

6 January 2016

# Abbey Retail Park (South), Barking

in the London Borough of Barking and Dagenham

planning application no. 15/01635/FUL

**Strategic planning application stage 1 referral**

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

**The proposal**

Demolition of existing buildings and the erection of new buildings ranging from 6 to 15 storeys in height to provide 597 residential units comprising a mix of studios, 1 and 2-bedroom flats and associated private amenity space, together with ancillary management and residents facilities, plant rooms and refuse storage areas, and the provision of flexible commercial space (Use Classes A1, A3 and B1), reconfiguration of existing vehicular access, car and cycle parking, public realm with hard and soft landscaping including dedicated child play space and other ancillary works.

**The applicant**

The applicant is **be:here Ltd** and the architect is **Broadway Malyan**.

**Strategic issues**

The principle of the redevelopment to provide commercial and residential uses in the London Riverside opportunity area is strongly supported. However, there are a number of outstanding strategic concerns relating to **housing** (notably affordable housing and residential quality) **urban design** and **transport**.

**Recommendation**

That the London Borough of Barking and Dagenham be advised that, while the principle of the proposal is strongly supported, the applications do not comply with the London Plan, for the reasons set out in paragraph 83 of this report; but that the possible remedies set out could address these deficiencies.

**Context**

1 On 26 November 2015 the Mayor of London received documents from London Borough of Barking & Dagenham notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 6 January 2016 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Categories 1A and 1C of the Schedule to the Order 2008:

- *1A: Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats.*
- *1C: Development which comprises or includes the erection of a building in respect of which one or more of the following conditions is met: a) the building is more than 30 metres high and is outside the City of London.*

3 Once London Borough of Barking & Dagenham has resolved to determine the application, it is required to refer it back to the Mayor for his decision, as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The Mayor of London's statement on this case will be made available on the GLA website [www.london.gov.uk](http://www.london.gov.uk).

## **Site description**

5 The site is located on the western side of Abbey Green, on the edge of Barking Town Centre, and adjacent to the River Roding. It comprises a number of retail warehouses and associated surface car parking. The surrounding area is mixed in character, comprising residential, retail and other commercial and employment use, and sits opposite the open space of Abbey Green and the Grade II Listed Abbey.

6 The site is approximately 700 metres away from Barking Station and is served by stops for nine bus routes nearby on London Road across Abbey Green. The site is located in a highly accessible location, with a public transport accessibility level (PTAL) of 6a (being the highest rating). Barking Station provides both Mainline (C2C) and Underground (District and Hammersmith & City) services into Central London and the Essex coast. The nearest part of the Transport for London Road Network is the A406 some 250 metres away along London Road, which itself is part of the Strategic Road Network (SRN).

7 The site is with the Barking Town Centre key development area within the London Riverside Opportunity Area, and the planning framework states that the location is suitable for high density mixed use developments with potential for tall buildings. The site also falls within the Barking Town Centre Area Action Plan (AAP) boundary and within the Barking Town Centre Housing Zone, for which the Mayor has pledged financial support to assist in the delivery of new homes.

## **Details of the proposal**

8 The proposed development will comprise of the demolition of existing retail warehouse units and the erection of new buildings ranging from 6 to 15 storeys to provide 597 units, comprising a mix of studios, 1 and 2 bed units for private rent (PRS) with associated private amenity space and ancillary uses, together with approximately 439 sq.m of ground floor commercial uses (Class A1, A3 and B1), along with reconfigured vehicular access, car and cycle parking, public realm with hard and soft landscaping and other ancillary works.

## **Case history**

9 On 28 September 2015 a GLA pre-application meeting was held at City Hall to discuss this scheme. The advice issued on 12 November 2015 stated that GLA officers supported the principle of a high density residential-led development, but flagged concerns with the residential quality, ground floor layout and the proposed relationship with the River Roding. The applicant was

strongly encouraged to take steps to respond to these strategic issues prior to the submission of an application for the scheme. The applicant was also advised to ensure that other issues with respect to affordable housing and viability, children's play space, energy, transport, flooding and inclusive access were appropriately addressed by the planning submission.

