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**Barking &  
Dagenham**

**London Borough of Barking and  
Dagenham**

# **Main Modifications Consultation Summary Report**

Prepared by Be First  
September 2024

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# Chapter 1

## Introduction

**1.1** Be First, on behalf of the London Borough of Barking and Dagenham (LBBD), consulted on proposed Main Modifications to the Barking and Dagenham 2037 Local Plan between 19<sup>th</sup> February 2024 and 14<sup>th</sup> April 2024, receiving 30 individual responses.

**1.2** The purpose of the Main Modifications consultation was to consult on the modifications proposed for soundness and general conformity purposes.

**1.3** During the consultation, the Council consulted with a range of stakeholders, including both statutory and non- statutory bodies and local communities, in order to seek views and feedback on the proposed initial main modifications to the draft Barking and Dagenham 2037 Local Plan. The consultation was carried out in accordance with Regulation 19 of the *Town Planning and Country Planning (Local Planning) (England) Regulations 2012* (Regulation 19).

**1.4** The proposed Main Modifications to the Barking and Dagenham Submission Local Plan follow on from the Initial Main Modification consultation, which ran from 22<sup>nd</sup> June 2023 to Monday 7<sup>th</sup> August 2023; the Regulation 19 (1) consultation, which ran from 5<sup>th</sup> October to 29<sup>th</sup> November 2020; and Regulation 19 (2) consultation, which ran from 11<sup>th</sup> October to 28<sup>th</sup> November 2021 (as well as two prior rounds of Regulation 18 consultation).

**1.5** This report contains a summary of the consultation and is prepared in accordance with Regulation 19. It provides an summary of the consultation responses received; and considers how these responses should be taken into consideration to inform the next iteration of the Local Plan. The key points to note are:

- All comments received have been read, and key points noted. Not all the individual points raised are included in the summaries. The summaries identify key themes raised and the general level of support for each.
- The value of the comment relates to its content, rather than how many times it has been said. This summary therefore does not quantify the number of comments received raising particular points.
- Summaries present the information as received. If a summary is considered not to be factually correct, the Council will check and verify information accordingly where required as part of the ongoing Local Plan process.
- The Council/Be First must operate within the General Data Protection Regulation (GDPR). Therefore, the addresses and contact details of individuals who have responded to the consultation are not published.

## Chapter 2

### Consultation Methods

2.1 The Council applied a range of consultation mechanisms to allow people to share their views through their preferred method. Consultation mechanisms included:

- Online resources;
- Direct e-mail correspondence;
- Social media
- Plan available for viewing in Dagenham Library and Barking Town Hall

The details are set out below.

#### Online Resources

There is a dedicated webpage providing updates on the development of the draft Local Plan which informed the public of the initial main modifications consultation. The website also hosts the latest Local Plan evidence-base documents and provides a link to the Local Plan examination website.

Link to the Council's website:

<https://www.lbbd.gov.uk/planning-building-control-and-local-land-charges/planning-guidance-and-policies/local-plan>

<https://yourcall.befirst.london/examination-library>

<https://yourcall.befirst.london/submission-documents>

#### Direct Email Correspondence

Emails were sent to all statutory and non-statutory consultees on the Council's planning policy database.

#### Social Media

A variety of methods were used to engage with the public, including:

- Post on Be First's Social Media
- Posts on LBBDD's Social Media
- Advertised in the Council's weekly Citizen's Alliance Network newsletter

#### Plan available for viewing in Dagenham Library and Barking Town Hall

Copies of the documents being consulted on, alongside new relevant evidence, were distributed to Dagenham Library and Barking Town Hall for members of the public to view.

## Chapter 3

### Overview of Consultation Responses

**3.1** This section summarises the main issues and comments raised during the consultation process. A full summary of responses is available to view in **Appendix A** of this report.

**3.2** In total, the Council received written representations from 30 individuals or organisations.

**3.3** Responses were received via email and post. These responses came from:

- Individuals;
- Statutory Bodies;
- Developers;
- Landowners;
- Other interested parties

- The main points received are set out in the next chapter, alongside commentary from Be First (on behalf of Barking and Dagenham Council).

## Chapter 4

### Summary Table of Main Comments Received

The Main Modifications consultation for the Barking and Dagenham Local Plan took place for 8 weeks between Monday 19th February and Sunday 14th April 2024. Responses were received from 30 individuals/organisations. Responses are available to view on the examination website, however a summary of the main points raised is available below, alongside Be First commentary on behalf of the London Borough of Barking and Dagenham. Please note that due to the stage of the Plan during this consultation, commentary focuses on the changes required for soundness and general conformity with the London Plan 2021.

