Wood Lane Sports Centre, Wood Lane, Dagenham
in the London Borough of Barking and Dagenham
planning application no.12/00793/FUL

<table>
<thead>
<tr>
<th>Strategic planning application stage II referral (new powers)</th>
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<table>
<thead>
<tr>
<th>The proposal</th>
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<tr>
<td>Demolition of existing sports centre and erection of 26 bungalows and 1 house for elderly people (over 55’s) along with associated highway alterations, car parking and landscaping.</td>
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<table>
<thead>
<tr>
<th>The applicant</th>
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<td>The applicant is London Borough of Barking and Dagenham, and the architect is Patel Taylor Architects.</td>
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<th>Strategic issues</th>
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<td>Outstanding issues in relation to <strong>affordable housing tenure split, inclusive design, sustainable development, employment and training, and transport</strong> are resolved satisfactorily.</td>
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<th>The Council’s decision</th>
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<td>In this instance Barking and Dagenham Council has resolved to grant permission.</td>
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<th>Recommendation</th>
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<td>That Barking and Dagenham Council be advised that the Mayor is content for it to determine the case itself, subject to any action that the Secretary of State may take, and does not therefore wish to direct refusal.</td>
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<th>Context</th>
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<tr>
<td>1 On 18 September 2012 the Mayor of London received documents from Barking and Dagenham Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. This was referred to the Mayor under Category 3D of the Schedule to the Order 2008: “Development – (a) on land allocated as Green Belt or Metropolitan Open Land in the development plan, in proposals for such a plan, or in proposals for the alteration or replacement of such a plan; and (b) which would involve the construction of a building with a floor space of more than 1000 square metres or a material change in the use of such building.”</td>
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<td>2 On 24 October 2012, the Deputy Mayor and Chief of Staff, acting under delegated authority, considered planning report PDU/3040/01, and subsequently advised Barking and</td>
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Dagenham Council that the application does not comply with the London Plan, for the reasons set out in paragraph 58 of the report; but the potential remedies also set out in that paragraph could address those deficiencies.

3 A copy of the above-mentioned report is attached. The essentials of the case with regard to the proposal, the site, case history, strategic planning issues and relevant policies and guidance are as set out therein, unless otherwise stated in this report. Since then, the application has been revised in response to the Mayor’s concerns (see below). On 12 November 2012 Barking and Dagenham Council decided that it was minded to grant planning permission, and on 15 November 2012 it advised the Mayor of this decision. Under the provisions of Article 5 of the Town & Country Planning (Mayor of London) Order 2008 the Mayor may allow the draft decision to proceed unchanged or direct Council under Article 6 to refuse the application. The Mayor has until 28 November 2012 to notify the Council of his decision and to issue any direction.

4 The decision on this case, and the reasons will be made available on the GLA’s website www.london.gov.uk.

Update

5 At the consultation stage Barking and Dagenham Council was advised that the application does not comply with the London Plan, for the reasons set out in paragraph 58 of the report; but the potential remedies also set out in that paragraph could address those deficiencies. The outstanding issues are as follows:

- **Urban design**: This is a well designed scheme of the highest quality, but further consideration should be given to addressing the potential safety and security issues resulting from the layout.

- **Inclusive design**: there are concerns in relation to car parking bays, scooter storage, “HomeZones”, width of pedestrian routes and Lifetime Neighbourhoods. These concerns should be addressed and conditioned.

- **Sustainable development**: the applicant should quantify the overall regulated carbon dioxide emission and saving for the whole development as well as at each tier of the energy hierarchy. Further information is required to assess if the carbon dioxide savings will meet the targets within Policy 5.2 of the London Plan. The installation of the proposed PV should be conditioned. In addition issues related with green roofing and rainwater harvesting should be clarified.

- **Employment and training**: a strategy should be submitted and secured as part of the s106 agreement.