10 The northern portion of Abbey Retail Park has a current planning permission for the demolition of the existing retail sheds and the construction of a new retail superstore (Class A1) of 9,544 sq.m and a self-contained retail pod (Class A1 – A3) of 372 sq.m, together with 419 car parking spaces, new vehicular access and highway works, improvements to the river bank and other landscaping, approved on 16 December 2014. (LPA ref: 13/00852/FUL, GLA D&P ref 2416a).

## **Strategic planning issues and relevant policies and guidance**

11 The relevant issues and corresponding policies are as follows:

- |                           |   |
|---------------------------|---|
| • Land use principles     | <i>London Plan; London Riverside Opportunity Area Planning Framework; Town Centres SPG</i>  |
| • Housing                 | <i>London Plan; Housing SPG; Housing Strategy; draft Interim Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG</i> |
| • Affordable housing      | <i>London Plan; Housing SPG; Housing Strategy; draft Interim Housing SPG</i>  |
| • Density                 | <i>London Plan; Housing SPG; draft Interim Housing SPG;</i>   |
| • Urban design            | <i>London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG</i>  |
| • Blue Ribbon Network     | <i>London Plan;</i>   |
| • Inclusive Access        | <i>London Plan; Accessible London: achieving an inclusive environment SPG;</i>  |
| • Flooding                | <i>London Plan;</i>   |
| • Sustainable development | <i>London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy</i>    |
| • Transport and Parking   | <i>London Plan; the Mayor's Transport Strategy;</i>   |
| • Crossrail               | <i>London Plan; Mayoral Community Infrastructure Levy</i>   |

12 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is Barking and Dagenham Council's Core Strategy (2010), the Development Control Policies Development Plan Document (2011), Barking Town Centre Area Action Plan (2011), and the 2015 London Plan consolidated with alterations since 2011.

13 The following are also relevant material considerations:

- Minor Alterations to the London Plan: Housing Standards and Parking Standards (Draft 2015)
- London Riverside Opportunity Area Planning Framework (Adopted September 2015)
- The National Planning Policy Framework, Technical Guide to the National Planning Policy Framework and National Planning Practice Guidance.

## **Principle of development**

14 The site is within Barking Town Centre, identified in the London Plan as a ‘Major Town Centre’. London Plan Policies 2.15, 4.7 and 4.8 promote new commercial, leisure and housing uses in these locations. London Plan Policy 3.3 seeks to increase London’s supply of housing and in doing so sets borough housing targets, of which Barking and Dagenham’s annual target is 1,236 additional homes per year between 2015 and 2025, which the proposals will contribute towards. The Housing Zone designation for the wider town centre also supports the accelerated delivery of new homes.

15 The site is also located within the London Riverside Opportunity Area as designated on London Plan Map 2.4 and Annex 1. London Plan Policy 2.13 states that development in Opportunity Areas is expected to maximise residential and non-residential densities and to contain a mix of uses. The London Riverside Opportunity Area Planning Framework (OAPF) indicates the potential for significant intensification for housing through consolidation and intensification of industrial activities to free up land for housing, identifying an indicative capacity of 16,000 new jobs and a minimum of 26,500 new homes over the plan period to 2035. The OAPF identifies Barking Town Centre as a key development area suitable for high density development with tall buildings and mixed uses. The Council’s Area Action Plan for Barking Town Centre also highlights and promotes the town centre for high density developments with potential for tall buildings, subject to sensitivity around heritage assets such as Barking Abbey.

16 The proposal for high density residential-led mixed use development with tall buildings, is therefore wholly consistent with the policy aspirations for this area and has strong strategic support in principle, subject to meeting design quality both in terms of the built form and the residential quality, and this is discussed in greater detail in the urban design section.

## Housing

### Proposed residential mix and private rented sector housing

17 The application proposes 597 residential units in total, which is equivalent to just over 48% of the borough’s annual monitoring housing target as defined by the London Plan. The proposed delivery of these new homes is strongly supported in accordance with London Plan Policy 3.3.

