

Initial Planning Note

Land at Kier Hardy Way

September 2023

BeFirst

This note has been prepared by the Be First Planning Consultancy Team to consider the planning context of the site known as 'land at Kier Hardy Way' and its potential for residential re-development. This is an initial, desk-based, high-level advice note only. To date, no consultation has been undertaken with the Council (as Local Planning Authority), local stakeholders, or any statutory consultees and no site visit has been undertaken. Further work is recommended, as set out at the end of this Note.

Site address: Land at Kier Hardy Way, Barking, IG11 9NU.



Figure 1: Site location plan

Site area: c. 0.17 hectares.

Existing use: Garages and hardstanding used for car parking (Sui Generis).

Proposed use: Residential (Class C3).

PTAL: 1b (low, on a scale of 1a – 6b where 1 is the lowest). The site is located 0.5-miles from Upney Station (10-minute walk), providing access to District line services to Barking, Central London and Dagenham.

Site background and key planning policies

Site planning history:

There are no planning records for the site on LBBD's online planning register. The site's planning history is neither a useful precedent for its future development, nor precludes it.

Planning designations:

The London Borough of Barking and Dagenham ('LBBD') are in the process of preparing a new Local Plan. The plan has reached the examination stage, and in line with NPPF paragraph 48 can be afforded

significant weight in the determination of planning applications. The planning review below therefore considers the emerging planning context for the site.

- The site is to be allocated for Housing and Housing-Led Mixed Use Allocations (site YG Garages at Kier Hardy Way);
- The entire site is located within Flood Zone 1 (Low Risk); and,
- None of the existing buildings are listed, either statutorily or locally, and the site does not fall within a conservation area.

Key planning policies:

- London Plan Policy D3 expects new development to optimise site capacity, utilising a design-led approach to determine appropriate form of development, infrastructure requirements and to ensure development is of High Quality and inclusive design, and is responsive to a sites context.
- London Plan Policy T6 specifies maximum car parking standards in this location (outer London, PTAL 1b) of up to 1.5 spaces per unit.
- London Plan Policy T5 specifies minimum cycle parking standards of: 1 space per 1 bed-1 person dwellings, 1.5 spaces per 1 bed- 2 person dwellings; and, 2 spaces for all other dwellings, plus 2 spaces for proposals upto 40 dwellings, and 1 visitor space per 40 units thereafter.
- Emerging Local Plan policy SP3 supports the optimal delivery of new homes, particularly focussed in the identified Transformation Areas and Site allocations, and seeks a 50% strategic target for Affordable Housing provision on private sector housing schemes.
- Emerging Local Plan policy SP2 promotes high-quality design led approaches to development, with focus on optimising density and site potential.
- Emerging Local Plan policy DMH1 expects residential development of 10+ units to provide maximise the delivery of Affordable Housing in line with Policy SP3, and through applying the threshold approach to viability in accordance with London Plan Policy H5.
- Emerging Local Plan policy DMH2 requires development proposals to provide a range of unit sizes, in line with the council's SHMA or subsequent housing needs evidence.
- Emerging Local Plan policy DMH4 is supportive of purpose-built shared housing where it needs the London Plan Policy H16 expectations and relevant space standards, and meets an identified need in the borough.

Planning obligations / CIL

CIL is charged based on the net uplift in floorspace, and for residential uses in this location ('rest of borough' band) is chargeable at the following rates:

- London Mayoral CIL £25/sq m + indexation; and,
- LBBD CIL £10/sq m + indexation.

There is relief from CIL for affordable housing.

Initial planning analysis:

Existing use

The site currently comprises hard standing used for car parking (see photo of site in Figure 2 below).



Figure 2: Google streetview of site (image captured 2008)

Garages and car parking are sui generis uses. There are no local or regional planning policies which specially deal with the loss of garages; therefore, their loss will be considered on a case-by-case basis. The loss of this facility could displace some car parking, which is highly likely to be a sensitive concern for local residents (this issue has been highlighted recently on the nearby Margaret Bondfield Avenue proposal).

A transport consultant should be instructed at an early stage to assess parking stress on local streets and advise if there is sufficient capacity to accommodate any displacement, in addition to any new demand created by the development proposal.

A balanced judgement will then need to be made between the loss of the use/potential impacts on the local highways and the public benefits of any new proposal. Positive consideration will be given to uses, like residential (particularly affordable residential), which meet an acute identified local need.

Principle of residential use

The Site is allocated for residential development and is situated within the Barking and River Roding Transformation area where the principle of new development is supported. Should the loss of the garages/parking be demonstrated to be acceptable then the principle of new residential accommodation will be strongly supported in planning policy terms.

As this site is public ownership, a minimum 50% of habitable rooms should be affordable. The affordable housing is expected to be split: 30% low cost rent (social rent or London affordable rent); 30% intermediate (London living rent or shared ownership) or low-cost rent; and, 40% borough-defined affordable housing. This will be subject to site specific considerations and financial viability.

Current local policy expects housing size mix to accord with the Council's preferred mix (as informed by SHMA); however, the final unit mix for this site should be based on site-specific considerations and current housing need. There are significant material considerations which will be considered by the case officer.

Design considerations

In terms of design, the following should be considered:

- The new London Plan expects a site's density to be informed by design, proportionate to the site's connectivity and accessibility by walking, cycling and public transport to jobs and services. The site

has a low PTAL (1b) with closest local services a 10-minute walk away on Lodge Avenue which will impact on the density that can be achieved.

- An architectural feasibility study should explore options to maximise the massing of the Site while ensuring any proposals do not detrimentally impact neighbouring amenity, nor overly dominate the streetscape/skyline. We consider that the site will be able to accommodate 3 – 4 storeys, subject to how this sits within the surrounding area;
- 10% of new units should be designed to confirm to Building Regulations M4(3) for wheelchair users, with the remaining conforming with Building Regulations M4(2).
- Children's play equipment will need to be provided in accordance with the Mayor's Play and Informal Recreation SPG.

Parking and highways considerations

Planning policy acknowledges the need for some car parking in outer London locations with poor PTALS. The approach, however, should be to promote sustainable modes of transport including car lite and car free principles, and discourage car parking provision utilising other mechanisms (such as car clubs). A specialist transport consultant should be instructed to advise on the appropriate level of car parking which will be required given the local nuances which will need to be considered.

Sufficient provision will need to be made for disabled car parking (min 3%, with flexibility to increase to 10% if required). A minimum 20% of all car parking spaces should be for electric vehicles, with passive provision for all remaining spaces.

Cycle parking should be provided in accordance with the new London Plan standards and designed in accordance with the London Cycle Design Standards guidance.

Technical and environmental considerations

The site benefits from being located in a low flood risk zone; nonetheless, drainage will need to be provided to achieve greenfield run-off rates. The drainage strategy should consider the London Plan's drainage hierarchy to promote the most sustainable drainage strategy possible.

Any new residential proposal will need to be zero carbon and designed in accordance with the London Plan's energy hierarchy. A minimum 10% of carbon savings should come from energy efficiency measures alone. If it is not possible to achieve zero carbon on-site then any shortfall will attract a financial contribution to be made towards off-setting schemes.

A Preliminary Ecological Appraisal should be instructed to investigate if the site provides habitat to any important species, this is particularly relevant for this site due to the site's proximity to the Rippleside Cemetery, a Site of Importance for Nature Conservations (SINC).

**Be First Planning Consultancy
September 2023**