

Greater Carpenters Neighbourhood Forum – our suggested changes to the further proposed modifications to the LLDC Local Plan

Matter 5 – Housing

Further Modification M29 (p.61, para. 5.21).

A) We propose to add at end ‘All social, affordable rent and intermediate housing should be managed by a local authority or private registered provider.’

Further Modification M30 (p.62, policy H.3).

A) We propose to replace ‘The Legacy Corporation will support the provision of new older persons’ accommodation to meet the identified annual benchmark of 17 per annum within C2 or C3 use classes which will be acceptable where...’ with ‘The Legacy Corporation will support the provision of 108 new older person’s accommodation per annum, equivalent to 5% of the London-wide benchmark...’

Further Modification M31 (p.62, para 5.23).

A) We propose to add ‘The excellent transport accessibility within the LLDC lends itself to delivering a near to equivalent of the average borough 6.5% London benchmark.’

Matter 12 – Site allocation 3.4 – Greater Carpenters

Further Modification M36 (p.277).

A) We propose to replace ‘2,300 homes (gross)’ with ‘650 new homes’. The sentence would then read:

‘The site allocation is expected to yield a minimum of 650 new homes with an affordable housing threshold of 35 per cent or 50 per cent on public sector land, in accordance with Policy H.2.’

Our reasons

1 – Introducing a new requirement of 2,300 homes fails the test of soundness on flexibility and deliverability. No options appraisal or delivery plan has been presented to show that 2,300 homes can be delivered within the timescale of the Local Plan.

2 – A target of 2,300 new homes is pre-empting the examination of the Neighbourhood Plan and is tantamount to deciding that the Neighbourhood Plan (with its allocation of 650 new homes) is not appropriate for this site. This would be contrary to the commitment to localism.

3 – The Transport for London-owned Triangle site was mentioned at the examination hearing as potentially yielding 1,000 new homes and therefore helping to achieve a target of 2,300. We can see the positive contribution of the Triangle site, but we would point out the Triangle is just outside the boundary of the site allocation and we have seen no evidence that this can provide 1,000 new homes (it appears to us a greatly exaggerated figure).

4 – A minimum of 650 new homes does not prevent a higher figure, whereas a minimum of 2,300 homes squeezes out many options and makes a decision in favour of large-scale demolition.

B) We propose new bullet points to ensure social and environmental sustainability.

- Proposals should seek to retain the social character and benefits of the area.
- Any proposal to demolish existing housing and facilities will require a comprehensive analysis of environmental and social costs.

Reasons

1 -A priority theme of the Local Plan (Chapter 3 – Vision) is to ensure environmental sustainability.

2 - The new London Plan requires ‘Good Growth’ to achieve sustainable development and defines this as “growth that is socially and economically inclusive and environmentally sustainable” (paragraph 1.0.1A Consolidated table of changes)

3 – The existing Carpenters estate is an oasis of calm in central London and contains many assets (Carpenters Arms public house, Carpenters and Docklands Centre, the Building Crafts College, Carpenters Primary School, a local green space) that are highly valued by the community.

4 - Demolition of existing housing and facilities and the construction of their replacement would yield high carbon and particulate emissions in an area that already far exceeds air pollution targets. This would have adverse consequences for people’s health and for climate change. These environmental and social costs should be considered alongside the financial costs when deciding whether to refurbish or demolish.