Representor	Summary of Comments	Commentary on behalf of LBBD:
Canal River Trust LP076	<ul style="list-style-type: none"> <li>No comments</li> </ul>	<ul style="list-style-type: none"> <li>None required.</li> </ul>
Natural England LP062	<ul style="list-style-type: none"> <li>No comments</li> </ul>	<ul style="list-style-type: none"> <li>None required.</li> </ul>
LB Redbridge LP085	<ul style="list-style-type: none"> <li>No comments</li> </ul>	<ul style="list-style-type: none"> <li>None required.</li> </ul>
Port of London Authority LP036	<ul style="list-style-type: none"> <li>No comments</li> </ul>	<ul style="list-style-type: none"> <li>None required.</li> </ul>
Environment Agency LP024	<ul style="list-style-type: none"> <li>Pleased to see changes taken on board.</li> </ul>	<ul style="list-style-type: none"> <li>None required.</li> </ul>
Be First (on behalf of Archway Group) LP048	<ul style="list-style-type: none"> <li>Support for adding proforma - site WC (Selinas Lane)</li> </ul>	<ul style="list-style-type: none"> <li>None required.</li> </ul>
Knight Frank (on	<ul style="list-style-type: none"> <li>Support removal of the SIL designation on the site.</li> </ul>	<ul style="list-style-type: none"> <li>None required.</li> </ul>

behalf of 1-8 Riverside Properties) LP132		
Peacock and Smith (on behalf of Devonshire Commercial Property) LP156	<ul style="list-style-type: none"> <li>• Pleased that B&amp;M site remains in Chadwell Heath Transformation Area and that remains a Tall Building Location + supportive of additional text work</li> </ul>	<ul style="list-style-type: none"> <li>• None required.</li> </ul>
National Highways LP094	<ul style="list-style-type: none"> <li>• No objection.</li> </ul>	<ul style="list-style-type: none"> <li>• None required.</li> </ul>
First Plan LP020	<ul style="list-style-type: none"> <li>• Supportive that SoCG amendments embedded. Addition of word 'infrastructure' missed in labelling of a Figure and request for this to be added. 'Rail Freight Facilities and Associated Rail <b>Infrastructure</b>'</li> </ul>	<ul style="list-style-type: none"> <li>• It is acknowledged that there was a text cut off in the image which means the word 'infrastructure' has not been shown. We would support its inclusion back into the labelling as per the wording in the Statement of Common Ground. This will be addressed as an additional modification on adoption.</li> </ul>
Network Rail LP123	<ul style="list-style-type: none"> <li>• Supportive that SoCG amendments embedded. Addition of word 'infrastructure' missed in labelling of a Figure and request for this to be added. 'Rail Freight Facilities and Associated Rail <b>Infrastructure</b>'</li> </ul>	<ul style="list-style-type: none"> <li>• It is acknowledged that there was a text cut off in the image which means the word 'infrastructure' has not been shown. We would support its inclusion back into the labelling as per the wording in the Statement of Common Ground. This will be addressed as an additional modification on adoption.</li> </ul>
Sport England LP067	<ul style="list-style-type: none"> <li>• Updated footnote required.</li> <li>• Request for amendment to phrasing - 'Any <b>expansion</b> on a playing field should have regard to the requirements of Sport England's Playing Field Policy' --&gt; 'Any <b>development</b> on a playing field should have regard to the requirements of Sport England's Playing Field Policy'.</li> <li>• Supportive of removal of Rugby Club Site allocation</li> </ul>	<ul style="list-style-type: none"> <li>• We agree that the footnote should be updated to reflect the latest Sport England webpage. This will be addressed as an additional modification on adoption.</li> <li>• We have no objection to the word 'development' replacing expansion. This will be addressed as an additional modification on adoption.</li> </ul>

<p>London Cycling Campaign LP157</p>	<ul style="list-style-type: none"> <li>• Welcome references to B&amp;D Cycling Strategy and correction of London Plan cycling referencing</li> <li>• Concern that Policies Map does not safeguard land for active travel</li> </ul>	<ul style="list-style-type: none"> <li>• We do not believe the proposed changes are required for soundness (see further comments below):</li> <li>• We do not think a change is required and the updated Fig 27 is sufficient at this stage of development.</li> <li>• Specific cycle routes and designs are usually developed with TfL involving consultation with local people and interest groups and then delivered as part of our LIPs (Local Improvement Plans) TfL award with associated planning/highway powers where needed.</li> <li>• As cycle routes are nearly always on borough or TfL highway land they do not need to be safeguarded in the Local Plan in the same way rail/tram or other schemes do which require more complex planning powers.</li> </ul>
<p>NHS Property Services LP073</p>	<ul style="list-style-type: none"> <li>• Welcome inclusion of several amendments that support healthy lifestyles</li> <li>• Request for future review of Plan and engagement to consider affordable housing for NHS/healthcare staff.</li> <li>• Further guidance on providing healthcare contributions should be included in the Planning Obligations SPD.</li> </ul>	<ul style="list-style-type: none"> <li>• None required.</li> <li>• We welcome further engagement with the NHS on affordable housing for NHS workers and on the Planning Obligations SPD.</li> </ul>
	<ul style="list-style-type: none"> <li>• Do not agree that, where viability is an issue, priority is given to affordable housing and transport.</li> <li>• Proposal to amend wording as follows: 4. Developments which cannot meet the Local Plan requirements because of viability impacts will be expected to provide evidence of this in a financial appraisal submitted as part of their planning application. If a financial appraisal demonstrates that planning obligations cannot viably be afforded, the Council will prioritise affordable housing, and necessary public transport and active travel improvements, <b>unless other infrastructure needs are demonstrated by technical assessments submitted with a planning application or infrastructure contributions are requested by statutory consultees or service providers. Where other infrastructure is demonstrated as needed or is requested, it should be prioritised with affordable housing or public transport.</b> There is an expectation that contributions will be made to</li> </ul>	<ul style="list-style-type: none"> <li>• We do not think the additional text proposed for paragraph 4 of DMM 1 is necessary for soundness or effectiveness given it's covered by identified need set out in the sentence that follows and that the prioritisation of affordable housing and transport follows the London Plan (Policy DF1).</li> </ul>



