

Sustainability Appraisal (SA) for the London Borough of Barking & Dagenham Local Plan

Note on Reasonable Alternatives as part of the Sustainability
Appraisal for the Local Plan

London Borough of Barking and Dagenham

September 2020

Quality information

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1 Introduction

1.1 Background

- 1.1 AECOM is commissioned to provide support for the Sustainability Appraisal (SA) of the emerging London Borough of Barking & Dagenham Local Plan – henceforth referred to as ‘the Local Plan’. SA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating adverse effects and maximising the positives. SA of Local Plans is a legal requirement.¹
- 1.2 Plan-making has been underway since 2015, with a wide range of evidence produced to inform the development of the draft plan. Prior to this current stage (Regulation 19²), a number of Local Plan and SA documents have been published. **Table 1.1** sets these documents out.

Table 1.1: Key Local Plan/ SA documents published to date

Local Plan Documents	SA Documents
	SA Scoping Report Consultation was undertaken from 23 March to 04 May 2015
Issues and Options Document Public consultation from 14 October 2015 to 16 January 2016	
Draft Local Plan Regulation 18 Consultation version Public consultation from 29 November 2019 to 24 January 2020	Interim SA Report and Non-Technical Summary Public consultation from 29 November 2019 to 24 January 2020 ³

1.2 Purpose and structure of this note

- 1.3 This note sets out the reasonable alternatives identified through the SA process at this stage (Regulation 19) and also sets out the emerging findings of the assessment. Its purpose is to inform the Cabinet’s decision to approve the Regulation 19 Local Plan for public consultation in October 2020. In line with regulatory requirements, a full SA Report and Non-Technical Summary will be published alongside the Regulation 19 Local Plan for public consultation in due course.
- 1.4 Following this introductory chapter this note is structured as follows:
- **Chapter 2** - sets out the alternatives identified at this current stage of plan-making (Regulation 19).
 - **Chapter 3** - presents the emerging findings of the appraisal of alternatives.

¹ Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (2019). The Town and Country Planning (Local Planning) (England) Regulations 2012 require that an SA Report must be published for consultation alongside the ‘Proposed Submission’ plan document.

² The Town and Country Planning (Local Planning) (England) Regulations 2012

³ <https://www.lbbd.gov.uk/sites/default/files/attachments/Reg-18-Interim-Sustainability-Appraisal-Report-28-Nov-2019.pdf>

2 Establishing the reasonable alternatives

2.1 Introduction

- 2.1 It is important to note that SA is an iterative process, with alternatives and the emerging plan (policies and allocations) considered at each stage of plan-making. In this context, five spatial strategy options were previously identified and considered through the SA process at the last plan-making stage (Regulation 18). The focus in terms of the identification of reasonable spatial strategy alternatives at the previous Regulation 18 stage was around:
- No further release of Strategic Industrial Land (SIL) or Locally Significant Industrial Land (LSIS).
 - No further release of designated Public Open Space.
 - Increased densities at well-connected brownfield sites.
 - Increased densities across other brownfield sites.
- 2.2 Five spatial strategy options were identified and appraised at the Regulation 18 stage based on the evidence and policy context at that time:
- **Option 1** - No further release of SIL/ LSIS or Public Open Space and standard densities across brownfield sites
 - **Option 2** - No further release of SIL/ LSIS or Public Open Space and increased densities (15%) at well-connected brownfield sites
 - **Option 3** - Release of SIL/ LSIS and Public Open Space and standard densities across brownfield sites
 - **Option 4** - No further release of SIL/ LSIS or Public Open Space and increased densities at well-connected (33%) and other (20%) brownfield sites
 - **Option 5** - No further release of SIL/ LSIS or Public Open Space and increased densities (36%) at well-connected brownfield sites
- 2.3 The findings of this work were presented in an Interim SA Report⁴ and separate Non-technical Summary⁵ published alongside the Draft Local Plan Regulation 18 Consultation version in November 2019.
- 2.4 As the evidence base and policy context has continued to evolve, it is necessary to reevaluate alternatives through the SA process to inform the emerging Regulation 19 Local Plan. The sections below set out the policy context and evidence as it stands, and how they have informed the development of reasonable alternatives at this current (Regulation 19) stage in plan-making.

