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JMc – 17/061  
BY EMAIL

Dear Sarah,

**GASCOIGNE ESTATE WEST - 17/00977/OUT**  
**RESPONSE TO MATTERS RAISED IN GLA STAGE 1 RESPONSE**

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Iceni Projects Limited ('Iceni') are appointed by the Regeneration Team of the London Borough of Barking and Dagenham ('LBBd' and the 'Applicant'), now also known as 'Be First' to advise on town planning matters relating to the residential regeneration of the Gascoigne West Estate in Barking Town Centre (the 'site'). As you are aware, an outline planning application was submitted to the LBBd Planning Department in July 2017 and subsequently referred to the Greater London Authority ('GLA') on 21 July 2017 (LBBd ref: 17/00977/OUT; GLA ref: 3239b).

The GLA's Stage 1 response was received on 11 September 2017 as required under Article 4(2) of the Town and Country Planning (Mayor of London) Order 2008 (the 'Order'). Whilst the Stage 1 response supported the principle of the regeneration of the site, a number of a strategic issues were raised relating to Estate Regeneration; Housing; Affordable Housing; Transport; Energy and Children's play space. This letter is therefore provided on behalf of LBBd to provide a response to each of the matters raised.

**a. Scheme amendments**

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On submission, the outline planning application allowed for redevelopment of the site to provide up to 850 dwellings, of which an element within the northern development parcels comprised potential C2 uses for assisted living / care. Following an internal review within LBBd / Be First, a strategic decision has been made which seeks to remove the C2 element from the outline planning application. Accordingly, the outline planning application submission should now be considered on the basis of proposals for 850 new homes (Use Class C3), up to 350 sq.m of flexible commercial or community floorspace (A1, A2, A3, D1 or D2) and an energy centre, together with associated car parking, cycle parking and landscaping. This has resulted in a series of minor amendments to some of the submission documents including:

- **Parameter Plan 933-P-0505** – Ground Floor Frontage Uses;
- **Parameter Plan 933-P-0506** – Upper Floor Uses;
- **Design Code pg. 10** – Plan;
- **Design Code pg. 11** – paras. 2.3.7, 2.3.8, 2.3.9.

All updated submission documents are enclosed for your reference at **Appendix A1**.

As a result of this amendment to the proposed scheme, no further detail is provided in response to paragraph 29 of the GLA Stage 1 response which requested the Applicant to clarify whether and in what circumstances this form of housing might be provided and how this may impact on the approach to affordable housing.

## b. Residential mix

As noted above, the proposed scheme has been amended to remove the C2 element. As such, the scheme now has potential to provide up to 850 new residential (C3) units within the site. The enclosed 'Indicative Accommodation Schedule' (**Appendix A2**) sets out an indicative residential mix for the scheme across site as summarised in Table 1 below:

**Table 1 – Indicative accommodation schedule**

	1B(1P)	1B(2P)	2B(3P)	2B(4P)	3B(5P)
Hab Rooms (per unit)	1	2	3	3	4
Minimum Unit Area (sq.m)	38	50	61	70	86
<b>Total (No):</b>	<b>3</b>	<b>314</b>	<b>80</b>	<b>340</b>	<b>113</b>
<b>Total (Percentage):</b>	<b>0.4%</b>	<b>36.9%</b>	<b>9.4%</b>	<b>40.0%</b>	<b>13.3%</b>

This indicative schedule demonstrates that the proposed development can deliver a mix of residential units which range in size, but all comply with the minimum residential space standards as set out within the London Plan and the Nationally Described Minimum Space Standards. Due to the nature of the site, the regeneration aspirations and approach to optimising development and density on the site, the scheme comprises solely residential apartments (no houses). However, c.13% are family-sized dwellings provided three or more bedrooms. Further, 40% of the units within the scheme are 2B4P dwellings which can also accommodate smaller families within a sustainable, town centre location.

