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02 March 2018

Iceni – 16/099
BY EMAIL

Dear Mr Khan,

DRAFT LONDON PLAN CONSULTATION – DECEMBER 2017

WRITTEN REPRESENTATIONS ON BEHALF OF DAGENHAM DOCK LIMITED

Iceni Projects Limited ('Iceni') are appointed by Dagenham Dock Limited ('DDL') to provide strategic town planning advice in relation to its commercial asset at the Former Dagenham Stamping and Tooling Operations Plant ('DSTO') at Chequers Lane, Dagenham (the 'Site'). For reference, DDL is a joint venture between land promoter St Congar Land and the real estate fund, Europa Capital. The site is wholly owned by DDL, following its acquisition from Ford Motor Company ('Ford') in May 2016. The following representations are provided on behalf of DDL in response to the current Draft London Plan consultation document, as issued by the Greater London Authority ('GLA') in December 2017.

a. Background of the Site

By way of background, the Dagenham Dock site comprises c.18.45 (46 acres) of former industrial land located immediately north east of Dagenham Dock train station. The Site is demarcated to the north by Chequers Corner (which has been developed to provide a Premier Inn and Brewster's Pub / restaurants and the 'Polar Ford Site'), beyond which is the A1306 carriageway (New Road). To the west, the site is demarcated by Chequers Lane and to the east, Kent Avenue. To the south, the Hope Construction cement deport and bagging plant (formerly known as the 'Goods Yard, Dagenham Dock Station') has recently been developed and butts the mainline and HS1 railway line. The River Thames flows immediately south of the site, with the A13 oversailing. For reference, a Site Plan is enclosed at **Appendix A1**.

The Site is currently vacant, following the decommissioning by Ford in October 2012, followed closely by its closure in July 2013. Following DDL's purchase in May 2016, an extensive programme of demolition and environmental works commenced in order to prepare the Site for future development. As part of this process, DDL and its consultant team have engaged extensively with LBBB, the Environment Agency and Historic England. This has included a series of Prior Notification submissions for demolition, in addition to two major planning applications for environmental remediation and the importation of fill to address site levels in order to mitigate flood risk and drainage constraints. For reference, the planning application submissions referred to are included at **Appendix A2**.

Planning Policy

The Site is located within the boundary of the London Riverside Opportunity Area Planning Framework ('LR OAPF') as adopted by the GLA as strategic planning guidance in September 2015.

Further, the emerging LBBD Local Plan, in particular the focussed review as approved by the LBBD Cabinet in September 2014 envisages the de-designation of the Site from Locally Significant Industrial Land ('LSIL') and promotion of a residential-led, mixed use development opportunity. This aligns with the approach adopted within the LR OPAF. More recently, DDL understand that LBBD have decided to progress a New Local Plan (rather than undertake a "focused review" of certain policy areas). The New Local Plan will set out a spatial strategy for the borough, until 2030 – including the allocation of sites for housing and employment, in addition to detailed design policies. LBBD are at the very early stages of producing the New Local Plan, with Issues and Options consulted upon in July 2015. The Issues and Options Report (July 2015), explained that the Council is committed to growth in seven 'hubs' with an unrivalled opportunity to deliver a wide range of new jobs and housing across the Borough. Of these, and together with Beam Park, the Site is identified as a major brownfield site having potential for housing and commercial activity to provide 3,200 new homes, and over 1,000 new jobs. Table 13 of the report outlines the infrastructure requirements for the Ford Stamping Plant and Beam Park as 3 primary schools, 1 secondary school, 3 GP surgeries, 0.14ha of playspace and 7.2ha of outdoor space.

DDL has engaged the professional services of a comprehensive design team, led by JTP as the lead architect and Masterplanner. To date, development proposals have been presented to Be First / LBBD which comprise a residential-led development opportunity providing c.2,850 new homes, c.65,000 sq.ft of flexible commercial / retail floorspace; a secondary school and potential industrial heritage centre / museum (subject to appropriate feasibility and viability testing). This proposal has been presented on a number of occasions to Officers at Be First / LBBD with high level principles agreed. It is DDL's intention to submit an outline planning application, supported by a comprehensive Masterplan and Environmental Impact Assessment in June 2018. The current project programme envisages formal pre-application discussions with GLA Officers in Spring 2018.

