Voices for Housing Justice Community Coalition's formal representation to the Draft London Plan consultation: Response on the London Riverside Opportunity Area

By email: londonplan@london.gov.uk
Consultation deadline: 5.00 pm, 15 October 2026

Dear London Plan Team,

Voices for Housing Justice is a coalition of residents and local organisations concerned about housing in Barking and Dagenham. This is our shared response to the Draft London Plan, focused on the London Riverside Opportunity Area and its implications for our borough. It also draws on concerns discussed at the Just Space network meeting on 22 July 2026.

We support new homes and jobs. However, the proposed scale of growth needs a credible, funded plan for affordable housing, transport, health services, community facilities and environmental protection, with residents able to hold those responsible to account. Without these safeguards, development will continue to create value while residents and public services bear the costs of incomplete delivery.

The Opportunity Area includes Barking town centre, Barking Riverside, Thames Road and Creekmouth, Castle Green and Dagenham Dock, as well as land in Havering. Annex E identifies capacity for more than 38,000 additional homes and 31,400 jobs by 2050. These figures need an integrated and enforceable delivery framework for the Barking and Dagenham part of the area, identifying responsible bodies, funding, deadlines and milestones. Progress and failures should be reported publicly, with clear action where commitments are missed.

London Riverside has been designated for growth since 2004, with repeatedly increased targets. Delivery has fallen well behind those ambitions, and the proportion of genuinely affordable and social rented homes has been inadequate. The GLA should publish an evaluation of delivery since designation before assuming that further growth will produce better outcomes. This should include existing permissions and unbuilt schemes, rather than treating additional allocations as a substitute for delivery.

The Plan must distinguish assessed housing need from development capacity. Identifying land for homes does not establish that the homes proposed will meet the needs of people on housing waiting lists or in temporary accommodation. The proposed 20 per cent affordable housing threshold for outer London is especially weak when the Draft Plan acknowledges that around 60 per cent of assessed housing need is for affordable housing. The GLA should explain how lower site thresholds can achieve its 50 per cent strategic ambition and identify the public investment needed to close the gap. Affordability must reflect local incomes, with a separate, measurable social rent target and clear requirements for family homes and bedroom sizes based on need.

Developer viability assessments should be published and independently scrutinised, with boroughs given the resources to challenge them. Policy should not repeatedly lower affordable housing or infrastructure requirements to preserve developer returns. Build-to-rent, student accommodation and co-living proposals should be tested against assessed local needs and their contribution to secure, genuinely affordable homes.

Barking Riverside illustrates these wider problems, although our concerns extend across the borough. Barking Riverside Limited has significant influence over the development and stewardship of a neighbourhood planned on the scale of a small city. Residents have faced long delays to promised health and community infrastructure, heating and water problems, concerns about affordability and service charges, and limited transparency and influence over governance. Additional homes at greater densities make these unresolved issues more urgent. Accountability and delivery must be addressed alongside density.

Describing Barking Riverside as a Healthy New Town or a platform for social infrastructure does not demonstrate that those promises have been fulfilled. Before further major phases proceed, there should be an independent, public review of what has been promised, funded and delivered. This must cover affordable housing, health provision, schools, community space, utilities, transport, service charges, environmental commitments, community assets and resident governance, with a timetable for addressing failures.

The Plan should judge density and building height against local housing needs, transport capacity, infrastructure and residents' health. Optimising land must not become an instruction to maximise unit numbers. Strong, enforceable standards are needed for space, daylight, ventilation, overheating, outlook and safe means of escape, including scrutiny of single-aspect flats. Family housing and neighbourhood quality must carry weight in decisions about built form.

London Riverside is presented as a connected growth corridor, yet essential transport remains uncertain. The Overground extension is important but insufficient for an Opportunity Area of this scale. Cross-river public transport, Beam Park station, safe walking and cycling routes, and reliable connections to town centres, jobs and services need firm commitments, funding and delivery dates. Housing phases should not run ahead of this infrastructure. The GLA should also explain how cross-boundary coordination with Havering and the wider South East will support delivery.

Thames Road, Creekmouth, Dagenham Dock and the Sustainable Industries Park support employment and essential industrial activity. Intensification should protect existing businesses and secure measurable commitments on local jobs, pay, training and procurement. It must manage conflicts between homes and industry and reduce residents' exposure to pollution. A headline jobs target does not establish who will benefit.

