

planning report PDU/0150/01

4 October 2006

## Barking Riverside

in the London Borough of Barking &amp; Dagenham

planning application no. 04/01230/OUT

### Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Act 1999; Town & Country Planning (Mayor of London) Order 2000

### The proposal

Comprehensive mixed-use development of a 180-hectare site. Proposals include up to 10,800 residential dwellings, together with retail, B1 offices, hotel, community, health and education facilities, open space, landscaping parking, transport infrastructure and remediation work.

### The applicant

The applicant is a joint venture company formed between English Partnership and Bellway Homes. The architect is Maxwan Architects and Urbanists.

### Strategic issues

The proposal to redevelop this brownfield site to provide a high quality sustainable community is supported. The application responds positively to London Plan **energy** requirements, and the need to deliver affordable **housing**. However, further work is required on **access** and **sustainability**. To ensure the delivery of key London Plan objectives, the strategies and targets within the application must be secured either by planning condition or through the s.106 agreement. There is a significant **transport** infrastructure funding gap, which will currently limit development to 4000 units.

### Recommendation

That Barking & Dagenham Council be advised that, subject to the inclusion of the required conditions and legal agreements, and revisions to the access and sustainability strategies, the proposal is acceptable in strategic planning terms.

### Context

1 On 18 January 2005 Barking & Dagenham Council consulted the Mayor of London on a proposal to develop the above site for the above uses. Under the provisions of the Town & Country Planning (Mayor of London) Order 2000 the Mayor has the same opportunity as other statutory consultees to comment on the proposal. This report sets out information for the Mayor's use in deciding what comments to make.

2 The application is referable under the following Categories of the Schedule of the Order 2000:

- 1A (a) *“Development which comprises or includes the provision of more than 500 houses, flats, or houses and flats”.*
- 1A (b) *“Development which comprises or includes the provision of flats or houses and the development occupies more than 10 hectares”.*
- 1B (c) *“Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings...outside Central London and with a total floorspace of more than 15,000 square metres”.*
- 1C (a) *“Development which comprises or includes the erection of a building.... more than 25 metres high and is adjacent to the River Thames”.*
- 1C (c) *“Development which comprises or includes the erection of a building...more than 30 metres high and outside the City of London”.*
- 2C (i) *“Development to provide a passenger pier on the River Thames”.*
- 3E (a) *“Development which does not accord with one or more provisions of the development plan in force in the area in which the application site is situated and comprises or includes the provision of more than 2,500 square metres of floorspace of class A1 (retail), B1 (office), C1 (hotels), D1 (non-residential institutions), and class D2 (assembly and leisure)”.*
- 3E (b) *“Development which does not accord with one or more provisions of the development plan in force in the area in which the application site is situated and comprises or includes the provision of more than 150 houses or flats or houses and flats”.*
- 3F *“Development for a use, other than residential use, which includes the provision of more than 200 car parking spaces in connection with that use”.*

3 If Barking & Dagenham Council subsequently decides that it is minded to grant planning permission, it must first allow the Mayor an opportunity to decide whether to direct the Council to refuse permission.

4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 has been taken into account in the consideration of this case.

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

## **Site description**

6 The application site comprises 179.34 hectares of brownfield land adjacent to the River Thames. The site is bounded to the north and north-west by housing, further north by rail land, and the A13, to the east and west by industrial and employment land, and to the south by the River Thames. The 2km river boundary is a key feature to Barking Riverside.

7 The site was previously occupied by three power stations, as well as a landfill, and was also used for tipping pulverised fuel ash, a by-product of the two coal fired power stations. Asbestos and other waste materials originating from the power stations have also been disposed of on the site. The site comprises largely vacant land, with former power station buildings, and a landfill, and is dominated by power lines running east to west and an operational switching station in the centre.

## **Details of the proposal**

8 Barking Riverside Limited, a joint venture company formed between English Partnerships and Bellway Homes, is seeking outline planning permission for a comprehensive redevelopment of a 180-hectare brownfield site. The architect is Maxwan Architects and Urbanists. The application is seeking approval for:

- a series of development parameters,
- strategic documents (including access, design and landscaping, energy and sustainability, and children's play space), and
- a package of detailed planning measures.

9 The development parameters include a detailed description of the proposal by land use to establish that:

- The total amount of residential development within Class C3 (residential) shall not exceed 10,800 units.
- No more than:
  - 19,700 sq.m shall fall within Classes A1 to A3 (retail, financial services, and restaurants),
  - 11,250 sq.m shall fall within Class B1 (offices),
  - 2,400 sq.m shall be 'live-work' units,
  - 4,800 sq.m shall fall within Class C1 (hotel),
  - 22,000 sq.m shall fall within Class C2 (residential institutions),
  - 2,450 sq.m shall fall within Class D1 (non-residential institutions, excluding education), and
  - 3,000 sq.m shall fall within Class D2 (assembly and leisure).
- Educational facilities, including:
  - two primary schools (up to three form entry), with a site area of not more than 15,000 sq.m each,
  - one secondary school (eight form entry), of 44,585 sq.m, with a school playing field not exceeding 14,313 sq.m, and
  - an ecology centre (250 sq.m).
- The height of the development shall not exceed 76m AOD (above ordnance datum)
- Principal and secondary roads shall be provided, as well as safeguarded routes for the East London Transit and Docklands Light Railway.

10 The proposed land-use and phasing schedule submitted with the original application (Document 1: description of development and parameters) is included in Table 1.1. While the applicant has stated that this table is still valid, it is noted that subsequent 'for approval' documents have adopted alternative figures. For example, the energy strategy states that phase one will include 1595 units, phase two 2550, phase three 4176 and phase four 2551. These figures propose an alternative phasing schedule, and also add up to more than the application is seeking permission for, at a total of 10872. In addition, the urban design guidelines give an overall figure of 10822 (data sheet, pp. 116-117). The development parameters state that *"the total amount of floorspace within Class C3 (residential) shall not exceed 10,800 units"*. It is important that the application documents are all consistent in their phasing and unit details, and that these are in accordance with the original application documents. An updated land-use and phasing schedule is required to be submitted, and strategic documents should be amended to reflect this schedule. The development triggers and document index in document one should also be updated as necessary.

## Application process

11 This proposal is for outline planning permission, with broad parameters, and site-wide strategies being established at this stage. Upon receiving planning consent for the outline scheme, the site will be divided into four strategic areas, with each area being the subject of a sub-framework plan (SFP). The SFPs will sit under any outline planning consent, and will further establish the design and land use parameters of the outline application, taking the form of hybrid reserved matter applications. Each sub-framework area will then be further broken down into a series of fifteen zones that will range in size from 2,343 to 113 dwellings, and will be accompanied by full reserved matters applications.

Table 1.1 Proposed land use (sq.m gross unless otherwise stated)

Use	Phase I Years 1 - 5	Phase II Years 6 - 10	Phase III Years 11 - 15	Phase IV Years 16 - 20	Total
Class A1 - A3 (retail)	2200	8000	5500	4000	<b>19700</b>
Class B1 (office)	2000	2000	3000	4250	<b>11250</b>
Class C1 (120 bed hotel)				4800	<b>4800</b>
Class C2 (institutions – residential)	2000		10000	10000	<b>22000</b>
Class C3 (housing units)	1784 units	3583 units	3363 units	2070 units	<b>10800 units</b>
Live work units			2400		<b>2400</b>
Class D1 (schools)	15000		73898		<b>88898</b>
Class D1 (ecology)	250				<b>250</b>
Class D1 (Institutions – non-residential)	1200	500	750		<b>2450</b>
Class D2 (leisure)		250	750	2000	<b>3000</b>
MS car parking spaces			500	500	<b>1000</b>

12 Under the terms of the Mayor of London Order (2000), the Mayor does not have a statutory right to consider applications at the reserved matters stage. Therefore, unless revised or new applications are submitted on this site, or future applications do not comply with the legal agreement, the Mayor's only statutory involvement in these proposals is at this outline stage.

13 As part of this application a series of advisory panels will be established that will maintain a continual involvement in advising on the drafting and future consideration of detailed applications, to ensure the parameters and strategies that are established at the outline phase are carried forward throughout the development lifespan. GLA officers, and where appropriate Design for London officers, will be represented on all strategic panels, including energy, design, access and transport.

## Case history

14 The site was used to generate power, and was occupied by three power stations, in addition to a council owned landfill site. These uses terminated in 1980s. The majority of the land was owned by National Power Plc, before being purchased by Bellway Homes in 1998. Following designation as a brownfield site for regeneration by Regional Planning Guidance for London (RPG9A 1995) and the Barking & Dagenham Council Unitary Development Plan (1995), an initial masterplan was prepared. The current land designations for the site as in the 1995 UDP proposal map are:

- Barking Reach masterplan boundary,
- City farm
- Barking Reach residential area,
- proposed country park,
- nature conservation areas,
- light industrial landscape buffer,
- A13 and River Road landscape improvements,
- Wildlife corridor and green chains/potential green chains,
- Riverside walk.

15 In 1994 permission was granted for large-scale remediation works to be carried out on site. In 1995 planning permission was granted for phase 1A of the masterplan, which comprised 473 residential units. In 1997 a further masterplan was prepared and later adopted as Supplementary Planning Guidance by the Council. In 1999 and 2000 permission was granted for phases 1A (revised from the 1995 submission), and 2A, which comprised 864 units in total. These are now completed on site. In 2003 a joint venture company was formed between English Partnerships and Bellway Homes to redevelop the site.