In light of the above, DDL has an active interest in the formulation of strategic planning policy within London. The following sets out DDL's response to a number of the draft planning policies currently included within the Draft London Plan.

b. The Draft London Plan – Chapter 1 'Planning London's Future (Good Growth Policies)'

Draft Policy GG1 – Building strong and inclusive communities

DDL is supportive of the Mayor's aspiration to build on London's openness, diversity and equality whilst helping to deliver strong and inclusive communities. DDL are therefore supportive of the policy aspirations set out in Draft Policy GG1.

Draft Policy GG2 – Making the best use of land

DDL is supportive of the Mayor's focus on high-density, mixed use development in order to make best use of land in order to accommodate London's growth. DDL supports Draft Policy GG2a which seeks to prioritise the development of Opportunity Areas, brownfield land, surplus public-sector land and sites which are well connected by existing or planned public transport infrastructure or on the edge of town centres. However, with such an intensive focus being placed on Opportunity Areas, Draft Policy GG2 needs to avoid conflict with any other policies within the London Plan. For example, the retention and intensification of SIL and LSIL – see responses to Policies E4-E7 below.

Draft Policy GG4 – Delivering the homes Londoners need

DDL is supportive of the Mayor's drive to ensure that planning consents are granted and homes delivered promptly. However, DDL raise concern with regards to Draft Policy GG4e which seeks Local Planning Authorities to establish '*ambitious and achievable*' build-out rates at the planning stage in order to incentivise build-out milestones to help ensure that homes are built quickly and to reduce the likelihood of permission being sought to sell land on at a higher value. DDL object to the potential inclusion of further restrictive conditions (or pressure on the boroughs to adopt such policies) on future

planning consents which seek to restrict timescales on delivery beyond the traditional implementation planning conditions applied to current planning consents in accordance with Section 92 of the Town and Country Planning Act to ensure the timely delivery of planning consents. Infrastructure commitments, market conditions, house builder capacity and labour supply can all affect the build out rate of strategic developments and this should not be for the planning authority to seek to restrict or penalise a perfectly implementable planning permission due to external factors. DDL's business plan is to develop a parcellated masterplan and facilitate multiple outlets on the site to maximise output and to avoid over reliance on a single builder.

c. The Draft London Plan – Chapter 2 ‘Spatial Development Patterns’

Draft Policy SD1 – Opportunity Areas

DDL welcomes the focus of the Mayor on the continued promotion of Opportunity Areas and associated Planning Frameworks. In particular, DDL support Policy SD1-A3 which supports and seeks to implement adopted Planning Frameworks in order to give them appropriate weight in planning decisions – which was previously lacking following the adoption of such frameworks without appropriate material planning weight.

In the case of DDL's commercial asset, this is positive clarification for its land at Dagenham Dock as the London Riverside OAPF (2015) proposes the release of the land at Dagenham Dock from its existing Locally Strategic Industrial Land (LSIL) designation for residential-led, mixed use development. However, DDL are concerned that the support for the implementation of adopted Opportunity Area Planning Frameworks such as the London Riverside OAPF is not unduly reflected in later policies within the London Plan – particularly in relation to the SIL and LSIL constraints proposed by Draft Policies E5, E6 and E7. DDL therefore request that the draft policies are reviewed and amended to ensure consistency and general corroboration with the spatial development patterns and aspirations set out within Chapter 2 of the Draft London Plan and Policy SD1.