2.2 How much growth?

- 2.5 Barking and Dagenham's Local Plan must be in 'general conformity' with the London Plan. In this context, the Draft New London Plan (DNLP) is the starting point for the development of potential alternatives for the emerging Local Plan given its advanced stage of preparation. However, it is recognised that the DNLP policies are still in flux following the Secretary of State's (SoS) letter on 13th May 2020 to the Mayor of London in relation to the 'Intend to Publish' version of the DNLP.

⁴ <https://www.lbbd.gov.uk/sites/default/files/attachments/Reg-18-Interim-Sustainability-Appraisal-Report-28-Nov-2019.pdf>

⁵ <https://www.lbbd.gov.uk/sites/default/files/attachments/Reg-18-Interim-Sustainability-Appraisal-Report-Non-technical-Summary-2019.pdf>

- 2.6 A critical issue for the Local Plan – and therefore the SA – is the level of housing to be accommodated in the Borough. In terms of the level or quantum of growth to be delivered during the Local Plan period (2019 to 2037), Policy H1 in the ‘Intend to Publish’ London Plan identifies a ten-year housing target (2019 - 2029) of **19,440** dwellings for Barking and Dagenham. This equates to an annual target of 1,944 dwellings per annum (dpa).
- 2.7 The Government’s recently published Housing Delivery Test (February 2020) identifies that there has been significant under delivery of housing in the London Borough of Barking & Dagenham (LBBD) over the last three years. As a result, in line with the NPPF, a 20% buffer needs to be added to the housing requirement for the first five years of the Local Plan period.
- 2.8 The ‘Intend to Publish’ London Plan (December 2019) does not identify a specific housing target beyond 2029. It states that, “*If a target is needed beyond the 10 year period (2019/20 to 2028/29), boroughs should draw on the 2017 SHLAA findings (which cover the plan period to 2041) and any local evidence of identified capacity, in consultation with the GLA, and should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements, and roll forward the housing capacity assumptions applied in the London Plan for small sites.*”⁶ As a result, LBBD has identified a housing target of **19,424** dwellings from 2029 to 2037, based on the 2017 GLA SHLAA Phases 4 and 5.
- 2.9 **Table 2.1** below sets out the evidence outlined above in relation to the quantum of housing growth.

Table 2.1: Housing target for LBBD

Source	Quantum of growth
‘Intend to Publish’ London Plan (Dec 2019) identifies ten-year housing target (2019 to 2029) for Barking & Dagenham	19,440 dwellings
NPPF and Housing Delivery Test (20% buffer to the first five-year housing target 2019 to 2024)	1,944 dwellings
2017 GLA SHLAA Phase 4 and 5 (2029 to 2037)	19,424 dwellings
Total for the Local Plan period (2019 to 2037)	40,808 dwellings

- 2.10 The total of 40,808 dwellings presents a minimum housing target to be delivered during the plan period in order to ensure that the Local Plan is in conformity with national planning policy and the DNLP.
- 2.11 Alongside the evidence set out above, there is also a need to consider LBBD’s aspirations and ambition to facilitate a transformational change in the Borough’s social and economic landscape through intelligent use of its industrial land. LBBD’s Industrial Land Strategy (2020) identifies sites where improvements might be made so that the industrial operations can function more effectively. The findings are intended to guide employment land policies and site allocations that are appropriate for the emerging LBBD Local Plan and other strategic development initiatives.
- 2.12 The ILS (2020) identifies that LBBD currently has 12 core employment areas with almost 450 ha of strategic industrial land. This includes 336 ha located within three Strategic Industrial Locations (SILs), 63 ha located within five Locally Significant Industrial Sites (LSIS), plus 48 ha of non-designated industrial sites (NDIS) contiguous with the Dagenham Dock SIL and Dagenham East LSIS. Together, these employment areas include slightly more than two million square metres of commercial floorspace, with 76% of this floorspace being located within the SILs and 16% within the LSIS. A review of these sites through the ILS (2020) identifies an under-supply of modern spaces and that the current stock is, generally, too old, the wrong specification and wrongly sized. The vast majority of existing floorspace is tertiary and/or secondary rather than modern or prime, which holds back LBBD’s employment and prosperity growth.

