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1 March 2018

London Borough of Barking and Dagenham Response to Draft London Plan

Please find below draft response to the Draft London Plan a final official Council response will be submitted on 20 March.

Key points

As a general point the Council would have preferred to see a more streamlined draft London Plan. The previous London Plan at 430 pages was a complex document especially for non-planners. The new draft London Plan at 530 pages has grown in length and complexity. We hope that the opportunity is taken in addressing the consultation responses to slim down the plan to a length befitting of a Strategic Plan.

Chapter 1: Planning London's Future (Good Growth Policies)

Policy GG1 Building strong and inclusive communities

The Council strongly supports the concept of 'good growth'. This is at the heart of our approach to regeneration building on the recommendations of the Independent Growth Commission *No One Left Behind: in pursuit of growth for the benefit of everyone*¹. It forms the basis of the Borough's Manifesto, as we strive to tackle inequalities and the Council's emerging Local Plan. Good health is essential for economically and socially thriving communities. Poor health can lead to social isolation and low income, for example. Therefore "good growth" must include "healthy growth" or healthy cities as in GG3 and for all residents.

To deliver Good Growth the Council has set up an urban regeneration company; Be First. Be First's mission is to facilitate and deliver inclusive growth as the borough accelerates its growth plans for over 50,000 new homes and over 20,000 new jobs over the next twenty-five years. Figure 2.19 shows that much of the borough is a Strategic Area for Regeneration and as with policy SD10 of the London Plan the focus of the Council's Local Plan and Be First will be ensuring development proposals contribute to regeneration by tackling spatial inequalities and the environmental, economic and social barriers that affect the lives of local people. However, whilst we are in full support of this approach we are concerned that some policies work against these objectives. In particular policy on Strategic Industrial Land (SIL) and Locally Significant Industrial Land (LSIL) and waste uses serve to reinforce the market failure which has held the borough back. The key to improving opportunities and quality of life for the borough's residents is in unlocking the full potential of the borough's industrial sites. We set out our concerns later in this response. The similarity between figures 2.19 and 6.2 is striking but not surprising. Good growth will have limited impact if it cannot be delivered.

¹ Please See Link of the document and its recommendations here: <https://www.lbbd.gov.uk/wp-content/uploads/2015/11/No-one-left-behind-in-pursuit-of-growth-for-the-benefit-of-everyone.pdf>



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Policy GG2 Making the best use of land

The Council supports the focus in this policy on creating high-density, mixed use places that make the best use of land. This is especially for important for industrial land which is often under-used, nowhere more so than in Barking and Dagenham where on average only 25% of industrial land is built on, half the London average².

Within Policy GG2, point B should be recast to emphasise more explicitly the need to make better use of underused employment land and also that higher densities are necessary across London not only in the best-connected locations. Our suggested wording is as follows:

b.) Proactively explore the potential to intensify the use of land, in particular underused industrial land, to support additional homes and workspaces, promoting higher density development across London, with the highest densities on sites which are well connected by public transport, walking and cycling, applying a design-led approach.

The Council argues later in this submission how a more flexible policy response to employment land is required in order to ensure a more efficient use of employment land and to ensure sufficient proven reserves of developable residential land exists to meet London's housing need of 66,000 homes a year.

Policy GG3 Creating a healthy city

We, welcome the emphasis on improved health and wellbeing within the revised London Plan. Barking and Dagenham is a borough of many health challenges. We also have ambition. Key strategies support our approach to health and wellbeing and reducing health inequalities: The Borough Manifesto, corporate plan, Joint Health and Wellbeing Strategy and Diversity and Equality strategy. In addition, addressing inequalities in health is embedded in our new Local Plan. We are an ambitious borough and have some ground-breaking work going on. In this context we offer the following:

- to share the HIA of our Local Plan as an example of good practice.
- Barking Riverside, as London's only Healthy New Town demonstrator site, to act as a case study for future testing and implementation of the London Plan policies that relate to health and health inequalities. Specifically, our example of planning innovative and integrated health and care infrastructure.
- Sharing of the 10 Healthy New Towns principles as supplementary to "good growth".

The emphasis in GG3 on improving Londoner's health and reducing health inequalities is welcome as Barking and Dagenham rates poorly on many of the key measures of health and health inequalities. Reducing inequalities and improving the

² Source: AECOM. Industrial Land Supply and Economy Study, GLA 2016, VOA 2016



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health of our local people are key priorities for the London Borough of Barking and Dagenham. As a council, we believe that everyone has the right to good health lbbd.gov.uk



Health impact assessments are a key way of systematically ensuring health is considered. They should be mandatory on sites above 1000 homes where there is the greatest opportunity to embed healthy lifestyles. They must also be undertaken at a very early stage of the master planning, so that any potential issues identified can be addressed.

We would like the London Plan to encourage boroughs to have 20mph speed limits around schools. We ask that action GG3 be amended to include this.

The Council is pioneering an approach to creating a healthy and inclusive city at Barking Riverside which is London's only Healthy New Town. Key to this is the 10 Healthy New Towns principles. These can be used to supplement the good growth principles. We would like to offer Barking Riverside as a case study and test bed to embed health in developments.

Policy GG4 Delivering the homes Londoners need

The Council supports the focus in policy GG4 on delivering the homes that Londoners need. However, it could go further in ensuring permissions are built out and that homes are lived in. This includes emphasising the need for full permissions in favour of outline permissions, requiring Council's to increase their pipeline of implementable permissions, and encouraging Council's to be more alive to the intentions of developers and their ability to build out their permissions. Finally, where a viability appraisal is provided for schemes under the affordable housing threshold and it demonstrates that the development is not viable that it can be refused on the basis it is not a sustainable development as it is not capable of being delivered.

Policy GG5 Growing a good economy

The Council supports the focus on ensuring that London's global economic competitiveness is enhanced, and its economic success shared amongst Londoners. However, this will not be achieved in Barking and Dagenham unless the full potential of its underused industrial sites can be unlocked.