- **Transport and parking**: further work is required with respect to the amount of car parking. A PERS Audit should be undertaken of the routes between the development site and the bus stops on the A124 Wood Lane and assessment of the bus stops themselves. Secure and covered provision for cyclists, with an exact number of cycle spaces should be clarified and a travel plan and CLP should be secured by condition.

Affordable housing/tenure split

6 The Council has imposed a condition which states that the homes will be let at an affordable rent that will be pegged at between 50% - 65% of a local market rent level and will be retained as Council accommodation in perpetuity. The units would be available solely for people who are of statutory retirement age or who require an adapted property and are on the Council’s housing list. This is welcomed.
As a result the scheme complies with affordable housing policies of the London Plan.

**Urban design**

The courtyard gardens of 5 properties would back onto the access road and visitor car parking area beyond. This would help to provide a level of security by virtue of general activity. In addition, the access road is directly adjacent to the visitor parking area and would be used regularly by residents and visitors which would further reduce opportunities for anti-social behaviour.

As a result the scheme complies with design policies of the London Plan.

**Inclusive design**

The applicant has confirmed that pedestrian routes will be at least 1.8m in width, the “HomeZone” areas and car parking bays will now be clearly identified and each dwelling would be provided with a storage shed within the courtyard which can be utilised for cycle storage, or for electric scooter storage with charging point.

The proposed layout is designed in line with Lifetime Neighbourhoods and adopts a community spirit with all units having a visual connection and integration with the central communal garden, which measures approximately 80 metres in length by 10 metres in width.

All of the units would comply with the Lifetime Homes Standards and would be built to the Habinteg Wheelchair Housing Design Guide which means that the units are generally larger in floor area to accommodate wheelchair turning circles and include accessible wet rooms and wheelchair charging spaces. All parking spaces are designed to be wheelchair accessible.

As a result the scheme complies with inclusive design policies of the London Plan.

**Sustainable development**

The Stage I report required the applicant to set out the savings in regulated carbon dioxide emissions. Whilst this requirement has not been met the application is conditioned so that it will meet Code for Sustainable Homes level 4. As such, the development meets the 25% savings (over the current Part L of the Building Regulations 2010) required under London Plan Policy 5.2.

The carbon reduction is achieved through passive design measures to maximise solar gain, a high standard of insulation, a heat recovery system, efficient gas boilers and solar photovoltaic panels which will be fitted to each unit.
As such, the scheme complies with the energy policies of the London Plan.

**Employment and training**

There is no s106 agreement in this scheme as the applicant is the Council itself, however, the Council has secured a condition on this issue stating that the developer (through its appointed contractor) shall ensure that local employment is a criteria during the initial screening of candidates for employment arising from the development and for the matching of candidates to any vacancies and the appointed contractor will interview and, if appropriate, recruit suitably qualified applicants put forward by the Council as local recruitment broker.

As a result, the scheme complies with employment and training policies of the London Plan.

**Transport for London’s comments**

At consultation stage, Transport for London (TfL) highlighted a number of issues raised by the application which should be addressed.

It is noted that there are still inconsistencies in trip generation data. However, as the development would have a low impact on the local transport network, even in the worse case, and especially when compared to the previous use of the site as a sports centre, it is accepted that further work is not needed.

Residents’ car parking whilst reduced is still above the London Plan maximum. The applicant has justified this provision on the basis of the likely needs of the elderly occupiers which will increase over time. Therefore given the small numbers involved, and the amount of parking for the previous use, the proposal is accepted.

Access arrangements for and within the site have been clarified. There is still uncertainty about the suitability of the route for the adjoining boating lake. However, this matter could be resolved when details of the scheme are submitted for approval. In any circumstance there would not be an impact on Wood Lane or on bus operations.

An updated travel plan has not been produced. Given the scale and nature of the scheme, this is not considered a necessity. However TfL is disappointed that the applicant has not followed through with its commitment when making the application.

