Barking and Dagenham Council  
Planning Committee  

**Date:** 18 March 2019  

| **Application No.** | 18/01972/FUL  
| **Ward:** | Abbey  

**Reason for Referral to Planning Committee as set out in Part 2, Chapter 9 of the Council Constitution:**  
The application is a strategic development which is of a scale and importance that should be determined at Planning Committee.  

| **Address:** | Crown House and Linton Road Car Park, Linton Road, Barking  
| **Development:** | Demolition of existing Crown House building and phased redevelopment of the site to provide 396 residential units and 430 sqm of flexible commercial floorspace (facilitating A1, A2, A3, B1, D1 and D2 uses) within two buildings (a part 9, 10, 16, 20 storey building and a part 10, 25, 29 storey building), associated highway works, servicing facilities, cycle parking, disabled persons car parking and public realm improvements.  
| **Applicant:** | Lightquote Ltd and London Borough of Barking and Dagenham  

**Summary:**  
The application proposes the demolition of the existing 15-storey Crown House building and the phased redevelopment of the Crown House site and Linton Road car park site to provide 396 residential units and 430 square metres of flexible commercial floorspace (facilitating A1, A2, A3, B1, D1 and D2 uses) within two buildings, associated highway works, servicing facilities, cycle parking, disabled persons car parking and public realm improvements.  

Building A comprises of a lower ‘shoulder’ building of 9-storeys high located at the corner of Cambridge Road and Linton Road which then steps up to a 16-storey tower to the centre of the site. The tallest part of Building A fronting Cambridge Road extends to 20-storeys and then steps down again to a lower ‘shoulder’ building of 10-storeys high adjacent to Building B.  

Building B comprises of a lower ‘shoulder’ building of 10-storeys high fronting Linton Road which then steps up to a 25-storey tower to the centre of the site. The tallest element of Building B is 29-storeys high fronting Cambridge Road.  

562 neighbouring occupiers were consulted and 4 objections have been received. The issues raised by the objectors relate to excessive development, concerns about the proposed building heights, loss of the Linton Road car park, loss of the existing Crown House building and impacts on sunlight, daylight, privacy and outlook. The objections are detailed in the ‘Consultation’ section of this report. Officers do not consider that any of these objections amount to a reason for refusal in this case.
Barking Town Centre has been awarded Housing Zone status by the Greater London Authority (GLA) and the application site is one of 10 initial schemes totalling 2,295 homes. A residential-led scheme is therefore supported on the application site.

The principle of a mixed-use development on the site is supported by officers and meets the requirements of the wider Barking Town Centre Site Specific Allocation Area BTCSSA3 (Barking Station).

The loss of the existing office space at Crown House and the loss of the Linton Road car park have been justified as part of the application and officers are satisfied with the justification given.

The proposed development would provide 43% sub-market housing on a habitable room basis (169 units), all within Building A, comprising 30% low cost rented units, 35% affordable rented units and 35% shared ownership units. The remaining 227 units (57%), all within Building B, would be private rented sector (PRS) units.

The proposed unit mix for Building A comprises 80 one-bedroom units, 71 two-bedroom units and 18 three-bedroom units and the proposed unit mix for Building B comprises 95 one-bedroom units and 132 two-bedroom units. Overall, the development comprises 175 (44%) one-bedroom units, 203 (51%) two-bedroom units and 18 (5%) three-bedroom units.

The mix and tenure of the development is in keeping with the Council’s strategy for the town centre, the aim of which is to support a widening of the town centre’s retail and leisure offer and in particular help support the evening economy, which is little developed.

The application site comprises part private and part publicly owned land and therefore in accordance with the Mayor’s viability guidance, the scheme has a blended threshold target for sub-market housing based on 35% provision for private land and 50% provision for publicly owned land, subject to viability. The blended sub-market housing threshold for the development is 42% sub-market housing on a habitable room basis. The proposed 43% sub-market housing offer on a habitable room basis therefore qualifies the development for the Mayor’s fast-track viability route and there is no requirement for the developer to submit a financial viability assessment. An early stage viability review mechanism to be secured by S106 Agreement would require a new viability assessment to be undertaken if the development is not substantially implemented within 2 years of any planning permission being granted.

A new public pedestrian route linking Cambridge Road and Linton Road is proposed along the northern side of Building B. The public route also includes a public square at the Linton Road end.

The facades of the tower elements within the development comprise of folded aluminium frames which would be taupe-coloured with a matt, stone-like appearance. A dark buff brick is proposed for the spandrels. The proposed red brick frame of the lower ‘shoulder’ buildings provides contrast with the facades of the tower and has been chosen to reflect the local material palette.
Officers consider that the materials strategy is acceptable in principle and consistent with the high-quality expectations of the development.

Overall, officers consider that the proposed development is of an exemplar design and quality, which in turn justifies the higher density and the tall building heights.

Historic England considers that the proposed development would result in ‘less than substantial harm’ to the Abbey and Barking Conservation Area which the Crown House site partly falls within. Pursuant to paragraph 196 of the National Planning Policy Framework (NPPF) this harm has been weighed against the public benefits of the proposal and officers consider that the regeneration benefits of the proposal, including new private and sub-market housing and new public realm, outweigh any harm to local heritage assets and the Conservation Area.

All residential units would benefit from a private balcony or terrace in keeping with London Plan policy. The development also includes private communal amenity space in Buildings A and B. The proposed level of amenity space is supported by officers given the town centre location and the limited provision of family-sized accommodation on the site.

Doorstep play is a key component of the communal amenity space and the whole area is playable with pieces of equipment and play features integrated with the seating and planting. A 58 square metre indoor play space is also located within Building A, providing the opportunity for all-weather play. The proposed development has an on-site shortfall in play space of 232 square metres. The GLA has advised that given the local availability of play space at Northbury Primary School, Barking Park and Abbey Green, all of which are within 300 to 500 metres walk of the application site; the perceived nature of PRS developments possibly having a lower child yield; and the offer of indoor, all-weather play space as part of Building A, on balance, the provision of play space is considered to be acceptable. Officers also support the GLA’s stance on play space.

The submitted Sunlight and Daylight Report concludes that the significant majority of residential rooms in the surrounding properties meet the Building Research Establishment (BRE) Guidelines for daylight and sunlight with the proposed scheme in place, although there are some reductions in sunlight/daylight to neighbouring residential properties. In this regard, officers draw Members’ attention to a recent appeal decision relating to the Whitechapel Estate development where the Inspector’s decision letter stated “The BRE document offers guidance on generally acceptable standards of daylight and sunlight but advises that numerical values are not to be rigidly applied and recognises the importance of the specific circumstances of each case. Inner city development is one of the examples where a different approach might be justified”. The Mayor’s ‘Housing’ Supplementary Planning Guidance (SPG) states that an appropriate degree of flexibility needs to be applied when using BRE guidelines to assess the daylight and sunlight impacts of new development on surrounding properties, as well as within new developments themselves. Guidelines should be applied sensitively to higher density development, especially in opportunity areas, town centres, large sites and accessible locations, where BRE advice suggests considering the use of alternative targets. This should take into account local circumstances; the need to optimise housing capacity; and scope for the character and form of an area to change over
time. Officers have applied a similar flexible approach to the proposed development.

It is considered that reductions in sunlight/daylight are unavoidable given the existing open nature of those parts of the site opposite the affected properties and the clear desire for high-density development around Barking Station. The site is located within a central urban location where significant regeneration is proposed. In order to maximise the development potential of regeneration sites the reality is that there are always going to be some impacts on sunlight/daylight to existing neighbouring properties. Officers are satisfied that the proposed impacts of the development on sunlight/daylight to neighbouring properties are justified in this case.

The submitted Daylight and Sunlight Report states that within the proposed development, 93.3% of habitable rooms meet their target values for daylight in average daylight factor (ADF) terms and 71.5% of living/kitchen/dining rooms analysed meet the BRE Guidelines for annual probable sunlight hours (APSH). On this basis, it is considered that the proposed residential units would generally receive good levels of internal daylight and sunlight.

The proposed development is car-free given the high public transport accessibility of the site and this is supported by officers. The exception to this is the provision of 5 on-site blue badge parking spaces and one car club space for Building A and 2 on-site blue badge parking spaces for Building B. The number of blue badge parking spaces falls short for Building B, however, officers are satisfied that the proposed provision has been maximised to its full extent having regard to site constraints. A condition to be secured will consider whether there is any opportunity for blue badge parking as part of the proposed highway re-alignment works. Servicing for both buildings can be facilitated on-site.

The proposed cycle storage for the development is compliant with draft London Plan standards.

The application includes provision to re-align the existing layout of Cambridge Road, with the removal of the sub-standard mini-roundabout currently present to the north of the site. The re-alignment has also considered pedestrian manœuvreurability and includes the provision of a zebra crossing facility on Linton Road and a dropped kerb/tactile paving pedestrian crossing on Cambridge Road. The Transport Development Management Officer and TfL have confirmed that the proposed re-alignment is acceptable in principle.

The proposed development is anticipated to achieve a 37% reduction in carbon dioxide (CO₂) emissions beyond Part L of the Building Regulations 2013. A carbon offset payment is to be secured by S106 Agreement to achieve the policy requirement for zero carbon homes.

The application is referable to the Mayor of London. If the Council resolves to make a draft decision on the application, it must consult the Mayor again and allow him 14 days to decide whether to allow the draft decision to proceed unchanged, or direct the Council to refuse the application, or issue a direction that he is to act as the Local Planning Authority for the purpose of determining the application and any connected application.
**Recommendation:**

That the Planning Committee grants planning permission subject to:

1. No Direction from the Mayor of London;

2. Section 106 legal agreements to secure the matters set out in section 5.11 of this report; and

3. The following conditions (with any amendments that might be necessary up to the issue of the decision, including any other conditions or S106 obligations that may be required as a result of referral to the Mayor of London).

**Conditions**

**Time Limit**

1. The development permitted shall be begun before the expiration of three years from the date of this permission.

   **Reason:** To comply with Section 91 of the Town and Country Planning Act 1990 (as amended by Section 51 of the Planning and Compulsory Purchase Act 2004).

**Plan Numbers**

2. The development hereby permitted shall be carried out in accordance with the following approved plans:

   30005 CJCT ZZ XX DR A 0105 Rev P01;
   30005 CJCT ZZ ZZ DR A 0101 Rev P01;
   30005 CJCT ZZ ZZ DR A 0102 Rev P01;
   SRS/18/1369/002 Rev A
   30005 CJCT ZZ 00 DR A 0200 Rev P01;
   30005 CJCT ZZ M1 DR A 02M1 Rev P01;
   30005 CJCT ZZ 01 DR A 0201 Rev P02;
   30005 CJCT ZZ 02-08 DR A 0202 Rev P02;
   30005 CJCT ZZ 09 DR A 0209 Rev P02;
   30005 CJCT ZZ 10 DR A 0210 Rev P01;
   30005 CJCT ZZ 11-14 DR A 0211 Rev P01;
   30005 CJCT ZZ 15 DR A 0215 Rev P01;
   30005 CJCT ZZ 16-19 DR A 0216 Rev P01;
   30005 CJCT ZZ 20-24 DR A 0220 Rev P01;
   30005 CJCT ZZ 25-28 DR A 0225 Rev P01;
   30005 CJCT ZZ 29 DR A 0229 Rev P01;
   30005 CJCT ZZ DR A 0600 Rev P01;
   30005 CJCT ZZ DR A 0700 Rev P02;
   30005 CJCT ZZ DR A 0701 Rev P01;
   30005 CJCT ZA DR A 0710 Rev P01;
   30005 CJCT ZA DR A 0711 Rev P01;
30005 CJCT ZA DR A 0712 Rev P01;
30005 CJCT ZB DR A 0620 Rev P01;
30005 CJCT ZB DR A 0720 Rev P01;
30005 CJCT ZB DR A 0721 Rev P01;
30005 CJCT ZA DR A 0750 Rev P01;
30005 CJCT ZB DR A 0751 Rev P01;
30005 CJCT ZB DR A 0752 Rev P01;
30005 CJCT ZB DR A 0753 Rev P01;
30005 CJCT ZB DR A 0754 Rev P01.

Reason: For the avoidance of doubt and in the interests of proper planning.

Phasing Plan

3. No development shall take place until a Phasing Plan showing how the development will be implemented in a comprehensive manner has been submitted to and approved in writing by the Local Planning Authority. The development shall then be implemented only in accordance with the approved Phasing Plan.

Reason: The Phasing Plan is required prior to commencement of development to allow the community infrastructure levy (CIL) liability to be calculated for each Phase and for any relief to be determined.

Contamination – Investigation and Risk Assessment

4. No development shall commence in a Phase until an investigation and risk assessment for the relevant Phase, in addition to any assessment provided with the planning application, has been completed in accordance with a scheme to assess the nature and extent of any contamination on the site, whether or not it originates on the site. The contents of the scheme are subject to the approval in writing of the Local Planning Authority. The investigation and risk assessment must be undertaken by competent persons and a written report of the findings must be produced. The written report is subject to the approval in writing of the Local Planning Authority. The report of the findings must include:

   (i) a survey of the extent, scale and nature of contamination;
   (ii) an assessment of the potential risks to human health; property (existing or proposed) including buildings, crops, livestock, pets, woodland and service lines and pipes; adjoining land; groundwaters and surface waters; ecological systems; archaeological sites and ancient monuments; and
   (iii) an appraisal of remedial options, and proposal of the preferred option(s).

This must be conducted in accordance with DEFRA and the Environment Agency’s ‘Model Procedures for the Management of Land Contamination, CLR 11’.

Contamination – Remediation Scheme

5. No development shall commence in a Phase until a detailed remediation scheme for the relevant Phase, to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment, has been prepared and submitted to the Local Planning Authority for approval in writing. The scheme must
include all works to be undertaken, proposed remediation objectives and remediation criteria, timetable of works and site management procedures. The scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

Contamination – Verification Report

6. The approved remediation scheme must be carried out in accordance with its terms prior to the commencement of development in the relevant Phase, other than that required to carry out remediation, unless otherwise agreed in writing by the Local Planning Authority. The Local Planning Authority must be given two weeks written notification of commencement of the remediation scheme works.

Following completion of measures identified in the approved remediation scheme, a verification report that demonstrates the effectiveness of the remediation carried out must be produced and is subject to the approval in writing of the Local Planning Authority.

Contamination – Previously Unidentified Contamination

7. In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported in writing immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken in accordance with the requirements of Condition 4, and where remediation is necessary a remediation scheme must be prepared in accordance with the requirements of Condition 5, which is subject to the approval in writing of the Local Planning Authority. Following completion of measures identified in the approved remediation scheme a verification report must be prepared, which is subject to the approval in writing of the Local Planning Authority.

Reason for Conditions 4 to 7: Contamination must be identified prior to commencement of development in each Phase to ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other off-site receptors in accordance with policy BR5 of the Borough Wide Development Policies Development Plan Document and policy 5.21 of the London Plan.

Construction Environmental Management Plan and Site Waste Management Plan

8. No development shall commence in a Phase, including any works of demolition, until a Construction Environmental Management Plan (CEMP) and a Site Waste Management Plan (SWMP) for the relevant Phase have been submitted to and approved in writing by the Local Planning Authority. These Plans shall incorporate details of:

a) construction traffic management;
b) the parking of vehicles of site operatives and visitors;
c) loading and unloading of plant and materials;
d) storage of plant and materials used in constructing the development;
e) the erection and maintenance of security hoarding(s) including decorative
displays and facilities for public viewing, where appropriate;
f) wheel washing facilities;
g) measures to control the emission of dust, dirt and emissions to air during
construction; such measures to accord with the guidance provided in the
document “The Control of Dust and Emissions during Construction and
Demolition”, Mayor of London, July 2014; including but not confined to, non
road mobile machinery (NRMM) requirements;
h) noise and vibration control;
i) a scheme for recycling/disposing of waste resulting from demolition and
construction works;
j) the use of efficient construction materials;
k) methods to minimise waste, to encourage re-use, recovery and recycling, and
sourcing of materials; and
l) a nominated Developer/Resident Liaison Representative with an address and
contact telephone number to be circulated to those residents consulted on the
application by the developer’s representatives. This person will act as first point
of contact for residents who have any problems or questions related to the
ongoing development.

Demolition and construction work and associated activities are to be carried out in
accordance with the recommendations contained within British Standard
5228:2009, “Code of practice for noise and vibration control on construction and
open sites”. Parts 1 and 2.

Once approved the Plans shall be adhered to throughout the construction period for
the relevant Phase.

Reason: The CEMP and SWMP are required prior to commencement of
development in each Phase in order to reduce the environmental impact of the
construction and the impact on the amenities of neighbouring residents, and in
accordance with policy BP8 of the Borough Wide Development Policies
Development Plan Document.

Construction Logistics Plan

9. No development shall commence in a Phase, including any works of demolition,
until a Construction Logistics Plan for the relevant Phase has been submitted to and
approved in writing by the Local Planning Authority. The Plan shall be designed to
minimise deliveries of materials and export of any waste materials within the times
of peak traffic congestion on the local road network. The Plan shall be implemented
in accordance with the approved details and thereafter maintained.

Reason: The Construction Logistics Plan is required prior to commencement of
development in each Phase in order to minimise the impact of construction on the
free flow of traffic on the local highway network and in the interests of highway
safety, and in accordance with policy BR10 of the Borough Wide Development

Archaeological Works
10. A) No development other than site clearance and demolition to existing ground level shall take place in a Phase until the developer has secured the implementation of a programme of archaeological evaluation for the relevant Phase in accordance with a written scheme which has been submitted to and approved in writing by the Local Planning Authority and a report on that evaluation has been submitted to the Local Planning Authority.

B) If heritage assets of archaeological interest are identified by the evaluation under A), then before development commences in a Phase, other than site clearance and demolition to existing ground level, the developer shall secure the implementation of a programme of archaeological investigation for the relevant Phase in accordance with a Written Scheme of Investigation which has been submitted to an approved in writing by the Local Planning Authority.

C) No development, other than site clearance and demolition to existing ground level, shall subsequently take place in a Phase other than in accordance with the Written Scheme of Investigation approved under Part B).

D) The relevant Phase of the development shall not be occupied until the site investigation and post investigation assessment for the Phase has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under Part B), and the provision for analysis, publication and dissemination of the results and archive deposition has been secured.

Reason: Heritage assets of archaeological interest may survive on the site. The Local Planning Authority wishes to secure appropriate archaeological investigation prior to development in each Phase, followed by the publication of results, in accordance with policies BP2 and BP3 of the Borough Wide Development Policies Development Plan Document.

Surface Water Drainage Scheme

11. No development shall commence in a Phase, except any works of site clearance and demolition, until a Surface Water Drainage Scheme for the relevant Phase, based on sustainable drainage principles and an assessment of the hydrological and hydro geological context of the development, has been submitted to and approved in writing by the Local Planning Authority. The Scheme shall comply with the drainage hierarchy and greenfield run-off rate in the London Plan. The Scheme shall subsequently be implemented in accordance with the approved details before the relevant Phase of the development is completed.