- 2.13 The central aim of the LBB Industrial Land Strategy is to create and support the delivery of modern commercial stock capable of attracting growing, modern business. This will include office, studio, light industrial and storage space, all within or in proximity to mixed-use developments. LBB's ambition is to deliver **mixed use neighbourhoods and residential-led developments through co-location facilitated by industrial intensification**, along with supporting economic clusters.
- 2.14 The ILS (2020) estimates that to achieve this transformational change there is likely to be a reduction in the amount of industrial land and floorspace. However, despite the release of employment land within these core employment areas, the ILS (2020) states that there is the potential to deliver net additional job spaces within LBB.
- 2.15 The 'Intend to Publish' London Plan (Dec 2019) identifies that the greatest scope for strategically coordinated plan-led consolidation of Strategic Industrial Locations (SIL) is in the Thames Gateway. LBB is only one of three London boroughs identified for limited release of its industrial land. The DNLP encourages these boroughs to intensify industrial floorspace capacity, investigate the reasons for high levels of vacancy, take positive steps to bring vacant sites back into industrial use where there is demand and support the re-use of surplus industrial land and floorspace for other uses through a proactive plan-led approach. The GLA's London Industrial Land Demand Study (CAG Consultants, 2017) identifies the potential release of 30 ha in the Borough, and the GLA concurs that this is an appropriate benchmark for LBB.
- 2.16 It is clear from the ILS (2020) and 'Intend to Publish' London Plan (2019), that LBB's aspirations for the Borough are far more ambitious than those of the GLA in terms of industrial land release. LBB's ambition for transformational change would result in a greater release of employment land (albeit resulting in a net increase in additional jobs) and an increased housing target than is required through the 'Intend to Publish' London Plan.
- 2.17 The SoS response (March 2020) to the 'Intend to Publish' London Plan suggests that the DNLP is not doing enough to deliver a step change in housing delivery and bring enough land into the system to build the homes needed. The SoS states that the DNLP takes an overly-restrictive stance on the release of industrial land, potentially hindering a boroughs' abilities to choose more optimal uses for industrial sites where housing is in high demand and directs the Mayor to take a more proportionate stance by removing the 'no net loss' requirement on existing industrial land sites whilst ensuring boroughs bring new industrial land into the supply. If left to the market, it should be expected that LBB's obsolete industrial spaces would be redeveloped for more productive (with higher value) uses and a higher density of jobs to floorspace, for businesses that require more hybrid office/workspace accommodation. This is already happening elsewhere in London and is likely to shift further to the outer east of London, including to LBB, where substantial growth in new housing is being planned.
- 2.18 LBB's ILS (2020) and the SoS response to the 'Intend to Publish' London Plan demonstrate that there is a need for the SA process to explore options that would deliver enough growth to deliver a step change in housing delivery and bring about transformational change in the Borough.
- 2.19 LBB's Housing Land Assessment (HLA) and housing trajectory identify available, suitable and deliverable sites that can potentially deliver 42,737 dwellings during the plan period. **Table 2.2** demonstrates how this is broken down.

Table 2.2: Housing land supply through the emerging HLA

Sources	Dwellings during plan period (2019 - 2037)
Strategic Sites ⁷ with planning permission (as at April 20)	20,093
Small Sites ⁸ with planning permission (as at April 2020)	121
Windfall sites (less than 10 dwellings)	1,012
Strategic site options without planning permission	21,402
Small site options without planning permission	109
Total	42,737

2.20 The HLA and housing trajectory also identify available, suitable and deliverable sites that can potentially deliver 12,001 dwellings post plan period. This is comprised of three strategic sites that will not be fully built out during the plan period:

- Castle Green (Site ID CF⁹) is designated as SIL and identified as having the potential to deliver 750 dwellings during the plan period and 11,250 dwellings post plan period.
- Chadwell Heath Industrial Estate (Site ID CH) is designated as LSIS and identified as having the potential to deliver 3,000 dwellings during the plan period and 685 dwellings post plan period.
- Harts Lane Estate (Site ID XC) is designated as LSIS and identified as having the potential to deliver 1,278 dwellings during the plan period and 66 dwellings post plan period.