## c. Affordable housing provision

### Social Rented Accommodation

The proposed development incorporates provision for 358 (42.2%) 'affordable' homes comprising Social Rent, Target Rent and Shared Ownership homes. This is detailed in Table 2 below:

**Table 2 – Indicative Affordable Housing Mix (Masterplan)**

Tenure	1B(1P)	1B(2P)	2B(3P)	2B(4P)	3B(5P)	Total	%
Affordable Rent	0	22	15	44	9	90	10.2
Target Rent	0	45	1	24	27	97	11.9
Shared Ownership	0	54	4	96	20	174	20.1
Private	3	193	60	176	60	489	57.8
<b>Total</b>	<b>3</b>	<b>314</b>	<b>80</b>	<b>340</b>	<b>113</b>	<b>850</b>	<b>100%</b>

At present, there are 97 existing Social Rented properties within Gascoigne West. This equates to 274 habitable rooms and an existing GIA of 7,491 sq.m. As part of the proposed development, LBBB are proposing to reprovide all of the existing Social Rented homes at LBBB Target Rents equating to 273 habitable rooms and 7,891 sq.m GIA. Total habitable rooms have dropped by one but the new mix delivers an increase in floor space and represents a betterment on the existing Social Rented housing within the existing site. The increase of family sized accommodation and 1 bedroom flats which aligns with the Borough's housing existing housing need.

**Table 3 – Existing Social Rented Accommodation**

Existing Social Rent	1B(2P)	2B(3P)	2B(4P)	3B(5P)	Total
Hab Rooms (per unit)	2	3	3	4	-
<b>Total – Homes</b>	<b>28</b>	<b>30</b>	<b>28</b>	<b>11</b>	<b>97</b>
<b>Total – Hab Rooms</b>	<b>56</b>	<b>90</b>	<b>84</b>	<b>44</b>	<b>274</b>
<b>Total – Percentage</b>	<b>28.87%</b>	<b>30.93%</b>	<b>28.87%</b>	<b>11.34%</b>	<b>100%</b>

Table 4 – Proposed Social Rented Accommodation (Target Rents)

Existing Social Rent	1B(2P)	2B(3P)	2B(4P)	3B(5P)	Total
Hab Rooms (per unit)	2	3	3	5	-
Minimum area (sq.m)	50	61	70	86	-
<b>Total – Homes</b>	<b>45</b>	<b>1</b>	<b>24</b>	<b>27</b>	<b>97</b>
<b>Total – Hab Rooms</b>	<b>90</b>	<b>3</b>	<b>72</b>	<b>108</b>	<b>273</b>
<b>Total – Percentage</b>	<b>46.39%</b>	<b>1.03%</b>	<b>24.74%</b>	<b>27.84%</b>	<b>100%</b>

#### Overall Affordable Housing provision

Tables 5-7 provide a breakdown of affordable housing mix and tenure within each phase of the proposed development:

Table 5– Affordable Housing by Phase (Affordable Rent)

Phase	1B(1P)	1B(2P)	2B(3P)	2B(4P)	3B(5P)	Total
Phase 1	0	11	7	29	7	54
Phase 2	0	11	8	15	2	36
Phase 3	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>22</b>	<b>15</b>	<b>44</b>	<b>9</b>	<b>90</b>

Table 6 – Affordable Housing by Phase (TR)

Phase	1B(1P)	1B(2P)	2B(3P)	2B(4P)	3B(5P)	Total
Phase 1	0	28	1	13	2	44
Phase 2	0	17	0	11	25	53
Phase 3	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>45</b>	<b>1</b>	<b>24</b>	<b>27</b>	<b>97</b>

Table 7 – Affordable Housing by Phase (Shared Ownership)

Phase	1B(1P)	1B(2P)	2B(3P)	2B(4P)	3B(5P)	Total
Phase 1	0	30	3	71	9	113
Phase 2	0	24	1	25	8	58
Phase 3	0	0	0	0	3	3
<b>Total</b>	<b>0</b>	<b>54</b>	<b>4</b>	<b>96</b>	<b>20</b>	<b>174</b>

In the GLA Stage 1 response, the Officers requested further details of the financial thresholds for the affordable housing elements of the proposed development. These are included for reference in Table 8 ‘Rental Values’ below.