Reason: The Surface Water Drainage Scheme is required prior to commencement of development in each Phase in order to reduce the risk of flooding and in accordance with policy BR4 of the Borough Wide Development Policies Development Plan Document and policy 5.13 of the London Plan.

Construction Working Hours

12. Demolition and construction work and associated activities, other than internal works not audible outside the site boundary, are only to be carried out between the hours of 08.00 and 18.00 Monday to Friday and 08.00 and 13.00 Saturday, with no work on Sundays or public holidays without the prior written permission of the Local
Planning Authority. Any works which are associated with the generation of ground
borne vibration are only to be carried out between the hours of 08.00 and 18.00
Monday to Friday.

Reason: To ensure that the proposed demolition and construction work does not
cause nuisance and disturbance to neighbouring occupiers and in accordance with
policy BP8 of the Borough Wide Development Policies Development Plan
Document.

External Materials

13. No above ground new development shall commence in a Phase until the
developer enters into detailed discussions with the Local Planning Authority around
the external facing materials for the relevant Phase, including providing on-site
sample boards. Full details, including samples, specifications, annotated plans and
fire safety ratings, of all external facing materials for the relevant Phase shall then
be submitted to the Local Planning Authority for approval in writing. The relevant
Phase shall only be implemented in accordance with the approved details and to
the satisfaction of the Local Planning Authority.

Reason: To protect or enhance the character and amenity of the area and to
ensure an exemplar finish to the building in accordance with policies BP8 and BP11
of the Borough Wide Development Policies Development Plan Document and
policies 7.1, 7.4 and 7.6 of the London Plan.

Hard Landscaping

14. No Phase of the development hereby permitted shall be occupied until full
details of the hard landscaping for the relevant Phase have been submitted to and
approved in writing by the Local Planning Authority. The hard landscaping scheme
shall include, but not be limited to, details of the following:

a) surface materials;
b) play spaces and any related play equipment;
c) street furniture, including on-street cycle stands;
d) boundary treatment; and

e) management and maintenance.

The hard landscaping scheme shall be implemented prior to occupation of the
relevant Phase in accordance with the approved details and thereafter permanently
maintained, to the satisfaction of the Local Planning Authority.

Reason: In the interests of design quality, residential amenity, walking, accessibility
and public safety, in accordance with policy CP3 of the Core Strategy and policy

Soft Landscaping

15. No Phase of the development hereby permitted shall be occupied until a
detailed scheme of soft landscaping for the relevant Phase has been submitted to
and approved in writing by the Local Planning Authority. All trees, shrubs, plants
and seeds introduced to the site should generally be native (except for fruit trees)
and of local provenance, unless otherwise agreed. The approved landscaping scheme shall be carried out in the first planting and seeding seasons following the occupation or completion of the relevant Phase, whichever is the sooner. Any trees or plants which within a period of 5 years from the completion of the relevant Phase die, are removed or become seriously damaged or diseased, shall be replaced in the next planting season with others of similar size and species unless the Local Planning Authority gives written consent to any variation.

Reason: To secure the provision of the landscaping in the interests of the visual amenity of the area and in accordance with policy CP3 of the Core Strategy and policies BR3 and BP11 of the Borough Wide Development Policies Development Plan Document.

Measures to Reduce the Risk of Crime

16. No Phase of the development hereby permitted shall be occupied until a scheme showing the provisions to be made for external lighting, CCTV coverage, access control and any other measures to reduce the risk of crime within the relevant Phase, has been submitted to and approved in writing by the Local Planning Authority. The external lighting of the development is to be designed, installed and maintained so as to fully comply with The Association of Chief Police Officers Secured by Design publication “Lighting Against Crime – A Guide for Crime Reduction Professionals”, ACPO SPD, January 2011. The design shall satisfy criteria to limit obtrusive light presented in Table 1, p25 of the guide, relating to Environmental Zone E3 – medium district brightness areas. The relevant Phase shall not be occupied until the approved scheme has been installed. Thereafter the approved measures shall be permanently retained.

Reason: In the interests of security and safety, to avoid light pollution and safeguard neighbouring amenity and in accordance with policy BP11 of the Borough Wide Development Policies Development Plan Document.

Refuse Strategy

17. No Phase of the development hereby permitted shall be occupied until a detailed residential and commercial refuse strategy for the relevant Phase, including the design and location of the refuse stores, has been submitted to and approved in writing by the Local Planning Authority. The approved refuse stores shall be provided before the occupation of the relevant Phase and thereafter permanently retained.

Reason: To provide satisfactory refuse storage provision in the interests of the appearance of the site and locality in accordance with policies BP8 and BP11 of the Borough Wide Development Policies Development Plan Document.

Cycle Parking

18. No Phase of the development hereby permitted shall be occupied until details of the cycle parking facilities for the relevant Phase, as shown on drawing Nos. 30005 CJCT ZZ 00 DR A 0200 Rev P01 and 30005 CJCT ZZ M1 DR A 02M1 Rev P01, have been submitted to and approved in writing by the Local Planning Authority. The submission should include details of the security, monitoring and
access arrangements for the cycle parking facilities. The relevant Phase of the development shall not be occupied until the approved details have been implemented. Thereafter, the cycle parking facilities shall be permanently retained.

Reason: In the interests of promoting cycling as a safe, efficient and non-polluting mode of transport and in accordance with policy BR11 of the Borough Wide Development Policies Development Plan Document and policy 6.9 of the London Plan.

Scheme of Acoustic Protection

19. No Phase of the development hereby permitted shall be occupied until full details of a scheme of acoustic protection of habitable rooms against transport noise for the relevant Phase has been submitted to and approved in writing by the Local Planning Authority. The scheme of acoustic protection shall be sufficient to secure internal noise levels no greater than 35 dB LAeq in living rooms and bedrooms (07.00 hrs to 23.00 hrs) with windows closed; and 30 dB LAeq in bedrooms (23.00 hrs to 07.00 hrs) with windows closed. Additionally, where the internal noise levels will exceed 40 dB LAeq in living rooms and bedrooms (07.00 hrs to 23.00 hrs) or 35dB LAeq in bedrooms (23:00 hrs to 07.00 hrs) with windows open the scheme of acoustic protection shall incorporate a ventilator system which is commensurate with the performance specification set out in Schedule 1 (paragraphs 6 and 7) of The Noise Insulation Regulations 1975 (as amended). The approved scheme shall be fully implemented before the first occupation of the residential unit in the relevant Phase to which it relates and shall be maintained at all times thereafter.

Reason: To ensure that the proposed residential units are adequately protected from noise and in accordance with policy BR13 of the Borough Wide Development Policies Development Plan Document and policy 7.15 of the London Plan.

Blue Badge Car Parking and Electric Vehicle Charging Points

20. The 5 blue badge car parking spaces for Building A and the 2 blue badge car parking spaces for Building B shall be constructed and marked out prior to the occupation of the relevant Phase as accessible parking bays (to be clearly marked with a British Standard disabled symbol). One blue badge car parking space for Building A and one blue badge car parking space for Building B shall be fitted with active electric vehicle charging points and the remainder shall have passive provision.

Reason: To ensure and promote easier access for disabled persons, to ensure sufficient off-street parking, and to encourage the use of electric cars in order to reduce carbon emissions, in accordance with policies BC2, BR9 and BR10 of the Borough Wide Development Policies Development Plan Document and policy 6.13 of the London Plan.

Energy Strategy and Details of Photovoltaic Panels and Pipework to Link to District Heating Network

21. The development hereby permitted shall be carried out in accordance with the submitted Energy Statement prepared by IN2 Engineering Design Partnership (Ref:
Minor amendments to the Energy Strategy may be agreed in writing from time to time by the Local Planning Authority. No above ground new development shall commence in a Phase until details of the location and quantum of any photovoltaic panels and a scheme showing the provisions to be made for interconnecting pipework to link into the District Heating Network (if and when a connection becomes available) for the relevant Phase have been submitted to and approved in writing by the Local Planning Authority. The relevant Phase of the development shall not be occupied until the approved details have been implemented.

Reason: In the interests of safeguarding the environment and providing sustainable development in accordance with policies BR1 and BR2 of the Borough Wide Development Policies Development Plan Document and policies 5.2, 5.3, 5.5, 5.6 and 5.7 of the London Plan.

Bird Nesting and Bat Roosting Bricks/Boxes

22. No Phase of the development hereby permitted shall be occupied until bird nesting and bat roosting bricks/boxes for the relevant Phase have been installed in accordance with details which shall have been submitted to and approved in writing by the Local Planning Authority. The details shall accord with the advice set out in 'Biodiversity for Low and Zero Carbon Buildings: A Technical Guide for New Build' (Published by RIBA, March 2010) or similar advice from the RSPB and the Bat Conservation Trust.

Reason: In order to preserve and enhance the Borough’s natural environment and to comply with policy CR2 of the Core Strategy, policy BR3 of the Borough Wide Development Policies Development Plan Document and policy 7.19 of the London Plan.

Noise from Plant

23. The combined rating level of the noise from any plant installed pursuant to this permission (other than plant which is only to be operated in emergency circumstances) shall not exceed the existing background noise level outside the window to any noise-sensitive room. Any assessment of compliance with this condition shall be made according to the methodology and procedures presented in BS4142:2014.

Reason: To ensure that noise-sensitive rooms within the proposed development and neighbouring developments are adequately protected from noise and in accordance with policy BR13 of the Borough Wide Development Policies Development Plan Document and policy 7.15 of the London Plan.

London City Airport Safeguarding – Details of Cranes and Scaffolding

24. No cranes or scaffolding shall be erected on the site unless, and until, construction methodology and diagrams clearly presenting the location, maximum operating height, radius and start/finish dates for the use of cranes during the development have been submitted to and approved in writing by the Local Planning Authority in consultation with London City Airport.
Reason: To ensure that construction activities will not adversely affect the operation of London City Airport.

Flexible Uses

25. Following the first occupation of each of the ground floor commercial units, as identified on drawing No. 30005 CJCT ZZ 00 DR A 0200 Rev P01, any further change of use to another use specifically permitted by this permission must be carried out within a period of 10 years from the date of this permission.

Reason: To provide flexibility of use between the approved uses in accordance with Class V, Part 3 of Schedule 2 of The Town and Country Planning (General Permitted Development) (England) Order 2015.

Delivery/Collection of Goods – Commercial Units

26. The delivery/collection of goods associated with the ground floor commercial units, as identified on drawing No. 30005 CJCT ZZ 00 DR A 0200 Rev P01, is only permitted to take place between the hours of 07.00 hrs and 21.00 hrs on any day.

Reason: To prevent any undue disturbance to residential occupiers and occupants of neighbouring properties at unreasonable hours and in accordance with policy BP8 of the Borough Wide Development Policies Development Plan Document.

Handling of Bottles and/or Movement of Bins and Rubbish – Commercial Units

27. The handling of bottles and/or the movement of bins and rubbish associated with the commercial units, as identified on drawing No. 30005 CJCT ZZ 00 DR A 0200 Rev P01, is not permitted to take place outside the premises between the hours of 23.00 hrs on one day and 07.00 hrs the following day.

Reason: To prevent any undue disturbance to residential occupiers and occupants of neighbouring properties at unreasonable hours and in accordance with policy BP8 of the Borough Wide Development Policies Development Plan Document.

Details of Any Commercial Kitchen Extract Ventilation System

28. Prior to occupation of any commercial unit hereby permitted with a commercial kitchen, details of any ventilation system for the removal and treatment of cooking odours from any commercial catering, including its appearance and measures to mitigate system noise, are to be submitted to and approved in writing by the Local Planning Authority. The measures shall have regard to and be commensurate with guidance and recommendations in:

- The current edition of publication “Specification for Kitchen Ventilation Systems”, DW/172, Heating and Ventilating Contractors Association, or other relevant and authoritative guidance; and

The approved details shall be fully implemented before the first use of the relevant
commercial unit and shall thereafter be permanently retained in an efficient manner.

Reason: To safeguard the appearance of the premises and minimise the impact of cooking smells, odours and noise in accordance with policies BR13, BP8 and BP11 of the Borough Wide Development Policies Development Plan Document.

Noise from Ground Floor Commercial Uses

29. Noise from the ground floor commercial uses hereby permitted, including, but not limited to, live and amplified music shall be controlled so as to be inaudible inside adjoining and other noise-sensitive premises in the vicinity of the use. The initial test for compliance with the ‘inaudibility’ criterion will be that noise should be no more than barely audible outside those noise-sensitive premises. In the event there is disagreement as to whether such noise is or is not audible the following numerical limits shall be used to determine compliance with this condition:

- the LAeq (CUAN) shall not exceed LA90 (WCUAN); and
- the L10 (CUAN) shall not exceed L90 (WCUAN) in any 1/3 octave band between 40Hz and 160Hz.

CUAN = Commercial Use Activity Noise Level, WCUAN = representative background noise level without commercial use activity noise, both measured 1 metre from the façade of the noise-sensitive premises.

Reason: To ensure that the proposed and surrounding residential properties and other noise-sensitive premises in the vicinity of the use are adequately protected from noise and in accordance with policy BR13 of the Borough Wide Development Policies Development Plan Document and policy 7.15 of the London Plan.

Structure Borne Noise Emissions

30. Any machinery and equipment installed pursuant to this permission shall be designed and installed to ensure that structure borne (re-radiated) noise emissions shall not exceed 35 LAeq dB (5 min) when measured in any habitable room in adjoining residential premises.

Reason: To ensure that the proposed residential units are adequately protected from noise and in accordance with policy BR13 of the Borough Wide Development Policies Development Plan Document and policy 7.15 of the London Plan.

Noise Insulation of Party Construction

31. No above ground new development shall commence in a Phase until a scheme of noise insulation of party construction between the residential units and the Classes A1, A2, A3, B1, D1 and/or D2 use(s) in the relevant Phase has been submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be fully implemented before the first occupation of the commercial / residential unit(s) to which it relates in the relevant Phase.

Reason: To ensure that the proposed residential units are adequately protected from noise and in accordance with policy BR13 of the Borough Wide Development Policies Development Plan Document and policy 7.15 of the London Plan.
Acoustic Barrier to Play Area for Building A

32. The relevant Phase of the development incorporating Building A shall not be occupied until details of an imperforate acoustic barrier not less than 2.5 metres in height, to be positioned the full length of the boundary between the play area adjoining Building A and Linton Road, has been submitted to and approved in writing by the Local Planning Authority. The approved barrier shall be installed before the first use of the relevant play area and maintained at all times thereafter.

Reason: To ensure that the proposed play area is adequately protected from noise and in accordance with policy BR13 of the Borough Wide Development Policies Development Plan Document and policy 7.15 of the London Plan.

Green Wall to Play Area for Building A

33. The relevant Phase of the development incorporating Building A shall not be occupied until details of a green wall not less than 2.5 metres in height, to be positioned to the full length of the boundary between the play area adjoining Building A and Linton Road, has been submitted to and approved in writing by the Local Planning Authority. The approved green wall shall be installed before the first use of the relevant play area and maintained at all times thereafter.

Reason: To mitigate against air pollution and in accordance with policy BR14 of the Borough Wide Development Policies Development Plan Document and policy 7.14 of the London Plan.

Windows to Internal Play Area in Building A

34. The windows for the ground floor internal play area in Building A shall be fixed shut on the Linton Road façade.

Reason: To mitigate against air pollution and in accordance with policy BR14 of the Borough Wide Development Policies Development Plan Document and policy 7.14 of the London Plan.

Air Quality Neutral Assessment

35. No Phase of the development hereby permitted shall be occupied until an Air Quality Neutral Assessment for the relevant Phase has been submitted to and approved in writing by the Local Planning Authority. The assessment shall include details of mitigation and/or offsetting measures to satisfy the air quality neutral benchmarks provided in the “Mayor of London Sustainable Design and Construction Supplementary Planning Guidance” April 2014. The approved mitigation/offsetting measures, which may include a financial commitment to finance off-site measures, are to be fully implemented before the first occupation of the relevant Phase of the development hereby permitted.

Building Regulations M4 (2)

36. 90% of the residential units hereby permitted in each of Buildings A and B shall meet Building Regulations Approved Document M Volume 1 (2015 Edition) M4 (2) ‘accessible and adaptable dwellings’. Evidence of compliance shall be notified to the building control body appointed for the development in the appropriate Full Plans Application, or Building Notice, or Initial Notice to enable the building control body to check compliance.

Reason: To ensure that accessible housing is provided in accordance policy BC2 of the Borough Wide Development Policies Development Plan Document and policy 3.8 of the London Plan.

Building Regulations M4 (3)

37. 10% of the residential units hereby permitted in each of Buildings A and B shall meet Building Regulations Approved Document M Volume 1 (2015 Edition) M4 (3) ‘wheelchair adaptable dwellings’. Evidence of compliance shall be notified to the building control body appointed for the development in the appropriate Full Plans Application, or Building Notice, or Initial Notice to enable the building control body to check compliance.

Reason: To ensure that sufficient accessible housing is provided in accordance with policy BC2 of the Borough Wide Development Policies DPD and policy 3.8 of the London Plan.

Communal Television and Satellite System

38. No Phase of the development hereby permitted shall be occupied until details of a communal television and satellite system for the relevant Phase have been submitted to and approved in writing by the Local Planning Authority. The approved system shall be provided prior to occupation of the relevant Phase and be made available to each residential unit with the Phase. No antennae or satellite dishes may be installed on the exterior of the building, with the exception of a single antennae or satellite dish per block to support the communal television and satellite system. The proposed antennae or satellite dishes shall be designed to minimise their visual impact and shall not be mounted on any publicly visible façade.

Reason: To safeguard the external appearance of the buildings in accordance with policy CP3 of the Core Strategy and policies BP2 and BP11 of the Borough Wide Development Policies Development Plan Document.

Delivery and Servicing Plan

39. No Phase of the development hereby permitted shall be occupied until a Delivery and Servicing Plan for the relevant Phase has been submitted to and approved in writing by the Local Planning Authority in conjunction with Transport for London. The Plan shall identify efficiencies and sustainability measures to be undertaken once the development is operational and should incorporate details of deliveries to the site and servicing arrangements, including the size of vehicles, routing and tracking of vehicles and times of deliveries and servicing. The approved
Plan shall be implemented for the relevant Phase and adhered to thereafter.

Reason: In order to minimise the impact of the development on the local highway network and traffic congestion and in accordance with policy BR10 of the Borough Wide Development Policies Development Plan Document and policy 6.3 of the London Plan.

No Driven Piling

40. There shall be no use of driven piling in the construction of the development hereby permitted.

Reason: In order to reduce the impact of construction on the amenities of neighbouring residents, and in accordance with policy BP8 of the Borough Wide Development Policies Development Plan Document.

Piling

41. No piling shall take place in a Phase until a piling method statement for the relevant Phase, detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works, has been submitted to and approved in writing by the Local Planning Authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement for the relevant Phase.

Reason: The proposed works will be in close proximity to, and have the potential to impact on, local underground sewerage utility infrastructure.