2.21 The HLA and housing trajectory therefore identify the potential for the delivery of a total of 54,738 dwellings during the plan period and beyond.

2.22 The policy context and evidence set out above suggests that the SA process should explore spatial strategy options to deliver **40,808** dwellings (minimum housing target to be in conformity with national planning policy and the DNLP) during the plan period as well as the longer term aspirations of the Council and the ILS (2020) for transformational changes.

2.3 Where could growth be located?

2.23 As previously stated, LBBD's Housing Land Assessment (HLA) and housing trajectory identify available, suitable and deliverable sites that can potentially deliver growth during the plan period and beyond. A number of these sites are already committed (i.e. have planning permission) as set out earlier in **Table 2.2**.

2.24 There are 48 site options identified through the HLA as not having planning permission but nevertheless available, suitable and deliverable during the plan period. Of the 48 site options without planning permission:

- The majority are predominantly brownfield land, with the exclusion of Padnall Lake ID CO¹⁰.
- None are located within the Green Belt.
- One (XO - Lodge Avenue) falls partially within Metropolitan Open Land (MOL) (Mayesbrook Park).

⁷ Sites that can deliver more than 50 or more units in total. These sites have a total site area or remaining developable area (where applicable), of >0.25ha.

⁸ Sites that can deliver less than 50 units, and those sites where the total site or remaining developable area is <0.25 ha or less.

⁹ Please refer to the Regulation 19 Local Plan for the full list of site names and IDs.

¹⁰ Ibid.

- Four contain areas designated as Public Open Space. Harts Lane Estate ID XC, Thames View/ Roxwell Road ID DI and Lodge Avenue Site ID XO contain small areas whereas Padnall Lake ID CO is almost entirely designated as Public Open Space. It is also noted that one site is a sports field (Barking Rugby Club ID RC).
- Seventeen fall within Flood Zones 2 and 3, with thirteen of these sites having over 50% of their area within Flood Zones 2 and 3.
- Four (Cambridge House ID ZO, Clockhouse Avenue ID DJ, Old Granary ID HM, Ripple Road ID HN) fall within the Abbey and Barking Town Centre Conservation Area.
- Two contain a Listed Building (Harts Lane Estate ID XC and Old Granary ID HM).
- Seven are either wholly or partially designated as SIL/ LSIS:
 - Chadwell Heath Industrial Estate Site ID CH (LSIS);
 - Castle Green Site ID CF (SIL);
 - Thames Road Site ID CI (SIL);
 - Riverside Gateway Zone Site ID XK (SIL).
 - Gascoigne Industrial Area Site ID CM (LSIS);
 - Harts Lane Estate Site ID XC (LSIS); and
 - Wickes (Hertford Road) Site ID HA (LSIS).
- 42 are well-connected in line with the Draft New London Plan, i.e. within 800m of a Major or District Town Centre, 800m of a railway station and/ or have a PTAL rating of 3-6. Please note this includes consideration of proposed new District Centres (Barking Riverside and Merrielands Crescent in the Draft New London Plan as well as the amalgamation of Merry Fiddlers, Whalebone Lane South and Althorne Way) as well as the new Barking Riverside Station and associated improvements to PTAL ratings.

2.4 What are the reasonable alternatives at this stage?

- 2.25 It is appropriate for the development of reasonable alternatives through the SA process to focus on the site options without planning permission. Amongst these sites there are likely to be choices in terms of delivering the minimum housing requirement (40,808 dwellings) and LBBD's aspiration for transformational change. The sites *with* planning permission and windfall should be considered a *constant* as part of any reasonable Borough-wide spatial strategy option, i.e. their future development is considered a given.
- 2.26 Taking the above into account along with the baseline information, policy context provided through the DNLP and Local Plan evidence base, it is considered appropriate that the focus in terms of the identification of reasonable alternatives through the SA process at this stage should focus initially on:
- **The amount of additional industrial capacity to be released/ intensified.** The DNLP proposes limited release of industrial land within the Borough and no net loss across London; however, the SoS response to the DNLP suggests that this approach is too restrictive, and more industrial capacity needs to be brought forward to deliver housing. The LBBD ILS (2020) sets out LBBD's strategic approach to facilitating a transformational change in the Borough's social and economic landscape through intelligent use of its industrial land.
- 2.27 The amount of industrial capacity released during the plan period will have an influence on:
- **Densities at well-connected brownfield sites.** No or a limited release of employment land would result in a shortfall in meeting the housing target, which would need to be made up through increased densities at well-connected brownfield sites. The DNLP identifies areas where the Council should seek to intensify uses and release land for

