

INDEPENDENT EXAMINATION OF THE GREATER CARPENTERS NEIGHBOURHOOD PLAN

EXAMINER: Andrew Mead BSc (Hons) MRTPI MIQ

Andrew Mead
Examiner
Greater Carpenters Neighbourhood Plan

Examination Ref: 02/AM/GCNP

9th January 2020

Dear Mr Mead,

GREATER CARPENTERS NEIGHBOURHOOD PLAN EXAMINATION

The Greater Carpenters Neighbourhood Forum sets out below our replies to your questions to us below, under each question. Please do not hesitate to contact us if you have any further queries about anything.

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?*

Although many comments and observations were received from LLDC at and subsequent to meetings, as outlined in the Consultation Statement, they did not make a formal response to the consultation under Regulation 14. Our apologies that it states erroneously on page 21 that a response was received from LLDC as well as the three other statutory bodies who did respond.

2. *What is the estimated current resident population of the GCNP area?*

We estimate the current resident population is about **7,207**. This is based on Newham average occupant numbers (three per household) excluding the student housing at Duncan House and Alumno and multiplied by number of households.

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?*

Although the situation has tended to change quite rapidly, due to changes in the political and planning context, at present, based on recent meetings of the Forum with the Mayor of Newham and Newham Council officers, we have grounds to hope that a substantial harmonisation is possible between our proposed Neighbourhood Plan and the Council's emerging proposals for the area. This is due to the significant concurrence of some of the options being prepared by the Council for resident approval with our Neighbourhood Plan (Options 1 and 2A out of the four options presented to residents in October 2019). We are optimistic about the possibilities of further dialogue with the Council and liaison with residents.

In addition, the consolidated changes to policy H10 AB of the draft new London Plan make it

clear that before considering the demolition and replacement of affordable homes, boroughs should always first consider alternative options. The supporting text of Policy H10 states that boroughs, housing associations and partners need to balance the potential benefits of demolition and rebuilding against the wider social and environmental impacts. This is similarly set out in the Mayor of London's Good Practice Guide on estate regeneration. The Forum has taken care to observe this – which is not the case with previous, now abandoned Newham Council plans, nor, we believe, with the LLDC's idea of 2,300 new homes on the estate.

With regard to future Newham Council plans, our consultations and communication with residents lead us to believe that residents are very likely to favour options that include minimal demolition. We think an option including substantial or complete demolition of Carpenters estate would have a poor chance of being supported in a residents' ballot.

We think it appropriate here to address the assertion in the LLDC's letter of 5th December 2019, giving their view of the Neighbourhood Plan, that "the majority of those attending [*the Mayor of Newham's consultation meetings for Carpenters estate residents*] do not appear to have a connection with the Forum." We wonder what evidence this view is based on? At one meeting, we pointed out to the Mayor that at least 28% of the resident attendees were Forum members (there may have been many more resident attendees who had responded to our consultation).

While acknowledging that the Forum has made significant effort to seek support for the Plan through consultation, the LLDC state "the nature of that engagement and its focus has nevertheless led to a wider question over the inclusiveness and effectiveness of the Forum's engagement with the residents of the estate and the neighbourhood area as a whole."

The 256 responses to our consultation should lay any such question to rest. The suggestion that the Forum has in some way neglected the needs of the wider area or the residents and businesses there can have absolutely no basis. We have made strenuous efforts to inform and consult every resident and stakeholder, and have many members and supporters among the Greater Carpenters Area outside the Carpenters estate. It is natural that residents of the estate are more engaged on average than others, as their very homes have been threatened by previous plans. The future of Carpenters estate understandably and rightly remains the most important issue for Forum members, including those living outside the estate.

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?*

Our Plan foresees the three high rise blocks as providing vital homes to the local community, and of a suitable, sought-after type, especially social housing, which is in very short supply. We count a total of 434 flats in these three blocks (Lund Point - 168; Dennison Point - 134; James Riley Point - 132). Most of these are of a spacious size which are sought after, in contrast with many newer buildings, with rather smaller room sizes. Lund Point has a larger proportion of one- and two-bedroom flats than the other two.

The large majority of these homes are empty at present, due to the previous policy of Newham Council to decant them with a view to demolition of the estate. There are only about 50 households still living in the 434 flats now. We know that many former tenants would like to return after refurbishment. Most of those remaining are leaseholders, who want to remain in their present home, justly fearing that they will not receive sufficient

compensation to enable them to purchase an equivalent home anywhere nearby.

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?

The eight-storey limit was based on consultation with residents. Most dislike the idea of more very tall buildings nearby, surrounded as they are on at least two sides by rows of high rises. Issues that are raised include possible sunlight blocking, creation of wind tunnels, drastic and unwelcome changes to the character of the area and insufficient social and other infrastructure to support such a large number of new homes.