Draft Policy SD10 – Strategic and local regeneration

DDL supports the strategic objective of Draft Policy SD10, whereby Boroughs are encouraged to identify Strategic Areas for Regeneration in Local Plans and support the implementation of Opportunity Area Planning Frameworks where relevant. However, it is crucial that the formulation and adoption of these strategic areas by the boroughs does not unduly prolong the planning process, particularly in relation to sites that are already progressing in advance of any future additions by the boroughs to the relevant Development Plan documents. This should be reflected as a clause within Draft Policy SD10.

d. The Draft London Plan – Chapter 3 ‘Design’

Draft Policy D2 – Delivering good design

Whilst DDL is supportive of the Mayor's aspirations to improve the quality of design on consented schemes across London, Draft Policy D2d and Policy D2f should be worded in a way which facilitates the submission of both detailed and outline planning application submissions. DDL acknowledge that Masterplans and Design Codes are extremely helpful in securing high quality design and place-making principles, however it is important that the variance between the level of detail submitted for outline and full planning applications is acknowledged. Whilst Draft Policy D2 is positive in its aspiration, onerous design review panels and supplementary material should be managed so not to prevent the progression of outline schemes.

As currently drafted Draft Policy D2 does not clearly clarify how the Design Review process should be managed in boroughs where a Panel has not yet been established; or where boroughs do not have the skills, resource or experience to facilitate such a forum. In these cases, it is not currently clear whether the Mayor would intervene and assume overall responsibility. Further, there will undoubtedly be situations whereby the Design Review Panel and the Local Planning Authority are unable reach an agreement on key principles / elements of the design. Draft Policy D2 does not currently advise on how this scenario would be overcome, and which view will be considered to carry more material weight in the planning application process. In addition, it is crucial that the requirement to enter into the

Design Review process does not unduly prolong the planning process and delivery of key, strategic site. Accordingly, DDL seeks further clarification from the Mayor on this pre-application requirement and the clauses within Draft Policy D2.

Draft Policy D4 – Housing quality and standards

DDL note the housing quality standards set out in Draft Policy D4 which broadly seek to align the London Plan with Part M Building Regulation and the Mayors Housing SPG (2016). Whilst the aspiration to secure the highest quality dwellings is supported by DDL; it is noted within Draft Policy D4a that the Mayor is seeking '*innovative housing designs*' in order to bring forward development across London and in particular on '*constrained sites*'. Therefore, the approach adopted within the draft London Plan to strictly enforce the minimum space standards could be considered at odds with an innovative approach to housing delivery. Whilst DDL understand that standards need to be established, DDL encourages the Mayor to consider a more flexible approach to minimum space standards in 'exceptional circumstances' where it can be demonstrated that it facilitates a more innovative design approach to housing.

Draft Policy D5 – Accessible Housing

DDL supports the wording of Draft Policy D5 which broadly aligns the London Plan with the accessible requirements of Part M Building Regulations.

Draft Policy D6 – Optimising housing density

DDL supports the principle of the Mayors approach to optimising housing density through a designed approach to capacity on future development sites. Whilst it is understood that higher density development proposals will be subject to a greater level of design scrutiny, as established by Draft Policy D6C, it is again important that the Mayor acknowledges within Draft Policy D6 the difference between full and outline planning application submissions. The purpose of an outline application to secure development principles and parameters should not be lost within the London Plan. For sites of the scale of DDL's asset at Dagenham Dock, there should be means of securing high-density residential proposals, supported by appropriate Parameter Plans and Design Codes, without necessitating the submission of extensive detail required by a full planning application. Accordingly, DDL requests further clarification on how Draft Policy D6 will be implemented on larger, strategic outline schemes.

e. The Draft London Plan – Chapter 4 'Housing'

Draft Policy H1 – Increasing Housing Supply

The housing targets set out within the draft London Plan are extremely ambitious, targeting 65,000 new homes per annum against a previous target of 42,000. Whilst this aspiration is welcomed, a number of the draft policies within the Plan place a heavy reliance on the London boroughs to establish and implement policies relating to design and density – often conflicting with the views of its members. In order to positively work towards the delivery of c.65,000 new homes per annum, the draft London Plan needs to be clearer and firmer on ensuring boroughs set appropriate policies that allow for the optimisation of density and clear guidance on design. Further, the London Plan should provide confirmation as to how the boroughs should appropriately address the significant uplift in housing targets as specified by the Draft London Plan, in particular the requirement for early reviews of recently adopted Local Plans.