residential and mixed-use growth. These 'well-connected' areas include sites within 800m of a Major or District Centre, 800m of a train station and/ or have a PTAL rating of 3-6. It should be noted that proposed new District Centres (Barking Riverside and Merriellands Crescent in the Draft New London Plan as well as the amalgamation of Merry Fiddlers, Whalebone Lane South and Althorne Way) have also been taken into consideration as well as the new Barking Riverside Station and associated improvements to PTAL ratings.

- 2.28 Taking the above into account, three alternative spatial strategy options have been identified at this stage based on the evidence and realistic choices available. It is important to remember that a large proportion of development proposed under each of the options is comprised of committed development (sites with existing planning permission as well as windfall). The three spatial strategy options are described on the next page.
- 2.29 Each of the options could deliver around 42,737 dwellings during the plan period to meet identified needs, based on the sites and capacities identified through LBBD's HLA and housing trajectory.

Option 1: No further release of industrial land and significantly increased densities at well-connected brownfield sites

- 2.30 This option does not propose the release of any additional industrial land outside of committed development (i.e. that has existing planning permission). Under this option there would be no redevelopment of the Gascoigne Industrial Area (ID CM¹¹), Thames Road (ID CI), Chadwell Heath (ID CH), Castle Green (ID CF) and Riverside Gateway (ID XK) and there would only be partial redevelopment of the Harts Lane Estate (ID XC). Only an extremely small proportion of Wickes (Hertford Road) site (ID HA) is designated as LSIS, it is assumed the designated area could be avoided and the site is therefore included under this option.
- 2.31 With the removal of four strategic sites and reduced capacity at two strategic sites the Borough would not be able to meet the minimum housing requirement identified through national planning policy and the NDLP. The shortfall could only be met by significantly increasing densities (approx. 80%) at well-connected brownfield sites. This option would deliver around 42,737 dwellings during the plan period (2019 to 2037) and does not include any sites that would deliver growth post plan period.

Option 2: Limited release of industrial land and increased densities across brownfield sites

- 2.32 This option proposes limited additional release of industrial land in line with the emerging DNLDP. Under this option there would be no redevelopment of Chadwell Heath (ID CH) or Castle Green (ID CF) and there would only be partial redevelopment of the Harts Lane Estate (ID XC) during the plan period. Only an extremely small proportion of Wickes (Hertford Road) site (ID HA) is designated as LSIS, it is assumed the designated area could be avoided and it is therefore included under this option. The limited release/ intensification of industrial capacity under this option would occur at the following sites:
- The Gascoigne Industrial Area (ID CM) is included as it forms part of a comprehensive estate renewal alongside a number of other committed sites.
 - The Thames Road (ID CI) site is included as it forms part of the comprehensive regeneration of the Thames and Riverside Transformational Area. There is an opportunity for the site to link in with the committed Barking Riverside development and deliver a district energy network.
 - The Riverside Gateway (ID XK) is included as it is in close proximity to the Thames Road site and would contribute to the transformational change in that area.
- 2.33 With the removal of two strategic sites, in particular Chadwell Heath (ID CH), and reduced capacity at one strategic site the Borough would not be able to meet the minimum housing requirement identified through national planning policy and the NDLP. The shortfall to meet the

¹¹ Please refer to the Regulation 19 Local Plan for the full list of site names and IDs.

minimum housing requirement for the plan period would need to be met by increasing densities (approx. 30%) at well-connected brownfield sites. This option would deliver around 42,737 dwellings during the plan period (2019 to 2037) and does not include any sites that would deliver growth post plan period.