	<p>healthcare, education infrastructure, affordable workspace and culture and leisure facilities where there is an identified need. Contributions to employment and sustainability will continue to play a significant role in S106 agreements.</p>	
	<ul style="list-style-type: none"> <li>• More flexibility requested with requirements around resisting net loss of existing social and community facilities. Following changes requested to Part 1 Draft Policy DMS 1:             <ol style="list-style-type: none"> <li>1. Development proposals involving the net loss of existing social and community facilities (excluding sports facilities, playing fields, and recreational buildings and land) will be resisted, unless:                 <ol style="list-style-type: none"> <li>a) the existing facility is being re-provided, whether on site or in a nearby location, that would continue to provide for and enhance the needs of existing local users</li> <li>b) there is no longer an identified need or demand for the existing use of the facility or use. In such circumstances, the applicant must provide robust documental evidence to demonstrate:                     <ol style="list-style-type: none"> <li>i. the loss of the facility or use would not lead to a shortfall in provision for the specified use for the community that it serves, and</li> <li>ii. active marketing has occurred over a period of not less than 12 months for its continuous use at a realistic price/rent which is supported by the Council, or</li> <li>iii. if the facility can be refurbished or used by multi occupiers to prevent the loss.</li> </ol> </li> <li>c) <u>development proposals where the loss of social infrastructure is part of a wider public sector transformation programme are excluded from the marketing requirements set out in Part a, and Part b clause ii and iii (and further detailed in clause 2 below).</u></li> </ol> </li> </ol> </li> </ul>	<ul style="list-style-type: none"> <li>• We are of the view the changes proposed in this response are more reflective of London Plan Policy S1 (F/F2) and therefore are needed for general conformity with the London Plan.</li> </ul>
<p>Healthy Urban Development Unit LP121</p>	<ul style="list-style-type: none"> <li>• Supportive of their requested amendments being embedded</li> <li>• Suggestion that clause J of DMM1 be separated into 2 clauses - one focused on health and the other on social and community infrastructure. Request that the wording on health facilities be broadened to secure mitigation of the impacts of development through sufficient contributions to expand existing facilities or provide additional/new facilities</li> </ul>	<ul style="list-style-type: none"> <li>• Whilst we acknowledge the separation of clause J in DMM1 could add clarity, we do not think it is a necessary change in terms of soundness.</li> </ul>

<p>Montagu Evans (on behalf of Aberdeen City Council Pension Fund) LP158</p>	<ul style="list-style-type: none"> <li>• Supportive of greater clarity on housing numbers/targets and that site capacities referenced as a minimum</li> <li>• Supportive of amendments to site WF boundary (97-131 High Road)</li> <li>• Do not think the new policy criterion in SP9 which implies that all major developments (which would include the Site) subject of a planning application should include an indicative masterplan to show how development would not prejudice adjacent sites is necessary. They are of the view that the proposed amendment should not apply to site allocations which are already subject to the various requirements listed under the allocation.</li> </ul>	<ul style="list-style-type: none"> <li>• The SP9 policy criterion referred to was discussed in the examination with regards to 'piecemeal development'. Our objective is to ensure development comes forward in a way that achieves the best results for placemaking (i.e., aiming for comprehensive and coordinated development). We do not believe there are soundness reasons for the proposed change to SP9 be made.</li> </ul>
<p>GLA LP008</p>	<ul style="list-style-type: none"> <li>• As currently written, it is the Mayor's opinion that the draft Local Plan is now in general conformity with the LP2021.</li> </ul>	<ul style="list-style-type: none"> <li>• None required</li> </ul>
	<ul style="list-style-type: none"> <li>• The conformity objection on proposed Traveller Site at Castle Green has been withdrawn due to clarity in wording around future review of the Plan being required to remove area from SIL but want future review wording strengthened</li> <li>• Release of SIL at Castle Green needs to be done through a Local Plan review - supportive that this has been noted, but should also be clear that the Masterplan will need signing off from the GLA</li> </ul>	<ul style="list-style-type: none"> <li>• We are of the view that main modifications consultation wording is clear that removing a site's SIL designation would require a further review of the Plan. Therefore, we do not believe there are soundness reasons for the proposed amendment.</li> </ul>
	<ul style="list-style-type: none"> <li>• Beyond 2029, housing targets based on 2017 GLA SHLAA - propose that some flexibility included to accommodate forthcoming GLA SHLAA which will set targets beyond 2029</li> </ul>	<ul style="list-style-type: none"> <li>• We are of the view that the proposed change is not necessary for soundness.</li> </ul>
	<ul style="list-style-type: none"> <li>• Housing shortfall should be made up by 2029 rather than over the entirety of the Plan in order to be in general conformity with the London Plan. Clarity on housing delivery for 2019/20 (first year of London Plan target) is also needed.</li> </ul>	<ul style="list-style-type: none"> <li>• We are still of the view housing shortfall should be made up over the entirety of the Plan and this was supported in the examination by the HBF given the positive approach the borough has to housing.</li> <li>• With regard to the 2019/20 year, as stated in the main modifications, Barking and Dagenham Council is projected to meet the entirety of the 2021 London Plan 2019-2029 housing target by the end of 2028/29.</li> </ul>