18 The application proposes solely private rented sector (PRS) housing. The table below sets out the proposed residential schedule.

unit type	total	% of total scheme
studio	79	13
1 bed	294	49
2 bed	224	38
<b>total</b>	<b>597</b>	<b>100.0</b>

Table 1: proposed unit mix

19 London Plan Policy 3.8 (Housing Choice) and emerging guidance within the Mayor's draft Interim Housing SPG identify PRS housing as addressing a distinct need, and recognise that the model is becoming increasingly important in terms of supporting labour market mobility. The draft SPG notes that PRS housing may be particularly suitable in instances of town centre intensification, and in locations benefiting from good transport connectivity. Noting the particular characteristics of this site, the proposed PRS housing offer is supported in strategic planning terms.

20 Both the Council and the GLA through the OAPF and the Housing Zone allocation are keen to rebalance the community in Barking Town Centre, where there is a greater presence of social rent over other tenures. The Council and the GLA are therefore seeking to introduce other types of tenures such as shared ownership, intermediate rent, starter homes and private tenures including PRS. The proposal for PRS units is therefore consistent with this strategic objective, subject to the viability evidence to demonstrate maximum reasonable amount of affordable housing (see below). With regards to covenants for the PRS units, the draft S106 Heads of Terms are noted. GLA officers would draw attention to the Interim Housing SPG (paragraphs 3.1.24 – 3.1.25) and would consider a covenant of at least 15 years to be appropriate for long term PRS.

### Affordable Housing

21 London Plan Policies 3.11 and 3.12 require the maximum reasonable amount of affordable housing to be delivered in all residential developments above ten units, taking into account; the need to encourage rather than restrain development; the housing needs in particular locations; mixed and balanced communities, and; the specific circumstances of individual sites. The tenure split suggested by the London Plan is 60% social/affordable rent and 40% shared ownership. The NPPF, the Mayor's Housing SPG and the London Plan clearly state that to maximise affordable housing in London and provide a more diverse offer for the range of people requiring an affordable home, the affordable rent product should be utilised in the affordable housing offer in residential developments. The Council's approach to affordable housing follows the same approach as the London Plan, requiring maximum reasonable determined through development viability.

22 At the time of writing, no affordable housing offer has been proposed and no Financial Viability Assessment has been submitted for consideration. We understand this material is being prepared and will be submitted to the Council for independent review during the determination period. GLA officers will update the Mayor on the position at Stage 2.

### Housing Mix

23 London Plan Policies 3.8, 3.9 and 3.11 and the Mayor's Housing SPG all seek to ensure that mixed and balanced communities are created in new development through, for example, the provision of a mix of tenures and unit sizes across development, including the priority need for family sized units.

24 Table one provides the indicative unit mix at this stage, which shows that the development will provide only studios, one and two bedrooms apartments. Whilst the Mayor is keen to ensure that there is adequate provision for family sized accommodation in new development, the borough of Barking and Dagenham already has a good proportion of family houses which will increase with further phases of Barking Riverside. It is understood that the Council has a particular need for smaller units, especially within the town centre, where this site is located. In this instance therefore, the indicative unit mix is considered acceptable in strategic terms.

25 In addition, as noted above, the Council and the GLA are keen to rebalance the community in Barking Town Centre. Accordingly, the provision of PRS units for smaller households is supported in strategic terms.

## Residential Density

26 London Plan Policy 3.4 requires development to optimise housing output for different locations taking into account local context and character, design principles set out in London Plan Chapter 7 and public transport capacity. Table 3.2 provides the Sustainable residential quality (SRQ) density matrix in support of this policy. Based on the characteristics of the location, the site is within a 'central' setting being within a major town centre, with a high PTAL. For a 'central' setting with a PTAL of 6, the density matrix suggests a residential density in the region of 650-1,100 habitable rooms per hectare.

27 The developable gross site area is 1.286 hectares of which 98.97% is proposed for residential use. As such, the residential density equates to 469 dwellings per hectare or 1,057 habitable rooms per hectare (based on the methodology set out within Paragraphs 1.3.62 - 63 of the Mayor's Draft Interim Housing SPG 2015). The proposed residential density is supported in strategic planning terms.