Vibration

42. If piling or other ground improvement work is undertaken pursuant to this permission then the 5% level of vibration attributable to these activities shall not exceed a peak particle velocity of 1.5mm/sec when measured at the point of entry to any adjoining residential development. In the event of reasonable complaint of vibration nuisance and at the request of the Local Planning Authority monitoring to evaluate compliance with this condition is to be carried out and the results submitted to the Local Planning Authority.

Reason: In order to reduce the impact of construction on the amenities of neighbouring residents, and in accordance with policy BP8 of the Borough Wide Development Policies Development Plan Document.

Restriction on Uses

43. The ground floor commercial units hereby permitted, as identified on drawing No. 30005 CJCT ZZ 00 DR A 0200 Rev P01, shall only be used for purposes falling within Classes A1, A2, A3, B1, D1 (excluding places of worship and schools and colleges) and D2, and for no other purpose.

Reason: To protect the locality by avoiding the introduction of a use unsuited to the
premises in accordance with policies BP8 of the Borough Wide Development Policies Development Plan Document.

**Water Efficiency**

44. The development hereby permitted shall comply with the water efficiency optional requirement in paragraphs 2.8 to 2.12 of the Building Regulations Approved Document G. Evidence of compliance shall be notified to the building control body appointed for the development in the appropriate Full Plans Application, or Building Notice, or Initial Notice to enable the building control body to check compliance.

Reason: To minimise the use of mains water in accordance with policy BR4 of the Borough Wide Development Policies Development Plan Document and policy 5.15 of the London Plan.

**Car Parking Design and Management Plan for Blue Badge Car Parking**

45. No Phase of the development shall be occupied until a Car Parking Design and Management Plan for the relevant Phase has been submitted to the Local Planning Authority for approval in writing setting out how additional demand for blue badge parking spaces beyond the 5 blue badge parking spaces for Building A and the 2 blue badge parking spaces for Building B could potentially be accommodated on-street as part of the highway re-alignment proposals. Any approved details shall be implemented prior to occupation of the relevant Phase of the development.

Reason: To ensure and promote easier access for disabled persons in accordance with policies BC2, BR9 and BR10 of the Borough Wide Development Policies Development Plan Document and policy 6.13 of the London Plan.

**Inclusive and Unhindered Access**

46. No Phase of the development shall be occupied until details have been submitted to the Local Planning Authority for approval in writing demonstrating that inclusive and unhindered access for the relevant Phase will be provided to all entrances safely, including details of levels, gradients, provision of accessible seating and widths of the paths.

Reason: To ensure inclusive and unhindered access for all within the development in accordance with policy 3.8 of the London Plan.

**Arboricultural Impact and Method Statement**

47. No development shall commence in a Phase until an Arboricultural Impact and Method Statement for the relevant Phase has been submitted to and approved in writing by the Local Planning Authority. The Statement should include a schedule of trees to be retained or removed; details of access facilitation pruning required to enable the construction works; an evaluation of the likely effects of the construction works on retained trees, including post development pressures; and recommendations on mitigation measures to be implemented. A dimensioned Tree Protection Plan should be included showing how retained trees will be protected whilst the development is constructed. The Statement shall accord with British

Reason: The Arboricultural Impact and Method Statement is required prior to commencement of the relevant Phase in order to ensure the safety and well-being of the existing trees on and adjacent to the site that are to remain after building works are completed and in accordance with policies BR3 and BP11 of the Borough Wide Development Policies Development Plan Document.

Fire Statement

48. No above ground new development shall commence in a Phase until a Fire Statement for the relevant Phase has been submitted to and approved in writing by the Local Planning Authority. The Fire Statement shall be produced by an independent third party suitably qualified assessor which shall detail the building’s construction, methods, products and materials used; the means of escape for all building users including those who are disabled or require level access together with the associated management plan; access for fire service personnel and equipment; ongoing maintenance and monitoring and how provision will be made within the site to enable fire appliances to gain access to the building. The relevant Phase of the development shall be carried out in accordance with the approved details.

Reason: In order to provide a safe and secure development in accordance with policy CP3 of the Core Strategy and policy D11 of the Draft London Plan.

BREEAM

49. The development hereby permitted shall achieve a BREEAM ‘Very Good’ rating for the non-residential elements, unless otherwise agreed in writing with the Local Planning Authority.

Reason: To ensure that the proposed development is constructed in an environmentally sustainable manner and in accordance with policy CR1 of the Core Strategy and policy BR1 of the Borough Wide Development Policies Development Plan Document.

Indoor Play Space in Building A

50. The indoor play space in Building A, as identified on drawing No. 30005 CJCT ZZ 00 DR A 0200 Rev P01, shall be provided prior to first occupation of Building A and should be maintained as play space in perpetuity. The indoor play space shall be open to residents between the hours of 07.00 and 20.00, 7 days a week, unless otherwise agreed in writing with the Local Planning Authority.

Reason: To ensure adequate play space is provided within the development and that its use is not inappropriately restricted in accordance with policy 3.6 of the London Plan.

Wind Mitigation Measures

51. The development hereby permitted shall be carried out in accordance with the recommended wind mitigation measures set out in the submitted report ‘Crown
1.0 Introduction and Description of Development

Existing Site

1.1 The application site (0.4336 hectares in total) is located within Barking Town Centre and is made up of two separate parcels of land (hereinafter referred to as Site / Building A and Site / Building B). The application site
1.2 Site A comprises the existing Linton Road Car Park which is currently under the freehold ownership of the London Borough of Barking and Dagenham and is used as a car park for Barking Market traders. Site B currently includes the existing 15-storey Crown House building, an under-utilised office block which is to be demolished as part of the proposal, and an associated car park. Site B is under a long leasehold held by Lightquote Ltd.

1.3 Cambridge Road is located to the north-east of the application site and Linton Road is located to the south-west. The south-eastern boundary of Site B adjoins Cambridge House, an office to residential conversion, and 2 Linton Road, which comprises a locally listed building accommodating Real Dreams Hotel and Kings Lounge. Sites A and B are separated by the Grade II Listed Barking Baptist Tabernacle and 26 Linton Road which has most recently been in use as a health centre. Barking 360, a residential-led development with ground floor commercial space, is currently under construction on the opposite side of Cambridge Road and this is located between the Barking Enterprise Centre, Hapag-Lloyd office building and the Central House residential development. On the opposite side of Linton Road are the Maritime House and Roycraft House office buildings.

1.4 The surrounding area generally comprises commercial and residential properties with building heights ranging between 2 and 28-storeys.

1.5 The site is located within the Barking Town Centre Area Action Plan (AAP) area. The site also falls partly within the Abbey and Barking Town Centre Conservation Area and would be widely visible across the Conservation Area due to its height. The Grade II Listed Barking Station Booking Hall is located nearby.

1.6 The St Mary and St Ethelburga Church, Linton Road; the former school, Linton Road/William Street; and The Presbytery, 41 Linton Road are all located in close proximity to the site and are locally listed.

**Proposal**

1.7 The application proposes the demolition of the existing Crown House building and the phased redevelopment of the site to provide 396 residential units and 430 square metres of flexible commercial floorspace (facilitating A1, A2, A3, B1, D1 and D2 uses) within two buildings (Building A - a part 9, 10, 16, 20 storey building and Building B - a part 10, 25, 29 storey building), associated highway works, servicing facilities, cycle parking, disabled persons car parking and public realm improvements.

1.8 The proposed development comprises 43% sub-market housing units (169 units) which will all be located in Building A and 57% private rented sector (PRS) units (227 units) which will all be located in Building B.
The Council issued a formal Environmental Impact Assessment (EIA) Screening Opinion on 3 October 2018 confirming that an EIA was not required for the proposed development.

The application is referable to the Mayor of London under Categories 1A and 1B of the Schedule to The Town and Country Planning (Mayor of London) Order 2008. The Greater London Authority (GLA) issued their Stage 1 report for the application on 28 January 2019 and their comments are set out in the ‘Consultation’ section of this report. If the Council resolves to make a draft decision on the application, it must consult the Mayor again and allow him 14 days to decide whether to allow the draft decision to proceed unchanged, or direct the Council to refuse the application, or issue a direction that he is to act as the Local Planning Authority for the purpose of determining the application.

Background

There have been various applications for Crown House over the years relating to roof-top telecommunications and changes of use of floors to non-residential institutions. There is not considered to be any recent and relevant history of note.

Consultations

Neighbours / Publicity

10 site notices were posted on 19 November 2018 and expired on 13 December 2018. A press notice was also published in the Barking and Dagenham Post on 21 November 2018 and expired on 15 December 2018.

562 neighbouring occupiers were consulted on 20 November 2018 and the 24-day consultation period expired on 14 December 2018.

There have been 4 objections to the proposed development as set out below:

Objection from 64 Sandhurst Drive, Ilford

“Speaking as a member of the Barking and Dagenham Heritage Conservation Group, I believe that the proposed development is far too excessive for this location as it has seen more than enough high rises already. This plan will lead to a greater deal of congestion as well as placing a more unbearable strain on local transport, health and educational services. Also, since events such as the Grenfell Tower tragedy, local Councils should now not really be allowing more tower blocks to be built for health, safety, as well as social and environmental reasons. There would also be the loss of a valuable town centre car park if this plan went ahead. Therefore, Barking and Dagenham Council should not allow this application to go ahead as it will greatly lessen the quality of life for many of our local residents here”.
Officer Note: As set out in this report, officers consider the proposed density and height of the development to be acceptable. The buildings would be fitted with sprinklers and the developer would need to demonstrate as part of the external materials condition that all materials are non-combustible. The loss of the car park is considered to be justified.

Objection from 41 Linton Road, Barking

“On this, and other proposed developments in this area, I would only want to make one comment, that they all go too high. I question whether this development is truly on a human scale. I also wonder if we are just allowing the construction of the slums of the future. The old Lintons lasted 50 years. How long are these mega buildings planned to last? Will people actually want to live in them? If they do, will it be good for them?”

Officer Note: As set out in this report, officers consider the proposed height and massing of the development to be acceptable.

Objection from an Unknown Address

“I like Crown House. I think it is a good example of 60s tower blocks and a Barking landmark worthy of being preserved. I have no issues with re-purposing it or with careful external refurbishment”.

Officer Note: As set out in this report, Crown House is considered to be a negative contributor to the Conservation Area and due to the inefficient layout of the building and the presence of asbestos, the existing building is not considered to be viable for refurbishment.

Objection from owner of Cambridge House, Cambridge Road, Barking

A letter submitted by Strutt & Parker on behalf of the owner of Cambridge House is detailed below. It should be noted that the letter was also accompanied by a letter from Consil commenting on the daylight and sunlight amenity analysis undertaken by the developer’s Sunlight and Daylight Consultant, Waldrams.

“The Cambridge House site currently comprises a three-storey block which is in lawful residential use, and which has been identified in various Council planning policy documents as a mixed use redevelopment site. The landowner himself also has aspirations for the residential-led mixed use redevelopment of the Cambridge House site in order to contribute to housing requirements and also meet other Council aspirations for this area.

To confirm, we do not object to the principle of the redevelopment of the Crown House site for mixed use development. Indeed, our client welcomes the benefits which this would deliver in principle, notably in respect of new housing and retail provision, and the wider potential public realm benefits. It is held that the Crown House and Cambridge House sites both comprise significant opportunities for sustainable development which could deliver various public benefits. The Crown House development would also broadly contribute to the Council’s aspirations set out in the Core Strategy;
Development Management DPD; Site Allocations DPD, Barking Town Centre Area Action Plan (BTCAAP) and Barking Station Masterplan SPD (BSMSPD). Moreover, there are no concerns in principle in respect of the density or scale of development proposed. However, we have serious concerns that the proposed development at the Crown House site would significantly hinder the potential for the redevelopment of the Cambridge House site, and the various benefits which that would entail. Additionally, the Crown House development would have an unacceptable impact on the amenity enjoyed by residents of Cambridge House as existing.

It is important to set out as background what may be considered as a material planning consideration. We provide the following extract from the National Planning Practice Guidance:

‘What is a material planning consideration?'

A material planning consideration is one which is relevant to making the planning decision in question (e.g. whether to grant or refuse an application for planning permission).

The scope of what can constitute a material consideration is very wide and so the courts often do not indicate what cannot be a material consideration. However, in general they have taken the view that planning is concerned with land use in the public interest, so that the protection of purely private interests such as the impact of a development on the value of a neighbouring property or loss of private rights to light could not be material considerations.' [our emphasis]

Paragraph: 008 Reference ID: 21b-008-20140306, Revision date: 06 03 2014.

As the Cambridge House site (like the Crown House site) is identified in various local planning policy documents for redevelopment and could bring forward various public benefits as previously mentioned, it is held that the potential to deliver the Cambridge House site to its optimum capacity is considered to be in the public interest.

Policy 7.6 of the adopted London Plan relates to architecture. In relation to planning decisions it states that:

‘Buildings and structures should [inter alia]:

d not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings

i optimise the potential of sites.’ [our emphasis]

Importantly, the supporting text at Paragraph 7.21 states that:
‘The building form and layout should have regard to the density and character of the surrounding development and should not prejudice the development opportunities of surrounding sites.’ [our emphasis]

The supporting text at paragraph 7.22 goes on to state that:

‘New development, especially large and tall buildings, should not have a negative impact on the character or amenity of neighbouring sensitive land uses.’

Policy 7.7 of the London Plan describes how tall and large buildings should not have an unacceptably harmful impact on their surroundings. The supporting text at paragraph 7.26 indicates that tall and large buildings should not have a negative impact on the amenity of surrounding uses, and that opportunities to offer improved permeability of the site and wider area should be maximised where possible.

In respect of local policy, Policy BP8 of the Borough Wide Development Policies DPD states that all developments are expected to (inter alia):

- ‘Not lead to significant overlooking (loss of privacy and immediate outlook) or overshadowing (loss of daylight and sunlight).
- Ensure existing and proposed occupiers are not exposed to unacceptable levels of pollution that may arise from the development. This can include noise, smoke, fumes, refuse and/or lighting during construction and occupation.
- Ensure existing and proposed occupiers are not exposed to unacceptable levels of general disturbance arising from the development, through such activities as traffic movements to, from and within the site during construction and occupation.’ [our emphasis]

The Barking Town Centre AAP at Policy BTC1 also indicates that:

‘All schemes proposing additional retail floorspace will need to demonstrate that they comply with the environmental and transport policies of the Local Development Framework and do not prejudice the achievement of other proposals contained in the Area Action Plan.’

Based on the above, it is clear that the impact of a planning application on the potential future development of neighbouring sites, and particularly those which are identified for development in the Local Plan such as Cambridge House, is considered to be a material planning consideration which should be afforded significant weight. This is a principle which is well established in development control practice and reinforced by case law.

The planning policy context also confirms that the impact on the amenity of existing properties is also a material planning consideration.

Based on the submitted application, Block B of the Crown House development would be built only 3 metres from the Cambridge House boundary and 7 metres from the existing habitable windows of Cambridge House which face to the north west. Block B of the Crown House proposals
would be built to 25-storeys at the nearest point and would have habitable windows facing to the south-east directly toward Cambridge House. Clearly this represents a wholly inappropriate relationship in terms of privacy and outlook for residents within both properties. Additionally, the enclosed letter from Consil indicates that the proposed Crown House development would have an unacceptable impact on the residents of Cambridge House in respect of daylight/sunlight. As such, the proposals would be contrary to Policy BP8.

We consider that Cambridge House currently comprises a negative feature in the local area, particularly noting its location adjacent to redevelopment sites and the conservation area. It also represents an inefficient use of land compared with the surrounding area. As indicated earlier in this letter, our client is currently actively considering options for the residential-led redevelopment of Cambridge House. However, at approximately 0.12 hectares, the Cambridge House site has a limited range of potential design solutions in order to bring forward future development, and clearly the proposed Crown House development (were this to be approved) would sterilise the potential for any future development of the site. The enclosed letter from Consil provides further commentary on the relationship in respect of daylight and sunlight amenity.

As indicated above, we highlight serious concerns in the proposed layout at the Crown House site, which includes new residential built form positioned only 3 metres from the site boundary. Based on the application documents submitted, it appears that no attempt has been made to create any relief or suitable relationship between the two sites.

The Barking Station Masterplan SPD sets out the vision for the development of the locality. Specifically, we note that Figure 17 indicates the provision of a new walkway between the Cambridge House and Crown House sites, and Figure 21 also shows the provision of a new Public Realm Link in this location. Were this to have been implemented in the proposals, this would have enhanced permeability and quality of the public realm in the locality, and also would have enabled the provision of a suitable relationship between the two sites.

It is unclear why a design which provided a ‘public realm link’ between the two sites was not provided as part of the Crown House redevelopment proposals, given that all of this land falls within the application boundary. Significantly, the applicant appears to have entirely ignored the advice provided from the GLA at the pre-application stage (as included in the Design and Access Statement), which states:

‘The applicant should explore the potential for repositioning the link along the southern edge of Block B. This would allow the service/parking bay/refuse store and plant to be relocated along the church car park boundary and away from Cambridge Road. It would also allow for both sides of the pedestrian link to be flanked with active entrances/frontages should the Cambridge House site come forward for redevelopment in the near future. The applicant should also set an indicative layout for the
Cambridge House site as part of this work that demonstrates how this site might be accessed and serviced.’

As set out within the enclosed letter by Consil, we note that the proposed development of Crown House could not be built without affecting the rights to light enjoyed by the overlooking windows in Cambridge House to an extent which would cause a significant infringement.

To summarise, we recognise the opportunity that the Crown House site presents and welcome the principle of site redevelopment to provide a residential mixed-use development in this sustainable location. However, it is clear that the proposed form of development would have an unacceptable impact on the amenity of the residential properties at Cambridge House due to the loss of privacy, outlook, and daylight/sunlight. Moreover, if approved, the Crown House development would prejudice any future development at Cambridge House. As such, the current Crown House proposals would deprive the Council and local area of the potential for new residential-led development. Consequently, Cambridge House will continue to be a negative feature in locality which is out of keeping with its surroundings.

We therefore strongly recommend that the scheme is amended accordingly in order to ensure that there are no unacceptable effects on the Cambridge House property, either as existing or in respect of future development opportunities. This aligns with the GLA’s previous comments which were not taken into account. Our client would be pleased to engage with applicants and Council to ensure that new proposals can complement each other as part of this regeneration area. We trust that officers will not be in a position to support the planning application in its current form”.

Officer Note: A letter submitted by Iceni Projects on behalf of the developer and in response to Strutt & Parker’s letter is detailed below:

“The Barking Station Masterplan SPD (2012) identifies Cambridge House as sitting within a wider plot of land including land fronting Station Parade and Ripple Road (Site BS10). There is, however, no approved masterplan or approved planning application for the Cambridge House site, nor a clear indication of the future form of likely development on the site. Therefore, there is no reasoned justification that the proposed development of the Crown House site could prejudice the development of the Cambridge House site.