The provision of electric vehicle charging points (EVCPs) and cycle parking has been confirmed as complying with London Plan policies. As requested by TfL, the Council has resolved to impose conditions to secure EVCPs and cycle parking and manage construction traffic.

**Summary**

The issues raised at Stage 1 have been satisfactorily resolved, either through provision of further information and clarification, or via a planning condition. Therefore, the scheme is considered to be in accordance with the transport policies of the London Plan and acceptable in strategic transport terms.

**Other Comments**

The application was discussed at the London Access Forum meeting held at City Hall on 12 November 2012. The Forum members assessed the scheme with regard to inclusive design. They commented as follows:
The Council should have a management plan that addresses the isolation issue given that the occupants are the elderly people in a remote area where public transport and community infrastructures are very poor (e.g. access to surgeries, shops and emergencies).

In the internal design of the bungalows, sliding doors rather than the swinging ones would better serve the occupants, in particular the doors leading to the courtyards.

If the above issues cannot be addressed then the forum believes that the bungalows are more suitable for young retired rather than the elderly people.

The Council is encouraged to address the concerns raised by the London Access Forum as details of the proposal progress. However, on balance, from strategic planning perspectives (provision of 100% affordable housing, excellent design, generous space standards, etc) the proposed scheme is strongly supported.

**Response to consultation**

A total of 34 neighbouring properties were consulted, two site notices were displayed and the application advertised in ‘The News’.

Residents’ response: 1 letter of representation from a resident in Wisdons Close was received objecting on the grounds that the development was too overcrowded, that flats would have been more suitable, insufficient car parking is provided and the chimney design is poor.

In terms of strategic planning, the Council’s committee report which was also highlighted in the GLA’s stage 1 report, explained that the provision of flats on the site would have been difficult to achieve given the location of the site in the Green Belt and the Council’s design brief demonstrates that the site is particularly well suited to over 55 year old accommodation.

Statutory consultees:

- **Environment Agency**: No objections subject to a condition ensuring that the development is constructed in accordance with the submitted Flood Risk Assessment. This issue is secured through an appropriate condition (18).

- **English Heritage (Archaeology)**: No objections subject to a condition securing the implementation of a programme of archaeological works. This issue is secured by condition (19).

- **London Fire & Emergency Planning Authority (Water Supply & Vehicle Access)**: In respect of access, this should comply with Section 11 of Approved Document B Volume 1 of the Building Regulations. In respect of water supply, the Brigade advises that 2 additional private fire hydrants are required. The applicant is addressing these issues.

- **Havering Council**: It is not considered that the scheme will have any significant implications for the London Borough of Havering. Havering Council would support the retention of existing trees where possible and where new landscaping is proposed, this should provide an effective screen between the proposed development and the adjacent open land.

All concerns raised are addressed and/or resolved through conditions.

**Legal considerations**

Under the arrangements set out in Article 5 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor has the power under Article 6 to direct the local planning authority to refuse permission for a planning application referred to him under Article 4 of the Order. The Mayor may also leave the decision to the local authority. In directing refusal the Mayor must have
regard to the matters set out in Article 6(2) of the Order, including the principal purposes of the Greater London Authority, the effect on health and sustainable development, national policies and international obligations, regional planning guidance, and the use of the River Thames. The Mayor may direct refusal if he considers that to grant permission would be contrary to good strategic planning in Greater London. If he decides to direct refusal, the Mayor must set out his reasons, and the local planning authority must issue these with the refusal notice.

Financial considerations

34 Should the Mayor direct refusal, he would be the principal party at any subsequent appeal hearing or public inquiry. Government guidance in Circular 03/2009 (‘Costs Awards in Appeals and Other Planning Proceedings’) emphasises that parties usually pay their own expenses arising from an appeal.

35 Following an inquiry caused by a direction to refuse, costs may be awarded against the Mayor if he has either directed refusal unreasonably; handled a referral from a planning authority unreasonably; or behaved unreasonably during the appeal. A major factor in deciding whether the Mayor has acted unreasonably will be the extent to which he has taken account of established planning policy.