Chapter 2: Spatial Development Patterns

Growth corridors and opportunity areas

Thames Estuary North and South

The Council are concerned that London Riverside appears to be demoted in importance within the draft London Plan. London Riverside forms part of the Thames Estuary which has eight sub areas. However, the draft London Plan only describes four Opportunity Areas (Poplar Riverside, Royal Docks, Bexley Riverside and Thamesmead and Abbey Wood). Given the scale of London Riverside, the biggest



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Opportunity Area (across London) in terms of homes it should be set out and described within this part of the plan.



Figure 2.7 sets out the housing and jobs output for each site. For London Riverside, this states a potential of 44,000 homes. It should be noted this can only be achieved if a more pragmatic approach to the intensification of employment land is taken. We discuss this in Chapter 6.

Elizabeth Line East

The Council would like to propose a new Opportunity Area; Chadwell Heath. The Elizabeth Line East corridor includes the Ilford and Romford Opportunity Areas. At Chadwell Heath the Council is promoting the intensification of the Chadwell Heath Industrial Area for 3,000 homes, above the threshold set out in Policy SD1, and linked to the improvements in public transport accessibility which will be brought by the Elizabeth Line in 2019. The Council will be bringing forward a masterplan for the area this year in parallel with the Local Plan and to shape the significant developer interest in the area into a cohesive and vibrant mixed use living and working community.

Policy SD2 Collaboration in the Wider South East

The Council supports the stance of the Mayor set out in Policy SD2 in working with partners across the wider South East to find solutions to shared concerns such as wider needs for freight, logistics and port facilities; and scope for the substitution of business and industrial capacity where mutual benefits can be achieved. However, the Council feels that the plan could be more explicit about the scope for substitution and the Plan's role in facilitating this.

Policy SD7 Town Centre Network

The Council supports the designation of two new district centres at Barking Riverside and Merriellands Crescent/Chequers Corner as set out in Appendix A1.4. In addition, the Council will be designating a new district centre at Merry Fiddlers to incorporate the Local Centres at Becontree Avenue and Whalebone Lane and incorporating the Morrisons superstore and Becontree Sports Centre. This will be supplemented by a mixed use development opposite the Becontree Sports Centre.

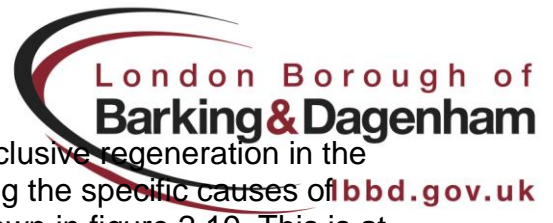
The Council considers that Barking has the potential to become a Metropolitan Centre due to the scale of regeneration planned which includes 6000 new homes, the transformation of the Vicarage Fields shopping centre, the redevelopment of Barking Station which includes a new London Overground link to Barking Riverside, new leisure and cultural facilities including two new cinemas and a burgeoning cultural industries quarter and arts scene. The definition of a Metropolitan Centre should move away from being based on the quantity of retail space due to the changing nature of retailing and instead have a bigger focus on leisure and culture.

Policy SD10 Strategic and local regeneration



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The Council strongly supports this policy. Delivering inclusive regeneration in the borough's Opportunity Areas will be essential in tackling the specific causes of deprivation in the Strategic Areas for Regeneration shown in figure 2.19. This is at the heart of what Be First has been set up to do to; to ensure no-one is left behind in the pursuit of growth.

Chapter 3: Design

Policy D2 Delivering Good Design

The Council strongly supports the focus on delivering good design and this is one of the core objectives of Be First which will be leading by example in demonstrating how good design can be delivered in a cost-effective manner. The Council has recently completed a Characterisation Study which address many of the criteria set out in D2A. It also supports the ability of Council's to use architect retention clauses in legal agreements to maintain design quality. Poor design is a bigger issue on small sites and the GLA could usefully issue best practice guidance on delivering good design on infill sites to help guide the smaller housebuilders particularly since the contribution to housing supply from small sites is so significant.

Policy D5.

We would like to see a more ambitious target than the current 10%. This is to take into account the growing ageing community, likely higher levels of disability and the pressure on beds being "blocked" whilst awaiting simple home refurbishments.

Policy D6 Optimising housing density

The Council supports the move away from the density matrix and the focus on a design-led approach to optimising housing density.

Policy D11 Fire safety

The Council supports the focus of policy D11 on fire safety and the requirement for all major developments to be submitted with an independent fire strategy produced by a third party suitably qualified assessor.

Policy D12 Agent of change

The Council supports the introduction of the Agent of Change principal into the London Plan, in addition to the issues listed in the policy, this issue has arisen in Barking and Dagenham with regard to places of worship and the Council supports the onus being placed on the new development to mitigate the impact on neighbouring residents, businesses and community groups.

Chapter 4: Housing

We understand that housing has a social and community purpose and thus strongly support the housing policies. People need homes of many different kinds, sizes, designs and locations. A mix of different types of homes bonds us together; it builds communities and helps working people stay in the borough and families stay near



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each other. As such, the ambition to ensure Barking and Dagenham is a place with sufficient, accessible, and varied housing is a key theme within our borough manifesto.



Policy H1 Increasing housing supply

Barking and Dagenham is a pro-growth borough. It has set up Be First to accelerate development and to deliver over 50,000 homes and 20,000 jobs in a way which improves socio-economic conditions across the borough, ensuring no one is left behind. Consequently, in principle it supports the borough's increased housing target. This is consistent with the borough's housing trajectory. However, the borough cannot support the composition of this housing target which is completely at odds with how we foresee new housing supply coming forward. The target of 519 net new homes a year coming forward on small sites is not achievable. We are not however arguing for a reduced housing target rather one which prioritises intensifying scandalously under-used employment land over flat conversions and back garden development.