## Children's play space

28 Children and young people need free, inclusive, accessible and safe spaces offering high-quality play and informal recreation opportunities in child-friendly neighbourhood environments. Policy 3.6 of the London Plan states that development proposals that include housing should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs.

29 Based on the residential mix set out in table 1 above, and applying methodology within the Mayor's Play and Informal Recreation SPG, GLA officers have calculated an expected child yield for the scheme of 27. Accordingly, the proposal would need to accommodate an overall play space requirement of 270 sq.m. in order to meet the 10 sq.m. per child standard sought by the SPG. It should be noted that these figures are based on a wholly private development because it is not known at this stage what the affordable unit mix is. The methodology should be re-applied once there is a confirmed unit schedule, and the required playspace planned for accordingly.

30 The submitted design and access statement sets out the proposed play strategy for the scheme, and identifies that the scheme could accommodate up to 2,000 sq.m. of playspace for children within the development, far in excess of what would be required. Possible equipment to be provided is set out, including objects integrated within the hard landscaping strategy and possible timber trim trail.

31 GLA officers would broadly support the proposed play strategy in accordance with London Plan Policy 3.6 and the SPG. Details of any formal equipment to be provided, should be secured via condition.

## Residential quality

32 London Plan policy 3.5, Table 3.3 and Annex One of the Housing SPG set out requirements for the quality and design of housing developments, including minimum space standards for new development. These include the requirement for all units to meet or exceed the minimum floor space and floor-to-ceiling height standards, together with relevant wheelchair housing standards.

33 At pre-application stage, GLA officers raised concerns with the proposed residential quality and noted that whilst the units would be initially delivered as PRS, there would be no certainty as to whether they would remain in PRS in the long-term, and a suitably high residential quality would need to be assured. Explicit comments were made in relation to the

quantity of single aspect units (particularly those with a northerly aspect only) and the number of proposed units per core.

34 Whilst it is noted, and welcomed, that the units meet the minimum space standards within Table 3.3 and Lifetime Homes standards, there are a number of areas where GLA officers feel the proposals could be improved to ensure a far better internal environment for residents, regardless of tenure.

35 In particular, the following areas are highlighted for consideration by the applicant and their design team:

Floor to Ceiling heights	The minimum floor to ceiling height in habitable rooms should be 2.5m between finished floor level and finished ceiling level. It is not clear from the submitted documentation what the proposed floor to ceiling height is. This should be confirmed. Given the density of the development, the propensity of single aspect units, GLA officers would expect the minimum of 2.5m to be met to help increase daylight into the units.
No. of units per core	As stated at pre-application stage, GLA officers raised concerns that the majority of the cores served more than 8 units, and did not comply with the requirements of the Housing SPG. Although some improvement has been made, GLA officers feel this has not been resolved and that further modest revisions could achieve significant improvements.
Internal corridors	Annex One of the Housing SPG states internal corridors should receive natural light and adequate ventilation, where possible. GLA officers consider there are opportunities to introduce windows into corridors, notably Blocks A2, B2 and D2, and this should be explored.
Windows	It is noted that the majority of kitchens do not have windows and this manifests externally with a number of blank facades. Given the site has two notable assets to the east and west, with the River Roding and Abbey Grounds, GLA officers would like to see glazing increased to improve the amenity for future occupiers and address the number of blank facades, raised in the urban design comments.
Individual units	GLA officers are concerned with a number of the individual units, notably those which sit within the corners of the horse shoe in Blocks A2 and B2. This is borne out within the Daylight & Sunlight Assessment, where the flat denoted as N7 fails the target ADF level. This should be revisited by the applicant.

36 In summary, GLA Officers feel the existing internal layouts could be improved significantly to provide better residential accommodation. Whilst some effort has been made post pre-application meeting with GLA officers to resolve some of the concerns raised, these should be taken further. Simple changes including the introduction of glazing into corridors and kitchens, amending the layout to address the issue of cores would help to create a better standard of residential accommodation.

37 GLA Officers would be happy to meet with the Council and applicants to discuss possible changes which could be made to improve the proposal and meet the standards within the Mayor's Housing SPG.

