

## **Response to LLDC Local Plan Consultation**

While the draft Local Plan speaks of “legacy” and “convergence”, it is very unclear how existing and less well-off communities will genuinely benefit. The draft Local Plan seems more generally to be weighted in favour of new homes that the majority of local residents cannot afford and of new high-end jobs, to the detriment of local existing residents and businesses. This will inevitably lead to their displacement. While it is intended that the LLDC area to provide economic opportunities and resources for both surrounding communities and for London as a whole, these two aims are likely to be in tension with one another, unless there are significantly stronger measures put in place to ensure existing communities will benefit.

For example, targets for affordable housing have already been reduced from those previously promised. Original plans were for 50% affordable homes with a 70/30 social-rented / intermediate split. Applying these to East Village London would have provided 35% social-rented homes, while only 24% have been delivered – the equivalent of 311 fewer social-rented homes than originally promised. Local newspapers have recently reported that the Chobham Manor scheme will deliver 77% market homes and only 23% affordable. If this is the case, only 13% are likely to be ‘affordable’ rent homes and only about half of those (6.5%) will be near social-rents. Given that average income levels in Newham are significantly lower than the London average (£24,959 compared to £37,759 in 2009) both the proposed housing targets combined with what appears to be being delivered provides insufficient in terms of a legacy that is meaningful to existing communities.

We are particularly concerned that Carpenters Estate community continues to feel under threat from top-down plans that have already caused damage to their community, including the running down of homes on the estate, reducing the use of local businesses, facilities and amenities that we depend on and value, through dispersal of estate residents. Despite UCL plans failing, Newham council continues to move residents off the estate with no real justification for doing so. In addition at least 300 structurally sound social-rented homes remain empty on the estate while homeless families are displaced to other parts of the country and away from the support of friends and family networks in this part of Newham.

The Local Plan must set targets for jobs that are accessible for local people since in recent and local schemes delivery has been very small; for example only 300 in the case of iCity. It is essential that evidence is gathered on what has already been lost in terms of employment land and past failures to deliver local jobs that meet local need. It seems there has been insufficient consideration of the existing strengths of the local economy—in particular industrial activities--and of the potential of existing businesses to provide healthy jobs growth that local residents can access.

The following additions and changes to the draft policy would help to address some of these concerns. Further involvement and opportunities for local community groups and businesses to be involved in the co-production of key elements of the Local Plan as it moves to further stages of development would be welcomed.

**Re: Section 3 – Vision and Objectives:** The Vision must be clear that “Legacy” means benefit to existing less well-off communities and must set out how this will be measured through the monitoring of the Plan.

Objective 1 Business growth – Currently, this objective suggests that business growth will only be achieved through the location, development and expansion of new businesses. It should be amended to recognise that business growth will also be achieved through growth of *existing* businesses within the LLDC area, and include measures to support this, for example recognising the role of existing work spaces, acknowledging existing business clusters and supporting the healthy growth of existing businesses.

Objective 2 Jobs – We welcome the emphasis on *good-quality* jobs, easily accessible for local residents. In order to achieve this, however, Section 4 will need revising significantly (see below), in particular to recognise that many existing local businesses are already a source of good-quality jobs accessible for local residents. A definition of *good-quality jobs* should be included. We are currently concerned that the potential for the manufacturing, light industry and distribution sectors to provide quality jobs is under-acknowledged.

Objective 3 Housing – the first line of text should be amended to ‘secure **and protect** a wide range of **new and existing** housing types.

Objective 7 Creating inclusive places Creating inclusive places is not just about the design of places and buildings but also about facilitating active engagement in a supportive local community (on a social and democratic, as well as a physical level). Accessibility also means ensuring affordability. Objective 7 should be widened to reflect this.

Section 7.5 and Policy HBE2 on Inclusive design should also be amended to reflect this.