Policy H2 Small sites

The small sites contribution for Barking and Dagenham is 519 units per annum, 22 percent of our draft annual total target. As set out in the Strategic Housing Land and Availability Assessment (SHLAA) based on past trends Barking and Dagenham has the lowest small sites contributions set against all other London Boroughs³ both on the eight-year trend (table 6.1, page 120, SHLAA, 2017), ten-year trend (table 6.2, page 122, SHLAA, 2017) and the twelve-year trend (table 6.3, page 124, SHLAA, 2017). The borough is therefore in a rather unique position with historic trends indicating that given the borough's unique circumstances it is unlikely to deliver sufficient levels of small sites. The Council sees no evidence of this trend changing significantly even with an altered policy approach.

First, the Council will continue to support the retention of existing family sized accommodation⁴ which will have a dampening impact on small sites supply. The London Plan rightly recognises the importance of getting the right mix of homes in new developments but that boroughs should not set prescriptive dwelling size mix requirements. The difficulty of securing family sized accommodation in new development due to the need to optimise densities increases the importance of protecting the borough's existing stock of family housing especially, to meet the needs of the borough's increasingly diverse community. Moreover, an overconcentration of Homes in Multiple Occupation (HMO) can have adverse impacts on quality of life and amenity. This was recognised in the borough making an Article 4 Direction which removes permitted development rights to convert dwelling houses into HMOs. For similar reasons the Council's Local Plan prevents the subdivision of family homes into flats. The Council does not intend to reverse these policies.

³ Excluding the City of London and Mayoral Development Corporation areas.

⁴ The Council has policies to protect family sized accommodation through policy BC4: Residential Conversions and Houses in Multiple Occupation, Borough Development Policies, DPD, 2012.



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Regarding the intensification component of policy H2 it requires boroughs to explore through design codes and other means how intensification could be achieved. The Characterisation Study sets out that given the distinct character of the borough intensification opportunities on small sites are limited. For example, where intensification does occur it is often residential extensions to meet the needs of growing and extended families.

Often proposals for new homes on small sites are poorly designed and executed, and we refuse many such applications. Whilst the Council supports a design code approach it questions the ability of local developers to respond to it based on the experience of the quality of proposals the Council receives. Additionally, the Council has undertaken a detailed assessment of capacity of small sites, including across its own land holdings, as part of our Housing Land Assessment and only limited opportunities were identified.

The Council expects it is not alone in questioning the achievability of the small sites target. The reliance on small sites reduces the need to work under-used industrial sites harder. This is demonstrated by the fact no supply from the Council's SIL is included in our 10-year housing supply. The Council has no confidence that the Mayor's average of 64,935 new homes a year will be achieved unless a more realistic approach is taken to small sites forecasting and a more pragmatic approach is taken to industrial land. However, if the Mayor seeks to continue with his current approach then the Council would like to see the following changes to the methodology.

As set out in the SHLAA 2017, two routes to calculating the small sites contribution have been undertaken. The second option applies to Barking and Dagenham, this involves the development of a model which calculates a small sites contribution based on a 1 percent change to the existing dwelling stock in PTAL 3 to 6 areas or 800 metres from a train station. The following changes are required to make the figure more realistic:

- *stripping out social rented tenure* - The methodology sets out that all tenures of the terrace and semi-detached housing stock were utilised in the calculation. In our view, social housing tenure should be taken out of the analysis. It is unlikely that these units (which are a considerable proportion in Barking and Dagenham⁵) would be intensified or converted into smaller units. The bulk of the social rented stock is in Council control, but we would assume Registered Providers would have the same commitments. Consequently, the social housing stock should be stripped out and not form part of the calculation.
- *a readjusted gross/ net growth factor* - The net and gross growth factors of 2.23 for detached/ semidetached and 1.34 for terrace properties are set uniformly for all chosen areas (PTAL 3 – 6 or are within 800 metres from a train station). It is our view that applying a uniform growth factor for all of

⁵ In Barking and Dagenham at the 2011 census 33.7% of households were in social housing stock. One of the highest rates in Greater London (Census 2011 – Table KS402EW).



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These diverse areas is unreasonable. It should be changed so PTAL 3 areas have a net growth factor lower than PTAL 6 given the significant differences in these settings.

- *Special dispensation for 'special heritage areas'* – The Becontree Estate will shortly celebrate its one hundredth anniversary. In the emerging Local Plan, the Council will designate the Becontree a special character area due to its importance to 20th Century town planning internationally. At its time of development, the Becontree was the world's largest social housing estate. Its principles were exported across the UK. Its character and its importance is set out in the recently completed Characterisation Study 2017. Therefore, we feel that the Becontree Estate should have the same yield rate, 0.25, as applied to conservation areas. Moreover, homes on the Becontree do not lend themselves to conversion and they tend to have small gardens.

Policy H5 Delivering affordable housing and Policy H7 Affordable housing tenure

The Council supports the Mayor of London's focus on delivering more genuinely affordable housing. Affordable housing is essential to improve quality of life, health and wellbeing and a reduction in inequalities within the capital. Be First's Business Plan commits it to building 1595 new affordable homes in the borough by 2023 to ensure residents are not priced out of the borough. On top of this is supply from third party sites such as Barking Riverside and Beam Park.

The Council is concerned that the focus on delivering 50% of new homes as affordable on public land may be at the expense of providing genuinely affordable new homes. On Barking Riverside 5% of the homes are at 50% market rents and at Beam Park 10% will be at London Affordable Rent. The Council in future would prefer the amount of target or London affordable rent homes to be prioritised over the overall amount of affordable housing achieved. Table 4.3 of the London Plan reinforces this which shows that by far the greatest need is for low-cost rent homes, data from the Council's own Strategic Housing Market Assessment, and the fact the borough's housing register currently stands at 5893 people.

Additionally, the Mayor needs to develop (with partners) definitions for all housing needs and be more explicit about the links to the objectives of the health inequalities strategy.

Policy H6 Threshold approach to applications

The Council supports the threshold approach to applications. This is already proving successfully with developers agreeing to provide 35% in order to avoid the uncertainty and delay caused by the scrutiny of viability appraisals and the imposition of review mechanisms.