However, our regulation 14 consultation highlighted that some would see some higher buildings on the perimeter of the estate by the railway lines as providing increased much-needed additional housing, and are aware of the many pressures to allow increased housing provision.

(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)?

It's difficult to estimate. A maximum of 10 storeys would not mean all 5 sites in figure 4.6 reaching this threshold. It could be possible on sites A and E which are by the railway line, but the other sites would need to respect the prevailing height of the estate which is 3-5 storeys.

(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?

There could be scope for taller buildings in location A, B and E. These locations are along the railway line, so taller buildings would be less intrusive here than elsewhere. At D and F, local residents are likely to fear overshadowing and other disadvantages. Newham Council's options 1 and 2A propose a range of building heights for new housing of 4 – 15 storeys. The Forum has considered this and would suggest the Neighbourhood Plan could align itself with this range, thereby achieving new development that is low rise in the heart of the estate and up to 15 storeys by the railway lines. This would apply to all new development (see answer below) and not just the sites in figure 4.6.

(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.

We have not counted this student accommodation towards the total new homes in our Plan, as these went ahead prior to the Plan. Since these have already been built, they should be added to the number of existing homes. The document LD33 in the examination of the LLDC Local Plan provides numbers of units at Duncan House as 511 student housing and at the Alumno on the High Street as 455.

(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?

The games area was not considered as suitable for new development by the Forum because residents were unwilling to see green and recreational space lost. Surrounded as we are by dense development, we are anxious to preserve the limited space remaining. Green and recreational space is also vital for human well-being.

We became aware of the potential of the TfL owned triangle site for development only quite recently, after our formal consultation and Plan preparation – we had assumed it was essential infrastructure for public transport needs beside Stratford Station. Discussions at our meetings indicate that the Forum may be happy to see this site developed, and to a considerable height. This may be appropriate given its location, without the danger of sunlight blocking or other interference for existing residents. We would think provision could be made for at least 80 or 100 homes here, possibly substantially more.

The yard adjacent to the railway lines and accessible from Stratford High Street was not discussed, but residents would be unlikely to have strong objections to possible development at this site, at least not unless an extremely tall building was proposed.

Following our responses to the above questions, we would suggest a rewording of Policy H2 ‘New Homes’:-

The target is to provide 1,000 new homes in total. 650 new homes will be provided through sensitive infill of the Carpenters estate (for their locations, see figure 4.6 on site allocations) and will be additional to the existing social rented housing rather than their replacement.

350 new homes will be provided outside of the Carpenters estate by the railway lines, in sites such as 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.

The building heights of new housing will range from 4 - 15 storeys, respecting the prevailing heights of the Carpenters estate, but with the opportunity to build up to 15 storeys by the railway line and at the periphery of the estate.

In case any of the sites in figure 4.6 cannot be brought forward, one or more of the garage sites in figure 4.1 will be considered for low-rise mixed-use development, subject to full consultation with local residents.

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?

Retention of the garage blocks was based on wishes of local residents with cars for whom the garages are a necessary and valuable asset. To make more use of the land, we proposed the addition of low-cost workspace above the garages and this was supported in the consultation as it enhanced opportunities for small businesses in the area. Local businesses are part of the Neighbourhood Forum and they feel threatened by development proposals which are not sensitive to the need to preserve the existing employment floorspace on the estate. Site E on Rowse Close involves the loss of employment land and the Neighbourhood Plan seeks to re-provide this above the garages.

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

This may be possible, on the ground floors. However, local people consulted on this issue liked the idea of genuinely low cost work spaces for starter businesses, many of whom would be unlikely to be able to afford the rents typical for the ground floor commercial space in otherwise residential accommodation. Therefore, the Forum would be loath to see these garage blocks all swept away to make room for housing. Carpenters estate has always had a complement of commercial and business activity, and residents have indicated they would like this continued, and not destroyed to make way for unreasonably dense housing. It has been pointed out that the garages are very narrow areas unsuitable for housing, except the garage site opposite the pub.

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?*

a) Local residents contributing to drawing up of our Plan were in favour of these measures, drawing on their own experience. Fast food takeaways attract loitering youths, including late into the night, leading to nuisance and anti-social behaviour; they are big sources of litter, and we often see rats nearby feeding on discarded food. Residents are keen to help prevent temptation for children and youths to poor diet (as many get into the habit of eating this unhealthy but tasty food every day), increasing lifetime risk of weight gain, obesity, diabetes and heart and cardiovascular disease.

b) Residents, for the same reasons as above, want to keep the fast food outlets at a reasonable distance away to help avoid temptation of children. In short, we regard the outlets as a threat to children's and young people's health, and a nuisance to everyone. Policy support for our position is provided by Policy E9 of the New London Plan which states "Development proposals containing A5 hot food takeaways should not be permitted where they are within 400 metres walking distance of primary or secondary schools".