		<ul style="list-style-type: none"> <li>We think this point is clear and therefore we do not consider that amendments are required for soundness or conformity reasons.</li> </ul>
	<ul style="list-style-type: none"> <li>Advise LBBD to follow recent London Plan Guidance on Small Sites and Optimising Site Capacity</li> </ul>	<ul style="list-style-type: none"> <li>Whilst we have no objection to references to this guidance being included, we do not believe there are soundness or general conformity reasons to reference them in the Plan.</li> </ul>
	<ul style="list-style-type: none"> <li>Tall building definition differs from SOCG - advise it would be more practical to use the definition with measurements to the top of the building rather than the floor of the uppermost storey.</li> <li>Also advise to only use metres rather than storeys to avoid confusion.</li> </ul>	<ul style="list-style-type: none"> <li>We are of the view that a change to the tall building measurements definition referring to the top of the building is not necessary for general conformity or soundness as the definition in the main modifications reflect the London Plan (as discussed at the Hearings).</li> <li>However, LBBD would welcome the GLA's change providing it does not undermine soundness and assists future clarity and effectiveness of the policy. The GLA definition they have proposed is from the following guidance: (<a href="https://www.london.gov.uk/sites/default/files/2023-06/Characterisation%20and%20growth%20strategy%20LPG.pdf">https://www.london.gov.uk/sites/default/files/2023-06/Characterisation%20and%20growth%20strategy%20LPG.pdf</a> - section 2.4.4.).</li> <li>Whilst we would also welcome the reference to 21m (as per the guidance definition), we equally do not think that this is necessary from a soundness or general conformity perspective given it is in guidance rather than the London Plan.</li> <li>However, for effectiveness, we are of the view it would be clearer to stick to one form of measurement (i.e., metres rather than storeys as suggested by the GLA) so the measurement parameters are clear.</li> </ul>

<ul style="list-style-type: none"> <li>• Backdrop of 1 of London's strategic views run through northern most part of SPP4 and should be taken into account to avoid impact on vista</li> </ul>	<ul style="list-style-type: none"> <li>• We are of the view that the design and tall buildings policies are sufficient to address views and vista. We are therefore of the view the proposed changes are not required for soundness.</li> </ul>
<ul style="list-style-type: none"> <li>• Strongly advise the use of 'appropriate heights' rather than maximum heights for flexibility</li> </ul>	<ul style="list-style-type: none"> <li>• We are of the view that this change is needed for effectiveness and general conformity with London Plan Policy D9 (criterion B2) which refers to appropriate heights.</li> </ul>
<ul style="list-style-type: none"> <li>• MM4 and MM21 - references need to be 2019 not 2020 to align with London Plan housing target period</li> </ul>	<ul style="list-style-type: none"> <li>• We are of the view these changes are not necessary for soundness as the references to 2020 reflects the start of the Plan period (with references to the 2019/20 year also in place where required to reflect the London Plan housing target period)</li> </ul>
<ul style="list-style-type: none"> <li>• Affordable housing - proposed mod treats 35% as Mayor's housing target which is not correct - this is a threshold which sets a limit for fast track route. Word <b>threshold</b> should be included and applicants should be required to seek grant wherever possible to increase housing above threshold</li> </ul>	<ul style="list-style-type: none"> <li>• For general conformity, we are of the view that the word 'threshold' should be included as proposed. This would make it clearer this is not a target, but something that opens up the fast-track route.</li> </ul>
<ul style="list-style-type: none"> <li>• Inclusion of 'subject to viability' not consistent with Mayor's threshold approach - LBBD strongly encouraged to follow guidance in H10 of London Plan</li> </ul>	<ul style="list-style-type: none"> <li>• We are of the view that removing 'subject to viability' in MM24 is necessary for effectiveness to align with other policies in the Plan. This is because viability is a material consideration regardless so does not need to be specifically referenced in one policy. The GLA also cite London Plan H10 policy where viability is not a specific policy test.</li> </ul>
<ul style="list-style-type: none"> <li>• Reference to specific figures on oversupply of industrial land should be removed as could be misleading - LBBD rely on employment projections but this is just one part and lacks analysis of market trends and other aspects such as industrial land values.</li> </ul>	<ul style="list-style-type: none"> <li>• We do not think the removal of the oversupply figure is necessary for soundness as it links back to our evidence base.</li> </ul>

	<ul style="list-style-type: none"> <li>• Supportive of main mods that embed/amend text as agreed in the SoCG</li> </ul>	<ul style="list-style-type: none"> <li>• None required</li> </ul>
	<ul style="list-style-type: none"> <li>• Tall building locations do not correspond between Policy Map and new Figure 12</li> </ul>	<ul style="list-style-type: none"> <li>• Since receiving their submission, we have met with the GLA to gain further clarity from them on their comments regarding (new) Figure 12 and the tall building locations. From these discussions, it is clear there was a misreading of the new Figure 12. They now understand that our tall building locations have not changed from those agreed in the SoCG and that we have just added in the SPP areas as an overlay. No changes are deemed necessary to the tall building areas.</li> <li>• However, we did agree it would add clarity if the wording of (new) Figure 12 were to be simplified by removing references to '<b>buildings above 18m not being appropriate outside of tall building locations</b>'. We are of the view that this would improve effectiveness as it would be clearer that the focus is specifically on appropriate heights in the Tall Building Locations (and we are supportive of this generally in the main policy text too as per our commentary on the Hollybrook Homes representation).</li> </ul>