The Council has two concerns. Firstly, it is somewhat iniquitous that on public land a higher 50% target applies than on private land where a 35% target applies. The same target, at whatever level it is set, should apply irrespective of who owns the land. It could be argued that a private landowner is in a better position to absorb the



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cost of an increased affordable housing target than a public land owner. The 50% target may adversely affect the ability of public authorities to bring forward sites and gives a competitive advantage to private landowners and developers who will be competing in the same market. Moreover, unlike private sites, the land receipt from public land is reinvested into sustaining vital public services.

The Council supports the focus on existing use value plus but it is important to note that in industrial areas in Barking and Dagenham the existing use value can be similar to the value of residential land. These sites are often heavily constrained and need considerable investment in infrastructure to unlock their potential. Most of the borough's SIL and LSIL is in the London Riverside Opportunity Area. For this reason, the Council is concerned that a 50% threshold applies to SIL and LSIL. Whilst we welcome the ability to apply a localised affordable housing threshold in Opportunity Areas it would be better for the plan to set a 35% target to SIL and LSIL in Opportunity Areas. This would reduce the uncertainty and delay in boroughs undertaking setting their own thresholds.

35% of housing supply is from small sites. On these sites the amount of affordable housing achieved is likely to be less than 35% overall as many will be under ten homes such as flat conversions or delivered through permitted development rights. Therefore, to achieve the Mayor's 50% affordable target significantly more than 50% of homes on the remaining 65% of supply will need to be secured. Therefore, the focus on small sites means it is unlikely that the Mayor's overall affordable housing target will be achieved. A more realistic small site figure and a more flexible approach to SIL and LSIL will help increase affordable housing delivery.

Policy H10 Redevelopment of existing housing and estate regeneration

The Council supports Policy H10 and welcomes the recognition that where a borough is redeveloping an estate as part of a wider programme then it may be possible to re-provide a different mix of affordable housing on the estate if the overall level of provision is maintained across the programme. In addition, in Barking and Dagenham due to low sales values and capital construction costs it can prove difficult to re-provide the existing quantity of social rented housing. Whilst the Council supports this objective the Mayor not only needs to support its implementation through the allocation of sufficient affordable housing grant but also allow Local Authority Housing Companies such as Reside to access it. Otherwise this policy might frustrate the regeneration of failed estates.

Policy H11 Ensuring the best use of stock

The Council supports the Mayor's concern around buy to leave properties even if this phenomenon hasn't reached Barking and Dagenham. However rather than rely on boroughs to tackle this issue the London Plan should make clear this will not be tolerated.

Policy H12 Housing size mix

The Council's Strategic Housing Market Assessment demonstrated significant need for family sized accommodation (three bed or greater). This policy needs to



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recognise that with developments increasingly having limited genuine family sized accommodation that this places a greater emphasis on protecting existing family sized homes.

Indeed, the policy recognises the role of one and two bed units in freeing up family housing. However, this is undermined by Policy H2 which seeks in PTAL 3-6 areas to encourage the subdivision of such homes.

Policy H13 Build to rent

The Council supports the London Plan in its continued support of the Build to Rent sector housing. The content of Policy H13 *Build to Rent* broadly reflects that set out in Affordable Housing and Viability Supplementary Planning Document (SPG) (August 2017). However, this policy says nothing about buy to let which lacks most of the benefits of build to rent for example longer tenancies, better management etc. Indeed by placing a threshold of 50 units it doesn't control at all the quality of smaller rented developments despite the fact that 35% of supply is envisaged from small sites. Policy H2 rightly focuses on the need for good design of small sites but it also needs to address the issues caused by Buy to Let on small sites which will not be captured by this policy. Greater controls need to be placed on new build sale properties to ensure that were they are bought to rent they are subject to the same standards set out in these policies for build to rent.

Policy H15 Specialist older persons housing

The Council welcomes the draft London Plan approach to Policy H15 *specialist older persons housing* and the connecting table 4.4 which sets out a requirement for 70 units for specialist older persons accommodation. We are of the view that the Mayor should commit to a proportion of this accommodation being affordable. The Council will explore how this need can be met through our emerging Local Plan.

Policy H16 Gypsy and Traveller accommodation

The Council understands why the Mayor of London has adopted a more inclusive definition for Gypsies and Travellers. However, an impact assessment should be undertaken to understand the implications of operating one definition for London and another for the rest of the country. In addition, London Boroughs will need substantial funding from the Mayor to enable them to address the special housing needs of Gypsies and Travellers.

Further comments to follow.

Chapter 5: Social Infrastructure

S1 Developing London's social infrastructure

The Council welcomes the draft London Plan's policies on social infrastructure. As London's growth opportunity, with the potential to provide over 50,000 homes and 20,000 jobs it is important that social infrastructure planning policies at both the London Plan and local level are fit for purpose to meet the needs of growth. The



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Council supports draft policy S1 *developing London's social infrastructure* which sets out the broad principle for infrastructure development including the need to maintain infrastructure demand and supply through need assessments. The Council also supports the need to protect existing social infrastructure in areas of defined need.

However, we are concerned that there is only a cursory mention of religious meeting places despite this being one of the main planning issues in Barking and Dagenham over the last ten years due to the borough's changing demographics and the difficulties for faith groups to find premises. Whilst social infrastructure such as schools and health are often planned for in new developments, religious meeting places are not to the detriment of place making and social inclusion. Often religious meeting places are afterthoughts if they are considered at all and the draft London Plan continues this trend. To address this Barking and Dagenham has done a study into religious meeting places, this involved an audit of existing groups and facilities to determine existing supply, forecasting future demand based on the Council's housing trajectory, and an examination of the practicalities of multi-faith facilities. One of the issues that emerged was that the needs of some groups are at the sub-regional or regional level and therefore best addressed at that scale. The GLA has an important role to play in this regard and this needs to be addressed in this policy. We are happy to share the recommendations of our study many of which apply equally to all of London as they do Barking and Dagenham.