Draft Policy H4 – Meanwhile Use

Whilst DDL is supportive of the GLA's aspiration to install meanwhile uses on sites for housing in order to make efficient use of land whilst it is awaiting longer-term development, Policy H4 must acknowledge that this may not always be feasible on some of the larger, strategic sites in London. For example, whilst DDL's Dagenham Dock site is an extensive area which has been cleared of existing structures, there is an ongoing extensive programme of site clearance and remediation works that would restrict any meanwhile uses during the early stages of work. There may however be potential to consider temporary advertising / leisure type facilities at a later date. DDL therefore request that this is acknowledged by the Mayor on the implementation of Policy H4.

Draft Policy H5 – Delivering Affordable Housing

Draft Policy H5 sets a strategic target of 50% of all new homes delivered across London to be affordable. In response, DDL believe that there should be greater flexibility in the Plan's policies on affordable housing. Greater flexibility will allow for a wider range of homes to be delivered which are more focussed on the local needs of each borough – see further comments below on Section H.

Draft Policy H6 – Threshold approach for Affordable Housing

Draft Policy H6 establishes a threshold approach to affordable housing for development proposals delivering 10+ dwellings or more than 1,000 sq.m of development. The thresholds established are i) a minimum of 35%; ii) 50% on public sector land; and iii) 50% for Strategic Industrial Locations, Locally Significant Industrial Sites and other industrial sites deemed appropriate for release for other uses.

DDL strongly object to the 50% threshold established for former industrial land. Para. 4.6.6 states that the higher level of affordable housing provision is required due to the difference in values between industrial and residential development. However, Draft Policy H6 and the supporting text at para. 4.6.6 pays no regard to the extensive costs often associated with the clearance and remediation of industrial sites which have been subject to previous contaminating uses. For example, and in the case of DDL's Dagenham Dock asset, DDL are currently engaged in the UK's largest demolition and remediation contract in 2017 – incurring significant costs prior to the planning and development process. This is a significant consideration, particularly as part of the remediation costs are associated with the restoration of the land to levels which are considered acceptable for 'vulnerable' residential uses and Human Health criteria. This level of remediation is beyond that required for a replacement industrial use which should be factored into the consideration of affordable housing viability on the assessment of development proposals.

In the case of DDL's Dagenham Dock site, understandably due to the significant remediations costs, requirement to provide a secondary school, heritage centre and substantial open space, in an area on the lower scale of sales values in London, meeting the 35% target will be a significant challenge and may not be deliverable. Raising the threshold to 50% would result in an entirely unreasonable level. DDL would without question be forced down the 'viability tested route', whereas the existing 35% threshold defined within the London Plan Homes for Londoners SPG (2017) offers a more realistic target for the fast track route.

In light of the above, DDL is supportive of para. 4.6.3 which advises that the Boroughs may wish to consider a localised affordable housing threshold in Opportunity Areas for the Fast Track Route or fixed affordable housing requirements. This approach would provide developers with certainty. However, for this approach to be honoured by the GLA in later pre-application submissions and referable schemes; DDL encourages the GLA to include a specific clause of this nature within Draft Policy H6.

Draft Policy H7 – Affordable Housing Tenure

Draft Policy H7 establishes future tenure of affordable housing. The policy requires 30% low cost rented homes (Social Rent / Affordable Rent), 30% intermediate products (Shared Ownership / London Living Rent); with the final 40% to be determined by the relevant borough based on identified need. Whilst DDL are not opposed to this policy aspiration, it is important that the GLA recognise all factors contributing to the overall development viability, and apply an element of flexibility to the proposed tenure split if it results in the delivery of i) a higher provision of affordable housing, or ii) a more preferable housing tenure for the borough. As currently worded, Draft Policy H7 could be considered at odds with the aspirations of the affordable housing policies included within the borough's Development Plans. This is referenced within para. 4.7.1 – 4.7.2, but should however be incorporated into the policy wording of Policy H7.