<p>TfL LP041</p>	<ul style="list-style-type: none"> <li>MM7 - Paragraph 4 should be corrected to show funding only from GLA and not the developer. The phrase 'business case' should also be removed to avoid any misunderstanding.</li> </ul>	<ul style="list-style-type: none"> <li>We acknowledge/support the correction to reference the funding provided is solely from the GLA. We are of the view this can be corrected through an additional modification to the Plan on adoption.</li> </ul>
	<ul style="list-style-type: none"> <li>Paragraph 5 assumes the 2019 'Review of bus services in London East Riverside' is an alternative to Beam Park Station- this is not the case as should the station not come forward, a further study will need to be undertaken.</li> <li>Propose wording changes below: <ul style="list-style-type: none"> <li>5. The Council strongly supports the new station. <del>However, if this isn't possible then growth could be supported by alternative public transport provision. A Transport for London study (Review of Bus Services in London East Riverside) found that the Beam Park development area would still be well-connected by public transport even without Beam Park Station<sup>22</sup>. The study found that the area would be within walking distance of Dagenham Dock station, which is on the c2 railway line. The study also found that there would be good bus connections to the area, including a new bus route that might be introduced to serve the Beam Park area. However, if Beam Park station is not secured, the developer will need to apply to lift the Grampian condition which would include discussions about potential alternative public transport provision.</del></li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>We are of the view the changes proposed by TfL to Paragraph 5 are needed for effectiveness to clarify the requirements on the developer regarding alternatives if Beam Park Station is not secured.</li> <li>We are keen to stress our support for the station, but also that should the station not come forward, there are other transport alternatives to serve the LBBD Beam Park developments.</li> </ul>

	<ul style="list-style-type: none"> <li>• Following amendments also proposed linked to point above: <p style="color: red;">6. <del>If Beam Park Station were not to come forward,</del> alternatives could include improved walking and cycling infrastructure, new <a href="#">walking and cycling pedestrian/cycle</a> bridges, and the use of bus connections. <a href="#">Additional public transport options will need to be identified to address capacity and connectivity constraints if Beam Park station is not delivered. Planning obligations must be secured to deliver agreed improvements to capacity and infrastructure.</a> There are currently two main proposals options for bus connections to Beam Park station:</p> <ul style="list-style-type: none"> <li>• <del>A shuttle bus service between Beam Park and Rainham and Dagenham stations</del></li> <li>• <del>Improvements to existing bus routes.</del></li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• We propose retaining the text as set out in the main modifications consultation as we are of the view the proposed changes from TfL here are not necessary for soundness. The alternatives were discussed at the hearing session which TfL were present at.</li> </ul>
<p>Barking and Dagenham Heritage Conservation Group LP049</p>	<ul style="list-style-type: none"> <li>• Constructing 20,000 homes on Barking Riverside along the 'River Thames' which is prone to flood risks will be an excessive strain upon local health, educational, transport, police, fire and other essential services, also a great amount of noise and air pollution would be created by having this large scale development here. The Thames Road area ought to be retained as mainly commercial and industrial for local employment and economic reasons rather than having 2,000 housing units within a location that is not environmentally suitable for residential schemes. These plans for 7,000 homes on Castle Green also need to be radically changed because of the sheer strain upon local infrastructure which would take place in already highly congested area.</li> <li>• The planned scheme for over 1,000 flats within the Hertford Road Wickes site also need to be totally changed due to the 'River Roding' flood risk that is becoming a much greater concern due to climate change.</li> <li>• Current estates such as Becontree, Harts Lane, Thames View and remaining parts of Gascoigne as well as other council housing should be retained as much as possible due to the fact that the current growing population has such a direct need for them as genuinely affordable local housing will always be a priority within Barking and Dagenham.</li> </ul>	<ul style="list-style-type: none"> <li>• We are of the view no amendments are required for soundness with regard to these comments (see further detail below):</li> <li>• We welcome and acknowledge these comments, however we do not think further changes to the Plan are required regarding them as each element has been considered.</li> <li>• We are of the view these are generally addressed through our evidence base (e.g., Sequential and Exceptions Test).</li> <li>• We also place an emphasis on affordable housing and Be First delivers a significant amount of this for the borough through council regeneration programmes.</li> <li>• We will, however, engage closely with resident groups/representatives in the implementation/delivery of the Plan and will arrange special de-briefings on adoption of the plan.</li> </ul>