Conclusion

36 Outstanding issues raised at stage 1 are resolved. The proposed scheme is strongly supported in strategic planning terms.

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Wood Lane Sports Centre, Wood Lane, Dagenham
in the London Borough of Barking and Dagenham
planning application no.12/00793/FUL

Strategic planning application stage 1 referral (new powers)

The proposal
Demolition of existing sports centre and erection of 26 bungalows and 1 house for elderly people (over 55’s) along with associated highway alterations, car parking and landscaping.

The applicant
The applicant is London Borough of Barking and Dagenham, and the architect is Patel Taylor Architects.

Strategic issues
Green Belt, loss of leisure and sports facilities, affordable housing, tenure split, housing quality/space standards, density, urban design, inclusive design, sustainable development, employment and training, transport and parking are the strategic issues which are relevant to the proposed development.

Recommendation
That Barking and Dagenham Council be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 58 of this report; but the potential remedies also set out in that paragraph could address those deficiencies. The application does not need to be referred back to the Mayor if the Council resolves to refuse permission, but it must be referred back if the Council resolves to grant permission.

Context

37 On 18 September 2012 the Mayor of London received documents from Barking and Dagenham Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 29 October 2012 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor’s use in deciding what decision to make.

38 The application is referable under Category 3D of the Schedule to the Order 2008: “Development – (a) on land allocated as Green Belt or Metropolitan Open Land in the development plan, in proposals for such a plan, or in proposals for the alteration or replacement of such a plan; and
(b) which would involve the construction of a building with a floor space of more than 1000 square metres or a material change in the use of such building."

39 Once Barking and Dagenham Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision, as to whether to direct refusal or allow the Council to determine it itself, unless otherwise advised. In this instance if the Council resolves to refuse permission it need not refer the application back to the Mayor.

40 The Mayor of London’s statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

41 The proposed Wood Lane site is positioned opposite to Central Park and is within the Metropolitan Green Belt. It lies in a green band which separates Dagenham/Chadwell Heath from Romford. The site sits between the Crowlands golf club on the western boundary and Romford football club on the east side. Wood Lane borders the southern edge of the site.

42 Nearby land use includes residential estates, schools, parks, sports grounds and high rise flats. The site is currently split into two portions by a security fence and a line of poplar trees; west of this line is the existing car park and to the east is the Wood Lane Sports Centre complex. The large Sports Centre buildings and high fencing dominate the site.

![Figure 1: Wood Lane site (in red) and the Lawns site (in blue) – Source: applicant’s design and access statement](image)

43 There are three existing vehicular entrances and one separate pedestrian entrance into the site which all open onto Wood Lane. The site boundary on the southern edge of Wood Lane is formed by a palisade security fence and the brick wall of the sports centre. The site is exposed to open views of the driving range to its west and north sides, and Wood Lane to the south. All other boundaries have some tree/shrub screening.

44 There is a requirement for an access route through to the boating house. The mature trees on site inform the layout of the development and consideration is given to tree protection zones. There is an electrical sub-station located to the south-east of the site, adjacent to the former staff parking area.
The site is located adjacent to the A124 Wood Lane, which forms part of the Strategic Road Network (SRN). The nearest bus stops (daytime routes 5, 103, 128 and 175 and night-time route N15) are located on this road and have services to Romford, Barking, Plaistow, Canning Town, Ilford and Rainham. There are no railway stations within an acceptable walking distance from the site. Therefore, the application site records a public transport accessibility level (PTAL) of 3 on a scale of 1-6, where 6 is the highest. (It is noted that the applicant has indicated it is 1a-1b, however TfL has confirmed that it is 3).

Details of the proposal

A full planning permission is sought for the demolition of existing sports centre and erection of 26 bungalows and 1 house for elderly people (over 55’s) along with associated highway alterations, car parking and landscaping.