## Strategic planning issues and relevant policies and guidance

16 The relevant issues and corresponding policies are as follows:

- Housing *London Plan; draft PPS3 Housing SPG*
- Affordable housing *London Plan; PPG3; Draft PPS3; Housing SPG*
- Urban design *London Plan; PPS1*
- Access *London Plan; SPG "Accessible London: achieving an inclusive environment"*
- Equal opportunities *London Plan*
- Mix of uses *London Plan*

- Sustainable development *London Plan; PPS1, PPG3; PPG13; PPS22; the Mayor's Energy Strategy, Sustainable design and construction SPG*
- River Thames/flooding *London Plan; PPG25; draft PPS25; RPG3B*
- Biodiversity *London Plan; the Biodiversity Strategy; PPG9*
- Ambient noise *London Plan; the Ambient Noise Strategy; PPG24*
- Transport *London Plan; the Mayor's Transport Strategy; PPG13*
- Parking *London Plan; the Mayor's Transport Strategy; PPG13*

17 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Barking & Dagenham Unitary Development Plan (1995) and the 2004 London Plan.

## **Housing and density**

18 The London Plan and the Sub-Regional Development Framework (SRDF) for east London designate Barking Reach (the site now referred to as Barking Riverside) as an Opportunity Area, with the potential to deliver a minimum of 10,000 new homes. The strategic priorities for east London, as set out in Policy 5C.1, include a responsibility to assist in tackling London's housing shortage, by maximising the number of additional homes, including affordable units, and by creating mixed and balanced communities. The Mayor has set a strategic target for affordable housing at 50 per cent of total housing provision, with a 70:30 split of social rented and intermediate provision. Within this, when negotiating on individual sites, regard should be had to the strategic target, the individual circumstances of the site and site costs, as well as the amount of public subsidy.

19 Given that this proposal is for outline permission for a phased scheme with a twenty-year lifespan, where future subsidy, build costs, demand and sale rates are not yet known, there have been difficulties in negotiating housing provision. There has been little information submitted on housing, with the majority of detail to be included in the s.106 agreement. The GLA has consistently required that an overall site-wide target for provision is set at this stage, which will then be subject to future viability testing during later application phases. As a result of these discussions, and a site-wide financial analysis, a total target of 41% of housing as affordable (by habitable rooms), with a 50:50 social rented and intermediate split (as a minimum of 50% social rented), and with 30% of total provision to be units of 3 bedrooms or larger, has been agreed. The applicant has agreed to include the following conditions within the legal agreement. Any variations from these conditions in future sub-framework plans would result in the applications being referable to the Mayor. It is vital to the acceptability of these proposals that the Council agree to this approach.

- A minimum of 41% of the habitable rooms across the site, and within each phase, to be affordable housing, subject to the availability of sufficient social housing grant, to be demonstrated by full financial appraisals before permission is granted.
- A minimum of 50% of affordable housing provision, by habitable rooms, to be provided as social rent provisions, meeting the criteria set out in the Mayor's Housing SPG.
- The intermediate provision, which can be provided as a range of tenures, including discounted outright home ownership, will meet the affordability criteria set out in the Mayor's Housing SPG, as updated in an annual basis.
- That there is no cap on either the affordable housing provision or the social rented proportion within any zone.

- A minimum of 30% of all units to be three or more bedrooms.
- A minimum of 40% of all social rented units to be three or more bedrooms.

20 The GLA has not been given a copy of the draft s.106, or a list of proposed planning conditions, which is unacceptable. A 'summary note on the status of negotiations on the Section 106 Agreement as at 18 September 2006' was recently submitted at the request of GLA officers. This is not sufficient. It is vital that, before the scheme can be considered acceptable by the Mayor, a s.106 and a full list of planning conditions is submitted to the GLA. Without this, the Mayor will not have the assurances that key London Plan policies are being secured. The summary s.106 note currently includes the 41% target, however does not include the minimum 50:50 split, or the need for 30% of units to be 3 or more bedrooms. The summary s.106 note also includes an unacceptable cap on affordable housing at 50% of total provision, and a cap on social rented units of no more than 50% in any one zone. The inclusion of these caps is unacceptable, as affordability levels must have the flexibility to respond to individual future viability testing, which should be able to go beyond the minimum targets set at this stage. The legal agreement must therefore include the measures outlined above.

21 The precise density of the development has not been set at this stage. The applicant has included an indicative density diagram within the Urban Design Guidelines, which illustrates how the required number of homes could be built out on site, and indicates a density range from 30-39 dwellings per hectare to 340-359 dwelling per hectare. These densities are largely linked to future proposed public transport provision, and will see the highest densities being built out towards the end of the development period. This approach is acceptable in strategic planning terms. The development on this site should aim to maximise densities in line with public transport and social infrastructure improvements. London Plan Policy 4B.3 should be used in the assessment of future sub-framework plans to ensure that the site is maximised, and that balanced and sustainable communities are developed.

22 London Plan Policy 3A.4 states that all new housing should be developed to 'Lifetime Homes' standards and that 10% of new dwellings should be wheelchair accessible, or easily adaptable. The applicant has positively responded to this policy and has included these requirements within the summary s.106 note. These must be transferred into the legal agreement.

## Urban design

23 The London Plan states that proposals for the London Riverside area, of which Barking Riverside is a key component, should "*focus on creating a successful and attractive residential community, [and establish] a whole new urban area*" (paragraph 5.75). In masterplanning Barking Riverside, planners and architects have the difficult task of developing a comprehensive spatial/functional strategy, that addresses overarching development goals, whilst at the same time providing a sufficient level of detail to convincingly ensure design excellence throughout the development lifespan. Following discussions with GLA officers, and members of the Mayor's Architecture and Urbanism Unit (A+UU), the need to deliver design excellence through a site-wide masterplan approach, which sets a series of design codes, was established. Maxwan Architects were commissioned by the applicant to develop the masterplan, which is realised through a series of urban design guidelines. The Urban Design Guidelines (UDG), document 18, forms part of the approval package for this outline application, and therefore should be used as a statutory document in assessing future sub-framework plans. "*The guidelines are intended to inform and guide developers and designers during the process of defining, designing and building or landscaping each of the future development areas, and the surrounding landscape and ecological areas*" (UDG, 2006, pp. 2). To further ensure that the design principles established at this stage are carried forward throughout the development process, a design panel will be established, which will

include representatives from the GLA and A+UU, and will advise on the drafting and assessing of future proposals for this site.

24 The UDG has been the subject of negotiation and redrafting, and the applicant has largely responded positively to advice from GLA officers. The UDG aims to provide a complete package for future applicants at the Riverside, and includes fundamental design principles for inclusive design, landscaping, pedestrian permeability and connections, play space, roads, block typology, and parking. The guidelines are grouped into the following sections:

- the inclusive principle,
- the urban realm: main streets and squares, neighbourhood parks, including play, sport and recreation facilities,
- the eight neighbourhood character areas,
- play, sport and recreation, and
- the nine landscape and ecology areas.

25 Each guideline consists of a text, a diagram and a photo. The significance of the guidelines stems from the combination of all three, and they should be used as such. A number of plans and cross-sections have been labelled 'for illustrative purposes only'. While it is clear that the illustrated building shapes and neighbourhood layouts are not definitive, they do serve a useful purpose in that they show how the design principles could successfully be implemented. They illustrate the principles on street typology, building typology and open space typology that are essential to the creation of a successful community. It will take strong leadership from the design panel to guide potential new developers and any future architect through the significance and implementation of these guidelines. The stakeholder panel, with Maxwan, should have the power to decide if a particular proposal meets the design guidelines.

26 The UDG does not adequately address the relationship of the development to the surrounding areas. The interface of the proposed development, and the areas to the east and west remains unresolved, and should be the subject of further investigation. There is a lack of clarity about the extent and configuration of the riverside green space inland of the flood embankment to the east of the site. In developing the sub-framework plans, greater attention should be paid to these interfaces. This should be secured through the legal agreement

#### **s.106**

27 The summary s.106 note is currently not clear with regards to the UDG. As one of the eight 'strategic documents for approval', it has clear statutory status, and therefore future applications must conform to the guidelines within the document. This status should be confirmed and supported with an appropriately worded planning condition indicating that all future developments must be in accordance with the UDG. The summary note currently includes the following "*The UDG will be the "umbrella" design document to guide future detailed design stages and approvals under planning conditions. The UDG will not be bound into the Agreement, but the Agreement will have cross-references to it*". As GLA officers have not seen the full Agreement, it is not clear what is included. It is important that the UDG is given full weight in future planning considerations. Therefore a condition, as suggested above, is vital in support of its 'for approval' status, and is the appropriate way to deal with this issue.

#### **Design panel**

28 The establishment of a design panel to advise and lead on the implementation of the UDG through future planning submissions is essential. The summary note does include details of the design panel, in an appendix, although the status of this within the Agreement is not known. The terms of reference for this panel must be included within the s.106, as this is an important element in ensuring the design principles are carried forward. The details included within the summary note are largely supported and include the following three main objectives of the panel:

- To provide co-ordinated design advice as to the formulation and adoption of sub-framework plans (SFP).
- To participate in the judging of any design competitions held in respect of individual buildings.
- To advise as to the constitution of such competitions.

29 However, this does not include a continuing advisory role for the panel in the determination of the SFPs once they are submitted to the LPA, or in the future detailed reserved matters applications. In addition, the operation proposals give a very small window of opportunity for the panel to advise on the SFPs. Under the proposals, the panel will be given six weeks to review a SFP before it is submitted to the LPA. This does not suggest time will be allocated to feedback and design development, which should be an essential role of the panel. The six week period should include the word 'minimum', and reference should also be made to the fact that every opportunity to work in partnership with the panel in drafting the SFPs will be taken by BRL.

30 The panel should be chaired by an independent advisor with a strong architectural reputation, and include representatives from the Council, the London Thames Gateway Development Corporation, the GLA and the A+UU, CABE, and also the chair of the access and inclusive design panel. Once established, a member of Design for London should also be included within the panel. The panel should also draw on the expertise and knowledge of Maxwan. The panel should be included in all future phases, meeting with, and advising the developer on their proposals prior to submission, and also advise the local authority on the acceptability of the proposals against the UDG.