	<ul style="list-style-type: none"> <li>• There should be a guaranteed protection for all community centres, libraries, public houses, locally and nationally listed buildings, industrial sites as well as shopping parades across this entire borough.</li> <li>• High rise tower blocks should be strictly limited for fire safety as well as environmental reasons and in terms of heritage there should be a strict rule regarding their construction in and adjacent to conservation areas and listed buildings.</li> <li>• There should be a policy of not building on any public parks, open green spaces and metropolitan open land areas. All protected trees within Barking and Dagenham should be preserved under any new local plan rules to ensure that air pollution is reduced within our borough too. I enclose certain documents to prove the case I am stating regarding this local plan as above: <a href="https://www.london-fire.gov.uk/safety/property-management/fire-safety-england-regulations-2022/">https://www.london-fire.gov.uk/safety/property-management/fire-safety-england-regulations-2022/</a> <a href="https://naturalengland.blog.gov.uk/2024/02/12/get-ready-for-new-biodiversity-net-gain-legislation/">https://naturalengland.blog.gov.uk/2024/02/12/get-ready-for-new-biodiversity-net-gain-legislation/</a></li> </ul>	
<p>Friends of Footpath 47 LP159</p>	<ul style="list-style-type: none"> <li>• Heritage Assets - MM17 should allow for updated heritage list to become available. In order for conformity with SP 6, there needs to be an amendment to MM17 to make it clear that the policy applies to <i>all</i> heritage assets and not just those in the council ownership. Additionally, local distinctiveness and character are vital to the borough's heritage, especially along the banks of the River Thames (navigation beacons, and wildlife habitat) and The lower reaches of the River Roding (wharves and reed-beds). MM17 should amended to reflect this. MM46 - There appears not to have been an updated version of the borough's revision Riverside Strategy for a considerable length of time. MM46 should contain a reference, along with suggestions for the borough's <u>own</u> Community Engagements (not led by the developer) in order to bring forward an updated version.</li> <li>• Insufficient reference is made in MM46 to the role by which the existing remnants of the former Inner Thames Grazing Marsh which are important flood alleviation ditches and watercourse channels (at The Goresbook, Buzzards Creek, the Ship and Shovel ditch, 'Ditch B', The Ripple Greenway,</li> </ul>	<ul style="list-style-type: none"> <li>• We are of the view no amendments are required for soundness with regard to these comments (see further detail below):</li> <li>• We welcome and acknowledge these comments, however we do not think further changes to the Plan are required regarding them as each element has been considered.</li> <li>• We are of the view these are generally addressed through our evidence base and policy.</li> <li>• We will, however, engage closely with resident groups/representatives in the implementation/delivery of the Plan and will arrange special de-briefings on adoption of the plan.</li> </ul>



	and the various water balancing lakes) at present contribute to the management of flooding.	
A. Thacker (resident) LP160	<ul style="list-style-type: none"> <li>• Flood risks in Thames Ward. The drainage dyke alongside the railway &amp; Wivenhoe Rd is completely overgrown making it inoperative. It joins the Mayesbrook River which drains into the river Roding, (behind the Wharf studios). This poses a serious flood risk and needs urgent attention.</li> <li>• Air Pollution in Thames Ward. This mostly emanates from the A13. Argue only solution is to tunnel the A13 from a point east of Gale st. and to surface west of the roundabout.</li> <li>• Argue there is a lack of engagement with residents.</li> <li>• Health Facilities not deemed adequate for the vastly increasing resident numbers.</li> <li>• Social Infrastructure provision not deemed adequate</li> </ul>	<ul style="list-style-type: none"> <li>• We are of the view no amendments are required for soundness with regard to these comments (see further detail below):</li> <li>• We welcome and acknowledge these comments, however we do not think further changes to the Plan are required regarding them as each element has been considered.</li> <li>• We are of the view these are generally addressed through our evidence base (e.g., A13 study, Sequential and Exceptions Test).</li> <li>• We will, however, engage closely with resident groups/representatives in the implementation/delivery of the Plan and will arrange special de-briefings on adoption of the plan.</li> <li>• A comment made on Gypsy and Travellers in the original response has been omitted from this summary/redacted from the published response as we do not feel it was appropriate.</li> </ul>
K. Hudson (resident) LP161	<ul style="list-style-type: none"> <li>• Concern raised over MM54 removing the reference to an Air Quality Impact Assessment for all major development within the borough in accordance with London Plan Policy SI 1.</li> <li>• The EU objectives that relate to Particulate Matter (PM), and especially Particulate Matter 2.5 should be included within MM54. There is no safe level or concentration of PM 2.5 where there is no adverse effect on the borough's population.</li> <li>• Planning Applications for incinerators require an Environmental Impact Assessment and the <i>cumulative</i> environmental impacts must be assessed.</li> </ul>	<ul style="list-style-type: none"> <li>• We are of the view no amendments are required for soundness with regard to these comments (see further detail below):</li> <li>• We welcome and acknowledge these comments, however we do not think further changes to the Plan are required regarding them as each element has been considered.</li> <li>• The reference to Air Quality Impact Assessments has been removed because we have instead clarified London Plan policy should be followed (which includes this reference but sets out more detail beyond this.)</li> <li>• We will, however, engage closely with resident groups/representatives in the implementation/delivery of the Plan and will arrange special de-briefings on adoption of the plan.</li> </ul>