Case history

This site has previously been subject to the following permitted planning applications; (68/00149/TP) use of premises as sports and recreational centre and (83/00219/TP) use of first floor flat to provide replacement staff changing/mess room and toilet facilities.

There is no other planning history for this site.

Strategic planning issues and relevant policies and guidance

The relevant planning issues and corresponding policies are as follows:

- Green Belt: London Plan
- Loss of sports facilities: London Plan
- Housing: London Plan; Housing SPG; Interim Housing SPG; draft Housing SPG; Housing Strategy; draft Revised Housing Strategy; Providing for Children and Young People’s Play and Informal Recreation SPG;
- Affordable housing: London Plan; Housing SPG; Interim Housing SPG; draft Housing SPG; draft Affordable Housing SPG; Housing Strategy; draft Revised Housing Strategy; draft Early Minor Alteration to the London Plan
- Density: London Plan; Housing SPG; Interim Housing SPG; draft Housing SPG
- Urban design: London Plan;
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 2010 Barking and Dagenham Core Strategy, the 2011 Barking and Dagenham Borough Wide Development Policies and the 2011 London Plan.

The following are also relevant material considerations:

- The Revised Early Minor Alteration to the London Plan

**Green Belt and loss of leisure and sports facilities**

The NPPF sets out that new buildings are inappropriate in the Green Belt although some exceptions to this are set out including limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.

The total building footprint is 2,695 sq m, all within the existing surface hard standing. The maximum height of the scheme is (the 3-bedroom house), which is 2 storeys high located at the
entrance of the site whilst the remaining twenty six (1 and 2 bedroom units) are single storey bungalows with mono-pitched roofs. The spread of the proposed development as shown above aligning the east and west of the site positioned away from the boundaries allowing new tree screening and shrub planting to reduce the impact on the openness of the Green Belt. In addition, the communal green spaces (over 1000 sq m) and the private courtyards layouts mitigate the negative impact the development has on the openness of the Green Belt.

<table>
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<tr>
<th>Dimension</th>
<th>proposed scheme</th>
<th>existing sports centre</th>
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<tbody>
<tr>
<td>Maximum Height</td>
<td>two-storey (6m)</td>
<td>over two-storey (~8m)</td>
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<tr>
<td>Footprint</td>
<td>2,695 sq m</td>
<td>2,304 sq m</td>
</tr>
<tr>
<td>Area of hard standing</td>
<td>6,330 sq m</td>
<td>7,755 sq m</td>
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As a result, the impact on the Green Belt is minimal and it is concluded that the benefits of the proposals, in particular, the provision of high quality, 100% affordable housing for elderly people (over 55), outweigh the overall impact on the Green Belt.

Loss of leisure and sport facilities: The applicant has stated that Wood Lane Sports Centre was closed in 2011 and has been replaced by the Dagenham Leisure Centre. Therefore, it is concluded that there is not an overall loss of sport facilities in the area.

Affordable housing

The housing development proposes a 100% provision of affordable housing, which is welcomed. However, the details of the tenure split within the affordable housing package should be submitted.

Housing choice/mix and tenure split

This proposal incorporates the provision of ten 1-bed/2persons, sixteen 2-bed/4 persons and one 3-bed/6 persons for elderly. Given the nature of the development, the unit size and mix is appropriate and the provision of this specialist form of housing is strongly supported.

Housing quality/space standards

The space standards proposed are shown below.

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<tr>
<th>Dwelling type</th>
<th>Proposed (GIA - in sq m)</th>
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<tr>
<td>1-bed / 2p</td>
<td>68 - 69</td>
</tr>
<tr>
<td>2-bed / 4p</td>
<td>88 - 89</td>
</tr>
<tr>
<td>3-bed / 6p</td>
<td>141</td>
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The space standards of the proposed housing development as shown above exceed the minimum requirements. This is welcomed.