### Urban Design

38 The key design policies for the site are set out in Chapter 7 of the London Plan. Noting the scale of development, London Plan policy 7.7 sets out specific design requirements for tall and large-scale buildings, which are defined as buildings that are significantly taller than their surroundings and/or have a significant impact on the skyline and are larger than the threshold sizes set for the referral of planning applications to the Mayor. Policies 7.10 and 7.11 set out the Mayor's approach to protecting the character of strategic landmarks as well as London's wider character.

39 As noted earlier in this report, the principle of a high density development with tall buildings is supported in this location. The design and layout of the scheme is well thought out to maximise permeability through the centre of the site where a new public route is proposed, which will connect the river edge on the western side with the open space surrounding the Barking Abbey on the eastern edge. The central route will also be well activated with commercial uses, which is welcome.

40 The height strategy and the way in which mass has been distributed on the site is logical with the tallest element adjacent to the river edge, and the lower parts along Abbey Road due to the sensitive setting of the listed Barking Abbey. Special regard has been given to the setting of the listed Barking Abbey as required by s.66 of the Planning (Conservation Areas and Listed Buildings) Act 1990.

41 The layout, massing and height strategy is broadly supported. There is no strategic concern with the architectural detailing and materials; however there is a concern with the quantity of blank façade and this is picked up in Paragraphs 35 in the discussions on residential quality and increasing levels of daylight into the cores and living areas of the proposed residential accommodation.

42 GLA officers are pleased that revisions were made to the scheme following pre-application discussions, notably improvements to the relationship with the River Roding in terms of increasing activity at ground floor level and reconfiguration of ground floor uses around the courtyards. GLA officers would challenge the applicant to go further in terms of improving the courtyards, which are currently dominated by car parking and service uses, and noting the comments from TfL regarding under provision of cycle parking, would encourage the applicant to think creatively in terms of cycle storage provision, including cycle shelters to 'activate' these courtyards and provide openings within the cycle storage rooms to allow natural light and increase passive surveillance. The River Walk should utilise high quality hard and soft landscaping (details to be secured by condition) and offers the opportunity to create a real asset for this development and the wider area.



43 In considering the courtyards and servicing in a development of this density, waste storage, particularly recycling, needs to be carefully considered. Higher density development in other parts of Barking & Dagenham have experienced problems in dealing with this issue and the applicant should set out how they will address this.

44 On the northern edge, the site adjoins the Abbey Retail Park North site, where there is consent to build a Sainsbury's food store. The proposal immediately adjoins the footpath and the main access road into the Sainsbury's car park and at pre-application stage, GLA officers suggested this frontage should be activated. Whilst it is accepted that front door access to duplex units to activate the frontage (as is proposed on the Abbey Road elevations) was unable to be delivered due to commercial arrangements, GLA officers requested that the quantity of glazing was increased to help ensure overlooking onto this route. GLA officers would re-iterate this request to increase glazing on this elevation, in line with our comments on enhancing residential quality, unless doing so would create potential amenity issues for residents in relation to operation of the Sainsbury's food store.

45 Overall, in tandem with the comments on residential quality, GLA officers feel further improvements can be made to deliver a better scheme for future residents and meet the aspirations of the London Housing Design Guide and Interim Housing SPG. GLA officers would be happy to engage in constructive discussions with the Council and applicant's team on how these could be delivered.

## **Inclusive design and access**

46 Inclusive design principles if embedded into the development and design process from the outset help to ensure that all of us, including older people, disabled and deaf people, children and young people, can use the places and spaces proposed comfortably, safely and with dignity. The aim of London Plan Policy 7.2 is to ensure that proposals achieve the highest standards of accessibility and inclusion, not just the minimum.

47 London Plan Policy 3.8 currently requires all new housing to be built to 'Lifetime Homes' standards, and expects at least 10% of units to be wheelchair accessible or easily adaptable. However, in order to bring the London Plan into line with new national housing standards, the draft Minor Alterations to the London Plan propose to replace this with a requirement that 90% of units meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings' and the remaining 10% of units meet Building Regulation requirement M4(3) 'wheelchair user dwellings'. The Council and the applicant should be mindful of this when drafting any related planning conditions and/or obligations.