<p>M. Hull (resident) LP162</p>	<ul style="list-style-type: none"> <li>Concerns raised on access to healthcare and fire risks associated with tall buildings and right to light.</li> <li>Concerns raised on flooding - Barking Riverside and Thames View are built on marsh land, Thames and River Roding flood plains. Yet they are being built on constantly reducing the ground that soaks up rainfall. It also affects the wildlife in the area which is being displaced. With climate change and increase of rainfall, these developments are at risk.</li> <li>There are limited properties for council tenants.</li> <li>Concerns over limited choice of properties besides flats in terms of mental health, wellbeing and anti-social behaviour</li> <li>There are limited community spaces where people can socialise.</li> <li>The police are already over stretched. There is little provision for police stations.</li> <li>Concerns over limited choice of shops and retail.</li> <li>The heritage of Barking is that of a fishing village. Barking and Dagenham have played a part in the heritage of the country yet this history and heritage is being neglected and lost.</li> <li>Concerns over jobs and industry being lost and will be lost by the developments.</li> </ul>	<ul style="list-style-type: none"> <li>We are of the view no amendments are required for soundness with regard to these comments (see further detail below):</li> <li>We welcome and acknowledge these comments, however we do not think further changes to the Plan are required regarding them as each element has been considered.</li> <li>We are of the view these are generally addressed through our evidence base (e.g., Sequential and Exceptions Test).</li> <li>We also place an emphasis on affordable housing and Be First delivers a significant amount of this for the borough through council regeneration programmes.</li> <li>We will, however, engage closely with resident groups/representatives in the implementation/delivery of the Plan and will arrange special de-briefings on adoption of the plan.</li> </ul>
<p>V. Narayan (resident) LP163</p>	<ul style="list-style-type: none"> <li>Strategic Policy SP8 and for the Sub-Area 2, Thames View and Barking Riverside: more needs to be included in the local plan, in particular the 'how' it should take place, with meaningful, documented and accountable efforts. This includes co-design with local residents on where is most suitable for social infrastructure and designing out crime.</li> <li>More needs to be done to safeguard the local history and heritage of sites such as refurbishment rather than demolition of the Farr Avenue Shopping Parade, including through securing Levelling up funding and recording history by erecting placards etc. describing the heritage of the local area.</li> <li>A better plan to connect developments at Thames Road with Bastable Avenue to ensure that the new and old communities are accessible and can opportunity for integration</li> </ul>	<ul style="list-style-type: none"> <li>We are of the view no amendments are required for soundness with regard to these comments (see further detail below):</li> <li>We welcome and acknowledge these comments, however we do not think further changes to the Plan are required regarding them as the aspects have either been considered or may be better worked towards through further engagement separate to the Plan process (e.g., food hubs)</li> <li>We are of the view the comments raised are generally addressed through our evidence base (e.g., Sequential and Exceptions Test).</li> <li>We are also working on updates to our Thames Road SPD which will set out more detail on the Thames</li> </ul>

	<ul style="list-style-type: none"> <li>• A better and more transparent communications steam with local groups, community religious and public, working in collaboration with Barking Riverside Limited and their planning team, with visible notes from meetings made publicly available and to plan alongside them, rather in silos.</li> <li>• A solid plan with TfL, in consultation with Thames View and Riverside residents, to if there is a desire to extend the Docklands Light Railway, before intense housing development and with minimal damage to local ecology, as proposed in 2008, to bring connectivity to Custom House (Queen Elizabeth and Central London).</li> <li>• A proper consideration of the increased traffic flow and how this will affect residents on Thames Road, considering the dual notions of 'industrial and residential'.</li> <li>• LDOs and CDOs not mentioned</li> <li>• Barking Riverside is in Flood Zone 3 - Environmental and flood risk consultation needs to take place across BRL to protect new residents from flooding. What are the measures in place for climate change and rising sea levels? Is there adequate drainage on Thames Road for the new and industrial development plans? Where does this exist on the local plan? As Thames ward is built on a flood plain/marshes, can pre-existing flood defences such as a various drainage ditches opposite Thames Road and in the Ripple Nature Reserve be considered as going through a proper refurbishment as part of developer's contributions to flood mitigations.</li> <li>• Comments also raised on engagement with community groups, holding developers to account for fire safety, nature conservation and food hubs for local high streets</li> </ul>	<p>Road/Bastable Avenue area which will be subject to further consultation.</p> <ul style="list-style-type: none"> <li>• We will, however, engage closely with resident groups/representatives in the implementation/delivery of the Plan and will arrange special de-briefings on adoption of the plan.</li> </ul>
<p>P. Miller (resident) LP164</p>	<ul style="list-style-type: none"> <li>• Concern on amounts of high rise buildings on a flood plain and limited infrastructure for health ie doctors and dentists.</li> <li>• Concerns on social areas and anti-social behaviour.</li> <li>• Concerns on wildlife and future wellbeing for residents in terms of developments being built</li> <li>• Feeling of little resident consultation</li> <li>• Concerns on high rise buildings obstructing light and cause wind tunnels. The obstruction of light affects, green spaces, water ways and residents.</li> </ul>	<ul style="list-style-type: none"> <li>• We are of the view no amendments are required for soundness with regard to these comments (see further detail below):</li> <li>• We welcome and acknowledge these comments, however we do not think further changes to the Plan are required regarding them as each element has been considered.</li> </ul>