Climate resilience must be a binding condition of growth. Much of the riverside is low-lying and exposed to flooding, overheating and poor air quality. The Plan must protect biodiversity and ecological connections, complete the Thames Path and safeguard Ripple Nature Reserve and Footpath 47. It should prioritise repair and retrofit, minimise demolition and embodied carbon, and ensure new and existing homes can withstand extreme weather.

We support stronger green space protection, but it must cover small local spaces and ecologically valuable sites as well as large parks. A site's nature conservation value does not depend on public access. Protection must not rely solely on formal designation or allow valued spaces to disappear while borough inventories remain outdated. Communities need a clear route to nominate spaces for protection and challenge omissions. A no-net-loss approach should preserve local access and ecological function, rather than justify replacement elsewhere.

Residents also need protection during construction. Large developments can mean years of noise, dust, vibration, disrupted routes and loss of access. The Plan should require assessment of cumulative impacts across phases and neighbouring sites, enforceable controls, public monitoring and an effective complaints and enforcement process.

Growth will not affect everyone equally. Rising rents, service charges and land values can displace lower-income residents, community organisations and local businesses. Equality and environmental justice assessments must shape development from the outset, addressing differences of income, ethnicity, disability, age, migration status, language and tenure. Existing council and social housing estates should not be treated simply as land for meeting targets. Repair and retrofit should be prioritised, with safeguards against displacement and any net loss of social rented homes, alongside meaningful resident consent where redevelopment is proposed.

Character studies and place visions must be co-produced with residents, recognising community-led plans and lived experience as evidence. The Plan should explicitly retain communities, equality and participation as strategic priorities, with enforceable duties rather than assurances that these concerns are embedded elsewhere. Consultation must include plain-English summaries, accessible and non-digital options, and a clear account of how residents' proposals affect decisions. Residents and independent community organisations need a formal role in ongoing governance. Community land trusts and community ownership of land and buildings should enable local people to retain a lasting stake in regeneration.

We therefore ask the GLA to amend Annex E and the relevant policies so that the London Riverside Opportunity Area:

- has a transparent, funded delivery framework for its Barking and Dagenham component, with named responsibilities, milestones, public monitoring and an evaluation of delivery since 2004;

- makes housing phases conditional on timely delivery of transport, health, education, utilities, community space and green infrastructure;
- replaces the 20 per cent threshold with stronger requirements linked to local incomes and assessed need, including separate social rent targets, family housing requirements and a credible funding plan;
- requires independent scrutiny of viability claims and a public review of existing commitments and resident outcomes before substantial additional development at Barking Riverside;
- protects housing quality, prevents displacement and loss of social rented homes, safeguards employment and community space, and secures measurable local jobs and training benefits;
- makes equality, environmental justice, flood resilience, retrofit, air quality, biodiversity and protection of valued open spaces binding requirements, regardless of public access or gaps in designation;
- controls cumulative construction disruption and provides effective monitoring and enforcement; and
- restores explicit commitments to communities and participation, gives residents a formal governance role, and supports community land trusts and community ownership.

The London Riverside vision should be judged by whether residents across Barking and Dagenham can secure affordable, healthy homes, access services and shape their neighbourhoods. We ask that this letter be accepted as the Voices for Housing Justice Community Coalition's formal representation to the Draft London Plan consultation.

Yours sincerely,
Voices for Housing Justice Community Coalition

Participating groups and resident support as per below

Thames Life CDT (convenor)
BD Community Research Network
Friends of Footpath 47
BD Heritage & Conservation Group
BD Community Research Network
BD Resident Planning Forum
Thames Life CDT
BD Resident Planning Forum
Barking Food Forest
Thames Life CDT
Thames Life CDT
Resident Planning Forum
Barking Sports 4 Change
Independent Living Agency

Future Molds Communities Youth Forum
B&D Youth Health Ambassadors
On the Rock Ministries
Resident Planning Forum
Resident Planning Forum
BD Community Research Network
London Community Infrastructure Network
Christ Church, Thames View
Ripple Effect
Ripple Effect
Humdum UK Community Interest Company
Environmental Community Development Worker
BD Community Research Network
Barking Food Forest
Mothership
Aspire Action Community Interest Company
BD Community Resource Network
Citizens Advice Barking & Dagenham