48 Reference is made within the Planning Statement and Design & Access Statement to providing 10% of units as wheelchair accessible/adaptable across the development and all of the proposed units will meet Lifetime Homes standards. This should be secured via condition or legal agreement

49 The development has predominantly level access throughout and a ramped access from Abbey Road is required to take into account the change in levels from the street. On the whole, the scheme complies with London Plan policy 7.2 and is acceptable in this regard.

## **Sustainable development**

### Energy

50 The application has been submitted with an energy strategy which outlines the approach to carbon reductions following the London Plan Policy 5.2 energy hierarchy. In relation to the 'lean' stage, a range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include mechanical ventilation with heat recovery and low energy lighting.

51 The demand for cooling will be minimised through external and internal shading, openable windows and solar control glazing. Active cooling will not be provided. The applicant has carried out an overheating assessment and has demonstrated that the dwellings are not at risk of overheating under current weather conditions. A small risk of overheating was identified when modelling a 2050 climate scenario but the applicant has identified that this could be addressed by retrofitting external louvres for additional solar shading.

52 The development is estimated to achieve a reduction of 19 tonnes per annum (3%) in regulated CO<sub>2</sub> emissions compared to a 2013 Building Regulations compliant development. Sample DER and TER worksheets and BRUKL sheets have been provided to support the savings claimed.

53 In relation to the 'clean' stage of the hierarchy, the applicant has identified that the site is within the Barking Town Centre district heating opportunity area but has stated that liaison with Barking and Dagenham energy officers suggests that there are currently no plans for imminent delivery of the proposed network. Evidence of correspondence should be provided.

54 The applicant has provided a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available.

55 The applicant is proposing to install a site heat network connecting all domestic and non-domestic building uses on site. A drawing showing the route of the heat network linking all buildings on the site has been provided.

56 The site heat network will be supplied from a single energy centre, which will be 176m<sup>2</sup> and located at ground floor level in the north west block (Block B).

57 The applicant is proposing to install a 124 kW<sub>e</sub> gas fired CHP unit as the lead heat source for the site heat network. The CHP is sized to provide the domestic hot water load, as well as a proportion of the space heating. A reduction in regulated CO<sub>2</sub> emissions of 137 tonnes per annum (25%) will be achieved through this second part of the energy hierarchy.

58 Preliminary heat profiles and engine sizing have been provided to support the savings claimed. The engine size appears large relative to the savings claimed, so it is recommended that the engine size is reviewed as the design progresses.

59 In relation to the final 'green' stage of the hierarchy, the applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install 84kWp of solar PV on the roofs of the buildings. A roof plan has been provided showing the proposed installation. A reduction in regulated CO<sub>2</sub> emissions of 40 tonnes per annum (7%) would be achieved through this third stage of the hierarchy.

60 Overall, a reduction of 196 tonnes of CO<sub>2</sub> per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 35%. This exceeds the target within Policy 5.2 of the London Plan.

## Water

61 A Flood Risk Assessment (FRA) accompanies the application and confirms that the site is within Flood Zone 1, despite bordering the River Roding. The FRA also confirms that the site is at low risk of surface water although has a medium risk of groundwater flooding. For the latter reason the FRA suggests that potential waterproofing of the ground floor slab and designing that slab for uplift pressures should be considered. The development is therefore acceptable in principle, in accordance with London Plan policies 5:12.

62 The flood risk assessment states that surface water will be discharged directly to the adjacent River Roding. The FRA also states that 660m<sup>3</sup> of attenuation will be built below ground level in order to attenuate a storm event that coincides with a high tide. It is considered that this storage volume could be reduced or removed with a more imaginative design solution to the site's drainage; however there is no objection to it.

63 The proposals are considered to comply with the requirements of London Plan Policy 5.13 and should be secured by appropriate planning conditions.

## **Transportation**

### Trip Generation

64 TfL confirms that the methodology for the Traffic Assessment (TA) is appropriate and the mode split is a valid assessment. The network impact is likely to be satisfactory.