Policy S2 Health and social care facilities and policy S3 Education and childcare facilities

The Council supports the principles set out in these policies as we work (through our corporate strategies) to ensure that Barking and Dagenham becomes a place which supports residents to achieve independent, healthy, safe and fulfilling lives. However, the GLA should take a bigger role in coordinating the planning and sharing of best practice for the development of such facilities given the cross-borough nature of such facilities. The Council supports the co-location of facilities with other uses in order for the more efficient use of land and to enable more integrated service delivery. For Barking Riverside and Thames ward an innovative and integrated health and care facility is being developed as part of the Healthy New Towns programme. This is offered as a case study and example of best practice.

With regard to policy S3 which focuses on education facilities, the Council supports the policy approach. The policy should go further to set out that education facilities should encourage the optimum use of land and where appropriate mix with other uses (such as residential or commercial). It should also promote the highest standards of design for education uses reflecting the fact that they are often at the heart of the communities they serve and often some of the first buildings built in major new developments and help set the tone for the development that follows. We support S3, the proposal to link existing foot path and cycle networks to create healthy routes to schools, educational and childcare facilities. The benefits of active travel are important for all age groups therefore we would like to see this amended to add "play and recreation settings and community centres"

We would also like a call for local authorities to set ambitious targets for the proportion of children and young people undertaking active travel.



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We would like this supported by a recommendation that Healthy Streets approach and encouragement of 20mph limits near these facilities be incorporated into planning decisions.



Policy S4 Play and informal recreation and Policy S5 Sports and recreation facilities

The council supports the principles set out in these policies. Developing health habits such as walking, and cycling are a key theme to the boroughs Healthy Weight Strategy and underpins the boroughs manifesto. Giving children the best start in life is a priority. Additionally, considering the development of intergenerational play grounds to encourage stronger, inclusive communities and enrich experience across generations is important.

Chapter 6: Economy – Industrial Release and Intensification

Policy E4 Land for industry, logistics and services to support London's economic function

The Council supports the GLA's focus on intensifying industrial land, it agrees that SIL and LSIL will continue to provide space for businesses which are vital to the functioning of London's economy. We also welcome the designation of the borough as a release borough reflecting the fact that industrial land vacancy rates are well above the London average.

It is not an exaggeration to say that the future of the borough is linked to the future of its industrial land. As a percentage of the urban area, there is more land protected for industry in Barking and Dagenham than in any other London borough. Whilst in Barking Town Centre densities of over 600 homes a hectare are being achieved, adjacent industrial land persists with less than 25% site coverage, aided and abetted by planning policy which focuses on making best use of housing land but does nothing to unlock the development potential of chronically underused industrial land. This is a relic of the borough's industrial history which now provides less than a quarter of jobs in the borough despite occupying 20% of its urban area. If average employment densities were achieved on the borough's industrial sites half the land currently designed as SIL and LSIL would be required. Moreover, the borough's industrial areas are surrounded by some of London's most deprived communities. This is shown in figure 2.19. The deep-rooted deprivation that exists in these areas cannot be changed unless there are changes to the structure of the local economy and the full potential of the borough's industrial areas can be unlocked to address market failure and end the cycle of deprivation that has blighted the borough.

It is for this reason that the borough has commissioned a pioneering study into the future of its economy and its employment land. We are using SQW and Cambridge Econometrics to model what the requirements of businesses will be over the next 15 years and using Hawkins Brown and WeMadeThat to plan how their needs can be accommodated with a focus on promoting higher plot ratios and more intense mixed use developments reflecting the changing needs of business and the blurring of the boundaries between space for living and working. We are challenging the borough's industrial land designations which are increasingly at odds with their proximity to



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central London, the needs of modern London serving businesses, the fact we are at the heart of London's production corridor and the need to find land to meet London's acute housing need. Whilst on the surface this would appear to be in tune with the London Plan a deeper examination of how the policies work in practice raises deep concerns.

Although the borough is classified as a release borough this does not appear to mean much if anything in practice. No housing supply from the borough's SIL is included in the Council's housing supply target from 2019-2029. Also, if we have understood correctly, paragraph 6.4.5 defines no net loss of floorspace as either the existing floorspace or the potential floorspace based on a 0.65 plot ratio (whichever is the greater). Presumably this definition applies to E7 E1). As already set out, in Barking and Dagenham the average plot ratio is 0.25. This is half the London average and a quarter of some boroughs', for example Tower Hamlets. In Tower Hamlets (a retain borough) and Wandsworth (a release borough) existing plot ratios are above 0.65. Here the principle of "no net floorspace" means exactly that; in Barking and Dagenham (a release borough) it means a 260% increase. The policy should act in reverse. It should seek to protect land with the highest existing plot ratios and enable the release of those with the lowest provided there is no net loss of floorspace.

Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function.

We have other concerns. Policy E7 sets out that the intensified industrial, storage and distribution uses are completed and operational in advance of any residential component being occupied and that a development agreement should be secured to ensure this. On top of this there is a requirement for 50% affordable housing.

Whilst laudable, the requirement for the new industrial floorspace to be operational before the residential component is occupied has no regard to how developments are funded and cash-flowed. The proceeds from the residential development will help subsidise the re-provision of the employment floorspace. There is no guarantee that there will be market demand for the new industrial floorspace and funders are unlikely to lend on any development burdened with the uncertainty that until the new industrial floorspace is operational the new homes cannot be occupied.

The 50% affordable housing target for industrial land does not recognise the economics of development in Barking and Dagenham where existing use values for industrial uses are often higher than residential land values. Indeed, the focus on existing use values throughout the plan assumes existing use values are less than the market value, this is often not the case in Barking and Dagenham. Due to lower land values, the likely existence of contamination and the need to re-provide industrial floor space, plus the need to provide new social infrastructure these costs will inevitably cut into affordable contributions.

The combined effect of these three requirements will be to sterilise the borough's industrial land for the lifetime of the London Plan. Not only has the Mayor maintained the Green Belt he has also introduced a Brown Belt. In fact, under this London Plan



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it will be easier to justify new homes in the Green Belt than in LSIL or SIL where a 35% not a 50% affordable target applies.



