

# INDEPENDENT EXAMINATION OF THE GREATER CARPENTERS NEIGHBOURHOOD PLAN

EXAMINER: Andrew Mead BSc (Hons) MRTPI MIQ

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Examination Ref: 02/AM/GCNP

11 December 2019

Dear Mr Haberlin, Ms Milosev and Ms Pomfret

## GREATER CARPENTERS NEIGHBOURHOOD PLAN EXAMINATION

After reading the Greater Carpenters Neighbourhood Plan (the Plan/GCNP) and its supporting evidence, including the responses to the Regulation 16 consultation exercise and what I saw on my site visit, I have a number of questions for the Neighbourhood Forum (GCNF); the London Legacy Development Corporation (LLDC); and the London Borough of Newham (LBN), which will assist me in carrying out the examination.

### Questions to GCNF

1. The Consultation Statement (CS) includes the results of the pre-submission consultation under Regulation 14. However, although the CS states that comments were received from LLDC, none are recorded in the statement. Please could the Regulation 14 comments of LLDC be submitted?
2. What is the estimated current resident population of the GCNP area?
3. Policy H1 gives the highest priority to refurbishing all existing homes in the neighbourhood. Whereas refurbishment may offer the best option for prolonging the life of the existing housing stock and may well minimise the disturbance to residents in the long term, what is the evidence that such an approach would be sufficiently viable to be deliverable?
4. Policy H2 states there are 2,200 existing homes and that 300-350 empty homes will be brought back into use. What does the Plan envisage will be the role of the three tall buildings (James Riley Point, Lund Point and Dennison Point)? To what extent do they currently contribute to the existing housing numbers, and will do so in the future?
5. Policy H2 states that the target is to provide 650 new homes, with a presumption that they will be in blocks of up to 8 storeys.
  - (a) What is the justification for the limit of eight storeys? If the limitation is policy based, what are the specific policies and their status?
  - (b) What would be the potential increase in housing numbers should the limitation be increased to 10 storeys? (See LLDC Revised Local Plan paragraph 12.5 and Table 12)?

(c) Given the development principles of the adopted LLDC Local Plan and the emerging LLDC Revised Local Plan for Site Allocation SA3.4: Greater Carpenter District, is there scope for significantly taller buildings at any, or all, of locations A, B, D, E and F on Figure 4.6, or elsewhere in the Plan area?

(d) In the response dated 5 December 2019 to my request for comments, the LLDC referred to student accommodation at Alumno Three Mills West and Duncan House. To what extent has this accommodation been included within either the existing housing numbers or future housing requirement? In this respect, I note that paragraph 5.28 of the Revised Local Plan equates 3 student bedspaces to a single home.

(e) The LLDC response above refers to Note OD6 of the Revised Local Plan Examination, which alleges shortcomings in the AECOM report on the GCNP housing options. It draws attention to the omission of sites which should have been explored to assess their potential for housing; specifically, the games area at Warton Road, the TfL triangle site in the area of the planned south-western entrance to Stratford Station and “the yard adjacent to railway lines accessed from Stratford High Street” that has been the subject of a previous significant development proposal. Why were these sites not considered as options for housing? Could any, or all, of these sites be developed for housing and, if so, how many units could be accommodated?

6. Figure 4.1 shows blocks of lock up garages in six locations on the estate.

a) What is the evidence to justify the use of the garage blocks for low cost work space in the face of the demand for additional residential development and the potential to use the space occupied by the blocks for housing?

(b) Would it be possible to integrate low cost work space into the mixed use buildings shown on Figure 4.6?

7. What is the evidence justifying (a) the exclusion of fast food takeaways within the Plan area and (b) the 333m exclusion zone around local schools?

### Questions to LLDC

8. The Revised Local Plan Site Allocation 3.4 Greater Carpenters District states that the site allocation is expected to yield a minimum of 2,300 new homes (gross). What are the assumptions on which that expectation is based?

9. Has the expectation been reduced, given recommended changes PR8 and PR10 of the Inspectors’ Report on the Examination of the London Plan 2019?<sup>1</sup>

10. The letter of 5 December 2019, paragraph 2, beneath sub-heading “Effectiveness of approach to sites for new housing”, states “...this gives a new figure of new homes for the area as 1,595 rather than 650”. I would be grateful to know the derivation of the 1,595 figure.

11. The supporting development principles within Site Allocation 3.4 include references to a new western entrance to Stratford Regional Station and improvements to the Judd Road bridge. The supporting development principles also include the safeguarding of land for the

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<sup>1</sup> View at: <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/examination-public-draft-new-london-plan/examination-public-news>

Docklands Light Railway North Route Double Tracking phase 2. I would be grateful to see a plan (or e-link) which shows the safeguarded land. The supporting development principles are in the adopted Local Plan and have been carried forward in the Revised Local Plan. I would be grateful to know whether the GCNP is considered to be in general conformity with these development principles.

### Questions to LBN

12. LLDC has forwarded to me a copy of a letter it received dated 26 September 2019 about the Carpenters Estate Regeneration Process. It was written as part of the LLDC Revised Local Plan examination process. The letter refers to residents who have a "Right to Return". I would be grateful to know approximately how many former residents have a Right to Return and where they are located, for example, within the London Borough of Newham and/or the LLDC, or further afield?
13. The letter of 26 September also referred to five workshops, at which options for the Carpenters Estate were discussed. I would be grateful to know the details of the options which were discussed and, especially, the outcome of the further workshop which was to have been held in October where the architects' original proposals were to have been updated. I have not seen the original proposals and trust they are included in the details of one of the workshops.

I would be grateful if you can provide a written response by **Monday 6 January 2020**.

In the interests of transparency, may I prevail upon you to ensure a copy of this letter is placed on the Neighbourhood Forum and local authority websites.

Thank you in advance for your assistance.

Your sincerely

*Andy Mead*

Examiner