Option 3: Significant release of industrial land in line and standard densities across brownfield sites

2.34 This option proposes a significant additional release/ intensification of industrial land in line with the ILS (2020) and the housing trajectory. The release/ intensification of industrial capacity under this option would occur at the following sites:

- Gascoigne Industrial Area (ID CM) is designated as LSIS;
- Thames Road (ID CI) is designated as SIL;
- Riverside Gateway (ID XK); is designated as SIL
- Harts Lane Estate (ID XC) is partially designated as LSIS;
- Chadwell Heath (ID CH) is designated as LSIS; and
- Castle Green (ID CF) is designated as SIL.

2.35 This option would deliver around 42,737 dwellings during the plan period (2019 to 2037) using a standard density approach for brownfield sites and includes the delivery of a further 12,001 dwellings post plan period (11,250 dwellings at Castle Green ID CF, 685 dwellings at Chadwell Heath ID CH and 66 dwellings at Harts Lane Estate ID XC).

3 Emerging SA findings

3.1 The table below sets out some of the emerging findings from the appraisal of the three spatial strategy alternatives identified in Chapter 2.

Table 3.1: Emerging findings for the SA of reasonable alternatives

	Option 1: No further release of employment land, significantly increased densities (80%) at well-connected sites	Option 2: Limited release of industrial land, increased densities (30%) at well-connected brownfield sites	Option 3: Significant release of industrial land, standard densities at brownfield sites
SA theme	Summary of emerging findings		
Biodiversity	<ul style="list-style-type: none"> Increased densities on well-connected brownfield sites under Options 1 and 2, in particular Option 1, could reduce the ability of development to deliver new green infrastructure and support biodiversity enhancements. Option 3 offers the greatest potential to deliver biodiversity net gain within the borough through the regeneration of significant areas of industrial land. As a result of increased densities at well-connected brownfield sites (particularly within Barking Town Centre and the River Roding Transformation Area) Options 1 and 2 would deliver more growth within the 6.2km zone of recreational influence for Epping Forest SAC compared to Option 3. While Option 1 does not include any further growth post plan period and Option 2 proposes a reduced level compared to Option 3, it is not considered likely that this would result in any significant differences between the options in terms of the nature and significance of effects on biodiversity. Under all the options further growth would need to be identified and delivered in the future/ post plan period to meet identified needs. It is predicted that none of the options are likely to have a significant residual effect on biodiversity once mitigation is taken into account. 		
Climate change	<ul style="list-style-type: none"> Increased densities at well-connected sites under Options 1 and 2 are likely to reduce the ability to deliver new green infrastructure and therefore less likely to support resilient ecological networks. Increased densities at well-connected sites under Options 1 and 2 could help to encourage the use of sustainable transport modes. Options 1 and 2 reduce the level of development that would be delivered in Flood Zones 2 and 3 but they also do not take advantage of the opportunity to improve drainage and increase flood resilience compared to Option 3. Option 3 would facilitate transformative change in an area of increasing strategic connectivity (Barking Riverside) and support growth with improved accessibility. It also provides greater potential to increase the viability of strategic energy infrastructure improvements, such as District Energy Networks, through the redevelopment of large scale brownfield sites. Option 3 is most likely to deliver a significant residual positive effect on climate change compared to Options 1 and 2 through the comprehensive regeneration of large scale brownfield sites, which will provide opportunities for District Energy Networks and provide opportunities to improve flood resilience. 		
Economy and employment	<ul style="list-style-type: none"> Options 2 and 3 increase the level of industrial land released/ intensified to deliver residential and mixed-use development. The ILS identifies that there is an under-supply of modern employment spaces and the current stock is, generally, too old, the wrong specification and wrongly sized. Option 1 would not address this issue and Option 2 would only partially address it. In line with the ILS, Option 3 is the only one that directly addresses this issue and proposes the consolidation, intensification, substitution and change of uses on LBBDD's industrial land to bring about a positive economic transformation. Option 3 is predicted to have a significant long term positive effect on economy and employment. The potential for significant positive effects under Option 2 are more uncertain given the limited release of industrial land. Option 1 is not likely to have a significant positive effect on this theme. 		
Environmental quality (air,	<ul style="list-style-type: none"> In terms of air quality, the entire Borough is designated as an AQMA making air quality a constraint for any development. All options seek to utilise brownfield development opportunities within the urban area and promote growth within accessible areas. 		