Draft Policy H12 - Housing size and mix

Draft Policy H12 sets the parameters for housing sizes and mix across London. DDL is supportive of Draft Policy H12c which states that Boroughs should not set prescriptive dwelling size mix requirements (in terms of number of bedrooms) for market and immediate homes. This is ultimately determined by the market and residential development, and as such, this element of flexibility is welcomed.

The wording of Draft Policy H12 is however still at odds to the supporting commentary detailed at para. 4.12.5 which states “*while one-bedroom units play a very important role in meeting house need, and provision in new developments can help reduce the pressure to convert and subdivide existing larger homes, one-person and one-bed units are the least flexible unit type. Thus, unless supported by a borough as meeting an identified need, schemes consisting of over 10 units which mainly comprise of one-person / one-bed units should be avoided to ensure that there is a mix of unit sizes*”. The approach of the London Plan establishing its own prescriptive view on housing mix is fundamentally contrary to Policy H12c which advises against prescriptive dwelling size mix requirements. DDL therefore request that this draft policy wording is reviewed.

DDL are disappointed that the London Plan does not include a review of the national minimum space standards within higher density developments in London, as this could support methods of delivering more innovative styles of housing; particularly on constrained or challenging sites.

f. The Draft London Plan – Chapter 5 ‘Social Infrastructure’

Draft Policy S1 – Developing London’s social infrastructure

DDL welcomes the Mayor’s objective to secure greater provision of social infrastructure across London; particularly Draft Policy S1C which offers support for development proposals which provide high quality, inclusive social infrastructure that addresses a local or strategic need – for example school provision. It is however crucial that the provision of such infrastructure, which often incurs significant costs to the developer either via the provision of land or S106 contribution, is recognised within the development proposal’s financial viability appraisal and the impact that this is likely to have on scheme viability and affordable housing. At present the requirements and aspirations of Draft Policy S1 do not directly correlate with the threshold approaches proposed in Draft Policy H6 – please refer to specific text in relation to this policy below.

Draft Policy S2 – Health and social care facilities

DDL wish to express the same concerns to Draft Policy S2 as noted above to Draft Policy S1.

Draft Policy S3 – Education and childcare facilities

DDL wish to express the same concerns to Draft Policy S3 as noted above to Draft Policy S1 and S2.

g. The Draft London Plan – Chapter 6 ‘Economy’

Draft Policy E3 – Affordable Workspace

Draft Policy E3 sets out the GLA’s approach to affordable workspace in London. Para. 6.3.1 defines affordable workspaces as workspace that is provided at rents maintained below the market rate for that space for a specific social, cultural, or economic development purpose. It advises that it can be provided directly by a public, charitable or other supporting body; through grant and management arrangements; and / or secured permanently by planning or other agreements.

Clause A of Draft Policy E3 advises that in defined circumstances, planning obligations may be used to secure affordable workspace at rents maintained below the market rate for that space for a specific social, cultural or economic development purposes.

DDL is supportive of the Mayor’s aspiration to establish more affordable workspace across London; and it can be considered within the Dagenham Dock site. However, compared to much of Greater London, workspace rates are already relatively low and further subsidisation against localised rates may not be practical or viable. DDL object to the requirement of Draft Policy E3, Clause F which requires ‘*affordable workspace elements of a mixed-use scheme to be operational prior to residential elements being occupied*’. It should be recognised that whilst best endeavours will be sought to ensure commercial spaces are operational prior to occupation, this is not always commercially feasible. At an absolute minimum, the Policy E3 should define ‘*operational*’ within the context of Policy E3.

The provision of affordable workspace should also be a key consideration in the development of Financial Viability Appraisals which support development proposals, and specifically in the context of Policy H5 and H6. The London Plan should acknowledge that in some cases, the provision of affordable workspace may be more attractive to a borough, and more important in a particular development proposal (i.e. assisting with local demand and placemaking) than the provision of affordable housing.