The Council is surprised that whilst policy is onerous on the intensification of release land for non-employment uses, policy is not similarly onerous for applications for employment uses in SIL and LSIL. The Council recently met one of the main providers of B2 and B8 space in London and their view was that it is unlikely that multi-storey B2/B8 buildings and a plot ratio above 0.45 would be viable in East London, east of the north circular. If this is true, then the example provided in Figure 6.3 is not viable in two of the three release boroughs. This is clearly a symptom of an oversupply of industrial land and planning policies which do little to increase commercial floorspace densities in the same way they do residential. Policy E7 is deficient in this respect, it says that development plans and development proposals should be proactive and encourage the intensification of business uses in Use Classes B1c, B2 and B8. However, there is no mechanism to ensure this. The Plan does nothing to force the intensification of SIL and LSIL and allows for the chronic underuse of industrial land in Barking and Dagenham to be maintained whilst at the same time stipulating a fivefold increase in small site developments across the borough's residential areas. The 0.65 plot ratio should be required for part A of policy E7. The plan should make clear that any application for uses B1c, B2 and B8 in SIL and LSIL must achieve at least the London average plot ratio of 0.5 and ideally 0.65.

To incentivise intensification the Council considers that new industrial development in SIL and LSIL should be required to provide a proportion of affordable floorspace proportionate to the level of intensification achieved. Therefore, policy E7 could work in tandem with policy E4. For example, where the plot ratio is less than 0.65 the difference between the proposed ratio and 0.65 should be made up by on-site affordable workspace. Where a plot ratio of 1 is achieved and this is above that borough's average plot ratio there would be no requirement to provide affordable workspace.

Finally, the Council is concerned that the borough's release status does not deliver any advantages and that the Plan needs to more clearly set out what this means in practice.

In summary the Council is deeply concerned by the London Plan's proposed approach to SIL and LSIL and proposes the following changes to policy for Release Borough's:

- Reduce the affordable housing target to 35% for developments in SIL and LSIL within Opportunity Areas
- Remove the requirement of a 0.65 plot ratio when calculating no-net loss of floorspace
- Remove the requirement for the replacement floorspace to be operational before the new homes are occupied
- Place a requirement on new industrial uses to achieve a 0.65 plot ratio and where they do not require the difference to be made up by on-site provision of affordable workspace



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Be more explicit on the role of the London Plan in facilitating substitution in recognition of the important role of the wider south east in serving the London economy



These changes will introduce more flexibility to the London Plan and help offset the fact that the borough will be unable to meet its small sites target which is unachievable. As it stands the London Plan sets an unachievable small site target for Barking and Dagenham and an unworkable release policy for its industrial areas. We would prefer an achievable small sites policy and a workable release policy. Without these changes the borough cannot accept its new housing supply target. The result will be more housing, more affordable housing and more jobs.

The Council would like to invite the relevant GLA to discuss our suggested changes to the draft London Plan industrial release and intensification policies (set out above) as well as discuss the outputs of our commissions; *the Future of Our Local Economy* and *the Future of Our Employment Land*.

Policy E8 Sector growth opportunities and clusters

Previous London Plans have not identified the true potential for economic growth in Barking and Dagenham. This Plan is different. It recognises the potential for a Thames Estuary Production Corridor and the potential for Creative Enterprise Zones. The Council's exciting plans for film studios at Dagenham and the potential for the new data centres to support the growth of the tech and digital sector in Dagenham are evidence of this.

Policy E9 Retail markets and hot food takeaways

Obesity is a major problem in London and shows major inequalities across London. There is a challenge to narrow the gap in levels of obesity across London and to reach certain communities. To address this requires actions on all fronts and an approach that tackles the causes of the causes such as low income and access to healthy food. As such, the Council strongly support the Mayors approach to limiting A5 hot food takeaways within 400 metres to both primary and secondary schools. We note the ability of boroughs to manage an over-concentration of these uses. However, we think the wording should be changed to "boroughs that wish to set a locally-determined boundary from schools may only do so provided that the new local boundary is greater than 400m."

The Council also support the use of the Healthier Catering Commitment (HCC) standard when permitting hot food takeaways. However, to support this we ask the Mayor to consider how to close loop holes in the HCC around how businesses classify themselves. We also ask the Mayor to support boroughs with limited resources dedicated to HCC.

Although the draft London Plans commitment to hot food takeaway restrictions is supported it is disappointing to see a more limited support of resisting the over-concentration of other uses such as betting shops, pawnbrokers and pay day loan stores which arguably all have their own health impacts. Much evidence has been assembled regarding the impacts of betting offices. The Council recommend that these harmful impacts and resisting their development should form part of policy E9.



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Policy E11 Skills and opportunities for all

The draft London Plan's approach to skills and opportunities for all should go further to ensure good growth becomes an outcome of development and not just an ambition. The policy on skills, set out in E11 skills and opportunities for all restricts itself to seeking to support employment skills opportunities and other education/training opportunities in both construction and end-use phases. Given the Mayor's commitment to good growth the policy should go further. First, when it comes to construction the policy should set out a percentage of those working on the construction to live locally. Second the policy, should go further into how end-use phases could pragmatically be delivered. This policy needs to be expanded and be wider connected to the 'good growth' agenda set out in chapter one.

Chapter 7: Heritage and Culture

Policy HC1 Heritage conservation and growth

The Council strongly supports the focus on preserving and enhancing London's historic environment. We also recognise the positive impact of culture on health. As such we would like to see the policy HC1 B4 strengthened to specifically mention the benefits to health (as well as social) well-being.

Policy HC5 Supporting London's culture and creative industries

The Council strongly supports the focus on London's culture and creative industries. The borough has put itself forward as a Borough of Culture, (enterprise area) and is at the heart of the Thames Estuary Production Corridor with ambitious but rapidly developing plans to establish Dagenham as a film and media centre. We have helped grow creative industries locally by securing affordable creative industry space and cultural facilities in new developments. The policy not only needs to secure affordable space for creative industries but also cultural facilities which celebrate local history, achievements, and creativity, an example of this locally is the space we secured for the East End Women's Museum. There is a burgeoning arts scene and a growing creative industries sector locally and we welcome the Mayor's support for this vital part of London's economy.