Density
The site has an area of 1.28ha and a PTAL of 3 within a suburban environment, which translates to 35-65 u/ha or 150 – 250 hr/ha in the London Plan density matrix. The proposed housing development has a density of 21 u/ha which is below the lower end of the range, however given the site’s location in Green Belt, it is acceptable.

**Urban design**

This is a well considered scheme and the Council is commended for its commitment to design excellence. The only concern is that the rear of some of the properties back onto highway, which could give rise to safety and security issues. The applicant should give further consideration to addressing this matter.

**Inclusive design**

The fact that all of the residential units proposed are to be wheelchair accessible (or easily adaptable) is welcomed. The floor plans show suitably designed residential units, in accordance with the wheelchair housing design guide.

The plans do illustrate lockable storage located in each of the residential units’ courtyards. This is illustrated with bikes in it, but could be suitable for the storage of mobility scooters. The applicant should look into the possibility of providing power to these storage units, to enable residents to charge mobility scooters if required.

The car parking level gradients are acceptable, it is stated that one parking bay will be provided for each residential unit (as per the wheelchair housing design guide), and in addition to this visitor parking will be provided. There does appear to be a mistake in the design and access statement however. Page 50 of the design and access statement explains that: “Where parking is not located in front of a house, a space 3300mm x 3600mm is provided where possible within the site curtilage for the wheelchair accessible homes.” This parking bay size is too small. However, on Page 52 it is stated that parking bays will be 3.3m x 4.8m which satisfies lifetime homes criteria, but not the wheelchair housing design criteria. The issue of parking should be re-visited and re-planned, given that the residential units are to be wheelchair accessible, the parking bays should also therefore be usable by wheelchair users.

There are also concerns regarding the ‘Homezone’ approach which is proposed. The concept of Home Zones, while helping to reduce traffic speeds and promote pedestrian priority, can mitigate against easy access for visually impaired people unless the detailed design specifically takes their needs into account - the detailed design should therefore demonstrate that there is a clear demarcation between the carriageway and footway in areas with vehicle movement and this should be detectable/navigable for blind and partially sighted people. If shared surfaces/ home zones are proposed, the applicants should illustrate what design features will be incorporated to ensure that the areas are safe and usable for disabled people. Further information is therefore required on this element of the proposals.

The widths of the pedestrian routes around this site are also a concern, and clarification regarding the pedestrian route widths should be provided. The ‘cast iron tree grilles’ highlighted in the design and access statement are also a concern, as depending on their design, could cause problems for people using sticks or a walking frame, blind and partially sighted people, and wheelchair users. The applicant should show that the design will not cause issues for these people.

The vehicle entrance/exit points into the site should provide dropped kerbs and crossing points designed in accordance with the DfT’s “Guidance on the use of tactile paving surfaces”. Confirmation of this should be sought.
Extending the Lifetime Home concept to the neighbourhood level can help to ensure that the public realm, the parking areas, the routes to the site and links to adjacent public transport and local services and facilities are also designed to be accessible, safe and convenient for everyone, particularly disabled and older people. This concept can also help to meet the specific needs of older people (see the CLG report ‘Lifetime Homes Lifetime Neighbourhoods a National Strategy for Housing in an Ageing Society’ and the emerging advice from the Lifetime Neighbourhoods Foundation (see http://www.lifetimehomes.org.uk/pages/lifetime-neighbourhoods.html). The design code should address these criteria and have regard to other best practice standards in achieving inclusive access.

**Sustainable development**

**Overview of proposals**

The applicant has broadly followed the energy hierarchy. Sufficient information has been provided to understand the proposals as a whole. Further revisions and information is required before the proposals can be considered acceptable and the carbon dioxide savings verified.

**BE LEAN**

**Energy efficiency standards**

A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include energy efficient lighting and maximising the use of natural ventilation.

It is unclear from the information provided if the proposed development will achieve any carbon savings from energy efficiency alone compared to a 2010 Building Regulations compliant development. The applicant should provide a commitment to achieving this and should quantify the regulated carbon dioxide emissions and savings in tonnes per annum and in percentage terms (across all the bungalows) as per table 1 and 2 of the Mayor’s energy assessment guidance.