Draft Policy E4 – Land for industry, logistics & services to support London’s economy

Draft Policy E4 clearly defines London’s land and premises for industry, logistics and services within three categories: Strategic Industrial Land (‘SIL’), Locally Significant Industrial Land (‘LSIL’) and, Non-Designated Industrial sites (‘NDIS’). Whilst DDL understand the GLA’s principle objective to ensure that retention and provision of industrial capacity across the three categories is planned, monitored and managed, it is essential that the GLA consider this (and any linked strategic planning policies – i.e. affordable housing) in the context of the individual borough’s emerging Developments Plans.

Draft Policy E5 – Strategic Industrial Locations (SIL)

Table 6.2 of the draft London Plan defines Barking and Dagenham as a borough where limited release of industrial land is acceptable. The purpose of Figure 6.2 and Table 6.3 is to define London’s SILs. However, the diagram at Figure 6.2 is unclear, with no further definition or refinement provided within Table 6.3. In the case of DDL’s commercial asset, it is assumed that the Dagenham Dock site falls outside of the SIL ref. 32 ‘Dagenham Dock / Rainham Employment Area’ as it is located north of the A13 and previously defined as LSIL in the London Borough of Barking and Dagenham Core Strategy (2010). DDL therefore request that on the final publication of the new London Plan, the document is supported by more detailed maps which clearly define the extent and boundaries of London’s SILs. This will remove any future ambiguity and uncertainty regarding strategically defined land uses.

Draft Policy E6 – Locally Significant Industrial Sites (LSIL)

On the basis that DDL’s commercial asset at Dagenham Dock is LSIL, our client’s attention is drawn to Draft Policy E6, focussed on the Capital’s locally defined industrial land. DDL feel that it is important that the Mayor does not simply safeguard industrial land in existing locations. Whilst it is positive that the Plan seeks net retention of industrial land within London; it should be recognised that the most appropriate locations are not always those that are currently in industrial use. In many areas these sites are central to areas of considerable change and regeneration. In these scenarios, the industrial land should be consolidated to more strategic locations within the borough with better access to the strategic road and rail network.

Whilst it is acknowledged that LPA Development Plans progress against different timeframes, a clause must be included within Draft Policy E6 which allows development proposals to be considered against emerging Development Plans and Frameworks for the London Boroughs. DDL’s land at Dagenham Dock has been defined within the draft London Borough of Barking and Dagenham Local Plan for release from a LSIL designation since early 2015, with the LPA clearly demonstrating that the land was surplus to industrial requirements. This was also reflected within the GLA’s London Riverside Opportunity Area Planning Framework which was published in September 2015. DDL’s business plan shares this vision for the site.

Accordingly, DDL object to the current wording of Draft Policy E6 and encourage the GLA to incorporate a clause which facilitates the release of land from LSIL where the LPA identifies environmental, economic and social advantages to residential-led mixed use development in areas where the acute demand for housing significantly outweighs the retention of the LSIL for employment uses. This should be considered in the same context as the supporting text at para. 6.6.1 which allows for the designation of new LSILs on the basis of a robust evidence base. This would also prevent conflict with planning decisions which have been made prior to the adoption and implementation of the new London Plan.

For example, in the case of DDL’s land at Dagenham Dock, land immediately east at Beam Park has previously been released by the GLA and the London Borough of Barking and Dagenham from industrial / employment uses to facilitate residential-led, mixed use development by Countryside Partnerships and L&Q – which is currently subject to planning application ref: 17/01307/OUT. Further, the land immediately west of the Dagenham Dock site, owned by Aviva is also subject to a residential

based planning application (ref: 17/01752/REM and 17/02111/FUL). Taking account of recent planning decisions, it would not be appropriate in this location to insist on the retention of employment uses on this former LSIL site; a use which would not be complimentary to recent residential planning consents on neighbouring sites.