Option 1: No further release of employment land, significantly increased densities (80%) at well-connected sites

Option 2: Limited release of industrial land, increased densities (30%) at well-connected brownfield sites

Option 3: Significant release of industrial land, standard densities at brownfield sites

SA theme	Summary of emerging findings
soil and water quality)	<ul style="list-style-type: none"> Increased densities at well-connected sites under Options 1 and 2 could help to encourage the use of sustainable transport modes, which could have indirect positive effects on air quality. Options 2 and 3 capitalise more on the improvements to public transport and services/ facilities through the delivery of committed development (Barking Riverside) in the South West of the Borough compared to Option 1. Option 3 is likely to bring about greater levels of land/ soil remediation. While Option 1 reduces development in the floodplain of the River Thames and reduces pressure on water quality in this respect, Options 2 and in particular 3 provide opportunities to improve drainage systems and the management of water within the floodplain through regeneration.
Health and wellbeing	<ul style="list-style-type: none"> The delivery of housing and associated infrastructure improvements under all options is likely to have benefits on health and wellbeing, particularly within areas of higher deprivation. Increased densities on well-connected sites under Options 1 and 2 are likely to reduce the ability to deliver new green infrastructure and open space on site but will increase development in highly accessible areas supported by active travel connections. Access to open space has become increasingly important during the Covid-19 pandemic. The significantly increased densities proposed through Option 1 would make it difficult to deliver accessible open space on site. Increased growth in the south of the borough under Options 2 and in particular 3 improves the viability of strategic energy infrastructure improvements, such as District Heating Networks, which support reduced fuel poverty. Option 3 is more likely to have a residual significant positive effect compared to the other options through the delivery of strategic open space/ green infrastructure as well as wider accessibility improvements to health services.
Historic environment	<ul style="list-style-type: none"> The options that proposed increased densities in well-connected areas (in particular Option 1) are likely to affect layout and height of buildings within and surrounding Barking Town Centre. This could have significant negative effects on the Abbey and Barking Town Centre Conservation Area, Barking Abbey Scheduled Monument and the listed buildings in the area. These options are also more likely to have negative effects on the Dagenham Village Conservation Area and listed buildings. The options that propose the regeneration of industrial land (in particular Option 3) are more likely to have significant effects on non-designated heritage, in particular the industrial heritage of the borough. Conversely, they also present an opportunity to regenerate vacant and under-utilised industrial sites that may currently detract from the historic environment and improve access and understanding to these areas. Option 1 is likely to have a significant negative effect on the historic environment given the significantly increased densities at non-industrial sites, mitigation is likely to be difficult/ costly. While Option 3 proposes a significant transformation of the borough's industrial land, it is considered that suitable mitigation will be available and that it offers greater potential for positive effects for the borough's historic environment. Option 2 is predicted to have an uncertain effect at this stage as it is less likely to have significant negative and positive effects compared to the other options.
Land, soil and water resources	<ul style="list-style-type: none"> All options maximise use of brownfield land and are likely to have significant positive effects on this theme. There are no significant differentiators between the options at this stage in relation to this theme, recognising that contaminated land is addressed under the Environmental Quality theme.
Landscape and townscape	<ul style="list-style-type: none"> Tall buildings are likely to be more prevalent under Options 1 and 2 given the need for increased densities - this has a greater potential for impacts in terms of key views and vistas - especially for example within the historic core of Barking Town Centre. Option 2 and in particular Option 3 are more likely to have positive effects on the townscapes of the borough through the regeneration of vacant and underused industrial buildings.

Option 1: No further release of employment land, significantly increased densities (80%) at well-connected sites

Option 2: Limited release of industrial land, increased densities (30%) at well-connected brownfield sites

Option 3: Significant release of industrial land, standard densities at brownfield sites

SA theme

Summary of emerging findings

- Option 3 is likely to have a significant long term positive effect on the historic environment although there is some uncertainty as it will be dependent on design and layout. Option 1 is most likely to have significant negative effects given the major increase in densities at non-industrial sites. While the potential significant effects under Option 2 is less certain so are the benefits arising through only a limited regeneration of the boroughs industrial land.

