments on Policy H2 as proposed by GCNF in its response of 9th January 2020? In particular, aside from affordable housing, given Revised Local Plan MMs 27, 28 and 29, does LLDC consider that the housing aspects of the GCNP would still not be in general conformity with the strategic policies of the development plans for the area?

The Draft Main Modifications referred to in the question are set out below and relate to the site allocation for the Greater Carpenters Area (SA3.4) of the Draft Revised Local Plan.

MM27	New	Policy SA3.4	<i>Insert following text at the start of the first bullet point:</i> <u>The detailed development principles for this area will be formulated through the emerging Greater Carpenters Neighbourhood Plan.</u>
MM28	New	Policy SA3.4	<i>Add following text to first bullet point:</i> <u>Consideration will be given to a range of options including refurbishment, opportunities for infill development, comprehensive redevelopment and combinations of these options for the site allocation area.</u>
MM29	New	Policy SA3.4	<i>Add following text to start of the second bullet point:</i> <u>The precise size of the housing allocation will be determined following the outcome of consideration of the options referred to in the bullet point above, which will involve full community consultation, the site allocation is expected to yield a minimum of 2,300 new homes (gross), a total which may be substantially increased following discussions with the Community Forum and the landowners with an affordable housing threshold</u>

In my letter of 5th December 2019 setting out the views of the Local Plan Authority, I set out the background to the minimum housing target included within the update of this Local Plan site allocation. This is further clarified in my letter of 6th January 2020 responding to your further questions. This explains that the minimum housing figure of 2,300 for the site allocation has been derived from the standard methodology used for the London Strategic Housing Land Availability Assessment (SHLAA) undertaken by the Greater London Authority to set housing targets for all London Local Planning Authorities. This is consistent with the minimum figures set out in all other site allocations within the draft Revised Local Plan that plan for new homes. The Main Modifications identified by the planning inspector examining the LLDC Draft Revised Local Plan are currently subject to public consultation, which is due to end on 24th February 2020.

The Greater Carpenters Forum in their response to your questions of 11th December have identified some suggested changes to Policy H2 of the Draft Neighbourhood Plan. These changes would result in the Neighbourhood Plan planning for 1,000 new homes in total across the site allocation area, with 650 of these within the Carpenters Estate itself. It also identifies the 'TfL Triangle Site' as a potential site and seeks to restrict building heights to 15 stories around the periphery of the estate and along the railway line.

The views of the LLDC

The LLDC view is one that acknowledges the potential removal from Site Allocation SA3.4 of the 2,300 minimum housing figure, dependent on the final recommendations of the planning inspector currently examining the Local Plan. It does not, however, consider that this changes the factors that potentially make the site allocation area as a whole suitable for a higher level of housing delivery than the 1,000 figure suggested in the Forums potential changes. The LLDC view of the approach used to identify the 650 homes figure remains and it is also unclear how the 1,000 how figure has been derived beyond the physical inclusion of the TfL Triangle site. The potential removal of the 2,300 target figure from the site allocation does not, in the view of the LLDC, change the SHLAA assessed capacity or adjust the wider strategic housing need or target identified within the Local Plan that it would be expected to contribute towards. It continues therefore to consider that the draft Neighbourhood Plan is not in general conformity with this aspect of strategic policy in the Draft Revised Local Plan for this area.

The LLDC's concern also remains in the context of these figures and approach being proposed ahead of the conclusion of the detailed options development being under taken by London Borough of Newham as it progresses its planning for the future of the Carpenters Estate, which is itself being undertaken with the involvement of residents. While a range of options have been developed, it is understood that a final preferred option will not be presented or confirmed by the Council until later this year. It would be this process that it would use to drive the approach to the future of the estate, including defining the approach to housing and housing numbers, which would contribute significantly to the total for the wider site allocation area. It continues to be considered that the Neighbourhood Plan would be better defined and more realistic if it were to be aligned with the Council's final option and approach to delivery when this is known. This would also be likely to change the LLDC's view on general conformity with the strategic policies of the Draft Revised Local Plan.

I trust that the above clarifies the LLDC position in respect of this matter.

Your sincerely



Alex Savine
Head of Planning Policy