## **Children's play space**

31 London Plan Policy 3A.15 provides a policy context for social infrastructure, including children's play space. In response to growing concerns over residential amenity in an urban setting, and the need to ensure access for children to play space, the Mayor requires developments that will include children, to provide adequate play facilities. The scale of this development will result in a large number of children living at Barking Riverside. An initial calculation on expected child population, based on the housing mix given in the commissioned report on market demand, and the agreed affordable housing target, concludes that 5,749 children will live at the Riverside.

32 The applicant, at the request of GLA officers, submitted a child play space strategy for the site. This strategy set standards and proposed quantities of play and sports provision for the lifespan of the development. Following comments by GLA officers on the draft strategy, the applicants have submitted a revised and improved document. The strategy includes relevant policies, establishes design principles for play areas, including illustrative sketches and illustrations, and details of long-term management. The strategy, particularly the design principles within it, should be used by future developers, and decision makers, to ensure quality provision of play space. Table 1.2, 1.3 and 1.4 detail the provision of play and sport facilities.

33 It is not clear whether some of these facilities have been ‘double counted’. For example, it is not clear if the additional MUGA’s which are listed in Table 1.4, are those proposed within the ‘play stations’/‘activity parks’ in Table 1.3. A definitive table of all proposed play and sports provision should be submitted. This table should then be included within the legal agreement, to secure delivery. The summary s.106 note does not make clear whether the children’s play strategy is included within the eight strategic documents for approval. It is important that this document is given appropriate weight, and should ideally be included within any approval package. Regardless of this, the standards set within this document, in a revised table, should be defined in the legal agreement.

Table 1.2 Formal sports facilities provided within school grounds. Taken from Table 8.0 in the Barking Riverside Play, Sport and Recreation Strategy

Facility	Number	Area	Location
Full size all weather pitch	1	1 ha	Shared school facility
Senior football pitches	2	0.9ha	Shared school facility
Junior football pitches	5	0.82ha	Shared school facility
Mini soccer pitches	4	0.35ha	Shared school facility
MUGA	4	0.12ha	Shared school facility
Tennis courts	5	0.06ha	Shared school facility
Cricket pitch (junior)	1	1ha	Shared school facility
Bowling green	1	0.15ha	Shared school facility

Table 1.3 Play provision. Taken from Tables 5.0, 2.0 and 3.0 in the Barking Riverside Play, Sport and Recreation Strategy

Typology	Age	Approx no.	Minimum size	Location	Facilities
Doorstep ‘play rooms’	Up to 10 years	30	250 sq.m	Every communal court or residential block	Ball games, climbing walls, slides, climbing frames, bike riding.
Local neighbourhood ‘play stations’	Up to 16	10	2000 sq.m	Within local public park	As above, plus, sports such as 5-a-side/MUGA.
Community park ‘play ports’	All	1	5000 sq.m	Jetty Square	As above plus water games, skateboarding, toilets, café.
Adventure play areas	All	1	5000 sq.m	Barking Riverside Park	Adventure play, workshops, toilets, café.
Activity ‘parks’	10 year +	3	0.2ha	Public squares	Skateboarding, MUGA, climbing walls.
Linear activity zones	10 year +	Along key routes	0.2ha	Along key routes between neighbourhoods and schools.	Skateboarding, informal kick about, climbing walls, bike stunts.
Country park	All	1		Barking Riverside Park	Nature trails, mountain biking, adventure play
Nature reserves	All	2		Barking Riverside Park	Restricted access nature trails

Table 1.4 Additional sports facilities provided within school grounds. Taken from Table 8.0 in the Barking Riverside Play, Sport and Recreation Strategy

Facility	Number	Area	Location
Tennis courts	5	Various	Throughout development, within and adjacent to, residential courts
MUGA	6	Various	Throughout development, within and adjacent to, residential courts
Skate parks	3	Various	Throughout development, within and adjacent to, residential courts
BMX tracks	2	Various	Throughout development, within and adjacent to, residential courts

## Access and equal opportunities

34 Policy 4B.5 of the London Plan expects all future development to meet the highest standard of accessibility and inclusion. This policy, together with the Mayor’s Supplementary Planning Guidance ‘*Accessible London: achieving an inclusive environment*’ underpin the principles of inclusive design and the aim to achieve an accessible and inclusive environment across London.

35 Following advice from GLA officers, the applicant commissioned an access strategy. This document should set site-wide inclusive design and access principles, which, as with the UDG, should be used by future applicants and the LPA in developing and assessing reserved matters applications. This document has been redrafted following earlier GLA officer comment, and is now supported by the inclusion of access guidelines within the UDG. The access strategy forms part of the package of strategic documents for approval, and therefore has significant weight in the assessment of future proposals.

36 The strategy is a positive step forward in ensuring inclusive design at Barking Riverside. However, the strategy and its aims, remain unresolved.

## Design principles

37 To ensure that the highest standards of access and inclusive design are met in future reserved matter applications, it is vital to establish at this stage a set of site-wide inclusive design principles. The applicant has included technical access guidelines within the UDG, which is supported, however these guidelines, and the access strategy, do not constitute site-wide inclusive design principles. The current guidelines within the UDG should be included in an appendix within the access strategy, to ensure that the strategy represents a complete document for access, however a set of design principles should also be established and embedded into the strategy from the beginning. Without establishing these principles, there is no assurance that the detailed proposals will comply with London Plan policies on access.

38 The inclusion of the Disabled Person’s Transport Advisory Committee’s (DPTAC) standards are supported. These should be adapted, together with CABE’s guidance on inclusive design, and be adopted as inclusive design principles for this development. These principles should then be

included within the access strategy, and the requirement to meet these standards included within the legal agreement. Future developers and architects should only be commissioned on the requirement that they commit to these principles, and the SFPs and reserved matters applications must include access statements that illustrate accordance with the principles, before planning permission can be granted. These requirements should also be subject to a legal agreement.

#### DPTAC principles

- provide equitable access,
- allocate appropriate space for people,
- require ease of use, comprehension, and understanding,
- require minimal stress, physical strength and effort,
- achieve safe, comfortable and healthy environments,
- accessibility for disabled people is a condition of any investment,
- accessibility for disabled people must be a mainstream activity,
- disabled people should be involved in determining accessibility,
- accessibility for disabled people is the responsibility of the provider.

#### CABE principles

- inclusive design places people at the heart of the design process,
- inclusive design acknowledges diversity and difference,
- inclusive design offers choice where a single design solution cannot accommodate all users,
- inclusive design provides flexibility in use
- inclusive design provides buildings and environments that are convenient and enjoyable to use for everyone

#### **Access and inclusive design forum**

39 The applicant has agreed to establish an access forum. The current access strategy does not provide sufficient details on the forum, its members, its role, or its management. The terms of reference for the forum should be included within the s.106.

40 Paragraph 3.4 lists suggested forum members. This should include a representative from the London Access Forum. The forum should be chaired by an independent person, who should have a strong access reputation and the post should be subject to advertising and interview. The chair of the access panel should also be included as a member of the design panel, to ensure inclusive design principles are fully integrated into the design. The parameters for the access forum should be established by the s.106 and include the following points:

- Role: Barking Riverside Access Forum (BRAAF) will scrutinise and comment on the access provisions made in all SFPs and zonal, reserved matters proposals, including access statements, prior to the submission of such applications to the LPA. The developer will have responsibility to ensure that all SFPs and reserved matter applications comply with the DDA, relevant legal agreements, reflect Barking & Dagenham's UDP, the London Plan and its accessibility SPG, apply the guidance set out in BRLs access strategy, and take into account BRAFs comments.
- The forum should help establish an agreed set of design standards, which future developers will be encouraged to conform to, this includes the conditioned requirements to meet Lifetime Homes, Wheelchair Homes, Part M, etc, but could also extend beyond these requirements to include best practice standards.

- The forum should be established a minimum of eight weeks prior to the submission of the first SFP, and meet a minimum of six weeks prior to the submission of the first SFP.
- The chair will lead on discussions, summarise the conclusions of the meeting, and within ten days, draft a report for approval by members prior to submission to the LPA.
- Detailed notice of BRAFs meetings will be circulated at least twenty days in advance of each meeting. By at least ten days prior to each meeting, the developer will provide all members with all necessary supporting documents and details of any intended presentations.
- The forum should have full involvement in Barking Riverside’s procurement process, with all chosen parties required to sign up to the inclusive design principles.
- The access statements produced for all SFPs, and reserved matters applications should be in collaboration with the access forum.

### **S.106 and planning conditions**

41 As a strategic document for approval, the access strategy is afforded significant weight. This would be appropriately supported by a planning condition which stated that all future developments should be in accordance with the approved access strategy. In addition, the terms of reference for the BRAF should be included within the s.106. The following are also required:

- A requirement within the legal agreement that all future SFPs and reserved matters applications should include an access statement illustrating accordance with the site-wide strategy, UDG and the inclusive design principles.
- Included within the s.106 a requirement that the Community Development Trust will financially assist with disability adaptations to social housing. A minimum contribution should be set.
- A requirement that the Transport Steering Group will include representation from disabled people, who have the experience of developing inclusive transport services.
- Included within the s.106 a requirement that, if required, the Community Development Trust, will fund a shop mobility scheme.

### **General comment**

42 The following, more detailed, comments and inconsistencies are raised in relation to the access strategy, which require amendments, and/or further discussion.

- Paragraph 1.6 harms the strength of the document. The sentence *“This means that disabled people will have as near as equal service as possible, and the occasions where disabled people feel that they are being treated differently will be reduced to a minimum”* should be removed. This does not represent a commitment to the highest standard of accessibility and inclusion.
- Paragraph 2.2 states that barriers to access will be overcome in the *“housing and public realm”*. No reference is made to overcoming these barriers in other uses, such as retail, leisure, employment, education or community facilities.