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

Draft Policy E7 seeks to consider options for the intensification of logistics, industrial and related-functions on industrial sites, in addition to the colocation of industrial and residential uses. At this stage, DDL strongly object to Draft Policy E7c which states that the intensification or consolidation of LSIL is only acceptable as part of a Masterplanning process in collaboration with the GLA or relevant borough, and not through ad-hoc planning applications. The Draft London Plan pays no regard to development proposals that have been progressing and subject to pre-application discussions under the previous London Plan and subsequent Opportunity Area Planning Frameworks (for example the London Riverside OAPF). The requirement for extensive masterplanning beyond that already established in the Planning Frameworks will detrimentally impact on the progression and subsequent delivery of strategic schemes in London.

Further, the consideration of co-located industrial and residential development on LSIL sites is unlikely to work in practice due to physical and financial constraints. The demand for such sites and space will be driven by alternative forms of industrial space in the borough. DDL believe that at this stage, insufficient research and a supporting evidence base has been conducted by the GLA to demonstrate the practicalities of colocation and the attractiveness to the market.

h. The Draft London Plan – Chapter 10 ‘Transport’

Draft Policy T5 – Cycling

DDL supports the approach to sustainable travel established within Draft Policy T5. DDL also welcomes the inclusion of Draft Policy T5C which allows for alternative forms of cycle parking provision to be provided where it is not possible to provide adequate cycle parking within residential developments. This clause allows for an element of flexibility on challenging development sites, and in some cases, a means of offering a more innovative approach to cycle parking provision.

Draft Policy T6 – Car parking

DDL supports the aspirations of Draft Policy T6 and Table 10.3 which seek to reduce the level of car parking delivered on future development proposals. DDL also supports Draft Policy T6H which only allows boroughs to adopt alternative local standards for schemes in PTAL areas 0-1 as this will assist in removing conflict between the GLA and boroughs throughout the planning process; thus, removing uncertainty throughout the design process.

i. Summary

Thank you for providing our client with the opportunity to formally respond to the draft planning policies proposed within the Draft London Plan. Whilst DDL is supportive of the Mayor’s aspiration to deliver additional homes and employment opportunities across the capital, DDL has concerns that many of the detailed policies within the Draft London Plan are currently contrary to one another in terms of their strategic objectives.