Policy HC6 Supporting the night-time economy

The council strongly support this policy and its focus on supporting a night time economy. Night time economies represent a valuable asset to local and national economies through job creation, revenue and providing opportunities for people to socialise as a borough where the employment age of residents of working age (16-61) is lower than both London (73.7%) and England (74.2%) methods to boost the local economy are warmly welcomed. However, we would like a clause added the diversity of the night time activities includes



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creating more options that don't necessarily involve the consumption of alcohol. This is as alcohol in excess can be harmful to health.



Policy HC7 Protecting public houses

The Council supports the protection of public houses where they have a heritage, economic, social or culture value to local communities. The term 'authoritative marketing' should be extended to set out a minimum amount of time the marketing should be undertaken. The Council's policy requires 12 months marketing for a pub use at price agreed with the Council following an independent professional valuation and if this is unsuccessful 12 months marketing for community uses. 24 months of marketing evidence would be sufficient to allow for sufficient time for marketing to be undertaken. This will incentivise land owners and pub operators that the planning system is taking a tough line on retention and this would hopefully lead to investment. Whilst public houses can be beneficial to wellbeing and social infrastructure. We suggest that the London Plan should state that proposals for new public houses be considered on their own merit and should be contingent on an assessment of the cumulative impact of licensed properties.

Chapter 8: Green Infrastructure and Natural Environment

Policy G1 Green infrastructure

The ambition to a build a borough which is clean, green and sustainable, is one strongly weaved in the borough manifesto and therefore the council supports the principles set out in this chapter. It is important for us to support the protecting of our green and open spaces as unitisation of such spaces will positively impact on physical activity levels and reduced obesity levels and improved mental health. However, the policy should provide more details on how we protect green assets such as; street trees, green roofs and SUDs in the long run. The London Plan should also state clearly if these assets (identified above) count as "key green infrastructure" referred to in G1-Ci.

The policy should be clear that the planning for green infrastructure must redress the current inequities of quality and accessibility across the capital as this can exacerbate health inequalities.

The policy is silent on the impact of densification and its impact on green infrastructure. Although many benefits come from densification, arguably it could have an impact on achieving good quality green infrastructure. Masterplans, planning frameworks and design codes should provide specific guidance on the location, structure, habitat and species selection of green infrastructure for new development to ensure its multiple benefits are realised.

Policy G2 London's Green Belt

The Council supports the continued protection of London's Green Belt. However, the Council considers that unless the Mayor addresses the borough's concerns on the industrial land and small sites policies then the Green Belt will come under more



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pressure from developers, challenging the borough's ability to meet their five-year housing land supply requirement. A more realistic small site target and a more flexible approach to employment land will help support the Mayor's aim to continue the strong protection of the Green Belt and Metropolitan Open Land.

Policy G3 Metropolitan Open Land

The Council supports policy G3 which protects Metropolitan Open Land from inappropriate development. The Council has recently approved its Open Space Strategy which includes masterplans for a number of its parks including Barking Park, Mayesbrook Park and Parsloes Park which aim to enhance the quality and range of uses within them in recognition of the fact they need to offer a lot more for the borough's diverse community. We look forward to working with the Mayor in realising our exciting plans for the borough's parks. The Plan could usefully include a map of London Metropolitan Open Land and include policies to encourage an even distribution across London given its strategic importance.

Policy G5 Urban greening

The Council support the principles within draft London Plan policy G5-urban greening. However, at G5-A the policy should set out that urban greening must benefit biodiversity. The Council also welcomes G5-B, where the policy states boroughs should develop an 'Urban Greening Factor' to identify the appropriate amount of urban green requirement in new developments. The 'Urban Greening policy is welcome. However, it may result in large areas of hardstanding such as car parks with no soft landscaping. There needs to be a caveat that prevents this, possibly by requiring urban greening to be inter connected on and off sites.

Policy G6 Biodiversity and access to nature

Given their importance Council feel that the protection this policy gives to SINC's should go further. The policy currently states that the greatest protection should be given to the most significant sites. In our view all SINC's should receive the same level of protection.

Policy G7 Trees and woodlands

This sets out that 'veteran' trees and ancient woodland should be protected where these are not part of a protected site. In our view all semi-natural woodland should also be protected, even if it is not ancient woodland, as woodland is a rare habitat within London and consequently protection should be extended.

Policy G8 Food growing

The Council strongly supports the focus on good growing something which has a proud history in the borough and is flourishing today at for example Dagenham Farm and Gale Street Organics. The plan should consider how to ensure these are accessible to diverse communities so as to narrow health inequalities.

Chapter 9 Sustainable Infrastructure



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Air quality is an important Public Health issue across London. It contributes to shortening life expectancy, disproportionately impacting on the most vulnerable. Added to this are the costs to the economy of the health impacts of poor air quality. The associated cost to Barking and Dagenham, a borough where mortality rates attributable to poor air quality are some 38% higher when compared with the UK average. We therefore strongly support the policies around sustainable infrastructure.

Policy SI1 Improving air quality

The Council support the principles in draft policy SI1 *improving air quality* given the borough's status as an Air Quality Management Area and the presence of several major air quality hot spots (e.g. A13, Barking town centre).

Policy SI2 Minimising greenhouse gas emissions

Policy SI3 Energy Infrastructure

The Council supports the focus on making London a zero-carbon city and the policies set out to achieve this. The Council has set up a energy company to help not only deliver green energy but also tackle fuel poverty and looks forward to working in partnership with the Mayor in achieving the aim of a zero-carbon city.

Policy SI6

The Council supports the focus on better digital connectivity. London Riverside has poor broadband access and investment is needed to maintain the areas economic competitiveness.