- Paragraph 6.1 does not state which wheelchair housing standards will be met. The London Plan uses the NATWHAG Wheelchair Housing Design Guide 1997. This strategy should adopt similar standards.
- The issue of Lifetime Homes standards is raised in paragraph 6.4. If construction technologies prevent certain standards from being met, then alternative technologies should be considered. An access strategy should be outlining ways in which barriers can be tackled, and not accepting them.
- Paragraph 12.5 states that “100% of all homes across the development will, where feasible and applicable, be built to Lifetime Homes Guidelines”. It is a requirement of the London Plan that all homes be built to these standards and therefore the inclusion of “where feasible and applicable” should be removed. This statement also runs contrary to the summary s.106 note which simply states that “100% are to be build to Lifetime Homes standards”.

## **Education, social and community infrastructure**

43 The development at Barking Riverside is predominantly residential in character. However, to achieve a sustainable community, it is essential that the required number of community, health and educational facilities are included within the development. This is in line with London Plan Policy 3A.15, which states “adequate provision of these facilities is particularly important in major areas of new development and regeneration”. These facilities should be provided in full accordance with need as identified by the Council. The original proposals for education, social and community facilities states that land will be remediated and passed to the Council to accommodate; two primary schools (with the possibility of two further primary schools), one secondary school, an ecology centre for educational purposes, two care homes, a PCT unit, with an additional two health care centres, and a dentist, two crèches and a place of worship.

44 Whilst the provision of land for these facilities is welcomed, there is serious concern regarding the availability of future funding to deliver these. It is understood that the developer is to provide the remediated land for such facilities, but not the construction or fit-out of such facilities, due to a lack of funds. The summary s.106 note states that “LBBB recognises that BRL has not allowed for funding schools within their overall infrastructure provision... LBBB with BRLs assistance will work in good faith to apply for central government for education funds in order to pay for the education provision that meets the needs of the Barking Riverside development”. There are no details on the funding of health or community facilities provision within the summary s.106 note. Provision should be included within the s.106 that seeks to secure funds from future development at Barking Riverside when financial viability testing of such development indicates that funds are available. This will ensure that if, in the future, the development is able to fund such facilities, it will be obligated to do so under the s.106. As the actual future success and value of the Riverside site is not yet known, this must be considered and safeguarded as an option.

45 There is also concern regarding the safeguarding of this land for future need. The summary s.106 note states that reversionary principles will be included within the s.106 “...if at some time in the distant future the education land is no longer needed for educational purposes”. Given the scale of development proposed in the wider London Riverside area, land currently reserved for health, education or community facilities for the Barking Riverside development should only be released if current, and expected/planned demand, on site and in the surrounding area shows that these facilities are not required. In the first instance, land should be considered for other social or community use, or for open space and play. Such safeguards should be built into the s.106 and within the planning conditions.

## Sustainable development

46 London Plan Policy 4B.6 requires all strategic applications to be accompanied by a sustainability statement illustrating how the principles of sustainability have been incorporated within the development. Due to the nature of this application and the lifespan of the development, it has been difficult to establish a satisfactory approach to securing the delivery of a sustainable development over a twenty-year time-span. In response, in discussion with GLA officers and the Council, the applicant has produced a series of sustainability benchmarks, which will be used to assess future developments. 'Points' are awarded for meeting certain criteria set for a number of indicators, with any developer requiring a minimum percentage overall to gain planning permission. The applicant has responded positively to previous comment provided on these benchmarks, re-submitting the strategy in an improved revised form. The minimum C requirements now largely reflect London Plan Policy. However, there are still concerns regarding the robustness of the document.

47 There are a number of incidents where applicants would be awarded points for complying with required policies, or where double points could be awarded for implementing one approach. This is not acceptable. The following points require further consideration by the applicant:

- A developer would score a maximum A rating for using waste heat from Barking Power Station, however the energy strategy establishes that this will be introduced from phase two (indicator 6.3).
- Maximum points would be awarded to a developer for achieving a 25% reduction in CO2 emissions compared to 2006 building regulations. However, the targets within the energy strategy set a 23% level for phase one, which climbs to 34% at phase two. The criteria therefore needs to encourage and reward applicants that seek to push beyond these targets.
- Double points could be awarded by Indicator 7.1 and 7.2, as both indicators allocate points for providing waste collection points. The criteria for these two measures should be combined into one indicator. In addition, it is not acceptable to award points to the developer if the local authority introduce a waste collection scheme. As recommended previously by GLA officers, the 'or' in Indicator 7.1 should be removed, and the same measure in Indicator 7.2.
- The inclusion of water efficiency measures, following previous GLA officer comment, is supported. However, the two indicators could result in applicants achieving double points for implementing one approach. The water efficiency measures in Indicator 8.1(a) will, by definition, result in a reduction in average water consumption. Therefore if an applicant achieves an A rating in 8.1(a) they will, by default, achieve a high rating in 8.1(b). This potential double pointing should be addressed, and if possible the two Indicators combined into one. In addition, the criteria in 8.1(b) is extremely low and does not reflect the requirements in the Mayor's SPG on Sustainable Design and Construction. The B rating should be amended to 25m<sup>3</sup>.
- Indicators 2.2(c) and 1.2(a) both support the provision of trees to provide solar cooling. Indicator 2.2(c) acknowledges that the Indicators are similar in nature, however offers no guidance on how points should be awarded. It is not acceptable for points to be awarded to a developer under several Indicators for implementing just one approach. It may be necessary to combine these, or distinguish clearly between their aims and assessment criteria.

- A similar case of double awarding could occur in Indicators 4.2(a), 4.2(b) and 4.2(c). Indicator 4.2(a) states that the total recycled/reclaimed content refers to hard surfaces and earthworks (amongst others), and therefore 4.2(b) recycled content in hard surfaces, and 4.2(c) recycled content used in earthworks, appear superfluous.

48 Within the legal agreement, there should be an agreed percentage figure, which each developer would have to meet prior to receiving planning permission. The current proposal is to set a 60% 'pass mark'. Using the benchmarking spreadsheet for the initial toolkit submission, a 70% mark would be achieved if all the criteria for a B rating were met. Therefore, to encourage applicants to go beyond the minimum requirements, and to deliver a truly sustainable development, a minimum 70% target should be set. This figure should be included with the s.106, and a mechanism built in which can review both this target, and the criteria, as policy develops. The s.106 summary note states that the criteria will be reviewed five times, but that there shall be no review of the target score. This is not acceptable and the target should be reviewed along with the toolkit, both of which should be included within the legal agreement. The inclusion within the summary note for a review of the criteria upon each adoption of a revised London Plan, to ensure the minimum C rating always reflects policy requirements, is supported. This should be transferred into the legal agreement.

## Energy

49 The London Plan aims to reduce CO<sub>2</sub> emissions through the incorporation of energy efficiency and renewable energy measures in all new development. Applicants are expected to undertake an energy demand assessment, demonstrate the application of the Mayor's heating and cooling hierarchy, and show how the scheme will meet a proportion of its energy demand from renewable energy sources.

50 The draft further alterations to the London Plan expect the fullest contribution to tackling climate change, primarily through reducing carbon dioxide emissions. There is a focus on linking up developments to ensure combined heat and power/combined cooling heat and power systems, complemented by renewable energy technologies, are delivered to maximise CO<sub>2</sub> savings. There is a revised target of a 20% CO<sub>2</sub> reduction from 2010 from on-site renewable energy technologies.

51 The applicant has developed an outline energy strategy in consultation with GLA officers, Barking and Dagenham Council, Barking Power Station and the London Climate Change Agency amongst other stakeholders. Work on the strategy is continuing. The key features of the current strategy are:

- An underlying sustainability benchmark system, whereby each part of the development will have to meet a minimum standard.
- A commitment to establish an Energy Services Company (ESCO) to ensure the delivery of the proposed low carbon and renewable energy measures.
- Commitment to communal heating infrastructure throughout the development.
- A series of targets for carbon dioxide reductions over time from energy efficiency and renewable energy.
- The establishment of an energy review panel to monitor and develop the proposed strategy in detail.

## **Sustainability Benchmarking**

52 There are six benchmarks within the sustainability framework that relate to energy. Each development will have to meet to a minimum standard. They will have to achieve:

- A minimum 10% reduction in CO2 emissions from energy efficiency measures against 2006 building regulations. Additional credit is gained for 15% or 20% reductions.
- All units will have to have internal and visible energy use information with extra credit gained if the ESCO delivers an education strategy
- All street lighting will have to be energy efficient with extra credit for having zero upward lighting.
- A minimum 15% reduction in CO2 emissions from renewable energy technologies with extra credit for 20% and 25% reductions.
- Designing all non-accessible roof-space to be capable of supporting either PV or micro-wind technologies with extra credit for designing in such technologies into the public realm.
- All developments must have communal heating infrastructure with extra credit for using a low-carbon heat source, being zero carbon or using heat from Barking Power Station.

53 In principle this approach is welcome, although there is scope to building in a centralised cooling infrastructure into these benchmarks. In addition, there is a danger of extra 'points' being awarded for carrying out works that are necessary requirements. For example, if future London Plan policy sets a 20% carbon reduction, as proposed, extra points could be awarded for complying with required policy. In response to these concerns, there is a requirement in the summary notes.106 that requires the benchmarking criteria to be reviewed as the London Plan policies develop, so that the minimum C grade is the minimum policy standard. This is welcomed and should be transferred into the legal agreement.