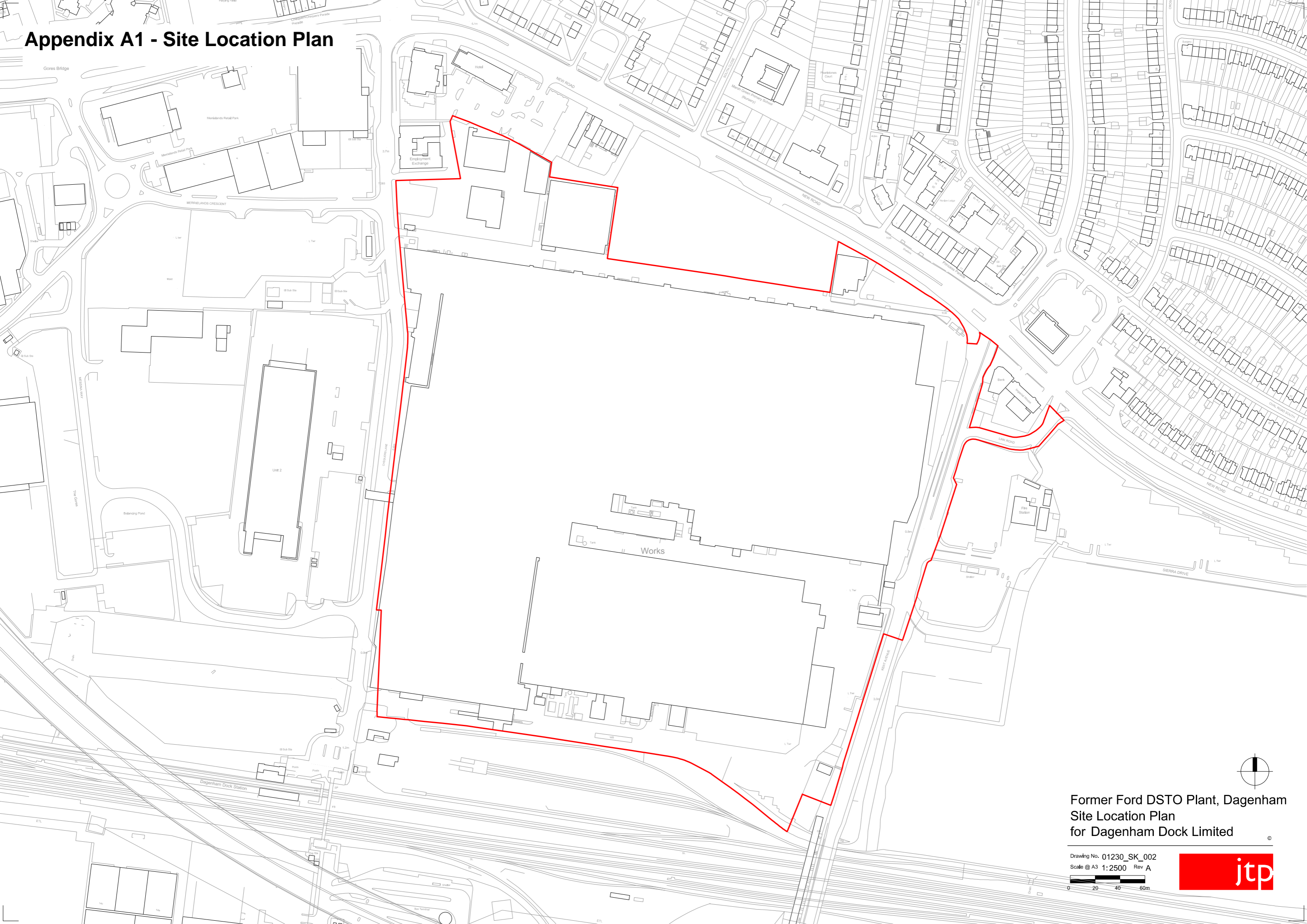
We trust that this feedback is helpful at this stage. We request that Iceni, on behalf of our client DDL are kept informed of future progress and timescales associated with the preparation of the new London Plan. As noted above, it is our intention to meet with the GLA’s Strategic Planning team in March 2018 to discuss the emerging development proposals for the site further. If you require anything further at this stage, then please do not hesitate to contact Iceni

Yours sincerely,

Jayme McArthur
DIRECTOR

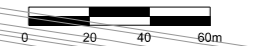
cc. Steve Taylor – Dagenham Dock Limited
Ralph Salmon – Dagenham Dock Limited
Hugo Black – Dagenham Dock Limited
Alex Druttman – Dagenham Dock Limited
Pat Hayes – Be First

Appendix A1 - Site Location Plan



Former Ford DSTO Plant, Dagenham
Site Location Plan
for Dagenham Dock Limited

Drawing No. 01230_SK_002
Scale @ A3 1:2500 Rev A



Appendix A2: Former DSTO Site – Planning History

Reference	Description of Development	Status
16/01323/PRIOR4	Application for prior notification of proposed demolition of old and new press shops, central work shop, former wheel plant and new tool room and associated buildings and structures including basement area.	Approved. Works completed.
16/01737/PRIOR4	Application for prior notification of proposed demolition of the Boiler House in the centre, the Old Press Shop (including the Wheel Plant and New Tool Room), conveyor lines building, the New Press Building located along the southern boundary, the Production Line building and ancillary offices located in the south-west and north-west corners of the site respectively.	Approved. Works completed.
17/00232/FUL	Engineering operations to excavate, break up and grade concrete and tarmac structures, including ground floor slabs and hardstanding (Phases A & B) and basement floor slabs and walls (Phase B, only); decommissioning and removal of underground structures/services including underground storage tanks, oil filled chambers and pits, interceptors and below ground pipework, remediation including on site bio-remediation techniques of contaminated soil, and backfilling to return levels to existing site levels, together with other ancillary works (Phases A & B).	Approved. Works commenced.
17/02018/FUL	Planning application for the importation of fill and formation of an engineered platform.	Pending determination by Be First.