The enclosed letter from Waldrams addresses the issues set out in the Consil letter. The letter sets out that reductions in daylight are likely to be unavoidable to allow full and proper development of an open site, as is the case directly adjacent to Cambridge House. Indeed, the BRE Guidelines recommend that alternative lower daylight levels be allowed in these circumstances. Under this scenario the Crown House planning application proposals provide daylight levels commensurate with the alternative target values set by the BRE Guidelines, created by the relationship of Cambridge House on the boundary with the Crown House site.
Such considerations on the relationship of proposed development and its potential impact on amenity must be balanced against other planning considerations in the overall consideration of the application.

In this regard it is important to note the policy direction of national policy with the NPPF stating at paragraph 123(c) that where there is an existing or anticipated shortage of housing land it is especially important to avoid homes being built at low densities and ensure developments make the optimal use of the potential of each site. It goes on that:

“local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).”

The emphasis of Policy 7.7 is in relation to the location and design of tall and large buildings. The quoted text from the policy set out in the Strutt & Parker letter relates to an element of the policy on ‘Strategic’ principles which confirms that: “tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations.”

The planning application falls within the context of such a plan-led approach to tall buildings. The London Riverside Opportunity Area Planning Framework (OAPF) states that the town centre is suitable for high density, mixed use developments with the potential for tall buildings. Further, Policy CM1 of the Core Strategy states that residential development (particularly higher density development) will be focussed in the key regeneration areas, which includes Barking Town Centre.

As identified above the Cambridge House site is not subject to any approved form of development either through a planning application or Development Plan Document. There is therefore no reasoned justification that the proposed development of the Crown House site would prejudice its future development potential. No weight can be given to this issue in the determination process.

To the contrary significant weight should be given to the benefits of the Crown House site delivering much needed housing and affordable housing for the area and delivering against the overall aims of local, London-wide and national planning policy.

As set out above the enclosed letter from Waldrams addresses the issues by Consil. The letter also responds to a range of other technical points raised in the Consil letter and concludes that the design of the proposed development at Crown House demonstrates good levels of daylight can be achieved along its boundary with careful internal design, suggesting that similar success could be achieved on the Cambridge House site were it to be built out.
As highlighted above the Cambridge House site is not subject to any approved planning application or any specific form of development approved in a Development Plan Document. Therefore, there is no evidence to demonstrate how the development of the Crown House site would prejudice, as yet undefined, development proposals coming forward.

Further, the GLA in its Stage 1 Response (28 January 2019) supports the principle of development set out in the Crown House application.

A key element of the proposed development is the incorporation of a public through route linking Linton Road to Cambridge Road which, will have adjacent ground floor uses and amenity space. This fulfils the aspirations of the Barking Station Masterplan SPD by enhancing links to the station and providing new high-quality public realm.

In conclusion, it is evident that the proposed development has been considerately designed to make the most efficient use of the land, deliver the aspirations for regeneration set out in local planning policy and results in an acceptable impact on neighbouring properties. Further, there is no justification to sustain an objection to the scheme on the issue of prejudicing future development potential of the Cambridge House site”.

**Officer Note:** The impacts of the proposed development on Cambridge House are considered in section 5.5 of this report.

In a separate and later response, the owner of Cambridge House advised that he had not received any letters/information about the development and that none of his 15 tenants had received any letters either.

**Officer Note:** It should be noted that all of the flats at Cambridge House were consulted, a press notice was published in the Barking and Dagenham Post and there were site notices put up in the local area, including Cambridge Road.

### 3.2 Consultees

- **Greater London Authority (GLA)** - The GLA issued their Stage 1 Report on 28 January 2019. This concluded as follows:

  London Plan policies on housing and affordable housing, urban design, heritage, inclusive design, climate change, flood risk, drainage and water and transport are relevant to this application.

  The following issues should be considered:

  **Land use:** The principle of the residential-led use of the site is supported.

  **Sub-market housing:** Additional information should be submitted to demonstrate that the blended threshold of 42% sub-market housing by habitable room for the site as a whole (Buildings A and B) is reached without the inclusion of public subsidy, in order for the scheme to be eligible
for the Fast Track Route. If public subsidy is being used to support this offer then the scheme must follow the viability tested route, and viability information must be submitted, which will be robustly scrutinised by GLA Officers. Early stage and (if the viability tested route is followed) late stage viability reviews must be applied.

**Officer Note:** The developer has confirmed that all of the sub-market housing would be located in Building A and that the 43% sub-market housing offer has been reached without public subsidy. Accordingly, the scheme is considered to meet the requirements for the Fast Track Route. The sub-market housing provision and an early stage review mechanism are to be secured in the S106 Agreement.

Paragraph 31 of the GLA Stage 1 Report also sought the tenure split information by habitable room and the locations and size mix of the sub-market units. The scheme proposes a sub-market housing split of 30% Low Cost Rent, 35% Affordable Rent, and 35% Shared Ownership. There are ongoing discussions with the the Council’s residential provider, Reside, in relation to its requirements for sub-market housing provision on this site. As such the exact units within Building A which would be allocated to each of the three tenure types has not yet been confirmed. Details on rent levels and income caps will also be clarified through the ongoing discussions with Reside. Updates on this matter will be provided at Planning Committee.

**Urban design and heritage:** The overall approach is generally supported. Some additional information is requested regarding the site tying in with the emerging context. On balance the residential quality is acceptable subject to further clarification on daylight penetration and further justification for single aspect units need addressing.

**Officer Note:** In response to the urban design matters above, the developer’s Sunlight and Daylight Consultant, Waldrams, undertook an exercise on daylight penetration of the single aspect units.

Overall, 239 out of 282 (85%) habitable rooms in single aspect units meet their target average daylight factor (ADF) level whilst 217 out of 282 (77%) habitable rooms in single aspect units achieve at least 80% daylight distribution. In Waldrams' opinion, ‘this level of compliance is commensurate with similarly dense schemes located in urban environments, particularly given the scale of the development opposite at Barking 360 posing a significant constraint on the north-eastern façade of the site. It should also be noted that a significant proportion of those rooms in single aspects which do not meet their target ADF or daylight distribution levels are bedrooms, which the BRE Guidelines acknowledge in paragraph 2.2.8 as being “less important”’.

To justify the number of single aspect units, a note has been prepared by the architects setting out details of how the development has evolved and how the design has been informed throughout by the aspiration to maximise the provision of dual aspect units wherever possible.
Inclusive design: The layout of the 1-bedroom / 2-person accessible units in Building A needs to be reviewed.

**Officer Note:** To address the above comment, the 1-bedroom / 2-person accessible units in Building A have been revised to include direct access to the bedroom from the hallway.

Transport: Car-free supported but insufficient number of disabled parking spaces for Building B. A S106 contribution is required for pedestrian and cycling improvements. Impact on Barking Station needs to be established and the best planning and financial mitigation measures to be agreed and resolved prior to Stage II referral to the Mayor. Bus stop accessibility audit should be completed. Construction Logistics Plan, Delivery and Servicing Plan and Travel Plan required.

**Officer Note:** A condition is proposed requiring a Car Parking Design and Management Plan for Blue Badge Car Parking to be submitted and this would consider whether there was any opportunity for additional blue badge parking as part of the highway re-alignment works.

The pedestrian and cycling improvements set out within the Transport Assessment are to be secured in the S106 Agreement.

Clarification has been sought by officers regarding Transport for London’s (TfL) comments regarding impacts on Barking Station. Given there is no strategy for station improvements as yet, no clarification as to what a contribution would be used for and the fact that the station is not in TfL’s control, this matter is not being pursued by TfL. Accordingly, no contribution towards Barking Station improvements is considered to be necessary.

A Bus Stop Accessibility Audit has now been submitted and depending on the outcome of TfL’s review there may, or may not, be a need to secure accessibility alterations to bus stops in the S106 Agreement.

A Framework Travel Plan has now been submitted and a Full Travel Plan is to be secured in the S106 Agreement.

Conditions are proposed to secure a Construction Logistics Plan and Delivery and Servicing Plan.

Flood risk, drainage, and water: The approach to flood risk management is compliant. The surface water drainage strategy does not give appropriate regard to the drainage hierarchy and greenfield run-off rate. Additional Sustainable Urban Drainage (SuDS) maintenance information required. Water harvesting and re-use should be integrated with the surface water drainage system to provide a dual benefit.

**Officer Note:** The developer has submitted a response to the drainage comments raised by the GLA. There are two main elements raised in the GLA response, the first is the surface water hierarchy and the second is the SuDS systems. For the hierarchy, the comments seek that the
development consider achieving as close to a greenfield rate as possible. The initial proposals contained a betterment over the brownfield rate. Having reviewed the impact of reducing run-off rates the development can realistically achieve a 3x greenfield rate within the confines of the development. This results in a larger storage volume. This can be achieved by deepening the tanks from 1 metre to 1.5 metres without a significant change in the footprint.

In relation to the other comments, at the current time the provision of rainwater harvesting within the scheme is not considered to be a feasible option.

A detailed Surface Water Drainage Scheme is to be secured by condition and this has been worded to require the Scheme to comply with the drainage hierarchy and greenfield run-off rate in the London Plan.

**Climate change:** Approach is generally supported. Some additional information is required. S106 Agreement will be required for district heat network connection. Single energy centre and network required for each building.

*Officer Note:* The developer has submitted a response to the energy comments raised by the GLA. The S106 Agreement will secure a commitment to connect the development to the district heating network within five years of planning permission being granted, as requested by the GLA. The developer has advised that it is not possible to provide a single energy centre and network for the development as there is no direct access across the site to connect the two buildings. The district heating network is likely to run alongside the main road and, as such, individual connections are likely to be the most efficient solution.

b) **Historic England (Archaeology)** – Initially advised that the submitted archaeological desk-based assessment was lacking in certain areas. The developer submitted an updated assessment to reflect the comments made and Historic England has subsequently confirmed that the assessment is acceptable and that their standard archaeology condition should be secured.

*Officer Note:* The recommended condition will be imposed on any planning permission granted.

c) **Historic England (Buildings)** - We appreciate that this area is subject to emerging tall building developments, however this site is partially situated within the Abbey and Barking Town Centre Conservation Area and therefore we believe there is an opportunity to preserve and enhance its setting.

The policies outlined below form the statutory basis on which your authority is duty bound to make its decision unless there are material reasons why this should not be the case.

Section 66 and 72 of the Planning (Listed Buildings and Conservation
Areas) Act 1990 impose a statutory duty upon local planning authorities to consider the impact of proposals upon listed buildings and Conservation Areas.

The National Planning Policy Framework (NPPF) 2018 provides guidance for decision making. It begins by setting out a presumption in favour of sustainable development, of which protecting and enhancing the historic environment in a manner appropriate to its significance is established as an environmental objective.

Paragraph 193 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation.

Paragraph 194 states that any harm to the significance of a designated heritage asset requires clear and convincing justification. It should also pass certain tests depending on the magnitude of harm caused. Where less than substantial harm would be caused, your authority must weigh the public benefits delivered by the proposals against the harm caused (paragraph 196).

Finally, paragraph 200 states that local planning authorities should look for opportunities for new development within Conservation Areas and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset, or better reveal its significance should be treated favourably. This is also captured in the Conservation Area Appraisal for Abbey and Barking Town Centre 2009: ‘Replacement buildings must enhance and add to the character of the conservation area, secure its setting and help to preserve the overall integrity of the conservation area through careful design and implementation’.

In our view, the proposed development demonstrates a poor contextual relationship with the Conservation Area, and an overdevelopment of the site through a considerable increase in height and massing, deviating away from small plot sizes and human scale of buildings and spaces.

The submitted information shows the arrangement of the massing stepping from 8 and 9-storeys along Linton Road to 29-storeys along Cambridge Road. There may be an opportunity to redistribute some height to the rear of the site where the current proposed 19-storey building is along Cambridge Road and restore the urban grain and street frontage along Linton Road with a much-reduced massing.

This would help connect this part of the Conservation Area to Station Parade and Ripple Road and strengthen its character and appearance, as well as provide a more contextual setting for smaller scale buildings in the Conservation Area including the Grade II Listed Tabernacle Church.

Historic England has concerns regarding the application on heritage grounds. We consider that the current proposals cause less than substantial harm to the significance of the Conservation Area. As stated in
paragraph 196 of the NPPF, this harm should be weighed against the public benefits of the proposals.

**Officer Note:** A detailed response to the above comments was prepared by the developer’s Heritage Consultant, Montagu Evans, and sent to Historic England. The response set out the relevant policies and case law, as well as the public benefits of the scheme. This matter is further discussed at section 5.3 of this report.

The following paragraphs are extracts from the Heritage Consultant’s response to Historic England:

“The proposed development includes the demolition of the existing Crown House building, which is identified by the Abbey and Barking Town Centre Conservation Area Appraisal (2009) as “unattractive”. It should therefore be common ground between all parties that its removal would enhance the character and appearance of the Conservation Area, subject to the proposed replacement. To the north and east, the existing site comprises a surface level car park, which is of poor amenity value and also is a detracting feature in the setting of the Conservation Area.

It is proposed to replace the existing Crown House building with relatively low-rise development fronting Linton Road. It will be a more cohesive element on the edge of the Conservation Area. The edge buildings of the development have been designed to relate to the existing Conservation Area, through replicating its plot widths in their ground floor openings and their fine grain, variation and materiality at upper levels. The proposed development will reinstate the historic building line along this frontage, with new active frontages and areas of public realm with high-quality landscaping.

To the north, new taller buildings are proposed, which are located outside of the Conservation Area boundary. These will be tall relative to the prevailing scale of the Conservation Area, but not incongruent to its existing setting that includes tall and large development. More significantly, that scale of development is commensurate with the importance of the site, which sits within an Opportunity Area, Major Centre and the Station Gateway Area that has a PTAL rating of 6a due to its proximity to Barking Station.

The Heritage, Townscape and Visual Impact Assessment (HTVIA) (2018) submitted with the application outlines a series of countervailing heritage benefits that the proposed development delivers, including those listed above. We consider therefore, the proposals would, at least, preserve the character and appearance of the Conservation Area.

It should be noted that the HTVIA does find harm to the Grade II listed Tabernacle Church. If the decision maker finds that the netting out produces residual harm to any asset, then paragraph 196 is engaged, the residual harm given great weight, and accordingly the decision maker considers whether there are any countervailing planning benefits, including heritage benefits. These benefits are effectively added to the heritage benefits taken already into account. There is no double counting, in other
words. The 196 balance is struck once the totality of benefits are taken into account.

The benefits for the proposed development include, but are not limited to, economical and regeneration benefits for the town centre. The proposed development will make a significant contribution to the site’s strategic policy designations, as set out in the Planning Statement prepared by Iceni that was submitted with the planning application.

Accordingly, we consider that the proposed development as a whole is acceptable. We find that the proposed development does not cause harm to the Abbey and Barking Town Centre Conservation Area. If harm is deemed to be found, then we consider this to be outweighed by the benefits achieved by the proposed development. In making this judgement we have had regard to the great importance and weight attached to the statutory objective of avoiding harm to the significance of heritage assets, which is reaffirmed in the High Court decisions for Barnwell Manor and Forge Field”.

d) **Designing Out Crime Officer** – General site-specific recommendations provided for designing out crime.

e) **Environment Agency** - The site is located within Source Protection Zone 2, an area designated for drinking water abstraction from groundwater. Therefore, the bedrock and groundwater are vulnerable to mobilised contaminants. The submitted contamination risk reports appear to be generally in line with the relevant guidance and show that the previous uses of the site have been of low polluting potential. We therefore have no objections to the proposed development.

f) **London Fire and Emergency Planning Authority (LFEPA)** - All buildings with a floor in excess of 18 metres above fire and rescue service vehicle access level will require firefighting shafts containing firefighting lifts and fire mains. In the case of any building with a floor level over 50 metres above fire and rescue service vehicle access level a wet fire main will be required.

Access for pump appliances to fire mains should comply with 16.6 and 16.7 respectively of Approved Document B (ADB) of The Building Regulations 2010 as amended; see also 16.8 and 16.11 of ADB. The provision, number and location of firefighting shafts should comply with Section 17 of ADB as appropriate.

The Commissioner strongly recommends that sprinklers are considered for new developments and major alterations to existing premises.

*Officer Note:* The above matters will be dealt with as part of Building Regulations approval. Officers can, however, confirm that sprinklers will be fitted in all buildings.

g) **London City Airport** – No objection subject to a condition being imposed regarding the submission of a methodology for the erection of any cranes or scaffolding on the site.
Officer Note: A condition is proposed accordingly.

h) **Thames Water** – General advice provided, along with a request to impose an informative relating to working near Thames Waters’ assets.

i) **Environmental Health Team** –

*Possible Site Contamination*
Standard land contamination conditions should be secured.

*Noise*
Based on the results of a detailed noise survey, the submitted noise and vibration report identifies mitigation measures needed to secure appropriate internal noise levels within proposed dwellings. The development will include non-residential elements, therefore an assessment of noise breakout from these elements to adjacent dwellings has also been undertaken and mitigation measures proposed. Noise limits for future building services plant have also been proposed. The site lies near to overground and underground railway lines, and an assessment of levels of vibration affecting the site has also been undertaken.

I have reviewed the report and am satisfied that the “typical constructions” set out in Table 4.5 of the report will be sufficient to secure appropriate mitigation of external noise. The report notes that further noise modelling will be required to allow for detailed “efficient” acoustic specifications to be developed for the various development facades.

Indicative noise breakout calculations are provided for a range of commercial uses which demonstrate that transmission through the party construction would be expected to satisfy relevant criteria within adjoining residential accommodation. A safeguarding condition is recommended.

Railway vibration is not predicted to have a significant impact on amenity.

I note that one of the commercial areas adjoins the public square and so there is potential for disturbance associated with any outdoor activity associated with that use during the late evening/night to residents living above and overlooking that area.

To safeguard the situation, I recommend that any permission be subject to conditions to require:

- The submission and approval of a scheme of noise mitigation against external noise.
- A limit on noise transmission between ground floor uses and adjoining dwellings.
- A limit on noise from fixed plant and machinery.
- A restriction on the hours of trading of the ground floor commercial uses.

The noise assessment does not seek to evaluate ambient noise affecting private and public external amenity areas.
Using the results of the noise measurement survey presented in the report, I have carried out indicative noise calculations and find that for lower floor balconies around the building perimeter, day-time road traffic noise will be significantly greater than the upper guideline value (55 LAeq). It is not feasible to reduce noise affecting these areas.

For the semi-formal play area adjoining the play room, day-time road traffic noise is predicted to be between 60 LAeq dB falling to 55 LAeq dB with increasing distance from the road.

This is a similar situation to that which applies in the case of the Trocoll House and Barking 360 sites, except that in both those cases, elevated gardens will satisfy the normal design criteria for external amenity areas whereas, with this application, the current design does not provide for such a facility.

Assuming that this is a case where making a compromise between elevated noise levels and other factors is warranted, I have evaluated the effect of providing a 2.5-metre high imperforate barrier to the site boundary between the semi-formal play area and Linton Road. With an acoustic barrier in place, day-time road traffic noise is predicted to be between 53 LAeq dB falling to 49 LAeq dB with increasing distance from the road and so will satisfy the BS8233 Design criteria for amenity space.