### **Phase one**

54 This phase will aim for completion in 2010. It is a primarily residential development with a total of 1595 units. The scheme will target an overall 10% reduction in CO2 emissions from 2006 building regulations minimum requirements through energy efficiency measures alone. This includes the use of natural gas combined heat and power plant within the scheme, provided by the ESCO. A further target of 23% reduction from renewable energy technologies will come from the use primarily of wind turbines and photovoltaic cells. This is a positive response to the emerging 20% target in the draft further alterations for the London Plan. In addition, the strategy states that once heat from Barking Power Station is available, that this will be installed into phase one. This is supported.

### **Phase two**

55 Phase two is planned to commence construction in 2010 and will deliver a further 2550 dwellings. This phase will utilise the waste heat from the existing Barking Power Station (BPS), and deliver a 24% reduction in CO2 emissions from 2006 building regulations minimum. This will be complemented by a further 34% saving through the use of renewable technologies, using wind power and photovoltaic cells. It is envisaged that the original phase one CHP installations would be retained for increased network resilience while the existing phase one network would be partly

supplied by heat from BPS. By utilising heat from BPS and including renewables, a reduction of 50% of the projected baseline (2006 building regulations) CO2 emissions could be achieved.

### Phase three

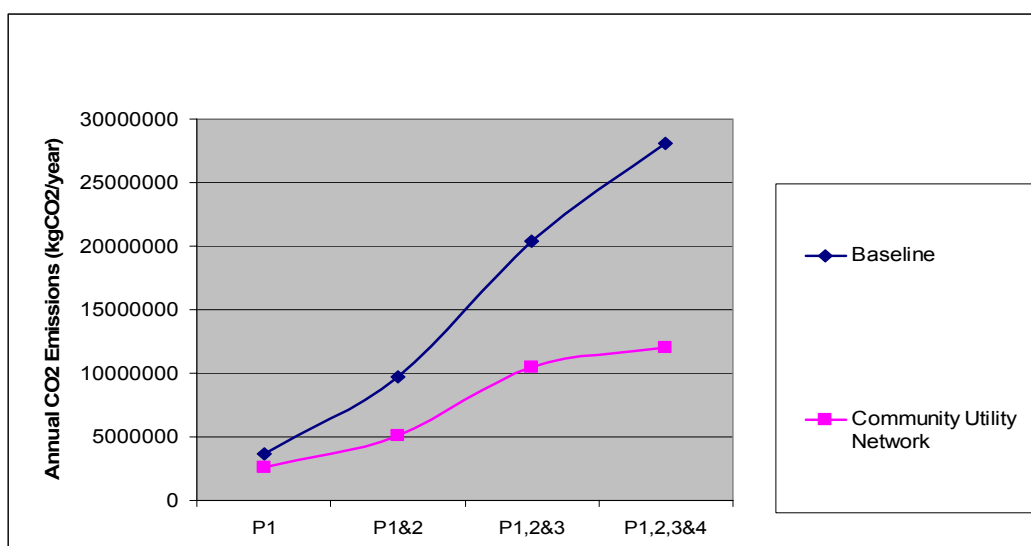
56 Phase three is due to begin construction in 2014, and will include 4176 dwellings. Waste heat from Barking Power Station is to be used to provide a 24% reduction in CO2 emissions, with a further 33% to be saved through renewable energy measures. A combined total of 50% reduction in CO2 emissions from the baseline has been planned for this phase. The renewable capacity has not increased between phase two and three, achieving 34% and 33% reductions respectively. It is likely that this is due to location and technical constraints from using small wind and photovoltaic cells at this particular site.

### Phase four

57 Phase four will deliver 2551 dwellings, and considerable commercial buildings, and begin construction in 2021. This phase will include a large proportion of high-density housing. The applicant has provided a graphical breakdown of carbon savings for this phase, and proposes an 80% CO2 emissions saving against 2006 building regulations minimum. Due to the high number of commercial properties, a different approach to renewable integration is proposed in addition to the possibility of using large- scale off-site renewable technologies.

58 The targets that have been set at this stage, and the use of waste heat from Barking Power Station from phase two onwards, is supported. The targets for CO2 emissions savings through energy efficiency and renewable technologies proposed for each phase must be included within the legal agreement, as minimum targets, to be adjusted if policy develops further. This will ensure that the efforts made in the strategy to date are secured throughout the development lifespan. In addition, the energy strategy should be included as a strategic document to be approved and to form part of any permission.

Cumulative annual carbon dioxide emissions over the four phases. BRE. 2006.



59 To assist in the delivery of this strategy, an energy panel has been suggested, which will include representatives from the GLA, and advise on the drafting and assessing of future development proposals. The terms of reference for this panel should be included within the s.106.

## **Cooling**

60 The applicant has not developed the cooling strategy in detail, as most of the anticipated cooling loads will occur in phases 3 and 4. There will be the opportunity at this stage to incorporate technologies such as absorption chillers. However, there are still commitments that the GLA considers can be made at this stage for all phases and this should be discussed further with officers.

## **Other considerations**

61 Barking Power Station Ltd has applied to the Department for Trade and Industry (DTI) to extend the existing Power Station. The DTI has confirmed that any new power station is expected, in operational terms, to produce useful heat – i.e. waste heat that is at the right temperature to be distributed to developments in a wider area. Where an application is made and infrastructure put in place to use that heat, Barking Power Station will be obliged to provide it.

## **Conclusion**

62 The applicant has developed a positive long-term strategy for addressing its likely carbon dioxide emissions from energy use and has responded to date to many of the issues raised by GLA officers. The key outstanding issues are ensuring that the targets set at this stage are carried forward into the legal agreement, and that the energy panel is also established in the agreement. Further information on cooling measures and scoping of the possible renewable energy saving supply options should be provided for phase four.

## **Flooding and the River Thames**

63 Barking Riverside is a key development in relation to the Blue Ribbon Network. It has a 2km river Thames Frontage, is currently defended from tidal flooding by flood defences, and has several watercourses running through it. Being a particularly large development, drainage issues are also of strategic importance. The site is within the indicative tidal Thames flood plain and has areas of fluvial flood plain from tributary rivers within the site.

64 GLA officers have previously provided comment with regard to flood risk and the Thames waterfront. Revisions have been made in response to these comments, which are welcomed. There are still outstanding concerns with regard to the Thames, however, the principle of the development is acceptable with regard to flooding and the water usage, subject to the inclusion of conditions within the legal agreement.

## **Flood risk**

65 In section 6 of the applicant's response, dated 06/04/06, under Main Access Routes, it is stated that *"In the event that a 1000 year breach does occur, the development will be safe from flooding."* In effect, the development will become an island. Whilst this will clearly pose difficulties for the residents and occupiers of the development, it would only be in relation to a rare event. It can be expected that the flooding would remain for some days. In principle, this is acceptable, subject to the inclusion of a condition relating to the detailed design stating that the development infrastructure (electricity, phones, water, sewerage, gas etc) should be designed to remain operational should such a flood occur. The applicant confirms that helicopter and boat access will be possible, to enable emergency evacuation of sick or injured people. The development is likely to act as a safe refuge for people escaping other adjacent areas of flooding, such as land to the south of the main rail line. In this respect, it provides some benefits for surrounding area in the event of an extreme flood risk.

66 The applicant confirms that flood-warning systems need to be integrated into the development. It is acknowledged that this is a more detailed aspect of the development, and therefore a condition should be placed upon any permission at outline stage to the effect that suitable flood warning systems are designed into the development to the Environment Agency's satisfaction and provision is made for their future operation and maintenance.

### **Main access routes**

67 Whilst confirmation that the development will not flood even in an extreme event is welcome, there remains concern regarding access to the development should such an event occur. The statement from the applicant suggests that this is a valid area of discussion, but that it does not automatically follow that it will be desirable to raise access routes (Renwick Road, Choats Road, River Road, Long Reach Road and Thames Road) to ensure that they remain dry. This is because of the possible knock on effects that this would have on the movement of flood-water in an extreme event. The Environment Agency also has concerns about this. Therefore, for the current stage of this application, it is acceptable to proceed on the proposed basis, subject to a condition within the legal agreement that the desirability and design for measures to keep the main access routes dry are explored in detail, and implemented should it prove desirable and viable.

### **Western perimeter**

68 The applicant confirms that with the land raising to +5m AOD this area will not flood even in the extreme 1000 year event. This responds to previous concern raised by GLA officers that this area appeared to be exposed to potential flooding depths of up to 4m.

### **Northern and eastern perimeter**

69 GLA officers previously sought confirmation that as these areas are likely to flood in an extreme flood scenario, the land would be reserved for open space and ecology, and not be used for residential purposes. The applicant has provided adequate information, which is accepted in principle.

### **Treatment and use of riverside**

70 Concerns remain regarding the treatment of the riverside. Throughout the application, and within the UDG, there are numerous references to the use of the river, notably for passenger transport. However, there are not any proposals included at this stage. The development should include a pier and terminal for river ferries, of a design and capacity to be agreed with London River Services, to be specified at the SFP stage. This should be secured within the legal agreement.

71 The development should also enable active river uses, such as visitor moorings, recreational water sports and boating activities. There is little detail within the current application on these potential uses. Therefore, the provision of a range of these facilities should be secured within the legal agreement in order to comply with policies in Chapter 4C of the London Plan.

### **Biodiversity**

72 The application site is very important for biodiversity. The whole site was identified by the London Ecology Unit as a Site of Metropolitan Importance. More recently only the Thames (including the foreshore and flood defence banks) and the Ripple Nature Reserve were endorsed by the Mayor as Sites of Metropolitan Importance. The reason for the reduced designation was in recognition of wider aspirations to develop the site.

73 The applicant has produced landscape and ecology guidelines, which now form part of the UDG, and together with the environmental statement, provide details on biodiversity and ecology. Most of the open space within the development is to be managed primarily for nature conservation. The applicant has responded positively to previous concerns raised by GLA officers. From a purely ecological view, the guidelines are generally quite good, concentrating on the key ecological deliverables of:

- Protection of birds on the foreshore from disturbance;
- Provision of habitat for key species – water vole, marsh warbler, “wasteland” invertebrates.