Population and communities

- All options will meet minimum housing requirements and anticipated need over the plan period (and significant long term positive effects are anticipated in this respect).
- Increased densities at well-connected sites under Option 1 is likely to reduce the ability to deliver new green infrastructure and community benefits on site.
- Increased growth in the south under Options 2 and in particular 3 take advantage of the potential to facilitate transformative change in an area of increasing strategic connectivity (Barking Riverside) and support enhanced community access in this area.
- All of the options will have a significant long term positive effect through the delivery of enough homes to meet identified needs during the plan period. Option 3 is likely to have an enhanced positive effect compared to the other options through the comprehensive regeneration of underused and vacant industrial land new homes, employment and associated services/ facilities.

Transport and movement

- Increased densities at well-connected sites under Options 1 and 2 could help to encourage the use of sustainable transport modes.
- The development of Castle Green (ID CF) is closely linked to potential improvements to the A13 to address the current capacity issues.
- Increased growth in the south under Option 2 and in particular Option 3 takes advantage of the potential to facilitate transformative change and support strategic infrastructure enhancements (Barking Riverside) and improved connectivity in this area.
- Option 3 is the most likely to deliver significant transport infrastructure improvements across the borough.

4 Developing the Preferred Approach

- 4.1 The Council's preferred option is **Option 3** (Significant release of industrial land, standard densities at brownfield sites) because it reflects the Council's ambition to be London's growth opportunity by recognising the potential to:
- **Utilise industrial areas more intelligently** - enabling the Council to focus on transforming the existing underutilised industrial areas into modern commercial stock that is capable of attracting modern businesses, and creating diverse new jobs at all levels, along with supply opportunities for our residents and businesses; attracting investment in the decarbonisation sector, bringing both economic and environmental benefits.
 - **Step-up housing delivery** - by significantly increasing the number of new homes, particularly affordable homes to help meet both identified local need and London's strategic need.
 - **Unlock growth through infrastructure investment** - a significant increase in density in the right locations will ensure that growth is well supported by physical, social and green infrastructure. Providing strategic transport access, connectivity and capacity and improvements of the highway networks must be addressed to avoid 'holding the borough back' from attracting investment; enabling necessary schools and health services and other green and sustainable infrastructure to be delivered in a timely manner.
- 4.2 The emerging SA findings demonstrate that Option 3 performs more strongly against the majority of SA themes compared to the other options. It also takes advantage of opportunities for significant positive effects in relation to the population and communities, economy, landscape and historic environment of the borough through the regeneration of vacant and underused industrial buildings.
- 4.3 While **Option 1** would deliver approximately the same level of growth during the plan, it would not address the issues raised through the LBBDD ILS (the current stock is too old, the wrong specification and wrongly sized) and therefore would not deliver the growth aspirations of the Council. Furthermore, this option does not meet the aspirations of the Greater London Authority through taking opportunities to strengthening and intensifying the borough's extensive and underutilised industrial land.
- 4.4 The emerging SA findings demonstrate that the significantly increased housing densities (around 80%) proposed through Option 1 could have significant negative effects on the townscape and historic environment of the borough, particularly the Abbey and Barking Town Centre Conservation Area, Barking Abbey Scheduled Monument and the listed buildings in the area. The significantly increased densities would also reduce the potential for green infrastructure and open space to be delivered on site with indirect negative effects for SA themes relating to biodiversity, climate change, health and well being and population and communities.
- 4.5 While **Option 2** would deliver approximately the same level of growth during the plan, it would only partially address the issues raised through the LBBDD ILS and therefore would not deliver the growth aspirations of the Council. However, this option would meet the aspirations of the Greater London Authority by taking opportunities to strengthening and intensifying the borough's extensive and underutilised industrial land.
- 4.6 Option 2 would result in increased densities (approx 30%) at sites within well-connected areas to make up for the shortfall as a result of removing some strategic sites that are designated as SIL/ LSIS from consideration. The emerging SA findings demonstrate that while Option 1 is less likely to have significant negative effects on the landscape and historic environment themes compared to Option 1 - it is also less likely to take advantage of opportunities to deliver positive effects of significance for the wider borough in terms of the economy, landscape and historic environment compared to Option 3.