**BE CLEAN**

**District heating**

No site-wide heat network or connection to a district heating network is proposed. Given the nature of the development this is accepted in this instance.

**Combined Heat and Power (CHP)**

No CHP is proposed. Given the nature of the development this is accepted in this instance. High efficiency gas boilers are proposed to meet the domestic hot water load and space heating requirements.

**BE GREEN**

**Renewable energy technologies**

The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install photovoltaic (PV) panels to meet the site’s renewable array. The applicant should quantify the area of the PV proposed (in sq m) and should provide roof drawings to show roof area available for the PV.
The applicant should quantify the regulated carbon dioxide emissions and savings in tonnes per annum and in percentage terms this third element of the energy hierarchy as per table 1 and 2 of the Mayor’s energy assessment guidance.

**OVERALL CARBON SAVINGS**

The applicant should quantify the overall regulated carbon dioxide emission and saving for the whole development as well as at each tier of the energy hierarchy. The information should be presented using the format set out in Table 1 and 2 of the Mayor’s energy assessment guidance.

Further information is required to assess if the carbon dioxide savings will meet the targets within Policy 5.2 of the London Plan.

In addition, the design of green roofing and rain harvesting should be clarified.

**Employment and training**

Continued investment in the skills of London’s current workforce will ensure that skills and training provision is tailored to meet current employer demand. The GLA is committed to develop the skills that London needs to sustain economic growth, improving individual’s employability skills in order to create a positive impact on the skills levels within all of London’s communities.

Consequently, and in accordance with London Plan 2011 Policy 4.12 ‘Improving opportunities for all’, the applicant should confirm that the proposals will deliver a number of employment opportunities for local residents as required by the London Plan policy. The proposed scheme should incorporate construction training.

**Transport for London’s comments**

**Access**

The vehicular access strategy submitted by the applicant proposes retention of the three existing accesses on the A124 Wood Lane. The eastern access will be used for traffic entering the site, whilst the central access will be used for traffic exiting the site. This format will enable the access of large refuse vehicles and emergency service vehicles onto the site. The western access will be used as a two-way access point for the Boat House and lake to the west of the site. However, TfL requests confirmation that the western access will be suitable for two-way traffic, as this access currently acts as part of the one-way system around the sports centre site and thus may not be suitable for two-way traffic without it being widened.

**Highways Impact**

The transport statement states that for the 27 dwellings proposed, the estimated number of trips per day would be 235, of which 94 will be by car and three daily deliveries. TfL does not consider this traffic will have an adverse impact on the capacity of the A124 Wood Lane.

**Parking**

It is proposed that the development will have 39 car parking spaces, comprising 27 resident parking spaces and 12 visitor parking spaces, for the 27 dwellings (10 one-bedroom properties, 16 two-bedroom properties).
two-bedroom properties and one three-bedroom property). This equates to a parking ratio of 1.44 spaces per residential unit. This level of provision exceeds London Plan standards, as set out in policy 6.13, but given the modest scale of the scheme and its nature it is considered acceptable.

84 Also, in line with London Plan policy 6.13, 20% of the parking spaces proposed should have active provision for electric vehicle charging points (EVCPs) and a further 20% passive provision. The blue badge and EVCP provision should be secured through a planning condition.

Walking and cycling and public transport

85 The application form states that a maximum of 54 cycle parking spaces are to be provided which is in accordance with London Plan policy 6.13 and the standards set out in Table 6.3. According to the site plans, it appears that each dwelling will have two cycle parking spaces and these will be located in the courtyard of each dwelling. TfL requests that the siting, design and total number of spaces are secured through a planning condition.