Based on the above considerations, I recommend that any permission that might be granted be subject to a condition to require the submission, approval and provision of a noise barrier to screen the semi-formal play area from traffic noise from Linton Road.

**Potential Odour Nuisance**
There is potential for odour nuisance to be associated with the operation of any A3 use. To safeguard the situation, I recommend a condition requiring the provision of an exhaust ventilation system.

**Potential Light Pollution**
I recommend a condition to require the design and implementation of a lighting scheme which conforms to the Association of Chief Police Officers (ACPO) guidance.

**Air Quality**
The submitted Air Quality Assessment evaluates construction phase emissions and identifies that during the construction phase, the site has the potential to generate dust nuisance beyond the application boundary. I concur with this conclusion and recommend the imposition of a suitable condition.

Dispersion modelling of emissions from traffic on the local road network has been undertaken to ascertain the likely level of exposure of future occupants of the proposed development to elevated nitrogen dioxide (NO2) and particulate matter (PM) concentrations. The assessment indicates that NO2, PM10 and PM2.5 concentrations will be well within the relevant long
and short-term air quality standards. I concur with this conclusion insofar as it relates to dwellings, all of which are situated at first floor level and above.

The play area and play room, the public square and other amenity areas are to a greater or lesser degree exposed to concentrations of NO2 above the national air quality standard (an annual average concentration of NO2 of 40 ug/m3) set to safeguard health.

For the purposes of London Local Air Quality Management (LLAQM), regulations state that exceedances of the objectives should be assessed in relation to “the quality of the air at locations which are situated outside of buildings or other natural or man-made structures, above or below ground, and where members of the public are regularly present”. Statutory guidance issued pursuant to the LLAQM regime gives guidance examples of where the air quality objectives should apply.

I accept the argument that for persons using the public square and smaller amenity areas, exposure is likely to be transient and so the annual mean objective need not be applied.

I do not think this can be assumed to be the case for the play area and associated play room. I think the play area/play room are locations where children may be regularly exposed to air pollution and so in my view the 40 ug/m3 annual average air quality standard is applicable; particularly if it is used in some semi-formal way as a community facility for residents.

Both the National Planning Policy Framework (NPPF) 2018 and Planning Practice Guidance (PPG) give guidance on how air quality considerations should be addressed in taking planning decisions.

PPG presents a decision tree which leads to the question:

“Will the proposed development (including mitigation) lead to an unacceptable risk from air pollution, prevent sustained compliance with EU limit values or national objectives for pollutants or fail to comply with the requirements of the habitats regulations?

If the answer is “yes” the PPG guidance is that the planning authority should consider how the proposal could be amended to make it acceptable or, where not practical, consider whether planning permission should be refused.

There is recent research regarding the impact of green screens on concentrations of NO2 at two London primary schools. The study was carried out to assess the efficacy of a green screen to prevent the transport of vehicle emissions from the nearby road into the school playgrounds.

The study found that 2.5-metre high green screens having mature vegetation were found to reduce annual average concentrations of NO2 by some 22% (+/- 8%) at a position 1 metre from the screened side of the barrier.
In this case the reductions in NO2 which are required to satisfy the National Air Quality Standard are some 2 ug/m3 (some 5%) and so I am confident that the provision and subsequent maintenance of a suitably designed 2.5-metre high green screen to the boundary of the semi-formal play area and the Linton Road footway will ensure that the National Air Quality Standard is satisfied.

To safeguard the situation, I recommend that any permission that might be granted be subject to conditions to require the provision of suitable green infrastructure and to require that windows to the ground floor play room opening onto the Linton Road facade are fixed shut. It may well be that an integrated acoustic/air quality mitigation design can be achieved.

Air Quality Neutral Considerations
I note from the Planning Statement that it is recognised that Policy 5.3 of the London Plan ‘Sustainable Design and Construction’ is relevant to this application. Policy 5.3 states that major development proposals should meet the minimum standards outlined in the Mayor’s ‘Sustainable Design and Construction’ Supplementary Planning Guidance (SPG). That guidance provides a cross-reference to London Plan Policy 7.14 which states that developers are to design their schemes so that they are at least ‘air quality neutral’.

The SPG provides inter-alia detailed guidance on air quality neutral policy for buildings and transport. It states that developers will have to calculate the nitrogen oxides (NOx) and/or PM10 emissions from the buildings and transport elements of their developments and compare them to benchmarks set out in the SPG.

Where schemes do not meet the ‘air quality neutral’ benchmarks, after mitigation measures have been implemented on-site, the developer is expected to off-set emissions off-site. Measures could be provided in whole or part directly by the developer or by contributing to an existing project. The SPG advises that measures should be secured by condition or S106.

So far as I am aware an Air Quality Neutral Assessment has not been submitted. I am confident that it will be possible to design the development such that meets the benchmarks for building emissions.

The information submitted pursuant to the application includes a Transport Assessment and I note that the development is essentially car-free and so I would anticipate it will meet transport benchmarks. To safeguard the situation, I recommend that any permission granted be subject to a condition to require the submission and approval of an Air Quality Neutral Assessment.

Demolition / Construction Phase Impacts
There is potential for significant adverse impact from construction phase noise, vibration, dust and other emissions to air.

Regarding vibration, I note that the one of the proposed buildings will be some 3 metres from Cambridge House so, if ground improvement or piling
is proposed, off-site vibration will be an issue. I note that the vibration limit agreed with the developer in relation to the Lymington Fields development was a maximum of 1.5 mm/s ppv. Whilst that criterion was satisfied, and in my view represents an appropriate limit, vibration from piling and ground improvement work was nevertheless the subject of significant community concern as development progressed. My initial risk assessment suggests that if driven piling were to be implemented, the impact on nearby residents would be entirely unacceptable. Therefore, I recommend conditions to:

- require the mitigation of dust and emissions;
- limit the hours of demolition/construction work;
- limit off-site vibration; and
- prohibit the use of driven piling.

**Officer Note:** All of the recommended conditions proposed by the Environmental Health Officer will be imposed on any planning permission granted.

j) **Transport Development Management Team** – The Public Transport Accessibility Level (PTAL) for the site is 6a, indicating an excellent level of accessibility to public transport.

The proposal is for a car-free development, with no vehicular parking provided on-site except blue badge spaces and a space which is intended to be used by a car club. Two of the existing vehicular accesses will be re-instated back to footway but the south-eastern access to Site B will be retained. For Site A, it is proposed to provide a new access on Cambridge Road that will lead to an undercroft area, providing both an opportunity for loading/unloading at the site and the proposed blue badge parking/car club space. The undercroft area also benefits from a head height clearance of 5.6 metres which can therefore accommodate all relevant vehicles, including refuse. For Site B, the dropped kerb access will also provide the entrance and exit point for blue badge parking and a servicing area.

A swept path analysis of the proposed vehicular access points and the associated parking have been carried out and have demonstrated that the parking layout is acceptable and the visibility from the proposed access is in accordance with the minimum standards contained within the Department for Transport’s ‘Manual for Streets’. The existing double yellow line waiting restrictions along both sides of Cambridge Road prohibiting parking at all times should prevent any residual on-street parking associated with the development from occurring.

The emerging London Plan states that 3% of dwellings should benefit from a blue badge parking space. Applying this to the proposal results in Site A (169 units) requiring 5 spaces which have been accommodated and Site B (227 units) requiring 7 spaces, however, only 2 spaces are provided. The justification that has been given is that due to the constraints of the sites and the design of the building footprints it is not possible to accommodate a higher number of blue badge spaces, but given the limited parking area the total amount has been maximised within the limits of these sites.
It is considered that the proposed cycle parking provision is in accordance with the minimum standards contained within the draft London Plan.

To encourage car club use, 2 years membership to a car club scheme (on request) for each residential unit should be secured by S106 Agreement.

Traditional refuse storage and collection methods are proposed across both sites in line with policy and existing practices currently employed within the Borough. A full refuse strategy is included within the Delivery and Service Plan. We would recommend that the Council refuse department confirms their acceptance to the site wide refuse strategy.

Based on the information that has been provided, and having considered the merits of this application, it seems that there are no apparent adverse highway implications arising from the proposed development.

The proposed layout relies on Cambridge Road being re-aligned and part of the highway being stopped up. It is stated that the design for the highway re-alignment has been developed to ensure that the proposals will not impact upon the movement of buses, given the number and frequency of services that traverse this route, and that buses will still be able to operate as per the existing scenario. Two new crossing facilities are proposed to safeguard safe routes for pedestrians to cross both Linton Road and Cambridge Road. It is considered prudent to secure a ‘Grampian’ planning condition, or S106 obligation, requiring the developer to a) agree a scheme of highway works and b) implement all off-site highway works prior to first occupation of the building. An informative should be provided advising the developer that the alterations proposed to the public highway will require consent separate to any planning permission granted. This will need to be secured with the developer and Local Highway Authority separately in a S278 Agreement (Highways Act 1980). We suggest, in the interest of highway safety, that this is entered into by the developer prior to construction taking place on site.

The Transport Statement does not indicate if there is likely to be any adverse impact to the public transport services, in particular the local bus services. Due to the likely predicted increase in numbers of passengers that will use these services, we would suggest that the developer makes a financial contribution for the local bus services operating in this area in order to improve the frequency and current capacity levels, so these services can continue to operate safely and efficiently.

As a car-free development, parking permits for the controlled parking zone (CPZ) in the surrounding streets should not be permitted to any future occupiers and this should be secured in the S106 agreement.

A Construction and Logistics Management Plan, including the layout for the operational use connected with the proposed build out of this development, should be secured by condition.

*Officer Note: The Transport Development Management Officer and the Council’s Refuse Team have discussed the proposed refuse collection.*
arrangements for the site and are of the view that the proposed layout will need to be refined in respect of Building B. This may, or may not, require the relocation of the blue badge car parking spaces into the landscape area fronting Cambridge Road. Officers consider that this matter could be dealt with as part of the refuse strategy condition and the highway accommodation works.

It should be noted that Transport for London (TfL) has not sought a contribution towards local bus services and therefore it is not considered appropriate to make such a request. TfL have, however, requested that a Bus Stop Accessibility Audit is undertaken by the developer to see whether any bus stops nearby require accessibility alterations and to carry out any works as required by TfL. A Bus Stop Accessibility Audit has now been carried out and if there are found to be any requirements for improvements arising from this then these will be secured in the S106 Agreement. The other conditions/S106 obligations proposed by the Transport Development Management Officer will be secured on any planning permission granted.

k) LBBD Energy Technical Manager - No comments as they are planning to connect to the town centre district heating scheme.

l) Drainage and Flooding Team – We are happy with the demonstration to reduce current surface water discharges by 50%.

m) Urban Design Officer –

**Layout, Height, Scale and Massing**

- The proposed replacement of Crown House; a poor-quality prominent building of little design merit and the redevelopment of an under-utilised site in a strategic town centre location, is welcomed.
- The proposed development has the potential to improve the setting of the Grade II Listed Barking Baptist Tabernacle Church, framing an important heritage asset.
- The creation of a new east-west pedestrian link improving permeability and access to Barking Station is supported and fits with the wider town centre movement strategy outlined in the Weston Williamson Barking Station Masterplan.
- The principle of stepped massing (mid to high rise blocks) in order to create an appropriate relationship with the surrounding context is accepted. The stepped height arrangement responds positively to the stepped profile of the adjacent Barking 360 development.
- The ‘Building A’ west shoulder block has increased in height by 1 storey since pre-application, slightly compromising the extent of the north-south graduation in height across the site. The degree of overshadowing in relation to the Church will subsequently increase.
- However, the breathing space created on either side of the Church and the visual breaks through the site help to reduce the cumulative impact of the massing.

**Appearance**
• The initial design concept of creating vertical ‘folds’ and horizontal ‘branches’ reflected in the materiality and elevational treatment is considered to be strong.
• The strategy of differentiating elevations with a uniform vertical order to the towers and a less formal approach applied to the shoulder blocks is supported.
• The staggered more playful balcony arrangement is largely limited to the north-west elevation of ‘Building B’. This should ideally be replicated on the corresponding south-east elevation of ‘Building A’ in order to break up the uniformity across the site.
• The balconies appear ‘heavy’ on both the tower blocks and the shoulder blocks. An alternative lighter balustrade design should be considered. The balcony detailing is key given the scale of the buildings and in order to avoid a monotonous generic feel.
• The combination of folded aluminium frame facades and brick detailing to provide layered depth and interest is welcomed. However, the original design concept is diminished on the smaller shoulder blocks with the ‘horizontal branches’ hard to detect. In addition to the brick corbelling these could be represented by extending the use of projecting/recessed brick banding.
• The proposed red brick for the shoulder buildings is considered too dark and the subsequent contrast with the towers too stark. A lighter brick tone is needed which considers both the relationship with the tower blocks and the Church.
• The proposed wind mitigation measures, in the form of two 2-metre wide perforated screens attached from the first floor balcony of ‘Building B’ to the height of the shoulder block, represent large prominent structures at odds with the quality of the building design. This mitigation approach should be reconsidered and any manufactured ‘physical’ measures should be embedded within the design rather than appearing as unplanned ‘add-ons’.

Internal Design
• The number of dual aspect units is acknowledged as is the reduction in the number of units per core.
• Revisions made to ‘Building A’ to allow natural light and ventilation into the internal corridors are welcomed.
• The quality of sunlight and daylight for the single aspect north-facing units in ‘Building A’ is a concern (given that health and well-being is a key architectural responsibility particularly with high-density living).
• The relocation of the entrances to ‘Building A’ to address Cambridge Road and Linton Road is welcomed and will ensure more active street frontages with highly visible entrances that are well overlooked.
• The provision of ground floor commercial space in ‘Building B’ is important in order to ensure active uses along the new pedestrian route.
• Creating an active frontage is key given the large proportion of space allocated to the entrance lobby which may be relatively inactive at certain times of the day.

Amenity Space
• The provision of private amenity space in the form of balconies in accordance with London Plan standards is acknowledged.

• The contribution and quality of the proposed communal spaces is key to the success of the build-to-rent model; these should be high-quality usable amenity spaces which encourage social interaction.

• The use of birch trees in these areas to reduce the scale and reinforce the original design concept is noted. Details of the soft and hard landscaping proposed should be secured by condition in order to ensure that the design intent is delivered.

• The decision not to provide habitable roof terraces in order to prevent anti-social behaviour is, in this instance, accepted given recent trends in the Borough. However, from an urban design perspective prevention of roof-top anti-social behaviour is a management issue rather than a design issue.

• The use of the roof spaces for photovoltaic panels will contribute towards the sustainable energy requirements of the buildings and is therefore considered an appropriate alternative.

• The shortfall in the amount of play space proposed compared with London Plan guidance is noted. The quality of the play space provided is therefore key and should be secured by condition as the use of Barking Park and Abbey Green as indicated in the Play Strategy is questionable given the distance from the site.

**Landscaping/Public Realm**

• The provision of high-quality amenity space and exemplary quality public realm is essential given the high density proposed and the strategic town centre location. Emphasis should be on quality of place.

• The proposed improvements to the public realm surrounding the site in the form of widened footways, a new footway crossing and tree planting are welcomed and will help to improve the pedestrian environment along Cambridge Road and Linton Road.

• Introducing more street-like characteristics including tree planting around the residential entrances will also help to create a sense of human scale particularly at the base of the taller blocks fronting Cambridge Road.

• The planned measures to improve the pedestrian experience are key given the large proportion of inactive street frontage along Cambridge Road taken up by car parking and servicing requirements.

• The landscape strategy creates a hierarchy of clearly defined public, private and semi-private spaces. The proposed colonnade is visually prominent and helps to define the new east-west connection as well as extending the width of the pedestrian link and providing a means of shelter.

• The proposed new public amenity space adjacent to ‘Building B’ (including a seating area) intended to provide an active space at the opening to the new pedestrian route has the potential to perform a similar function to that of ‘Short Blue Place’ - a high quality animated space to the west of the site.

• Spatial quality and architectural quality should support and complement each other both visually and functionally. In this regard, the design objectives and aspirations outlined in the landscape strategy are supported.
Officer Note: Following the above comments, revisions have been made to the wind mitigation screens on the side of Building B. Furthermore, in order to justify the number of single aspect units, a note has been prepared by the architects setting out details of how the development has evolved and how the design has been informed throughout by the aspiration to maximise the provision of dual aspect units wherever possible. The Urban Design Officer has confirmed that the wind mitigation design for Building B is more acceptable and that the architects have demonstrated sufficient justification for the single aspect units.

n) Arboricultural Officer – I have been involved with the engineers in some aspects of this site. The proposal does affect some boundary trees that are young, in good condition and were planted as street side trees. They are identified as such in the tree report. The rest of the removals are justified due to poor quality and low retention value.

Overall, I am satisfied the landscape proposal includes a good spread of new trees. I could not see species specifics, but I would like to see included in the planting spread some larger canopy trees at maturity. Particularly in the roadside areas to retain public highway visibility and shading of the highway. Given that some good highway verge trees are being sacrificed, I think this is necessary.

Some of the planting is in paved surfaces. There should be a design specific for what size tree and socket design.

Some trees are down for retention which look to be good specimen choices. The developer must supply the relevant tree protection plans.

Officer Note: The developer has advised that after reviewing possible roadside locations for planting trees, the landscaping and transport consultants have advised that planting in these areas is not possible due to highways constraints.

In terms of the point raised regarding planting in paved surfaces, it has been confirmed that tree cells would be used where possible.

Details on specific tree species is set out in the submitted Landscaping Strategy (Part 3). Two new species of trees are proposed, including ‘Birch’ which is proposed in groups in the green lungs of the development as a response to the design concept of Barking as ‘the settlement by the birch trees’. Elsewhere, the single trees around the edges of the site comprise ‘Platanus acerifolia’, a relatively upright tree suited to city locations and roadside edges.

The Landscaping Strategy also details the existing trees that are to be retained, including:

- The existing tree to the south-west corner of Crown House (Species: Platanus x hispanica); and
- The existing trees in the Church car park (Species: Acer Pseudoplatanus).
The submission of an Arboricultural Impact and Method Statement, including tree protection plans, is to be secured by condition.

4.0 Local Financial Considerations

4.1 The developer would be liable for a Mayoral Community Infrastructure Levy (CIL) contribution which will be charged at a new rate of £25 per square metre of chargeable floorspace with indexation applied from 1 April 2019. Decisions granted before 1 April 2019 will be charged at the old rate of £20 per square metre.

4.2 A Borough CIL contribution would be payable based on a rate of £70 per square metre of residential floorspace and assuming a rate of £10 per square metre of commercial floorspace, with indexation applied. The exception to this is any B1 office space which is charged at a nil rate under the Borough’s CIL. It should also be noted that the Borough has differing CIL rates for commercial floorspace and given the flexible uses sought there is the potential for the commercial rate of £10 to increase or decrease depending on the end use.