### Car Parking

65 It is proposed that 82 car parking spaces will be provided, to include 69 residential spaces, 7 spaces for the commercial uses and 6 visitor spaces with 10% provision for disabled users, 10% fitted with active Electric Vehicle Charging Points (EVCPs) and 10% passive EVCPs. TfL requests clarification of the exact number of Blue Badge parking and expects 59 Blue Badge spaces to be provided for the residential accessible units equating to a ratio of 1 space per accessible unit in order to meet the requirements in the Accessible London SPG. Additionally, TfL requests that 20% active EVCPs and 20% passive EVCPs are provided for the 69 residential spaces as required by the London Plan for residential uses. This should be secured by condition.

### Cycle Parking

66 The proposed number of cycle parking provision does not meet the London Plan (2015) cycle parking minimum standards requirement. The total requirement generated by the uses on the site is 821 long-stay and 14 short-stay spaces, but the applicant proposes only 597. TfL would recommend that 238 additional parking spaces should be provided for the residential uses. TfL confirm that they would not count storage spaces for folding cycles towards this allocation, given it is highly likely people will store these within their residences.

67 The proposal does not mention which type of cycle stands will be provided (e.g. Sheffield stands or two-tier stands). If two-tier stands are provided, it is recommended that they should have a mechanically or pneumatically assisted system for accessing the upper level, as many people find using these spaces difficult. The product must also allow for double-locking, which can be difficult when using two-tier stands.

68 Note that the London Plan refers to the need for 'easy access' and catering 'for cyclists who use adapted cycles'. This is an accessibility requirement; therefore the applicant should outline how these standards are met.

### Cycle Hub

69 The suggestion of more cycle parking spaces via a cycle hub is welcomed. However, TfL would like to see a detailed proposal for a cycle hub in this location. The provision of the cycle hub and associated management arrangements should be secured through the section 106 agreement.

#### Car Club

70 3 of 69 residential car parking spaces will be designated as Car Club spaces. However, TfL would suggest that the developer should provide 3 years free membership to all residential units as a means to reduce the reliance on a private vehicle. This should be secured within the Section 106 Agreement.

#### Pedestrian & Cycle Access

71 While the PERS audit is welcome, there is further scope for improving the pedestrian environment and addressing the relatively poor collision record, particularly the junction of Abbey Road and London Road. Therefore, a more detailed analysis could identify any trend in collision causes and indicate potential mitigation measures.

72 TfL requests a Cycling Level of Service (CLOS) assessment to be undertaken in order to identify where mitigation may be needed to improve the cycle network, especially on Abbey Road. It is likely that, in spite of the existence of signed routes, local improvements would be needed in this location to encourage more people to cycle.

73 To encourage access to the site by cycle, consideration should be given to linking into a significant improvement that TfL and the London Borough of Barking & Dagenham have committed to make to cycle infrastructure in the area. A link will be built between the existing Cycle Superhighway 3 on Newham Way to an improved east-west route for cyclists on Longbridge Road, via Barking town centre. The provisional alignment is Jenkins Lane - Fleet Road - Highbridge Road - Town Quay, before crossing Abbey Road, just to the south of this site, and continuing across Abbey Green to the town centre. Consideration should therefore be given to the likely appearance of a new crossing over Abbey Road and to the possibility of future links into the southern part of the site through to Town Quay.

#### Wayfinding

74 There will be no need to install additional Legible London signage as part of this development. However, TfL requests that the developer should contribute to the costs of refreshing 4 local wayfinding signs in the surrounding area to integrate the new development into the Legible London wayfinding system. An estimated cost of this contribution is £2,445 and should be included in the Section 106 agreement.

#### Construction Logistics

75 TfL expects the development to be supported by a Construction Logistics Plan (CLP). This is accepted by the applicant who is committed to providing a CLP. This plan should be secured by condition and/or through legal agreement as appropriate and should accord with TfL guidance.

#### Delivery and Servicing

76 A full Delivery and Servicing Plan (DSP) should be secured by condition and produced in accordance with TfL best practice guidance. The purpose of a DSP is to effectively manage the impact of vehicles accessing the development site. The DSP should be secured by condition.