86 The site is close to bus stops on the A124 Wood Lane which serve four routes during daytime and one route at night. According to the transport statement, 1.4 daily trips per dwelling will be made by walking and public transport, representing an additional 38 daily trips. This is not expected to have an adverse impact on the bus network or the bus stops on the A124 Wood Lane.

87 TfL recommends a Pedestrian Environment Review System (PERS) Audit is undertaken of the routes between the site and the bus stops on the A124 Wood Lane and that any necessary improvements which are identified as necessary to serve the development are included as transport mitigation to be secured through condition/section 106 agreement as appropriate. An assessment should also be made of the bus stops themselves including to establish whether the shelters are adequate and whether they meet London Bus Services Limited (LBSL) accessibility guidelines. If they do not then the applicant should make contributions towards the necessary improvements especially given the residents of the development are more likely to need accessible bus stops and to rely upon bus transport.

Travel Plan and Construction & Logistics Plan

88 The applicant has committed to updating the travel plan prepared for a similar development which was previously proposed, subject to the application for the development being approved. The previous travel plan failed the ATTrBuTE test; the updated travel plan should be secured through a condition and pass the ATTrBuTE test.

89 In line with London Plan policy 6.3, a construction & logistics plan (CLP) should be secured by condition. Further information can be found here: http://www.tfl.gov.uk/microsites/freight/construction_logistics_plans.aspx.

Summary

90 Overall, TfL has no objections to the principle of the proposed development. However, in order to comply with the transport policies of the London Plan, TfL considers that further work is required by the applicant with respect to the amount of car parking (including the definition of ‘fully accessible’ parking, provision for blue badge holders and EVCPs). A PERS Audit should be undertaken of the routes between the development site and the bus stops on the A124 Wood Lane and assessment of the bus stops themselves. Secure and covered provision for cyclists, with an exact number of cycle spaces should be clarified and a travel plan and CLP should be secured by condition.

Local planning authority’s position
Barking and Dagenham Council planning officers have yet to confirm their position.

**Legal considerations**

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

**Financial considerations**

There are no financial considerations at this stage.

**Conclusion**

London Plan policies on Green Belt, loss of leisure and sports facilities, affordable housing, tenure split, housing quality/space standards, density, urban design, inclusive design, sustainable development, employment and training, transport and parking are relevant to this application. The application complies with some of these policies but not with others and on balance does not comply with the London Plan; the reasons and the potential remedies to issues of non compliance are set out below:

- **Green Belt**: The impact on the openness of the Green Belt is limited, there is no strategic concern.
- **Loss of leisure and sport facilities**: A new sport facility has been built at close proximity; therefore, there is no overall loss of sports facilities provision.
- **Affordable housing/tenure split**: The 100% provision of affordable housing is welcomed, but details of the tenure split within the affordable housing package should be submitted.
- **Housing quality/space standards**: The proposed scheme exceeds the minimum required space standards.
- **Density**: The proposed density is much lower than the density matrix of the London Plan, but given the location of the site in Green Belt, it is acceptable.
- **Urban design**: This is a well designed scheme of the highest quality, but further consideration should be given to addressing the potential safety and security issues resulting from the layout.
- **Inclusive design**: there are concerns in relation to car parking bays, scooters storages, “HomeZones” and width of pedestrian routes. These concerns should be addressed and conditioned.
- **Sustainable development**: the applicant should quantify the overall regulated carbon dioxide emission and saving for the whole development as well as at each tier of the energy hierarchy. Further information is required to assess if the carbon dioxide savings will meet the targets within Policy 5.2 of the London Plan. In addition issues related with green roofing and rain harvesting should be clarified.
• **Employment and training**: a strategy should be submitted and secured as part the s106 agreement.

• **Transport and parking**: further work is required with respect to the amount of car parking. A PERS Audit should be undertaken of the routes between the development site and the bus stops on the A124 Wood Lane and assessment of the bus stops themselves. Secure and covered provision for cyclists, with an exact number of cycle spaces should be clarified and a travel plan and CLP should be secured by condition.

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