74 Whilst the landscaping guidelines seek to protect the water vole, and state that new habitat must, wherever possible, provide connectivity to the existing habitat, the potential to link the zonal areas together, to ensure as much connectivity between the various areas of wetland habitat as possible, should be made more explicit. This does not necessarily have to be through a hydrological connection, but could be equally secured by locating ditches and ponds in close proximity, with suitable terrestrial habitat to allow water voles to move easily between the two. It may be possible to resolve this issue through the legal agreement, requiring the protection of water voles and connectivity of habitats in planning and landscaping ecological areas.

75 To ensure the protection of existing habitats, and the success of future habitats and wildlife areas at Barking Riverside, a planning condition should be included which requires the submission of a detailed landscape plan for each SFP and zonal application, illustrating accordance with the landscape and ecological guidelines, and detailing measures to protect and enhance existing species.

## **Open space**

76 The provision of open space in accordance with the submitted strategies is welcomed. However, there are concerns regarding the long-term ownership and management of these spaces. The summary s.106 note states that the land will be transferred to the Barking Riverside Community Development Trust (BRCDT), but that it will be offered for public adoption should the Council wish to adopt it. If the Council does not adopt the land, the land should be designated as open space within the Council’s Local Development Framework (LDF). This should be secured in the legal agreement, together with a requirement that limits the developer to closing the site for no more than the minimum required to maintain their control of access rights. These measures will ensure that, regardless of ownership, the land will be protected for public use.

## **Noise**

77 The applicants have responded positively to comments provided previously on the environmental statement and the sustainability framework, with regard to noise. However, key concerns remain in relation to the environmental statement. The statement does not adequately address the issue of noise sensitive design. The applicant claims that the issue of noise sensitive buildings affected by a major noise source could be addressed through separation techniques, such as the use of single aspect blocks with windows of habitable rooms facing away from the noise. However, the current application does not include such proposals explicitly. A condition within the legal agreement is therefore required that states that development must be in accordance with London Plan Policy 4A.14, particularly “separating new noise sensitive development from major noise sources wherever practicable”. In support of this, a more robust statement is required from the applicants detailing how this issue could be resolved. This should be submitted prior to the Mayor’s final consideration of the proposals. GLA officers will provide further assistance if required.

78 In response to previous GLA officer concerns regarding internal noise standards, the applicant stated that section 7.3 of BS8233 only requires that the upper value in table 5 need be achieved. This is incorrect and has unacceptable consequences. Section 7.3 of BS8233 refers to the fact that in some circumstances it is also desirable to have a lower internal noise limit, e.g for privacy in shared spaces, as given in table 6 (and this is made clear in the next sentence of 7.3), but in most cases it is only necessary to consider an upper limit internal noise, BS8233 then goes on to provide two possible sets of guideline upper limit. BS8233 therefore clearly establishes two possible internal noise limits, “good” and “reasonable”. For a flagship development such as this, if external noise cannot be reduced, or mitigated by single aspect designs, the “good” internal standard should be required. This should be included within the legal agreements.

## **Transport for London**

79 The Barking Riverside site has very limited access and due to the barriers to movement created by the A13, rail lines, waterways and industrial sites, there are only limited road connections into the site. All road connections link directly to the A13 – a route subject to peak hour congestion, particularly around the Renwick Road junction.

80 A full package of transport infrastructure and service improvements will be needed to provide both a high level of public transport accessibility and sufficient transport capacity to support the development. Local links to Barking and other local centres would be provided by extensions to bus services and East London Transit (ELT), which would also connect at Barking Station with rail and Underground services into central London. A new grade separated junction is needed at A13/Renwick Road to improve the operation of other A13 junctions, including Movers Lane, Lodge Avenue and Goresbrook interchange, which are important in maintaining journey times for buses/ELT. It would also provide a new section of bus only road between Renwick Road and Goresbrook Road to enable a north-south bus route to be introduced. An extension to the DLR would give access to employment opportunities at Canary Wharf and links to the City. In the future, DLR would also connect with Crossrail at Custom House providing additional links through central London. In order to achieve a high modal share for public transport and to minimise the impact on the road network, car parking will need to be restricted.

81 A schedule of public transport infrastructure and service improvements co-ordinated with the phasing of the development has been agreed with the applicant in principle. It has also been agreed with the London Borough of Barking & Dagenham (LBBD) and Barking Riverside Limited (BRL) that TfL will be a party to the section 106 agreement. Although there is broad agreement about the schemes that are required, the funding to deliver the full package falls significantly short. Due to low expected development values the section 106 funding currently being offered to address transport needs is insufficient. As a result additional funding will need to be secured from public sector agencies. The list of improvements and required funding is identified in Table 1.5.

### **Public transport improvements**

#### Bus services

82 To serve the Barking Riverside development there will be a phased introduction of extended and/or new bus services. This will be particularly important in the early years of the development before ELT infrastructure is completed. Services will need to be supported by pump prime funding to ensure that they are available to residents as they move in. In discussions with the applicant’s consultants it has been agreed that a minimum contribution of £10.8 million will be required to provide pump prime funding for bus and ELT services. This funding will need to be available in the early stages and TfL is close to reaching agreement with BRL about arrangements for payment. It is essential that this is secured through the section 106 agreement.

Table 1.5 Required infrastructure and funding

<b>Transport improvement to deliver 10,800 units</b>	<b>Estimated total cost</b>	<b>Secured public sector funding</b>	<b>Barking Riverside Ltd funding</b>	<b>Funding gap</b>
<b>East London Transit</b>				
ELT phase 1a infrastructure	£15.1m	£15.1m (TfL)	---	---
ELT phase 1b infrastructure (within BR site)	£8.2m+	---	£8.2m+	---
ELT alignment south of A13 to access site	£10.9 <sup>1</sup> m -16.4 <sup>1</sup> m	---	---	£10.9 <sup>1</sup> m -16.4 <sup>1</sup> m
ELT alignment from east of site to Dagenham Dock	£4.7 <sup>1</sup> m	---	---	£4.7 <sup>1</sup> m
<b>DLR extension to Dagenham Dock</b>				
Obtaining TWA powers	£4.5m	£4.5m (TfL)	---	---
Land required within BR site	£11.5m+		£11.5m+	
Construction, land acquisition and fees	£295m*	---		£295m*
<b>A13 Renwick Road junction</b>				
Construction of grade separated junction	£47.8m	£5m (DCLG)	£5.4m	£37.4m
<b>Bus services</b>				
Off site bus priority	£5m <sup>^</sup>	---	---	£5m <sup>^</sup>
Contribution towards extended bus routes/ELT service	£10.8m <sup>~</sup>	---	£10.8m <sup>~</sup>	---
<b>Totals</b>	<b>£419m</b>	<b>£24.6m</b>	<b>£35.9m</b>	<b>£358.5m</b>

+BRL estimates which they will provide at cost. TfL estimates the cost to be £14.6m which includes allowances for design, contingency, risk, maintenance and urban realm.

\*Excluding optimism bias and rolling stock costs

<sup>^</sup>Dependent on monitoring. Estimate based on 20 locations at £250,000

<sup>~</sup>Assumed contribution of £1k per unit

<sup>1</sup>Totals are out turned costs that include allowances for design, contingency, risk, optimism bias, maintenance and urban realm

Totals do not include any costs associated with capacity improvements at Barking station, either on the rail side as requested by Network Rail, or the highway side to accommodate future ELT/bus services.

#### East London Transit (ELT)

83 An ELT route with the primary aim of serving the Barking Riverside site is being developed, with services anticipated to operate between Barking and Dagenham Dock stations, through the heart of the Barking Riverside site. The infrastructure would be constructed in phases to allow improved bus and ELT services to be introduced in line with development build out. Temporary bus stands and turn around facilities will be required to enable both bus and ELT routes to be extended in phases along with the phased completion of the development. The introduction of services using ELT infrastructure will provide faster public transport journey times to national rail and Underground services at Barking and will therefore be important in catering for journeys to central London without adding to pressure on the road network. This is in addition to the vital link to the facilities in Barking town centre that ELT will provide. The applicants have agreed to construct a fully segregated alignment for ELT through the site.

84 To mitigate the impact of additional development related traffic using the River Road corridor on ELT and bus services, a need has been identified for a section of priority which would require the widening of River Road between the A13 Movers Lane junction and Bastable Avenue. Between the River Road/Bastable Avenue junction and the Barking Riverside site, various possible ELT corridors with intense priority are being examined and will be the subject of public consultation. ELT infrastructure proposals between the A13 and the development site would require land and property acquisition and are estimated to cost from £10.9 million to £16.4 million depending on the alignment option. Consideration is also being given to the provision of a segregated ELT and bus alignment along Choats Road between the eastern boundary of the development site and Chequers Lane, near Dagenham Dock station. The cost of this is currently estimated at £4.7 million and work is ongoing to assess the benefits of this section of alignment. Funding has not been secured for any of these sections although there are ongoing discussions between TfL Corporate Finance and London Thames Gateway Development Corporation (LTGDC) to seek funding for the ELT infrastructure. Securing funding for the ELT infrastructure is vital to the sustainable development of the Barking Riverside site particularly in the early phases of its development (i.e. pre DLR).

85 As part of developing the business case for the ELT service for Barking Riverside, modelling work has been carried out using the Docklands Public Transport Model (DPTM). This is the same model that is used by DLR for their scheme development and ensures that both projects use the same assumptions and there is no 'double counting' of passenger demand. Modelling work has assumed that the Thames Gateway Bridge will be built and that the DLR extension will go ahead. The draft business case indicates that the overall scheme benefits outweigh costs. The actual date for operation of an ELT service in the development site will be dependent on its build out, but based on indicative timescales from the developer, there is likely to be sufficient demand around 2011. This will also be dependent on funding being made available for the section into the development site, as explained above.