**Re: Section 5 - Business, economy and employment:** Overall, the LLDC’s economic policies are insufficiently grounded in an analysis of the existing local economy (data available in Section 1, for example, seems to be based on Census data and thus the local residential community, not the business community). The LLDC’s legacy and convergence objectives would suggest greater consideration of existing local businesses is needed, even where these fall outside highlighted employment hubs or protected strategic locations (Policies BEE 1–5). Existing businesses, some of which provide not only goods and services to the local population, but also for London as a whole, must be acknowledged. For example, while the Sub-Area 3 section acknowledges the mixed nature of the Carpenters Estate, the potential for the existing local businesses and education and community facilities to provide a basis for healthy growth accessible to local residents should be explored within Section 5, given the LLDC’s strategic objectives around legacy and convergence.

The policies in this section provide insufficient - if any - mechanisms by which existing local businesses will benefit from change, rather than displaced by it. Research has shown that businesses displaced by the Olympic Park developments, for example, were badly affected by the relocation process, despite compensation offered (Mike Raco and Emma Tunney, 2010). Many local businesses report little benefit from the Olympic Games themselves.

Similarly, there is insufficient attention paid to how economic development will benefit and meet the needs of local residents. We are unconvinced that the three policies out of the 11 in this section are sufficient to meet Objective 2 – more detail is needed on how quality jobs will be delivered and how residents will access them, as well as how this will be monitored. Policy BEE 9 on Jobs, Skills and Employment, for example, could go much further; it only focuses on jobs, skills and access in relation to developments generating significant construction jobs. The Building Crafts College on the Carpenters Estate should be recognised as a key asset, and existing local businesses should be supported to make

links with local training and education colleges and to employ and train local people.

It is of concern that education and related research and development are subsumed into this section, where they are given insufficient attention. We feel that these issues would be better placed and explored in more detail in the section on community infrastructure

Table 5.1 lists the 'gross direct jobs' by 2013 associated with recent and planned significant development schemes. Figures detailing the jobs displaced through these schemes should also be included, to enable net direct jobs to be calculated. Figures detailing the proportion of jobs accessed by local people should also be included, and what proportion of these jobs are 'quality-jobs', in light of Objective 2.

With the possible exception of Hackney Wick and Fish Island, the policies under-value the potential future contribution of existing strengths in manufacturing, light industry and distribution, in particular in providing good-quality jobs, accessible to local residents (Objective 2 of the Local Plan), as well as providing important services for London as a whole and the basis for more sustainable and equitable economic development.

Policy BEE 6 (Managed and Affordable Workspace) should acknowledge the role of existing workspaces in providing affordable workspace for businesses and introduce measures to prevent this being lost. Research suggests that more affordable workspace is being lost in London than is being delivered through affordable workspace policies (Jessica Ferm, 2011).

**Re Section 4: Housing:** The LLDCs evidence of housing need shows that 46% of new and additional home built should be social rented, 36% intermediate and 18% market homes. The draft Local Plan proposes: 70% market homes (four time greater than evidence suggests is needed), 18% 'affordable' rent and 12% intermediate. The Local Plan is currently insufficiently based on evidence of need.

At current available funding levels this means that that only 9% of homes delivered will be at near social-rent levels. The likely result is changed demographics to the extent that existing young lower income households are forced out of Newham / London.

The Local Plan should provide a policy on **protecting existing social-rented homes** to ensure that a maximum number of secure and genuinely affordable homes are available.

The Local Plan should also provide a policy on **empty homes** – to prevent homes being empty for more than 6 months. There are more than 300 empty homes on the Carpenters estate that, while in need of refurbishment, are structurally sound. Many of these homes have been empty for two years or more.

Any loss of social-rented homes in the LLDC area would make affordable housing targets (which must take into account any replacement homes) much harder to achieve.

Section 6.13 fails to set a target for new pitches based on a proportion of the need that has been identified for the Boroughs of Hackney, Newham, Tower Hamlets and Waltham Forest. There should be a supply of land to meet this need. The need arising from the Olympic site relocation also needs to be referenced in the Local Plan.