Policy SI8 Waste capacity and net waste self sufficiency

Policy SI9 Safeguarded waste sites

Table 11.1 of the London Industrial Demand Study shows that that is an indicative land requirement for waste in Barking and Dagenham of -21.3 hectares and similar reductions in the other release boroughs. In other words, there is a surplus of land in waste use or allocated for waste in the release boroughs. This is not surprising. A journey to Dagenham Dock, Thames Road and River Road will reveal a multitude of waste uses, many low grade and far removed from the type of waste management facilities envisaged by the London Plan and its encouragement for the circular economy. These uses blight the local area and are subject to regular enforcement action by the Environment Agency. These sites act as a barrier to regeneration on nearby sites. Yet the London Plan safeguards such uses, irrespective of their quality and purpose, and requires that they should be re-provided if lost. The London Plan should only require those well managed waste uses necessary to manage our apportioned waste should be safeguarded, not low grade waste uses which are surplus to requirements.

On the other hand, Table 11.1 shows that many other boroughs require additional land for waste uses. Therefore, not only do the release boroughs have proportionally some of the highest apportionments they are also required to maintain the existing



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surplus in waste management capacity, which means their actual apportionment is significantly above that shown in Table 9.2. To make matters worse, Barking and Dagenham is still receiving applications for waste uses which have been forced out of Greenwich and Hackney due to regeneration. In line with our Joint Waste Plan we refuse these applications on the basis we have met our apportionment through our more proactive approach to planning for waste uses in our Joint Waste Plan. Greenwich and Hackney are retained boroughs and shown in Table 11.1 as having marginal surplus waste capacity and in the case of Hackney a deficit. Policy S19 needs to recognise these spatial imbalances in waste provision and make clear, in line with the proximity principle, that where a waste use is lost in a retain or provide borough the capacity must be re-provided in that borough and not re-provided in a release borough where there is already a surplus of waste capacity.

Chapter 10: Transport

Policy T1 Strategic approach to transport

The Council supports the principles set out in this policy. However, it should be noted that achieving these targets will require significant investment in new transport infrastructure/services – particularly in outer London, but many of the measures proposed remain uncosted/unfunded.

Policy T2 Healthy Streets

The Healthy Streets approach is strongly supported. We also welcome the reduction of car dominance, ownership and use as being supportive for active travel. This approach is an opportunity to improve public health. However, we call on the Mayor to strengthen this approach through further consideration of health inequalities.

Given the particular health challenges facing many Londoners we would like healthy planning to go much further and for all new strategic developments to adopt the 10 'healthy new town principles' as are being applied to the Barking Riverside development.

Policy T3 Transport capacity, connectivity and safeguarding

The Council supports the principles set out in T3 *transport capacity, connectivity and safeguarding*. However, the indicative list of Transport Schemes lacks clarity on what major transport infrastructure improvements are necessary to deliver the 44,000 new homes and 29,000 new jobs envisaged in London Riverside. Other than the London Overground Extension to Barking Riverside no other scheme is mentioned. There is reference to highway decks and DLR extensions but these are not specific and do not correspond with the Draft Mayor's Transport Strategy which specifically refers to Lower River Roding Crossing, Extension of London Overground to Abbey Wood and DLR Extension to Barking.⁶ We are also concerned that the Gallions Reach River Crossing is pushed further back beyond 2030 despite the now well-rehearsed arguments for the need for more river crossings in this part of East London.

⁶ See figure 48, Draft Mayor's Transport Strategy, 2017.



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Considering this plan is for the next 20-25 years the lack of certainty provided on major transport improvements is disappointing and at the very least should be consistent with the Mayor's Draft Transport Strategy.

Good transport infrastructure is essential for health and wellbeing by reducing social isolation, improving air quality and encouraging physical activity for example. However, the current transport system is unequally distributed – for example the burden of harm from cars and poor access to services falls disproportionately on more deprived communities. We therefore ask the Mayor to ensure that this transport policy benefits every one of all ages, abilities and background – particularly those that need it the most to ensure the maximum health benefits are recognised.

We would also ask that they Mayor – in line with his commitments in his Manifesto and in the draft Health Inequalities strategy - considers a stronger focus on suicide prevention through the transport system.

The public transport system provides an opportunity to promote healthy behaviours through advertising. We therefore ask that the plan states that TfL should create health a promoting environment by removing all advertising of HFSS foods and drinks (products that are high in fat, salt or sugar), and alcohol.

Policy T5 Cycling

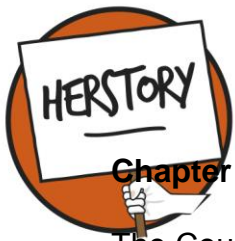
The Council supports the principles set out in this policy. It will benefit positive mental and physical health as well as improve the environment. Although greater emphasis needs to be placed on delivering improvements, such as cycle parking and safe routes in outer London if car dependency is to be reduced.

Policy T8 Aviation

We support the Mayor's stance in this policy on additional aviation capacity and his view that any expansion of Heathrow airport must be able to demonstrate that it would not result in any additional noise or worsening of air quality and that the surface access networks must be invested in to accommodate the resultant additional demand. We agree that better use must be made of existing airport capacity with improved surface access links. In particular in East London better public transport links are needed to Stansted Airport and City Airport.

Policy T9 Funding transport infrastructure through planning

The Council broadly supports this policy although the Mayor's Community Infrastructure Levy should not be restricted to just Crossrail 2 as this doesn't benefit everyone in London. It is clearly iniquitous that a development in Barking will be funding Crossrail 2 which does not bring any benefits to Barking and Dagenham given that there is no commitment to an eastern spur to the borough. Due to viability the Mayor's CIL is double the borough's own CIL in these areas and takes vital funding away from the infrastructure needed to support the delivery of the 44,000 homes in London Riverside.



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Chapter 11: Funding the London Plan



The Council shares the Mayor's concerns about the growing funding gap between required public sector investment and committed funds and supports his call for further devolution of fiscal powers in line with the recommendations of the London Finance Commission including the devolution of Vehicle Access Duty, Council Tax, Stamp Duty and Business Rates to London.