#### DLR extension

86 Modelling work carried out for TfL in 2003 indicated that once the Barking Riverside site is developed beyond 6,000 units, further public transport capacity would be needed in addition to bus and ELT services and that this should take the form of an extension to the DLR or equivalent high capacity fixed link. The developers believe that the certainty associated with a DLR extension will be important in attracting residents to the site.

87 DLR has developed initial options for an extension from the existing Beckton branch at Gallions Reach to cross the River Roding in tunnel, which are now being developed in further detail. The extension would provide three stops to serve the Barking Riverside site and potentially terminate at Dagenham Dock station.

88 The business case for the extension is positive and indicates that the route could be developed for a capital cost of c.£295 million with annual operating costs of £2.8 million. £4.5 million from TfL's Investment Programme has been allocated to feasibility work and TfL is working towards an application for a Transport and Works Act (TWA) Order in January 2008. This would enable the Secretary of State to be in a position to grant such an order in early 2009.

89 On this timetable, procurement of the project is likely to occur in the second half of 2010 with construction of the extension starting in 2011. These dates lie beyond the period to 2009/10 for which TfL has confirmed funding from Government. There will accordingly be a need in a subsequent Spending Review, probably beyond the Comprehensive Spending Review in 2007, for TfL to secure a funding settlement.

90 This timescale would allow for an opening in 2015/16 to tie in with the 6,000 unit threshold being reached. It is important that the DLR extension does not open too early in the development process because of the impact on revenue. There would also be practical problems in bringing the timescale forward because the DLR can only be constructed once the waste tip on the Barking Riverside site has been remediated.

91 Modelling work indicates that annual operating costs for the DLR extension would only be recovered from passenger revenue if the Barking Riverside development was fully built out to the anticipated timescales. Any delays to the development programme could result in a significant revenue gap which TfL would not be prepared to accept. The applicants have commissioned work to examine whether the projected and very ambitious build rates can be sustained over the 25-year period. This indicates that the required high and sustained level of private sales would be challenging but achievable if a number of positive influences on sales rates were all in place. TfL would want to see some form of mechanism to ensure that the anticipated rate of housing delivery and occupation can be guaranteed to prevent any shortfall in passenger revenue and/or a mechanism to finance any revenue shortfall. Without such guarantees, TfL has serious reservations about the future DLR revenue risk.

92 Although the DLR will be second only in priority to Crossrail, there is at present no guarantee that funding can be secured from central government. It is assumed that DfT (which provides TfL funding) would attach the same level of priority to the DLR extension as DCLG. The case for the extension rests on regeneration rather than transport benefits. Without this funding guarantee, an opening date for the DLR should not be built into a planning permission.

#### Barking station

93 Network Rail has raised concerns about future capacity at Barking station in connection with the Barking Riverside development. The total number of people expected to use the station will be dependent on whether the DLR extension is built and the ELT link between Barking Riverside and Barking station. Even if the DLR extension goes ahead there is likely to be a significant increase in usage of Barking station in the period leading up to 2015 as the main public transport access into central London. LTGDC is proposing a study to examine the issue of station capacity and whether proposals can be brought forward to increase station capacity, taking into account cumulative impacts as a result of Barking Riverside and other planned developments around Barking town centre. BRL's funding package includes no allocation for Barking station. Also within the scope of the LTGDC study will be the requirement to provide additional bus/ ELT stopping and standing facilities at Barking Station to cater for the increase in services as a result of Barking Riverside and other developments in the area.

#### **Impact on road network**

94 By road the site can only be accessed from three junctions leading from the A13. These are all subject to peak hour congestion, in particular the Renwick Road junction, which will provide the primary road access into the Barking Riverside site. TfL has secured £5 million funding from DCLG to carry out design work and initial land acquisition for a grade separated junction at Renwick Road. In addition Barking Riverside Limited will contribute £5.4 million towards the cost of full grade separation. However, this still leaves a funding gap of £37.4 million based on an estimated total cost of £47.8 million.

95 TfL believes that the grade separated junction is needed early on in the development which will enable the flow of traffic to be better managed in a way that minimises impacts on bus and ELT operations at other junctions on the A13. It will also provide a new section of bus only road between Renwick Road and Goresbrook Road, to enable the provision of a north-south bus link between Barking Riverside and Becontree/Dagenham Heathway. The applicant's consultants have

done further analysis and proposed additional measures that would enable up to 4,000 houses to be built with minor modifications to the operation of the Renwick Road junction alongside improvements to the Lodge Avenue junction to improve circulation and minimise delays to buses. These modifications would need to be in place at the start of development. However, these temporary changes will only buy limited additional time. It is essential that ring-fenced funding to meet the full costs of the scheme can be secured through the Government's 2007 Spending Review. Subject to full funding being secured, an indicative programme has been drawn up which would enable construction work for the grade-separated junction to be complete by the beginning of 2012 to avoid any disruption during the Olympics.

96 It is important to note that the primary reason for carrying out the works would be to better manage traffic flows from the Barking Riverside development rather than to improve conditions on the A13 in accordance with the A13 Route Strategy. As a result TfL would not be able to justify funding the scheme under its usual transport criteria and would expect the full costs to be met by external funding. The contribution of £5.4 million from BRL is welcomed but this would need to be supplemented by direct funding from a relevant body such as DCLG, English Partnerships or London Thames Gateway Development Corporation (LTGDC). To deal with the current uncertainty about funding, a Grampian condition needs to form part of any permission for Barking Riverside to ensure that the development cannot proceed beyond 4,000 dwellings without the grade separated junction being in place. Without the Grampian condition, the impact of the development on the strategic road network would be unacceptable.

97 Even with a grade separated junction at Renwick Road the development will still place significant pressure on the local and strategic road networks. The applicant's consultants have identified a limited number of junctions where works will be carried out to introduce public transport priority measures or to increase efficiency in terms of general traffic flow. Two measures that will be required at an early stage in the development are a northbound bus lane on River Road and a southbound bus lane on Lodge avenue. The implementation and funding of these improvements will need to be secured through the section 106 Agreement. TfL believes that due to the scale of the development, effects will be felt over a wider area including junctions north of the A13 to the detriment of public transport. To address this, it is essential that provision is made within the proposed Sustainable Transport Fund for future funding of priority measures where these are shown to be necessary as a result of monitoring of bus/ELT journey times.

### **Transport Strategy**

98 A Transport Strategy has been prepared with input from TfL to set out all the transport related proposals for Barking Riverside in a single document. To oversee the implementation of the Transport Strategy, a Steering Group will be established including representatives of BRL, residents/occupiers, TfL, LBBB and LTGDC. The strategy itself will need to be revised regularly and includes a process of ongoing monitoring. It acknowledges that the transport provisions will need to be adjusted to meet the needs of the development as the site is built out.

99 A degree of flexibility is required, particularly regarding the details of bus/ELT service provision, which can only be determined in the context of the wider network. However, there is a concern that at this stage due to the nature of the application, long development timescales and lack of funding, there is not a firm commitment to deliver many of the measures outlined in the Strategy. There is a real risk that changes in the housing market or altered priorities will mean that good intentions will not be translated into measures on the ground and many of the ambitious proposals to make this a model of sustainable transport may not be realised. To guard against this it is essential that provisions in the Transport Strategy are reflected in the section 106 agreement.

100 In particular there needs to be a strong commitment by the developer to deliver measures that will encourage walking and cycling, maximise the use of public transport and minimise the

impacts on the road network. The Transport Strategy outlines the use of personalised travel planning techniques for new residents, adoption of employer and school travel plans, car clubs and cycle pool facilities as well as the use of traffic demand management measures. It is intended that in the longer term these initiatives will be funded through a Sustainable Transport Fund, which is financed through income generated by visitors and residents parking charges. BRL would provide an initial loan to fund the above activities until the Sustainable Transport Fund becomes self-financing. This loan and the income from parking charges needs to be sufficient to cover the full range of activities. TfL would like to see the travel demand management measures developed at an early stage in the planning process to ensure the opportunities for achieving sustainable travel behaviour are maximised.

101 The level of parking that was proposed in the original Transport Assessment of over 1 space per residential unit was unacceptable to TfL. It would have resulted in a high level of car dependency and undermined the case for investment in public transport. This would in turn have raised the level of subsidy required. Total parking would have been 14,846 spaces, 13,328 to serve the residential development and a further 1,518 including two multi-storey car parks for the commercial elements. The resulting parking ratio for the residential development would have been 1.23 per unit ranging from 0.95 per unit for the later riverside zones to 2.00 for one of the initial western zones.

102 Following discussions with TfL and as part of the Transport Strategy, indicative proposals have now been put forward by the applicants for lower residential parking ratios which equate to an average of 0.7 per unit. However for the first 4000 dwellings the ratio would still be 1 per unit. If parking is not strictly controlled, particularly for the early phases of development, there is a real risk of establishing a high degree of car dependency which will be difficult to change when the full package of public transport improvements is introduced. In response to TfL's comments the applicant has also agreed to reduce the parking for the non residential uses. Commercial and community facilities are primarily designed to serve local residents who would be able to access them by foot, cycle or public transport and so shouldn't require high levels of parking. However all these reductions are only indicative and TfL will require a cap on the total parking provision, including any spaces in street, not only for the full 10,800 home development but also for the individual stages at 1,500 and 4,000 to be secured through the section 106 agreement.