#### Travel Plan

77 TfL welcomes the submission of a draft Travel Plan and a full Travel Plan should be secured through condition or as part of the Section 106. TfL welcomes that the applicant has checked and passed the robustness of the Travel Plans by using the ATTrBuTE tool (<http://attrbute.org.uk/>).

78 In summary, due to the high PTAL nature of the proposed development, it is unlikely to have a significant impact on the surrounding highway network. However, TfL wishes to raise detailed issues relating to the quantity of cycle parking, Blue Badge parking, EVCPs, car club spaces, cycle hub and pedestrian and cycle access. Car club memberships, Construction Logistics Plan, Delivery and Servicing Plan and Travel Plan should all be secured by condition or through the s106 agreement.

### **Mayoral Community Infrastructure Levy**

79 In accordance with London Plan Policy 8.3 the Mayoral Community Infrastructure Levy (CIL) came into effect on 1 April 2012. All new developments that create 100 sq.m. or more additional floorspace are liable to pay the Mayoral CIL. The levy is charged at £20 per square metre of additional floorspace in Barking & Dagenham.

### **Local planning authority's position**

80 London Borough of Barking & Dagenham is still considering the application and expecting to take the application to Committee in March 2016.

### **Legal considerations**

81 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged or direct the Council under Article 6 of the Order to refuse the application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

### **Financial considerations**

82 There are no financial considerations at this stage.

### **Conclusion**

83 London Plan policies on principle of development, housing, urban design, inclusive access, sustainable development and transport are relevant to this application. Whilst the scheme is broadly supported in principle, the application does not fully comply with the London Plan for the following reasons:

- **Principle of development:** The proposal for high density residential-led mixed use development with tall buildings, is wholly consistent with the policy aspirations for this area and has strong strategic support in principle, subject to meeting design quality both in terms of the built form and the residential quality, and this is discussed in greater detail within the urban design section.
- **Housing:** The provision of PRS for smaller households is welcomed and will help support wider aspirations for Barking Town Centre. The covenant for the PRS should be secured by legal agreement, noting the comments in Paragraph 20. The position regarding affordable housing is currently unclear, pending the submission of a viability assessment. At this point, GLA officers are unable to offer a clear steer on London Plan compliance with regards to affordable housing. Whilst the proposed density and mix is acceptable, GLA officers have concerns with the residential quality and these are set out in Paragraphs 32 – 37. The applicant and their architects are strongly advised to revisit aspects set out within Paragraph 35.
- **Urban design:** The proposed design and layout is well-considered, with active ground floor frontages to the River Walk and public routes. No concerns are raised with the proposed approach to detailing and materials, however there is a concern with the current quantity of blank façade and it is felt this can be addressed through improvements to the internal layout and increasing glazing within the development. The internal courtyards also need to be reconsidered, as they are currently dominated by car parking and service uses.
- **Inclusive access:** The scheme complies with London Plan policies 7.2 and is therefore acceptable.
- **Sustainable development:** The proposed measures within the energy strategy meet the policy requirements of Policy 5.2 of the London Plan and should be secured by condition.
- **Transport:** Whilst TfL has no objections to the principle of the redevelopment, detailed issues relating to the quantity of cycle parking, Blue Badge parking, EVCPs, car club spaces, cycle hub and pedestrian and cycle access should be addressed. Car club memberships, Construction Logistics Plan, Delivery and Servicing Plan and Travel Plan should all be secured by condition or through the s106 agreement.

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for further information, contact GLA Planning Unit (Development & Projects):

**Colin Wilson, Senior Manager – Development & Projects**

020 7983 4783 email [colin.wilson@london.gov.uk](mailto:colin.wilson@london.gov.uk)

**Justin Carr, Strategic Planning Manager (Development Decisions)**

020 7983 4895 email [justin.carr@london.gov.uk](mailto:justin.carr@london.gov.uk)

**Jon Sheldon, Senior Strategic Planner (Case Officer)**

020 7983 5852 email [jon.sheldon@london.gov.uk](mailto:jon.sheldon@london.gov.uk)

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