Table 8 – Rental Values LBBD

Rental Values – LBBD	1 bed	2 bed	3 bed
Market Rent (per calendar month)	£1,200	£1,400	£1,600
Affordable – 80%	£960	£1,120	£1,280
Income requirements	£32,821	£38,291	£43,761

#### Buy back

The process undertaken by the Council in buying out leaseholders and decanting tenants takes into account best practice established in the Mayor of London’s ‘*Good Practice in a Fair Deal for Tenants and Leaseholders*’ guide, combined with the Council’s depth of experience gained from other projects of a similar nature, such as Gascoigne East, Eastern Thames View, and Becontree heath regeneration projects:

- All tenant decant cases receive the statutory homelessness payment of £6,100 plus payment for any additional fixtures and fittings that need to be relocated (satellite TV, Alarms, Disability adaptations)
- The Borough offers Council tenants the opportunity to relocate to alternative permanent Council accommodation in the borough through the Council's Tenant Decant programme and Choice Lettings system, which offers Council tenants choices about where they are relocated.
- Secure lifetime tenancies are carried over to the tenants' new properties, with rent staying at equivalent levels.
- Tenants subject to decanting are offered the option of return where possible, but the Council is clear at the outset the terms that a new tenancy will be offered by BD Reside, which may include a new form of tenancy and rent regime.
- The Council has dedicated Leaseholder and Tenant teams carrying out buy backs and tenant moves – they have a variety of options available to support vulnerable residents including enhanced removal services, direct offers where people are not able to use web based bidding and support with changing details over when moving. The Council is also able to liaise closely with Social Care and Mental Health workers to do joint visits when necessary.
- All Leaseholders are offered full market value plus the appropriate homelessness and compensation payments – the option of Shared Ownership will be able to be offered early in 2018 when the first Shared Ownership units developed by the Council's development vehicle, Reside are completed.
- Private tenants are made aware of the Council's Housing Advice service and Reside affordable rent properties.

#### **d. Financial Viability Appraisal**

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On the request of both LBB and the GLA, a Financial Viability Appraisal ('FVA') has been prepared by POD on behalf of the Applicant. This sets out the justification for the level of affordable housing proposed within the outline scheme. Please find enclosed at **Appendix A5**.

#### **e. Housing Quality**

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Paragraph 32 of the GLA Stage 1 response referenced **London Plan Policy 3.5** (Quality and design of housing developments) and advised that all future reserved matters application(s) should comply with the Mayor's Housing Design Standards. This has been discussed with the LBB Case Officer and it has been agreed that an appropriately worded planning condition will be included in any future planning consent for the site. The Applicant is very supportive of promoting quality within residential schemes in the Borough and therefore welcomes this addition within any future planning consent.

#### **f. Inclusive Design**

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Paragraph 34 of the GLA Stage 1 response referenced **London Plan Policy 3.8** (Housing Choice) and advised that 90% of new residential units will need to meet Building Regulation Part M4(2) standards, and 10% will need to be wheelchair accessible or adaptable in accordance with Part M4(3). In response, it has been agreed with the LBB Case Officer that an appropriately worded planning condition will be included in any future planning consent to secure the provision of wheelchair adaptable or accessible units across all dwelling types, tenures and storeys. The detail of such provision will be subject to future reserved matters planning application submission(s).

#### **g. Children's play space**

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Paragraph 33 of the Stage 1 response acknowledged that the current outline application allows for 2,350 sq.m of dedicated children's play space. However, in accordance with **London Plan Policy 3.6** (Children and young people's play and informal recreation facilities), an assessment is required against the Mayor's Supplementary Planning Guidance '*Providing for Children and Young People's Play and Informal Recreation*'. Due to the outline nature of the proposed scheme, the precise mix and tenure of the residential units is unknown until future, detailed reserved matters submissions are made. However, and on the basis of the indicative schedule enclosed at **Appendix A2**, the outline submission for 850 dwellings would generate a child yield of 232 (127 Under 5s; 67 5-11 year olds; and 38 12+ year olds). In accordance with the Mayor's SPG, the proposed development therefore

generates a requirement for 2,316 sq.m of dedicated playspace. For information the children's play space assessment / appraisal is enclosed at Table 8 below:

Table 8 – London Plan Playspace requirements

Age of children	Number of children	Percentage of yield	Provision (sq.m)
Under 5	127	55%	2,316 sq.m
5 to 11	67	29%	
12 +	38	17%	
<b>Total</b>	<b>232</b>	<b>100%</b>	