4.3 The development is to be phased and CIL payments are also to be phased. It is considered that a discount for demolition of the existing Crown House building would be applicable in calculating the CIL charges and a discount for the sub-market housing units within the development would also be applicable subject to an acceptable application for social housing relief being submitted and approved prior to commencement of the development.

5.0 Analysis

5.1 Principle of the Development

5.1.1 Barking Town Centre is a key development area within the London Riverside Opportunity Area. The London Riverside Opportunity Area Planning Framework (OAPF) states that the town centre is suitable for high density, mixed-use developments with the potential for tall buildings.

5.1.2 Policy CM1 of the Core Strategy states that residential development (particularly higher density development) will be focussed in the key regeneration areas, which includes Barking Town Centre. Policy CM2 of the Core Strategy sets a target of 6,000 new homes in Barking Town Centre.

5.1.3 The proposed development of 396 residential units equates to 32% of the London Plan annual monitoring target of 1,236 residential units for the Borough and 18% of the draft London Plan annual monitoring target of 2,264 residential units for the Borough.

5.1.4 As well as falling within the Barking Town Centre Area Action Plan (AAP) area, the proposal site is located within the wider Barking Town Centre Site Specific Allocation Area 3 (BTCSSA3) (Barking Station) which proposes mixed-use development comprising new homes, an improved transport
interchange, shops, restaurants, cafes, office and other commercial uses; leisure uses and hotel uses. BTCSSA3 identified an indicative capacity of some 600 new homes, 7,000 square metres (net) of shopping and 30,000 square metres of offices.

5.1.5 Barking Town Centre has been awarded Housing Zone status by the Greater London Authority (GLA) and the application site is one of 10 initial schemes totalling 2,295 homes. A residential-led scheme is therefore supported on the application site. A further 12 schemes have been identified in the zone. The Council’s role in each varies from just assessing planning applications through to leading the delivery.

5.1.6 Site Allocations BS11 (Crown House) and BS12 (Linton Road Car Park) in the Supplementary Planning Document ‘Barking Station Masterplan’ 2012 set out objectives for the application site, namely at the Crown House site to deliver better quality office accommodation through refurbishment, including a full external makeover; and to improve the vitality of the ground floor, introducing commercial uses to enliven the existing office accommodation; and at the Linton Road Car Park site to deliver a high-quality residential and office scheme in close proximity to the station; to reinstate the historic street alignment and containment of Cambridge Road; and to create a street with clear built edges. It should be noted that these allocations have now been superseded by the Barking Town Centre Housing Zone status and the Weston Williamson Barking Station Masterplan which is being progressed.

5.1.7 The proposed 430 square metres of ground floor flexible commercial floorspace (facilitating A1, A2, A3, B1, D1 and D2 uses) is in keeping with Policy BTCSSA3 and provides active street frontage and natural surveillance of pedestrian walking routes.

5.1.8 The existing Crown House building which is to be demolished is an under-utilised 15-storey office block. Crown House is currently less than 50% occupied and it is understood that the existing tenants are all on short-term contracts with little or no rent. Due to the inefficient layout of the building and the presence of asbestos, the existing building is not considered to be viable for refurbishment. The developer has also set out that there is insufficient demand for new office space on the site. Having regard to these points, the loss of office space is accepted by officers and the GLA.

5.1.9 The existing Linton Road car park would also be lost as part of the proposed development. This is currently used on market days as parking for market trader vans and as a pay and display public car park on other days. The loss of the car park was considered by the Council in a Cabinet report dated 19 July 2016 where it was stated at the time that alternative market trader parking could be provided at Roycraft House car park and also the London Road multi-storey car park. The Cabinet report considered that the loss of the Linton Road car park is not seen as adversely impacting on provision for shoppers and other town centre users given the proximity of the multi-storey and Roycraft House car parks.
5.1.10 Overall the principle of the redevelopment of the site to provide a
residential-led, mixed-use scheme is welcomed and supported, subject to
the matters discussed below being satisfactorily addressed.

5.2 Housing

Housing Mix

5.2.1 The proposed 396 residential units comprise of 169 sub-market housing
units (43%) within Building A and 227 private rented sector (PRS) units
(57%) within Building B.

5.2.2 The proposed unit mix for Building A comprises 80 one-bedroom units, 71
two-bedroom units and 18 three-bedroom units and the proposed unit mix
for Building B comprises 95 one-bedroom units and 132 two-bedroom units.
Overall, the development comprises 175 (44%) one-bedroom units, 203
(51%) two-bedroom units and 18 (5%) three-bedroom units.

5.2.3 Barking Town Centre and its environs have a high proportion of social
rented housing including larger units and the Council’s strategy which
informed the successful Housing Zone bid is to provide additional one and
two-bedroom flats (private for sale, private rented sector (PRS) and shared
ownership) which attract working residents who can help support a
widening of the town centre’s retail and leisure offer and in particular help
support the poorly developed evening economy.

5.2.4 Policy CC1 of the Core Strategy states that major housing developments
will generally be expected to provide a minimum of 30% family
accommodation (3-bedrooms or larger) in Barking Town Centre. The policy
goes on to state that not all sites will be suitable for family-sized
accommodation, for example in town centre locations where the size and
form of the site is too tight, and where it would not be possible to provide a
satisfactory environment for young children, particularly in respect of access
to external amenity space. For these reasons, officers accept that the
development cannot deliver further family-sized units beyond the 18 units
proposed.

5.2.5 The proposed residential units have been designed to be compliant with the
nationally described space standards and the minimum space standards set
out in the London Plan.

5.2.6 The mix and tenure of the development is in keeping with the Council’s
strategy for the town centre, the aim of which is to support a widening of the
town centre’s retail and leisure offer and in particular help support the
evening economy, which is little developed.

Density

5.2.7 The density matrix in the London Plan identifies that a site with a PTAL of 6
in a central setting should provide 140-405 units per hectare (u/ha) or 650-
1,100 habitable rooms per hectare (hr/ha).
5.2.8 The proposed residential density is 913 u/ha or 2,378 hr/ha which therefore exceeds the density guidance in the London Plan.

5.2.9 It is accepted, however, in the Mayor’s ‘Housing’ Supplementary Planning Guidance (SPG) that there may be exceptional circumstances where densities outside the ranges may occur. In such scenarios the test for acceptability is about the quality of the proposal – the requirement being that housing should be of exemplary design quality. As discussed later in this report, officers consider that the proposed development meets this test. It should be noted that the Draft New London Plan moves away from using the density matrix and focuses instead on matters of design quality, public transport accessibility and surrounding infrastructure as informing the proposed density of developments. Having regard to the draft London Plan, the proposed development is considered to meet the design quality test, the site has excellent public transport accessibility and it is located within the heart of Barking Town Centre where high density development is considered to be appropriate.

**Sub-Market Housing**

5.2.10 Policy 3.12 of the London Plan and Policy BC1 of the Borough Wide Development Policies DPD seek to achieve the maximum reasonable amount of sub-market housing for individual private residential and mixed-use schemes. Developers will normally be expected to provide their sub-market housing on site, but exceptional circumstances may allow for partial off-site provision and/or commuted payments.

5.2.11 The application site comprises part private and part publicly owned land and therefore in accordance with the Mayor’s viability guidance, the scheme has a blended threshold target for sub-market housing based on 35% provision for private land and 50% provision for publicly owned land, subject to viability. The blended sub-market housing threshold for the development is 42% sub-market housing on a habitable room basis.

5.2.12 The proposed offer of 43% sub-market housing on a habitable room basis (169 units in total) within Building A comprises 30% low cost rented units, 35% affordable rented units and 35% shared ownership units. The proposed offer is considered to be policy compliant and therefore the scheme qualifies for the Mayor’s fast-track viability route. On this basis, there is no requirement for the developer to submit a financial viability assessment.

5.2.13 The proposed sub-market housing provision is to be secured in the S106 Agreement. An early stage viability review mechanism is also to be secured and this would require a new viability assessment to be undertaken if the development is not substantially implemented within 2 years of any planning permission being granted. If triggered, a new viability review would consider whether the scheme could afford any additional sub-market housing units up to a maximum of 50% provision. As all of the sub-market housing is located within Building A, the S106 Agreement would include a clause requiring the sub-market housing to be delivered prior to the occupation of the private housing in Building B.
5.2.14 In accordance with Policy 3.8 of the London Plan, 90% of the proposed residential units are to meet Building Regulation requirement M4(2) ‘accessible and adaptable dwellings’.

Wheelchair User Dwellings

5.2.15 In accordance with Policy 3.8 of the London Plan and Building Regulation requirement M4(3) ‘wheelchair adaptable dwellings’, 10% of the residential units in each of Buildings A and B would be wheelchair adaptable.

5.3 Design and Heritage

5.3.1 Policy BP4 of the Borough Wide Development Policies DPD defines a tall building as any building which is significantly taller than its neighbours, and/or which significantly changes the skyline. The proposed buildings are considered to meet the definition of tall buildings.

5.3.2 The application site is considered to be a suitable location for tall buildings of exemplary design quality in accordance with Policy BTC17 of the Barking Town Centre AAP and the London Riverside Opportunity Area Planning Framework.

5.3.3 The proposed development includes the provision of 396 residential units across two separate buildings, both with ground floor commercial space.

5.3.4 The two buildings sit either side of the Grade II Listed Barking Baptist Tabernacle and its associated car park and a two-storey property at 26 Linton Road which has most recently been in use as a health centre. Building A is located to the north-west of the Tabernacle and Building B is located to the south-east.

5.3.5 Building A comprises of a lower ‘shoulder’ building of 9-storeys high located at the corner of Cambridge Road and Linton Road which then steps up to a 16-storey tower to the centre of the site. The tallest part of Building A fronting Cambridge Road extends to 20-storeys and then steps down again to a lower ‘shoulder’ building of 10-storeys high adjacent to Building B.

5.3.6 Building B comprises of a lower ‘shoulder’ building of 10-storeys high fronting Linton Road which then steps up to a 25-storey tower to the centre of the site. The tallest element of Building B is 29-storeys high fronting Cambridge Road.

5.3.7 A new public pedestrian route linking Cambridge Road and Linton Road is proposed along the northern side of Building B and this would be bounded by the Tabernacle and 26 Linton Road to the north. The public route also includes a public square at the Linton Road end. A covered walkway is proposed along the edge of Building B to provide some protection for pedestrians from the elements.
5.3.8 Building A has two residential cores and therefore pedestrian access to the building would be from either an entrance on Cambridge Road or Linton Road. Building B would be accessed from either Cambridge Road or the new public route between Cambridge Road and Linton Road.

5.3.9 The scheme has been designed to maximise the amount of active ground floor frontage, particularly adjacent to the proposed new public realm. Two commercial units are proposed on the ground floor of Building A fronting Cambridge Road, one on the straight and the other on the bend in the road. A ground floor commercial unit fronting the new public route and square and Linton Road is proposed for Building B.

5.3.10 The proposed residential units in both buildings would be located at first floor level and above. It should be noted that the ground floor and first floor levels are separated by a mezzanine level which would accommodate the majority of long stay cycle parking for the development. A small amount of cycle parking would be provided internally at ground floor level.

5.3.11 The buildings have been designed to optimise the provision of south-facing units and to maximise the number of dual aspect units. On a typical floor in Building A, 50% of the units are dual aspect while on a typical floor in Building B, 43% of the units are dual aspect. The upper floors of both buildings comprise 100% dual aspect units. Overall, 54% of the units in Building A are dual aspect and 68% of the units in Building B are dual aspect. Where there are single aspect units these have been carefully orientated so as to avoid any being directly north-facing.

5.3.12 The application proposes general refuse and recycling bins within each building in keeping with the Council’s standards for flatted blocks. Storage space for bulky items has also been accommodated. The proposed development incorporates on-site refuse servicing. Whilst the Council’s Refuse Team has not responded directly to the consultation process, a meeting was held between the Transport Development Management Officer and the Refuse Team to discuss the refuse collection arrangements for the site. It is considered that the layout for refuse collection for Building B would need to be refined and officers consider that this can be achieved through the refuse strategy condition and highway accommodation works.

5.3.13 The facades of the tower elements within the development comprise of folded aluminium frames which, as part of the design concept, represent the trunks of birch trees. The proposed frames are taupe-coloured with a matt, stone-like appearance. A dark buff brick is proposed for the spandrels (the space between the top of the window in one storey and the sill of the window in the storey above).

5.3.14 The proposed red brick frame of the lower ‘shoulder’ buildings provides contrast with the facades of the tower and has been chosen to reflect the local material palette. It is proposed that the inset panels between the windows would be corbelled red brick (projecting brickwork pattern) to add texture and depth to the facade as well as to distinguish the brick adjacent to the windows from the brick frame which defines the ‘shoulder’ buildings.
5.3.15 Dark aluminium framed windows are proposed across the development.

5.3.16 In order to tie the different facades together, it is proposed that the balconies of both the towers and the ‘shoulder’ buildings would be of the same materiality, being a perforated screen in a light gold metal colour.

5.3.17 Officers consider that the materials strategy is acceptable in principle and consistent with the high-quality expectations of the development. In the event of planning permission being granted, a condition would require the developer to work closely with officers in order to ensure that an exemplar standard of architectural detailing and facing materials is achieved.

5.3.18 The proposed development was the subject of a Design Council Design Review in July 2018 and this has helped to shape and reinforce the current design. Be First’s Urban Design Officer has also reviewed the design of the proposed development and he is generally supportive of the scheme as set out in the ‘Consultation’ section above.

5.3.19 Overall, officers consider that the proposed development is of an exemplar design and quality, which in turn justifies the higher density and the tall building heights.

5.3.20 Paragraph 192 of the NPPF, Policy CP2 of the Core Strategy, Policy BP2 of the Borough Wide Development Policies DPD and Policy BTC19 of the Barking Town Centre AAP seek to protect and enhance the historic environment.

5.3.21 The site falls partly within the Abbey and Barking Town Centre Conservation Area and would be widely visible across the Conservation Area due to its height. The site is adjacent to the Grade II Listed Barking Baptist Tabernacle and the Grade II Listed Barking Station Booking Hall is also in close proximity to the site.

5.3.22 The former Barking Tap at 2 Linton Road (now Real Dreams Hotel); St Mary and St Ethelburga Church, Linton Road; the former school, Linton Road/William Street; and The Presbytery, 41 Linton Road are all located near to the site and are locally listed.

5.3.23 As set out in the ‘Consultation’ section of this report, Historic England (Buildings) commented that “We appreciate that this area is subject to emerging tall building developments, however this site is partially situated within the Abbey and Barking Town Centre Conservation Area and therefore we believe there is an opportunity to preserve and enhance its setting. In our view, the proposed development demonstrates a poor contextual relationship with the Conservation Area, and an overdevelopment of the site through a considerable increase in height and massing, deviating away from small plot sizes and human scale of buildings and spaces”.

5.3.24 Whilst Historic England suggested redistributing some height to the proposed 20-storey building on Cambridge Road so as to restore the urban grain and street frontage along Linton Road with a much-reduced massing,
this is not considered to be a workable solution given the different land
ownerships in this case and the relationship with the Barking 360
development on the opposite side of Cambridge Road.

5.3.25 Paragraph 193 of the National Planning Policy Framework (NPPF) states
that when considering the impact of a proposed development on the
significance of a designated heritage asset, great weight should be given to
the asset’s conservation (and the more important the asset, the greater the
weight should be). This is irrespective of whether any potential harm
amounts to substantial harm, total loss or less than substantial harm to its
significance. In this instance Historic England considers that the proposed
development would cause less than substantial harm to the significance of
the Conservation Area and as stated in paragraph 196 of the NPPF, this
harm should be weighed against the public benefits of the proposals.

5.3.26 In the Conservation Appraisal for the Abbey and Barking Town Centre
Conservation Area, the existing Crown House building is identified as a
negative contributor. There is therefore an acknowledgement of the need to
improve the visual impact of the existing building on the local setting.

5.3.27 The Heritage, Townscape and Visual Impact Assessment (HTVIA) which
accompanied the application identifies that the proposed development
would preserve the character and appearance of the Conservation Area
and moreover states that it may be considered to provide a net heritage
benefit.

5.3.28 The HTVIA states that the removal of the existing Crown House building
which is located in the Conservation Area would be wholly beneficial. At
ground floor, the proposed development would comprise townscape and
urban design benefits, including the reinstatement of a historic building line,
and provision of active frontages and hard landscaping within the
Conservation Area.

5.3.29 The HTVIA considers the impact of the proposed development to the
special interest of the Grade II Listed Barking Baptist Tabernacle Church.
The assessment identifies a degree of harm arising from the cumulative
effect of the proposed tall buildings within close proximity, however, the
identified harm is considered to be ‘less than substantial’.

5.3.30 The HTVIA concludes that “The juxtaposition of tall buildings within lower-
rise areas in the Opportunity Area is nonetheless inevitable. This is not only
acceptable and appropriate, but also necessary to deliver the regeneration
benefits set out in the development plan. Accordingly, one must consider
the extent to which design has mitigated harm. The development as a
whole must be considered, including the existing site condition, which
comprises a surface level car park and the existing Crown House building.
Both are detracting features to the setting of the Church. Again, the
proposed replacement buildings would create a positive street frontage and
natural surveillance formed by a mix of residential and small commercial
units fronting onto Linton Road. This would form a street with a clear built
edge. The relatively low-rise buildings fronting Linton Road would be
designed in a traditional masonry vernacular, in response to the Church and
the character and appearance of the wider Conservation Area. The lower scale massing and different architectural treatment would also serve to break up the overall proposed scale and mass. Central to the proposed development is the creation of high-quality soft and hard landscaping around the Church. This would provide a significant enhancement to its setting. The overall impact must be considered within the context of transformational change envisaged for Barking Town Centre. Intensification is not just anticipated, but desirable. In the context of an identified allocated site, and the provision of much needed housing, the extent of impact should therefore clearly be considered acceptable on balance. In the wider area, accurate visual representations of the proposed development inform the assessment of visual impact to the setting of heritage assets. In all cases, the assessment finds the proposed development would have a negligible effect upon setting and thus would preserve their significance”.

5.3.31 Officers accept the conclusions reached within the HTVIA. Furthermore, having regard to the Weston Williamson masterplan which sets out a vision for the Barking Station area, including tall buildings, as well as the tall buildings permitted at 16-48 Cambridge Road (Barking 360 which is under construction) and Vicarage Field, which are located partly within or just outside the Conservation Area, officers do not consider that the proposed development would cause significant harm to the character and appearance of the Conservation Area. The redevelopment of a 15-storey under-utilised and poorly designed office building and a surface level car park, contributing to the Borough’s targets for residential accommodation, including a policy compliant level of sub-market housing, along with improved public realm which ties in with the masterplan for improving the Barking Station area, is considered to meet the test for public benefits and outweigh the less than substantial harm to the Conservation Area. Officers consider that overall the proposed development enhances the surrounding area and is fitting with the regeneration proposals for the town centre.