### **Methods of financing**

103 To address the shortfall of section 106 contributions to transport, TfL would encourage BRL to explore new methods of raising revenue to give ongoing support to public transport. Charges for residential parking could be set at a level higher than the cost of provision to provide an income stream. Alternatively methods of capturing the increase in land and residential values as a result of investment in public transport could be explored. This would need to encompass gains to individual householders as well as benefits to agencies involved in the development process. If a guaranteed income stream could be generated then it may be possible to consider innovative ways of financing the required transport improvements. Some initial work was carried out by English Partnerships to investigate potential mechanisms for value capture but this hasn't been taken forward. However, TfL would still require commitments from central government to provide full scheme funding.

### **Summary**

104 The current funding shortfall means that the transport infrastructure required for the full build out of 10,800 units cannot be guaranteed at this stage. Phased implementation is therefore envisaged, although there are risks associated with this approach. To enable the initial stages of development to proceed in the absence of funding commitments, BRL has proposed Grampian conditions that will restrict development to 4,000 residential units until full funding has been

secured for the grade separated junction and the DLR extension. TfL understands that LBBD will also impose a Grampian condition restricting development to 1,500 units until the DLR TWA Order application has been submitted. Without these conditions being imposed, the Barking Riverside application would have an unacceptable impact on the strategic road network and would not provide good public transport access for residents.

105 Although these conditions are necessary, there is a risk that 4,000 units could be built without significant improvements to transport capacity. At 4,000 units the ELT phase 1b alignment would not be complete through the eastern part of the site, the DLR extension would not be built and unless the grade separated junction was in place, there would be unacceptable levels of congestion at A13 junctions. The business cases for ELT phase 1b and the DLR extension assume a 10,800 home development. If this scale of development is not achieved, the schemes may not be viable in their current form.

106 The DLR extension is only likely to be justified to serve a full 10,800 home development. The lower option of 4,000 homes will not support the necessary transport improvements and residents would be faced with limited travel choices to access employment opportunities and key services. There is a risk that by using up any spare capacity on the existing highway network, an incremental approach to the Barking Riverside development could jeopardise wider regeneration of the Thames Gateway. There are therefore risks associated with a partial build out of the proposal.

## **London Development Agency**

107 In principle the LDA supports the proposal for residential led development at Barking Riverside. The proposed development is of a scale that will act as a major catalyst to regeneration in London Riverside and the wider Thames Gateway. However to fulfil this role, the LDA would like to make sure that the comprehensive development of this proposal occurs and that a partial build out is not possible. The Council is encouraged to condition the phasing of the development to ensure the development potential outlined in the scheme is fully delivered.

108 In terms of employment generation on site, the figures appear to be optimistic. The Agency requests that the applicant provide more detail on the assumptions and methodology used to derive these figures. This is particularly the case for the B1/B8 and retail uses. Justification is required as to why the proposed retail provision is higher than that recommended in the 'London Riverside Retail and Leisure Capacity Study'. In addition, the Agency would like to be reassured that there is an adequate management plan for the 300 live-work units and that there is a demonstrable need for this type of space.

109 Given the scale of this development, there is a significant opportunity for the local borough population to benefit from training and employment opportunities. The Agency welcomes the provisions made within the summary note. Provisions include:

- the appointment of a local employment and business coordinator,
- the establishment of a Community Liaison Group, involving representatives from the local community, local businesses and the Council,
- the requirement that BRL pay £100 per residential occupation to the Council's Skills, Learning and Enterprise Division (SLED), who will use monies to fund employment training for local residents,
- the encouragement of zone/plot developers to ensure that 25% of the construction weeks are accessible to local residents,
- the provision of vocational training and apprenticeships to local residents,

- the provision of skills training to allow local residents to access high-level jobs resulting from the development, and
- the requirement to allow SLED five working days to fill construction site vacancies before other advertising.

110 However, the majority of the obligations are vague and imprecise, with no details of how such provisions will be carried out, the minimum number of people who should benefit, and no details of the management of such provisions. A detailed employment strategy should be prepared and included in the legal agreement. This will help to develop and integrate the proposals in the summary s.106 note into a comprehensive package, and ensure the extra detail and certainty is provided at this early stage. The strategy should include the following elements, and be tied into the legal agreement:

- Timing and arrangements for its implementation including funding arrangements.
- A stakeholder charter, to ensure initial and subsequent employers within the completed development participate in the implementation of the strategy.
- Minimum local recruitment targets for employees, and targets for the involvement of local businesses, and measures to be undertaken by the applicant to meet with these targets.
- Periodical workforce and business monitoring and reporting of the results to the Council and such other parties as may be set out in the approved strategy.
- A programme for skills training for local residents and/or businesses, including the potential for the provision of suitably equipped training premises.
- Local publicity, awareness raising proposals and methods for advertising employment opportunities and impending contracts.
- Initiatives to promote the involvement of local businesses including sub-contracting and the supply of goods and services.
- Initiatives to promote the employment of small and medium businesses.
- Initiatives to promote the employment of black and ethnic minority owned businesses.
- Projects for removing barriers to employment including the availability of childcare.

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

111 The Council is due to consider the Barking Riverside application in October 2006.

### **Legal considerations**

112 Under the arrangements set out in article 3 of the Town and Country Planning (Mayor of London) Order 2000 the Mayor has an opportunity to make representations to Barking & Dagenham Council at this stage. If the Council subsequently resolves to grant planning permission, it must allow the Mayor an opportunity to decide whether to direct it to refuse planning permission. 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 comments unless specifically stated.

### **Financial considerations**

113 There are no financial considerations at this stage.

## Conclusion

114 The redevelopment of this brownfield site to provide a high quality sustainable community is supported. The proposals have the potential to deliver a dramatic new urban environment in this riverside location, and key to this is the delivery of vital transport improvements. There is currently a significant transport funding gap, which means that the required transport infrastructure cannot be guaranteed at this stage. In response to this a phased approach has been proposed, which would limit the number of units to 4,000. Without guarantees of funding for the DLR, or the required junction improvements, development could not continue beyond this point. Without these conditions being imposed, the full development would have an unacceptable impact on the strategic road network and would not provide good public transport access for residents. However, with this approach, although there will be minor highway improvements and bus/ELT services, there is a risk that 4,000 units could be built without significant improvements to transport capacity, and the potential of only part build-out could impact negatively on the wider Thames Gateway regeneration. In addition, due to the risk associated with development build out rates, a mechanism to protect TfL from any shortfall in DLR passenger revenue and/or a mechanism to finance any revenue shortfall is required.

115 With continual involvement from GLA and TfL officers, the application has evolved and developed. The scheme has responded positively to the Mayor's energy requirements, and sets an acceptable affordable housing target. However, there are key concerns regarding the access strategy, the sustainability strategy, the phasing and unit numbers, and the apparent lack of funding for the education and health infrastructure.

116 It is crucial to ensure that the targets and strategies that have been negotiated are secured and delivered in all future SFPs and zonal reserved matters applications. This is particularly important given that the Mayor will only have a statutory opportunity to comment on this outline application. The GLA has not yet received the draft s.106 or planning conditions, which is essential in order to ensure that London Plan policies will be met. The following conditions and/or s.106 measures are required. This is a summary of comments in the report, and is not an exhaustive list:

- Strategic documents: a requirement must be included that each SFP and zonal masterplan must be in accordance with the eight strategic documents.
- Housing: a requirement that 41% by habitable rooms of units are affordable, that 30% are 3-bed+, with a 50:50 intermediate and social rented split. These targets should be expressed as a minimum, with no cap on affordability. The requirement that 100% of units be built to Lifetime Homes Standards, and 10% be built to wheelchair standards, should also be included.
- Energy: a requirement that the phase-by-phase targets for renewable energy and energy efficiency, included within the energy strategy, are delivered. These targets should be expressed as a minimum.
- Sustainability: a requirement that future developers must meet a set minimum target for the sustainability framework. This target should be agreed with GLA officers. There should also be a requirement to update the C ratings and revise the minimum targets as policy develops. The issue of double scoring should also be resolved.
- Transport: mechanisms will be needed to secure funding and deliver the full package of strategic and local transport improvements that are necessary to serve the development. Conditions will be required to ensure that this is phased with development.

- **Access:** a requirement that each SFP and zonal masterplan must include an access statement, that the terms of reference for an access forum is included within the access strategy and s.106, that the strategy includes inclusive design principles, which should be specifically included within the legal agreement.
- **Children’s play space:** the quantum and type of play space and sport provision currently proposed should be included within the s.106 requirement.
- **Biodiversity and open space:** a requirement that each SFP and zonal masterplan must include a landscape strategy, a condition protecting water voles, an agreement that the Council will adopt the open space, and that the developer will not close off open space for more than the minimal period.
- **Thames:** a requirement that future SFPs and zonal masterplans must include details of a flood-warning system, protection of development infrastructure, secure river transport provision and promote river uses.
- **Noise:** a requirement that future SFPs and zonal masterplans must include detail on noise sensitive design and internal noise standards.
- **Community, social and education infrastructure:** a condition is required to protect land designated for these uses, and that resists the loss of the land. A condition must also be included that requires future developments to contribute to their provision, subject to financial viability.
- **Local employment initiatives:** further detail on the initiatives to secure local employment opportunities is required.

117 The GLA Group would like to continue to work closely with the applicants and the Council in ensuring the resolution of these issues, and the inclusion of all the required conditions and legal agreements. Given the strategic importance of Barking Riverside to the regeneration of the Thames Gateway, the application and future development should represent an exemplary response to the policy objectives of the London Plan.

---

for further information, contact Planning Decisions Unit:

**Giles Dolphin, Head of Planning Decisions**

020 7983 4271 email giles.dolphin@london.gov.uk

**Colin Wilson, Planning Decisions Manager (Development Planning)**

020 7983 4783 email colin.wilson@london.gov.uk

**Sarah Thomas, Senior Strategic Planner, Case Officer**

020 7983 5751 email sarah.thomas@london.gov.uk

---