## **h. Highways and Transport**

Throughout the consultation period of the planning application, there has been extensive correspondence between the Applicant's highways consultant (Iceni Transport) and Rob Goodall, Principal Technical Planner at Transport for London ('TfL'). In an email dated 19 September 2017, Rob Goodall advised that his initial comments had been included with the GLA's Stage 1 response, however advised that it would be helpful if all subsequent technical information and correspondence was collated into one technical note. Accordingly, the enclosed Transport Memo has been prepared by Iceni Transport (**Appendix A3**). The Transport Memo provides a formal response to all comments made by TfL (in *italics*). To avoid duplication, the key points within the Transport Memo are not repeated within this letter, however the enclosed addresses all outstanding matters relating to:

- Traffic generation associated with dwellings numbers (up to 850 new homes);
- Traffic Impact Assessment;
- Car parking provision;
- Cycle parking provision; and,
- Re-routed bus provision along The Shaftesburys.

We trust that this appropriately addresses and satisfies TfL's previous concerns. Through discussions with the LBBD Case Officer, it has also been agreed that the following reports will be secured via the Section 106 or planning conditions should planning consent be granted:

- **Residential Travel Plan** – Section 106;
- **Construction and Logistics Management Plan** – planning condition; and,
- **Delivery and Servicing Plan** – planning condition.

## **i. Energy and Sustainability**

Paragraphs 35-36 of the GLA Stage 1 response sets out the energy and sustainable development requirements of the proposed development. Further to the Energy report submitted with the outline planning application, a technical note was prepared by the Applicant's energy consultant (CES) and shared with Lyndon Forthergill at the GLA on 07 September 2017 (enclosed at **Appendix A4**). This technical response set out further detail relating to the London Plan policies requirements, specifically the 'Be Lean, Be Clean, Be Green' hierarchy and the future CHP plant. The Applicant has not yet received a response to this technical note. Accordingly, we would welcome any further feedback from the GLA Energy Officer. There is currently insufficient detail to develop TER and DER worksheets but these will be developed be submitted as part of reserved matters applications for each phase, along with confirmation of any regulated CO2 emissions that require offsetting through the Borough's offset fund.

## **j. Flood risk**

Paragraph 37 of the GLA Stage 1 response references the large portion of the southern part of the site which falls within Flood Zone 3. As acknowledged within the response, a Flood Risk Assessment was prepared by Dr Paul Garrad which informed the submission of the outline planning application.

Within the Flood Risk Assessment, a series of measures are considered and proposed to address and mitigate potential flood risk – including sustainable urban drainage measures such as rainwater harvesting, green roofs, storage and attenuation measures. As noted within paragraph 37, these measures have been discussed further with the LBB Case Officer and it has been agreed that an appropriately worded planning condition will be included in any future planning consent which seeks to secure measures which comply with **London Plan Policy 5.13** (Sustainable Urban Drainage). The detail of these measures will be considered further and secured via future reserved matters submission(s).

#### k. Summary

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I trust that this is a helpful response to the strategic matters raised in the GLA's Stage 1 response. This information has also been shared with Adele Lawrence, the LBBD Planning Case Officer for this planning application and will subsequently be presented to the LBBD Planning Committee. We would welcome your confirmation as to whether the enclosed satisfies the GLA's previous concerns, and whether any further information is required ahead of Planning Committee and subsequent GLA Stage 2 referral. Should you require anything further then please do not hesitate to contact me on 020 3657 5034 / [jmcarthur@iceniprojects.com](mailto:jmcarthur@iceniprojects.com) or my colleague Danielle St Pierre on 020 3725 3841 / [dstpierre@iceniprojects.com](mailto:dstpierre@iceniprojects.com).

Yours sincerely,



Jayme McArthur  
DIRECTOR

cc: Adele Lawrence – London Borough of Barking and Dagenham  
Jennie Coombes – Be First  
Fraser Ward – Altair on behalf of London Borough of Barking and Dagenham  
Lyndon Fothergill – Greater London Authority  
Rob Goodall – Transport for London