5.3.32 Officers have paid special attention to the desirability of preserving or enhancing the character or appearance of the Conservation Area in accordance with Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

5.3.33 Officers consider that the proposed development has the potential to improve the setting of the Grade II Listed Barking Baptist Tabernacle by the removal of the existing Crown House building which is of little architectural merit. The proposed new ‘shoulder’ buildings help to frame this important heritage asset.

5.3.34 The proposed development is not considered to affect the setting of the Grade II Listed Barking Station Booking Hall which is located nearby.

5.3.35 The proposed development is considered to be sufficiently removed from important views so as not to significantly affect the setting of the heritage assets at Abbey Green, namely the Barking Abbey Scheduled Ancient Monument, the Grade I Listed Parish Church of St Margaret, the Grade II Listed Tomb of Captain John Bennett at St Margaret’s Church, the Grade II Listed remains of Barking Abbey and the old churchyard walls and the
Grade II* Listed Fire Bell Gate (Curfew Tower). Officers also do not consider that the locally listed buildings in the vicinity would be significantly affected by the proposal.

5.3.36 In reaching the above conclusions, officers have paid special attention to the desirability of preserving features of special architectural or historic interest, and in particular, listed buildings in accordance with Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

5.3.37 The proposal is considered to be in keeping with the relevant policies of the NPPF, Policies CP2 and CP3 of the Core Strategy, Policies BP2, BP8 and BP11 of the Borough Wide Development Policies DPD, Policies 7.1, 7.2, 7.3, 7.4 and 7.6 of the London Plan, Policies BTC16, BTC17, BTC19 and BTCSSA3 of the Barking Town Centre AAP and the London Riverside Opportunity Area Planning Framework.

5.4 External Amenity Space

5.4.1 All residential units would benefit from a private balcony or terrace designed in accordance with the space requirements set out in the Mayor’s ‘Housing’ SPG.

5.4.2 The scheme also includes two private communal amenity areas, one to the south-east of Building A (168 square metres) and the other to the south-east of Building B (138 square metres).

5.4.3 In accordance with London Plan policy, 10 square metres of usable children’s play space should be provided per child for new developments, with play space provided on-site for children under 5 years as a minimum.

5.4.4 The closest play areas to the development for younger children are considered to be adjacent to Northbury Primary School and at Barking Park and Abbey Green, all of which are within 300 metres walk of the application site.

5.4.5 Doorstep play is a key component of the communal amenity space and the whole area is playable with pieces of equipment and play features integrated with seating and planting. An indoor play space (58 square metres) is also located within Building A, providing the opportunity for all-weather play. Overall, 364 square metres of private communal amenity space, which doubles as play space, is provided.

5.4.6 A new public square is also proposed between Building B and 26 Linton Road providing further opportunities for informal play.

5.4.7 London Plan policy requires 596 square metres of on-site play space for children under 5 years based on the proposed child yield for the development. The proposed provision of play space therefore falls short by 232 square metres.

5.4.8 The GLA has advised that given the local availability of play space, the perceived nature of PRS developments possibly having a lower child yield
and the offer of indoor, all-weather play space as part of Building A, on balance, the provision is considered to be acceptable. Officers also support the GLA’s stance on play space. The indoor play space is to be secured by condition in perpetuity, along with appropriate hours of operation.

5.4.9 Due to the town centre location and the constraints of the site, the overall proposed external amenity space provision does not meet the quantity requirements sought under Policy BP5 of the Borough Wide Development Policies DPD. Policy BP5 acknowledges, however, that it will not always be possible in town centre locations and strategic regeneration proposals to meet the quantity requirements. The proposed level of amenity space is supported by officers given the town centre location and the proposed mix of units.

5.5 Amenity Issues

Sunlight, Daylight, Outlook and Privacy

5.5.1 The Building Research Establishment (BRE) sets out guidance for new residential developments in the document ‘Site Layout Planning for Daylight and Sunlight’ (2011). In this regard, officers draw Members’ attention to a recent appeal decision relating to the Whitechapel Estate development where the Inspector’s decision letter stated “The BRE document offers guidance on generally acceptable standards of daylight and sunlight but advises that numerical values are not to be rigidly applied and recognises the importance of the specific circumstances of each case. Inner city development is one of the examples where a different approach might be justified”. The Mayor’s ‘Housing’ SPG states that “an appropriate degree of flexibility needs to be applied when using BRE guidelines to assess the daylight and sunlight impacts of new development on surrounding properties, as well as within new developments themselves. Guidelines should be applied sensitively to higher density development, especially in opportunity areas, town centres, large sites and accessible locations, where BRE advice suggests considering the use of alternative targets. This should take into account local circumstances; the need to optimise housing capacity; and scope for the character and form of an area to change over time”. Officers recommend a similar flexible approach be adopted in this case due to the recent and emerging changes to the character and form of Barking Town Centre.

5.5.2 In respect of light to existing buildings, the following paragraphs of the BRE Guidelines are considered relevant:

2.2.5 … a modified form of the procedure adopted for new buildings can be used to find out whether an existing building still receives enough skylight. First, draw a section in a plane perpendicular to each affected main window wall of the existing building. Measure the angle to the horizontal subtended by the new development at the level of the centre of the lowest window. If this angle is less than 25-degrees for the whole of the development then it is unlikely to have a substantial effect on the diffuse skylight enjoyed by the existing building. If, for any part of the new development, this angle is more
than 25-degrees, a more detailed check is needed to find the loss of skylight to the existing building.

2.2.6 Any reduction in the total amount of sky light can be calculated by finding the VSC [vertical sky component] at the centre of each main window.

2.2.7 If this VSC is greater than 27% then enough skylight should still be reaching the window of the existing building. Any reduction below this level should be kept to a minimum. If the VSC, with the new development in place, is both less than 27% and less than 0.8 times its former value, occupants of the existing building will notice the reduction in the amount of skylight. The area lit by the window is likely to appear more gloomy and electric lighting will be needed more of the time.

5.5.3 The application was accompanied by a Daylight and Sunlight Report prepared by Waldrams Chartered Surveyors. The analysis was carried out in accordance with the methodologies contained in the BRE Guidelines.

5.5.4 In daylight and sunlight terms, Waldrams’ Report concludes that the significant majority of residential rooms in the surrounding properties meet the BRE Guidelines for daylight and sunlight with the proposed scheme in place.

5.5.5 It should be noted, however, that there are reductions in daylight and sunlight to habitable rooms within the residential schemes at 16-48 Cambridge Road (Barking 360 - currently under construction); Central House, Cambridge Road; and Cambridge House, Cambridge Road as described by Waldrams below. It is their opinion that such reductions are unavoidable given the existing open nature of those parts of the site opposite these properties and the clear desire, outlined in the Barking Station Masterplan, for tall buildings around the station:

16-48 Cambridge Road (Barking 360) and Central House, Cambridge Road

“The analyses undertaken demonstrate that either the impacts arising from the proposed development at Crown House or the retained levels of daylight to windows and rooms are, on the whole, either BRE Guidelines compliant or commensurate with recently consented daylight levels in the vicinity of the site (i.e. at Gascoigne Estate). A small number of rooms and windows experience reductions beyond the BRE Guidelines recommendations but, in a previously underdeveloped location where high density is sought, it is in our opinion likely that a small number of larger reductions are unavoidable, particularly given the balconies and recessed windows which feature as part of the architectural design of 16-48 Cambridge Road”.

Cambridge House, Cambridge Road

“If the conversion of this property to residential use is accepted, it should be noted that this building in our opinion then creates a bad neighbour relationship with the development site due to it having windows serving
habitable rooms facing directly over the site, at an approximate distance of 30-50cm from the site boundary. Were a development of equal massing positioned an equivalent distance from the site boundary on the development site, these windows would effectively be entirely blocked from receiving daylight and sunlight. In daylight terms, 37 out of 43 windows in Cambridge House meet the BRE Guidelines for VSC (i.e. retain at least 80% of their existing daylight or retain in excess of 27% VSC in absolute terms) with the proposal in place. The six windows which do not meet the BRE Guidelines are the six windows in the side elevation of the building. As discussed above, these windows form a bad neighbour relationship with the Crown House development site, taking more than their fair share of daylight from over the site. Therefore, although these windows experience reductions in daylight beyond the recommendations in the BRE Guidelines, in our opinion these reductions are unavoidable given the bad neighbour relationship…

5.5.6 As referenced in the ‘Consultation’ section of this report, the owner of Cambridge House has objected to the proposed development on the grounds of loss of sunlight, daylight, outlook and privacy. Their own Sunlight and Daylight Consultant, Consil, has stated that Waldrams’ Report unnecessarily analyses windows in window walls which would meet the initial 25-degree line test thereby artificially inflating the rate of compliance with the BRE guidelines. Consil, however, consider that the only windows which would not meet the initial 25-degree line test, and, following the BRE Guidelines, would require further assessment are the six windows (referenced as Ground W1 and W2, First W1 and W2 and Second W1 and W2 in Waldram’ Report) on the side elevation of Cambridge House adjacent to Crown House.

5.5.7 Consil has further stated that “All the rooms served by these windows would, according to BRE guidance, “appear more gloomy and electric lighting will be needed all the time”. The ratio between the proposed and existing values and the percentage reductions show a significant reduction in daylight amenity far in excess of the BRE guidelines. It should be noted that, except for ground floor window 2, the windows in the flank wall to Cambridge House serve bedrooms. Section 2.2.2 of the BRE guidelines states that “the guidelines given here are intended for use for rooms in adjoining dwellings where daylight is required, including living rooms, kitchens and bedrooms.” It also states under 2.2.8: “bedrooms should also be analysed although they are less important.” The BRE guidance at no point states that light to bedrooms should be ignored”.

5.5.8 In reference to the Cambridge House site, page 22 of the Waldrams’ Report states that “this building in our opinion then creates a bad neighbour relationship with the development site due to its have [sic] windows serving habitable room [sic] facing directly over the site …”. Consil has stated that “Waldrams fail to point out that the Crown House development is positioned at a similar proximity to the boundary with overlooking rooms serving main living rooms, as well as bedrooms. As such, the Crown House development should be considered in the same context. Should the
Cambridge House site be redeveloped in the future, the proximity of the main habitable accommodation served by windows formed directly in the flank wall in the proposed Crown House development would present a similar problem in terms of maintaining adequate light to both properties”.

5.5.9 Consil has stated that “the proposed development of Crown House could not be built without affecting the rights to light enjoyed by the overlooking windows in Cambridge House to an extent which would cause a significant infringement”. Members should note that ‘rights to light’ legislation is separate from any planning consideration relating to neighbouring amenity.

5.5.10 In response to Consil’s comments, Waldrams has provided a response that states that “These windows [i.e. those on the side of Cambridge House] are positioned almost directly on the site boundary between Cambridge House and the Crown House site and so, as referred to in paragraph F5 of Appendix F of the BRE Guidelines, form a ‘bad neighbour’ relationship with the Crown House site. Reductions in daylight are likely to be unavoidable to allow full and proper development of an open site, as is the case directly adjacent Cambridge House. Indeed, the BRE Guidelines recommend that alternative lower daylight levels be allowed in these circumstances, set via a ‘mirror image’ analysis. In order to calculate an appropriate alternative target value, a mirror image of the ‘bad neighbour’ building is positioned on the proposed development site equidistant from the boundary line as the ‘bad neighbour’ building and its impact on the ‘bad neighbour’ compared to that of a proposed scheme. When this is undertaken at Crown House i.e. the impact of a mirror image of Cambridge House on Cambridge House itself is compared to the impact of the proposed scheme, it shows that the average retained VSC on the ground and first floors with the proposal in place is commensurate with the average retained VSC on the ground and first floors with the mirror image of Cambridge House in place (1.5% VSC with proposal, 1.7% VSC with mirror image). Thus the proposal provides daylight levels commensurate with the alternative target values set by the BRE Guidelines, created by the relationship of Cambridge House on the boundary with the Crown House site”.

5.5.11 Consil’s letter makes the assertion that the Waldrams’ Report “unnecessarily analyses windows in window walls [within Cambridge House] which would meet the initial 25-degree test thereby artificially inflating the rate of compliance with the BRE Guidelines”. Waldrams has advised that “this is not a relevant point. Whilst the BRE Guidelines list the 25-degree test as the first analysis to determine acceptability of a scheme’s impact to a neighbouring property, it does not say that VSC and daylight distribution analysis should not be undertaken where a window may meet the 25-degree test. At no point do the BRE Guidelines make any sort of assertion that the 25-degree test must be undertaken ahead of VSC and daylight distribution tests. Indeed, it is arguable that undertaken quantitative analysis provides a more accurate representation of the impact to Cambridge House. Importantly, had the 25-degree test been applied to those windows not directly facing the proposal, we would still have commented that all but six windows in Cambridge House meet the BRE Guidelines for daylight and sunlight. Furthermore, all windows analysed show a reduction in daylight demonstrating that these windows warranted
analysis and were not included to “artificially inflate the rate of compliance” as claimed by Consil”.

5.5.12 Waldrams has also stated that “We have made no assertion that “light to bedrooms should be ignored” anywhere within our report but acknowledge that Consil and thus their client accept that daylight is less important to bedrooms”.

5.5.13 Waldrams has reviewed the proposed drawings for Building B and has advised that these show that there are a number of living/kitchen/dining rooms positioned on the elevation facing Cambridge House. However, they have noted that the majority of these are dual aspect with equally sized main windows facing away from Cambridge House; the impact to these rooms from a proposal at Cambridge House would therefore likely be considered minimal as a main window is not materially impacted in daylight terms. Waldrams has stated that “The design of the proposed development at Crown House therefore demonstrates that good levels of daylight can be achieved along this boundary with careful internal design, suggesting that similar success could be achieved on the Cambridge House site were it to be built out. It should also be noted that there has been no indication of forthcoming redevelopment at Cambridge House throughout the scheme evolution at Crown House, including consultation. In summary, therefore, in our opinion the impact to Cambridge House is acceptable given the methodologies laid out in the BRE Guidelines and does not prevent future development of the site, whilst Cambridge House itself forms a bad neighbour relationship with the open part of the Crown House site”.

5.5.14 Officers accept the conclusions reached by Waldrams’ with respect to the impact of the proposed development on sunlight/daylight to the surrounding properties, including Cambridge House, namely that the significant majority of residential rooms in the surrounding properties meet the BRE Guidelines for daylight and sunlight with the proposed scheme in place and where there are shortfalls these are unavoidable given the high-density redevelopment proposals for the town centre and the ‘bad neighbour’ relationship of Cambridge House. Officers do not consider that the proposed development of the Crown House site jeopardises the development potential of the Cambridge House site.

5.5.15 The submitted Report states that within the proposed development, 969 out of 1,039 (93.3%) habitable rooms meet their target values for daylight in average daylight factor (ADF) terms.

5.5.16 181 out of 253 (71.5%) living/kitchen/dining rooms analysed within the proposed development meet the BRE Guidelines for annual probable sunlight hours (APSH) or in Waldrams’ opinion come close to doing so.

5.5.17 244 out of 253 (96.4%) living/kitchen/dining rooms analysed within the proposed development meet the BRE Guidelines for winter APSH or in Waldrams’ opinion come close to doing so.
5.5.18 It should be noted that each residential unit within the proposed development also has access to a private balcony which can provide an excellent alternative source of sunlight amenity.

5.5.19 In sunlight amenity (shadow) terms, two out of three amenity spaces in the adjacent development at 16-48 Cambridge Road meet the BRE Guidelines with the proposal in place. In Waldrams’ opinion, the positioning of an amenity space on the first floor of that scheme, itself positioned to the north of the application site, places a significant and unfair burden on the application site as, in order to maintain good levels of sunlight to this area, the proposed development would have to be restricted to no more than 3-4 storeys. Officers accept that this is unavoidable in this context.

5.5.20 In terms of the proposed amenity spaces within the proposed development, the submitted Report states that the four amenity spaces receive at least two hours of sunlight on March 21st to 41%, 33%, 38% and 13% of their areas. These areas were also tested on June 21st (i.e. in the summer months) when they are most likely to be used by residents. The results, show that three of the four areas receive at least two hours of sunlight on June 21st whilst the fourth adjacent to Building B, receives two hours of sunlight to 42% of its area. Overall, it is concluded that the results indicate that the areas will be well sunlit during summer months.

5.5.21 Officers have considered the objection from Cambridge House relating to loss of privacy and outlook as a result of the proposed development. Officers consider that this is unavoidable given the close proximity of the existing windows to the Crown House boundary (approximately 1 metre away) and their current outlook onto a surface level car park. The side windows in question result from the building previously been in use as offices. Officers consider that boundary treatment would sufficiently protect the privacy of ground floor windows and any loss of outlook arising from any new boundary treatment is not considered to be objectionable in this case. Any perceived loss of privacy and outlook to the four windows in question at first and second floor level is considered to be unfortunate but unavoidable in order to maximise the development potential of the site. Whilst there would be a total distance of approximately 3 metres between the closest side elevation of Crown House and the existing side elevation of Cambridge House, officers do not consider that there would be direct overlooking between any facing windows so as to be unacceptable.

Noise

5.5.22 The submitted Noise and Vibration Report identifies mitigation measures needed to secure appropriate internal noise levels within proposed residential units. The Council’s Environmental Health Officer is satisfied that the “typical constructions” set out in the Report will be sufficient to secure appropriate mitigation of external noise.

5.5.23 It is considered that suitable noise environments within the development could be created subject to the imposition of noise conditions as detailed in the Environmental Health Officer’s comments in the ‘Consultation’ section of this report. Subject to those conditions, the proposal is considered to be in
keeping with the relevant noise policies, being Policies BR13 and BP8 of the Borough Wide Development Policies DPD and Policy 7.15 of the London Plan.

5.6 Transport / Parking

5.6.1 The application site is well served by public transport with Barking Station being located approximately 275 metres to the east of the site. The station provides District Line, Hammersmith and City Line, London Overground and C2C services between London and Essex. Station Parade, London Road and Ripple Road, all within close proximity to the site, are served by a number of local bus routes. The public transport accessibility level (PTAL) of the site is 6a on a scale of 1-6 where 6 indicates excellent accessibility.

5.6.2 The proposed development will be car-free given the high public transport accessibility of the site. The exception to this is the provision of 5 on-site blue badge parking spaces and one car club space for Building A and 2 on-site blue badge parking spaces for Building B.

5.6.3 The car-free nature of the scheme is supported by the Transport Development Management Officer and TfL. The draft London Plan, however, states that a minimum of 3% of residential units should benefit from a blue badge parking space. On this basis, TfL has advised that the development should provide 5 blue badge parking spaces for Building A and 7 blue badge parking spaces for Building B. Given the constraints of the site, TfL has advised that consideration should be given as to whether additional blue badge parking spaces could be provided on-street as part of the highway re-alignment proposals. The submission of a Car Parking Design and Management Plan for Blue Badge Car Parking is to be secured by condition and this would consider how initial and any future provision of blue badge parking spaces will be made, managed and enforced.