**Re Section 8: Infrastructure:** Policy IN1 should encourage **protection and enhancement of existing community infrastructure** as well as encouraging provision of new as part of new large scale developments. There has been poor delivery of community

and green infrastructure in some new developments (for example surrounding the Carpenters Estate). Existing social and community facilities and amenities and green spaces are vital to both the existing and to new communities.

**Re Section 9: Natural Environment:** We pleased that NE3: The Waterways suggests that the LLDC will seek to balance the use and natural functions of the waterways by seeking to maximise movement of passengers and freight. However, we are concerned that some detail is provided here that can be measured and monitored since there have been failures to increase freight transport on waterways for the Olympics despite massive public investment in a new at 3 Mills.

### **Sub-area 1 – Hackney Wick and Fish Island**

We welcome the recognition that development in this area will connect with established communities and existing clusters of businesses; similar commitments should be made in all sub-area plans in light of the LLDC's legacy and convergence objectives.

We welcome the recognition that the manufacturing and industrial activities present in this area have a role in the future economy of the area, and suggest this is explored in other sub-areas where such industries are present. The listing of these areas as strategic and other significant industrial location is welcome also. However, we are concerned that many businesses have already been displaced through development processes connected with the Olympic Games, and would urge the LLDC to monitor this carefully in future and introduce further protections where necessary.

### **Sub-area 3 – Central Stratford and the Southern Queen Elizabeth Olympic Park**

Carpenters District: A community plan has been developed by Carpenters residents, businesses and stakeholders through significant levels of consultation (including detailed consultation responses from 186 individuals from more than half the existing homes on the estate. This has been presented to the LLDC and we would like to see this section of the plan acknowledge the community plan and reflect what the existing community of this area have said they want.

Proposed amendments:

The vision for Sub-Area 3 makes no mention of existing businesses; this should be addressed to acknowledge the place of existing businesses in the future vision for the area, as is the case for existing residential communities.

Section 14.16 should include the Carpenters and Docklands Centre as a key asset, providing affordable playcare, sporting facilities, community and small business space, and with a long history of supporting the local community.

Sections 14.17 to be replaced with following:

***“The core Carpenters Estate area comprises a strong, diverse and supportive community of social tenants, leaseholders and freeholders. It provides a sustainable basis upon which to support surrounding new developments. It provides relatively good levels of green, play, social and community facilities and amenities not just servicing the immediate community but also wider and new residents. It includes existing concentrations of businesses and education and training facilities, which represent an asset for the future.*”**

***Improved links and access and physical improvements and enhancements of existing homes, community facilities and amenities will continue to benefit new and existing residents and businesses in the wider area.***” This is particularly important since there has been no, or insufficient, provision of green and play space in surrounding and relatively new developments.

Section 14.18 should be amended to: ***The local character should be enhanced through refurbishment and small scale development to retain the overall mix of business, residential and educational use. There should be no net loss of housing including social rented housing to ensure that the overall local housing supply, particularly for housing that is genuinely affordable in terms of meeting local need, is not reduced. Existing economic and community assets should be retained and supported.***

Section 14.20 should include the Carpenters and Docklands Centre and the Building Crafts College. It should be amended to focus on retention rather than re-provision of all community assets, as these are widely supported and valued by the local community.

Policy SA3.7 should be amended to refer to retention, refurbishment and enhancement – not replacement.

Section 14.3 mentions a “significant process of community engagement and stakeholder consultation”. This should be applied in relation to any refurbishment of the Carpenters Estate (not redevelopment). ‘Significant’ sounds good, but needs to be more specifically defined. The Carpenters Estate has had a long history of top down development of plans and extremely poor levels of engagement prior to the development of the Carpenters Community Plan. It would be beneficial if some guidance were produced, through detailed consultation with residents, local businesses and local community groups to allay existing fears and begin to instil confidence in the community. Incorporating the views of local residents, businesses and stakeholders in the next version of the Local Plan, as set out above, will also be important in building trust.

### **Section 16. Delivery and Implementation**

Further involvement and opportunities for local community groups and businesses to be involved in the co-production of key elements of the Local Plan as it moves to further stages of development would be welcomed.

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