5.6.4 The proposed on-site blue badge parking spaces are to be fitted with electric vehicle charging points in keeping with draft London Plan standards. This will result in 20% of the spaces having active charging facilities and the remainder having passive provision. This is to be secured by condition.

5.6.5 The application proposes 298 cycle parking spaces for Building A and 407 for Building B. This includes 15 adaptable/oversized spaces for Building A and 20 for Building B. The proposed ground floor layout also includes the provision of 7 Sheffield cycle stands within the vicinity of Building A and 9 stands within the vicinity of Building B, therefore providing an additional 32 cycle parking spaces for residential or commercial short stay. The proposed cycle parking provision for the development is in keeping with draft London Plan standards.

5.6.6 The application includes provision to re-align the existing layout of Cambridge Road, with the removal of the sub-standard mini-roundabout currently present to the north of the site. The re-alignment has also considered pedestrian manoeuvrability and includes the provision of a zebra crossing facility on Linton Road and a dropped kerb / tactile paving pedestrian crossing on Cambridge Road. These crossing facilities have
been placed to align with the proposed public realm within the site and to improve and facilitate general pedestrian accessibility in the area and the proposed route through the site. The Transport Development Management Officer and TfL have confirmed that the proposed re-alignment is acceptable in principle.

5.6.7 TfL has advised that the improvements to the public realm and the widening of the footway towards the northern end of the site, as set out in the Transport Assessment, help to improve the safety and security of the route to and through the town centre, increasing footfall and vitality to the road. These improvements are to be secured in the S106 Agreement, along with enhancements to wayfinding in the vicinity of the site.

5.6.8 The proposed building line has been set back to ensure that sufficient forward visibility (25 metres) is available for vehicles traversing Cambridge Road and Linton Road.

5.6.9 Due to the existing configuration of both Cambridge Road and Linton Road, and the limited site frontage to Linton Road, servicing and car parking access for both buildings would be from Cambridge Road. It is proposed to provide on-site service areas for both buildings. The vehicular access for Building A will lead to an undercroft area providing an opportunity for service vehicles to load/unload. The vehicular access for Building B will also lead to a servicing area. It is considered that this area can be utilised by vehicles associated with both the residential and commercial units.

5.6.10 As set out in the ‘Consultation’ section of this report the Transport Development Management Officer has confirmed that there are no apparent adverse highway implications arising from the proposed development.

5.6.11 The conditions and S106 obligations recommended by the Transport Development Management Officer and the GLA/TfL relating to transport and parking matters will be secured on any permission granted.

5.7 Energy and Sustainability

5.7.1 Policy 5.2 of the London Plan sets a zero carbon target for new residential development. The ‘Housing’ SPG defines ‘zero carbon’ homes as homes forming part of major development applications where the residential element of the application achieves at least a 35% reduction in regulated carbon dioxide (CO₂) emissions (beyond Part L of the Building Regulations 2013) on-site. The remaining regulated CO₂ emissions, to 100%, are to be off-set through a cash in-lieu contribution to the Council, to be ring-fenced to secure delivery of carbon dioxide savings elsewhere.

5.7.2 The London Plan sets a price for carbon off-setting based either on local conditions or a nationally recognised carbon price such as the ‘Zero Carbon Hub’ price of £60 per tonne of carbon over 30 years.

5.7.3 The submitted Energy Statement applies the Mayor of London's energy hierarchy design approach of ‘Be Lean’, ‘Be Clean’ and ‘Be Green’.
5.7.4 The Energy Strategy proposes on-site energy measures comprising passive design (6% reduction in CO$_2$), connection to the Borough’s district heating network for heating and hot water (27% reduction in CO$_2$) and the installation of roof-top photovoltaic panels (4% reduction in CO$_2$) in order to achieve an estimated 37% reduction in site-wide CO$_2$ emissions beyond the requirements of Part L of the Building Regulations (2013).

5.7.5 Through this combination of on-site energy measures and a carbon off-set payment to be secured in the S106 Agreement, the proposed development is considered to be in keeping with the relevant policies.

5.7.6 A BREEAM pre-assessment has also been undertaken for the non-residential elements within the proposed development and this has identified how a ‘very good’ rating could be achieved. This is to be secured by condition. The feasibility of achieving an ‘excellent’ rating, as generally required by policy BR1 of the Borough Wide Development Policies DPD, was reviewed but found to be cost prohibitive for this development.

5.8 Biodiversity and Ecology

5.8.1 The existing trees on the site have been assessed and an Arboricultural Survey accompanied the application. It is currently proposed to remove 17 of the existing trees on the site to accommodate the development. These trees are categorised as Category B (moderate quality), C (low quality) and U (those in such a condition that they cannot realistically be retained for longer than 10 years.). It is proposed, however, to retain the existing London Plane tree to the south-west corner of Crown House as the tree makes a significant contribution to the views down Linton Road and will signal the new pedestrian route through the site. The existing trees in the adjacent Church car park are unaffected by the proposed development and the site will benefit from this borrowed asset.

5.8.2 Replacement tree planting is proposed, along with the addition of hedging, defensible planting and climbers. The proposed planting would provide colour, scent and seasonal interest. The proposal will increase the biodiversity of the site and two new species of trees are proposed. Birch is proposed in groups as a response to the design concept of Barking as ‘the settlement by the birch trees’. Proposed single trees around the edges of the sites comprise ‘Platanus acerifolia’ (London Plane) which is a relatively upright tree suited to city locations and roadside edges.

5.8.3 A condition is proposed to secure an Arboricultural Impact Assessment and Method Statement setting out, amongst other things, details of trees to be removed and retained and showing how retained trees on and adjacent to the site will be protected whilst the development is constructed.

5.8.4 The submitted Ecological Assessment identifies the site as having potential to support nesting birds due to the scattered trees present. Accordingly, a condition is proposed to ensure that habitat clearance works are undertaken outside the main nesting bird season, or should this not be possible, all trees and buildings must be inspected by an ecologist to determine the presence/absence of any nesting birds immediately prior to clearance.
5.8.5 A condition is proposed to secure the provision of bird and bat boxes within the completed development.

5.8.6 The application is supported by a Preliminary Bat Roost Assessment which was carried out in June 2018. All buildings and trees within the site were identified as having negligible suitability to support roosting bats.

5.9 Wind / Microclimate

5.9.1 A report, Pedestrian Level Wind Microclimate Assessment, prepared by RWDI, contains a summary of the wind tunnel testing for the proposed development and mitigation measures for ensuring pedestrian safety and comfort.

5.9.2 The report highlights that mitigation measures are required to alleviate adverse wind conditions at three locations. The report outlines four mitigation measures, comprising of two 2-metre wide 50% porous screens which are to be attached to Building B and new tree and hedge planting. It should be noted that the design of the wind mitigation on Building B has been revised during the application process from ‘add-on’ screens to an extended façade option which is more acceptable in design terms. The proposed mitigation measures are to be secured by condition. With the mitigation measures in place, all locations at ground level are considered suitable for the intended use.

5.10 Flood Risk

5.10.1 The Environment Agency flood map indicates that the site falls within Flood Zone 1 (low risk of flooding). This zone has less than a 1 in 1000-year annual probability of flooding. The NPPF Planning Practice Guidance states that all types of development are suitable for this flood zone.

5.11 S106 Developer Contributions

5.11.1 Having regard to Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended) and Policy CC3 of the Core Strategy, a S106 Agreement is required to secure the following obligations. It should be noted that due to the separate land ownerships and the phased nature of the development, two separate S106 Agreements are to be secured.

*Sub-market Housing*
Secure 43% sub-market housing (on a habitable room basis) on-site comprising low cost rented units (30%); affordable rented units (35%) and shared ownership units (35%).

Secure an early stage viability review mechanism to be triggered if an agreed level of progress on implementation has not been made within two years of any planning permission, in accordance with the Mayor of London’s Affordable Housing and Viability SPG.
The delivery of the sub-market housing in Building A must be secured prior to occupation of the private housing in Building B.

**Private Rented Sector Units**
Secure matters pertaining to the provision of Private Rented Sector (PRS) units as set out below:

1. **The Owners shall:**
   1.1 construct the Private Rented Sector Units in accordance with the Private Rented Sector Unit Mix; and
   1.2 provide the units as Private Rented Sector Units for a minimum of 15 (fifteen) years and the Private Rented Sector Units shall not be occupied for any other use other than Private Rented Sector Units within that 15 year period unless otherwise agreed in writing with the Council.

2. **The Owners shall not Occupy any Private Rented Sector Unit until the Private Rented Sector Marketing Strategy has been submitted to the Council for approval and the Private Rented Sector Marketing Strategy has been approved and is implemented.**

3. **The Owners shall not Occupy any Private Rented Sector Unit until the Private Rented Sector Management Plan has been submitted to the Council for approval and the Private Rented Sector Management Plan has been approved and is implemented.**

4. **The Private Rented Sector Management Plan shall:**
   4.1 Cover the length of the initial lease which shall be a minimum of 12 months and on renewal if the Owners agree (at their discretion) up to 5 years;
   4.2 Demonstrate that a consistent and quality level of housing management will be offered that meets appropriate standards (e.g. set out in the London Mayor’s Rental Standard, required by regulatory and/or voluntary bodies such as the Homes and Communities Agency);
   4.3 Cover provision for rent increases (which shall reflect the market) provided always that there can be no more than one rent increase per 12 calendar months.

5. **The Private Rented Sector Marketing Strategy shall cover:**
   5.1 Prioritisation of residents who live and or work in the Borough when marketing and identifying suitable tenants for the scheme. (For avoidance of doubt, this will not require the Owners to exclusively market only to Borough residents but will require that such residents are prioritised for the Private Rented Sector Units available in circumstances where equally acceptable prospective tenants wish to rent a Private Rented Sector Unit, one prospective tenant lives or works in the Borough and others do not);
5.2  *Local marketing in the Borough (including in Council publications etc)*:

PROVIDED THAT the Owners will be able to select the tenants on the basis that the Private Rented Sector Units will be available to working households with a good track record of managing a tenancy (with no history of anti-social behaviour or significant rent arrears).

**Same Calibre Architects for Construction Drawings**
Secure that architects of the same calibre as Carey Jones Chapman Tolcher are retained to produce all construction drawings, or that a budget is allocated to allow them to review these when they are produced.

**Public Realm / Highway Works**
Secure enhancements to the public realm and highway in the vicinity of the site, including any traffic management measures, in accordance with the public realm and highway improvement works set out in the Transport Assessment (scheme to be agreed).

Implement all off-site highway works prior to first occupation of the development.

Secure wayfinding enhancements in the vicinity of the site (scheme to be agreed).

Secure 24-hour access to public realm areas.

Fund repair of public roads damaged during construction;

**Improvements to Bus Stop Accessibility (if deemed necessary by Transport for London (TfL))**
If TfL determines that alterations are required to local bus stops following their review of the developer's Bus Stop Accessibility Audit then a strategy shall be agreed with TfL and the alterations shall be funded by the developer.

**Local Labour / Local Supply**
Secure a commitment to local labour/local supply so that residents and businesses in the Borough will benefit from the proposed development.

**Restrictions on Controlled Parking Zone (CPZ) Permits**
Secure restrictions preventing future residents from obtaining parking permits for any controlled parking zone (CPZ).

**Provision of New Car Club Space**
Secure the provision of one on-site car club space in conjunction with Building A.

**Car Club Membership for Residents**
Secure a commitment to provide two years’ membership to the local car club scheme per residential unit (on their request).

**Travel Plan**
Secure the submission, implementation and monitoring of a Travel Plan for the development.

**District Heating Network**
Secure a commitment to connect the development to the district heating network within five years of planning permission.

**Energy and Carbon Offset**
The development shall achieve a minimum 35% reduction in carbon emissions over Part L of the Building Regulations 2013 through on-site provisions and the remaining carbon emissions to zero carbon should be offset through a monetary contribution to the Local Authority’s carbon offset fund calculated on the basis of £60 per tonne over 30 years.

**S106 Legal Fees**
Pay the Council’s professional fees associated with the preparation and completion of the S106 Agreement.

### 6.0 Equalities

**6.1** The Equality Act 2010 requires the Council to advance equality of opportunity in the exercise of its functions. In this respect, conditions are proposed to ensure that the residential units are accessible and adaptable, with 10% of residential units having a layout and size specifically enabling ease of use by a wheelchair user. The commercial uses would also be fully accessible.

### 7.0 Conclusion

**7.1** The proposed development would replace an under-utilised and poorly designed 15-storey building and a surface level car park within Barking Town Centre where regeneration is a key priority. The development is considered to be of exemplar design quality to justify its location, height and residential density.

**7.2** The proposed development would provide 396 high-quality residential units (169 sub-market housing units and 227 private rented sector units), as well as flexible ground floor commercial space. The proposed sub-market housing offer is policy compliant and would provide affordable homes for local residents. The PRS element would help to rebalance the tenure mix in the town centre and assist the local economy. Overall the development is considered to have significant regeneration benefits for Barking Town Centre.

**7.3** The proposal generally complies with the relevant policies set out in the National Planning Policy Framework, the London Plan and the Local Plan, with the exception of children’s play space and blue badge car parking. The shortfall in children’s play space is considered acceptable on balance by the GLA and officers and the shortfall in blue badge car parking is a result of site constraints. A condition is to be secured to look at any opportunities for additional blue badge parking spaces as part of the highway re-alignment works.
7.4 It is recommended that the Planning Committee grants planning permission subject to any direction from the Mayor of London, a S106 Agreement to secure the matters set out in Section 5.11 of this report and the conditions listed in this report (with any amendments that might be necessary up to the issue of the decision, including any other conditions that may be required as a result of referral to the Mayor of London).

**Background Papers**

- Planning Application File
  [http://paplan.lbld.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=PI865OBL02Z00](http://paplan.lbld.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=PI865OBL02Z00)

- Local Plan Policy

  *Borough Wide Development Policies Development Plan Document (March 2011):*

  - Policy BR1 – Environmental Building Standards
  - Policy BR2 – Energy and On-Site Renewables
  - Policy BR3 – Greening the Urban Environment
  - Policy BR4 – Water Resource Management
  - Policy BR5 – Contaminated Land
  - Policy BR9 – Parking
  - Policy BR10 – Sustainable Transport
  - Policy BR11 – Walking and Cycling
  - Policy BR13 – Noise Mitigation
  - Policy BR14 – Air Quality
  - Policy BR15 – Sustainable Waste Management
  - Policy BC1 – Delivering Affordable Housing
  - Policy BC2 – Accessible and Adaptable Housing
  - Policy BC7 – Crime Prevention
  - Policy BC8 – Mixed Use Development
  - Policy BE2 – Development in Town Centres
  - Policy BE4 – Managing the Evening Economy
  - Policy BE5 – Offices – Design and Change of Use
  - Policy BP2 – Conservation Areas and Listed Buildings
  - Policy BP3 – Archaeology
  - Policy BP4 – Tall Buildings
  - Policy BP5 – External Amenity Space
  - Policy BP8 – Protecting Residential Amenity
  - Policy BP10 – Housing Density
  - Policy BP11 – Urban Design

  *Core Strategy (July 2010):*

  - Policy CM1 – General Principles for Development
  - Policy CM2 – Managing Housing Growth
  - Policy CM5 – Town Centre Hierarchy
  - Policy CR1 – Climate Change and Environmental Management
Policy CC1 – Family Housing
Policy CC3 – Achieving Community Benefits Through Developer Contributions
Policy CE1 – Vibrant and Prosperous Town Centres
Policy CP1 – Vibrant Culture and Tourism
Policy CP2 – Protecting and Promoting Our Historic Environment
Policy CP3 – High Quality Built Environment

*Barking Town Centre Area Action Plan (BTCAAP) (February 2011):*

Policy BTC1 – Additional Shopping Floorspace
Policy BTC5 – Leisure Uses and the Evening Economy
Policy BTC13 – Housing Supply
Policy BTC16 – Urban Design
Policy BTC17 – Tall Buildings
Policy BTC19 – Heritage and the Historic Environment
Policy BTC22 – Sustainable Energy
Policy BTC23 – Developer Contributions

Site Specific Allocation BTCSSA3 – Barking Station

*Other Guidance:*

Planning Advice Note - Waste and Recycling Provisions in New and Refurbished Residential Developments (10 February 2013)

- **The London Plan (March 2016):**

Policy 3.3 – Increasing Housing Supply
Policy 3.4 – Optimising Housing Potential
Policy 3.5 – Quality and Design of Housing Developments
Policy 3.6 – Children and Young People’s Play and Informal Recreation Facilities
Policy 3.8 – Housing Choice
Policy 3.10 – Definition of Affordable Housing
Policy 3.11 – Affordable Housing Targets
Policy 3.12 – Negotiating Affordable Housing on Individual Private Residential and Mixed Use Schemes
Policy 3.13 – Affordable Housing Thresholds
Policy 5.2 – Minimising Carbon Dioxide Emissions
Policy 5.3 – Sustainable Design and Construction
Policy 5.5 – Decentralised Energy Networks
Policy 5.6 – Decentralised Energy in Development Proposals
Policy 5.7 – Renewable Energy
Policy 5.9 – Overheating and Cooling
Policy 5.10 – Urban Greening
Policy 5.11 – Green Roofs and Development Site Environs
Policy 5.12 – Flood Risk Management
Policy 5.13 – Sustainable Drainage
Policy 5.14 – Water Quality and Wastewater Infrastructure
Policy 5.15 – Water Use and Supplies
Policy 5.18 – Construction, Excavation and Demolition Waste
Policy 5.21 – Contaminated Land
Policy 6.3 – Assessing Effects of Development on Transport Capacity
Policy 6.9 – Cycling
Policy 6.10 – Walking
Policy 6.13 – Parking
Policy 7.1 – Lifetime Neighbourhoods
Policy 7.2 – An Inclusive Environment
Policy 7.3 – Designing Out Crime
Policy 7.4 – Local Character
Policy 7.5 – Public Realm
Policy 7.6 – Architecture
Policy 7.7 – Location and Design of Tall and Large Buildings
Policy 7.8 – Heritage Assets and Archaeology
Policy 7.13 – Safety, Security and Resilience to Emergency
Policy 7.14 – Improving Air Quality
Policy 7.15 – Reducing and Managing Noise, Improving and Enhancing the Acoustic Environment and Promoting Appropriate Soundscapes
Policy 8.2 – Planning Obligations

Draft London Plan (consultation draft December 2017)
Draft new London Plan showing Minor Suggested Changes (13 August 2018)

Mayor of London’s Supplementary Planning Guidance:

Shaping Neighbourhoods: Character and Context (June 2014)
Accessible London – Achieving an Inclusive Environment (October 2014)
Sustainable Design and Construction (April 2014)
Town Centres (July 2014)
Housing (March 2016)
Shaping Neighbourhoods: Play and Informal Recreation (September 2012)
Affordable Housing and Viability (August 2017)

London Riverside Opportunity Area Planning Framework (September 2015)

- National Planning Policy Guidance

National Planning Policy Framework (July 2018)
Planning Practice Guidance
Technical Housing Standards – Nationally Described Space Standard (March 2015)