	<ul style="list-style-type: none"> <li>• Concern on demolition of housing estates and feeling there is not being a replacement of social housing that is affordable to residents</li> </ul>	<ul style="list-style-type: none"> <li>• We are of the view these are generally addressed through our evidence base (e.g., Sequential and Exceptions Test).</li> <li>• We also place an emphasis on affordable housing and Be First delivers a significant amount of this for the borough through council regeneration programmes.</li> <li>• We will, however, engage closely with resident groups/representatives in the implementation/delivery of the Plan and will arrange special de-briefings on adoption of the plan.</li> </ul>
<p>K. Ndomahina (resident) LP165</p>	<ul style="list-style-type: none"> <li>• Comments raised on environmental impacts including requests to allow for protection and conversation of local biodiversity including on brownfield sites and nature being at risk where buildings on raised ground are planned.</li> <li>• The plans for 7,000 homes on Castle Green also need to be reconsidered because of the sheer strain upon local infrastructure.</li> <li>• Heritage - concerns raised over loss of buildings and heritage. Requests guaranteed protection for all community centres, libraries, public houses, locally and nationally listed buildings.</li> <li>• Nature conservation and protection of public parks and open spaces - There should be a policy of not building on any public parks, open green. Trees protection to be enhanced whilst new trees been planted.</li> <li>• Fire safety - The focus is on high rise buildings. High rise buildings are classified at higher risk. There are recommendations for high rise with 2 escape stairs and sprinklers/ alarm systems requiring annual maintenance, which occurs higher build costs and service charge plus require an operation teams checking on this.</li> <li>• Flood risk - Risk to live and property are due to floods are not addressed as proposed new flood defences and tidal flood defences are not in place alongside Thames, and rivers. Built up of new development means that spaces which could be act as a buffer for flood waters are raised and build on.</li> </ul>	<ul style="list-style-type: none"> <li>• We are of the view no amendments are required for soundness with regard to these comments (see further detail below):</li> <li>• We welcome and acknowledge these comments, however we do not think further changes to the Plan are required regarding them as each element has been considered.</li> <li>• We are of the view these are generally addressed through our evidence base (e.g., Sequential and Exceptions Test).</li> <li>• We also place an emphasis on affordable housing and Be First delivers a significant amount of this for the borough through council regeneration programmes.</li> <li>• We will, however, engage closely with resident groups/representatives in the implementation/delivery of the Plan and will arrange special de-briefings on adoption of the plan.</li> </ul>

	<ul style="list-style-type: none"> <li>• Strain on Police, Fire, Health and Transport Services - Risk to live and property as the infrastructure is not provided alongside new developments.</li> <li>• Concerns raised on lack of affordable social housing</li> <li>• Concerns raised on public engagement - Deprived members of deprived communities are struggling with bills, family and work commitment and disengage from consultations.</li> <li>• Zoning of industry and housing - New Fabrica meant for makers and clean businesses are very expensive compared to existing spaces. Small businesses forced to close or cannot open due to lack of rents which meets their business forecast</li> </ul>	
<p>Axis (on behalf of S. Norton) LP166</p>	<ul style="list-style-type: none"> <li>• It is considered that the E-089 allocation should be removed from the emerging Local Plan as it is not in general conformity with policies in the London Plan or the Joint Waste Plan. The safeguarding of wharves, waste management sites and strategically important industrial land should be maintained because they are critical to the effective functioning of London's economy. This allocation extends over part of S. Norton's existing metal recycling site on land allocated as a SIL and safeguarded for both waste management and an operational wharf. It also mirrors the red line boundary and net additional floorspace (443s sqm) relating to planning permission ref: 20/01371/FULL. This permission relates to the erection of a workshop for the maintenance of on-site plant and a non-ferrous metal storage shed, not that illustrated in the allocation.</li> <li>• The Barking Riverside Transformation Area (MM5) references a potential river crossing with the London Borough of Bexley (Paragraph 104) and both Figures 4 and 7 includes an annotation referring to a River Roding bridge or crossing (MM3). It is noted that no annotation appears on the Policies Map and no specific policy or spatial extent is provided in the emerging plan. On this basis it appears this infrastructure is aspirational rather than forming a specific development in the emerging plan. S Norton reiterate the importance of their site (for the reasons already stated in this letter) and therefore any potential crossing should seek to protect the S. Norton / Dockgrange Limited site.</li> </ul>	<ul style="list-style-type: none"> <li>• We are of the view that for effectiveness and general conformity, the 'proposed use' and 'existing use' sections on the proforma should remove the wording shown in the main modifications (MM128) and state that the site is a safeguarded waste site. The planning application reference should also be added which, as per the SLAA, is for a workshop and non ferrous shed. (B1/B2/B8 waste metal recycling facilities). However, if the allocation/proforma were to be removed, it is still SIL so we are not concerned about a loss there in terms of employment. Additionally, we now understand the site has been developed so a proforma is not a necessity.</li> <li>• No comment on 2<sup>nd</sup> point as schemes aspirational</li> </ul>
<p>Thames Water</p>	<ul style="list-style-type: none"> <li>• The SINC designation for the open land within Thames Water ownership to the south of Gascoigne Road is not appropriate due to the lack of</li> </ul>	<ul style="list-style-type: none"> <li>• We would be happy to explore this further as part of a wider BNG work we are undertaking, but current analysis</li> </ul>

LP066	<p>public access to the land and value of the site. The Policies Map should therefore be amended to omit the designation from this area.</p> <ul style="list-style-type: none"> <li>Thames Water support the SIL designation of all of their land, including land currently designated as the Gascoigne Pumping Station Rough SINC and consider that it should be extended to fully cover the site to the south by the river. The SIL designation across Thames Water’s land is supported and appropriate at this location as suitable employment development can be provided here which incorporates mitigation and achieves the required Biodiversity Net Gain.</li> </ul>	<p>suggests that there is SINC value and that the designation should not be removed and therefore no amendments would be needed to the Policies Map regarding this. As such, we are of the view that there is no soundness reason to remove the SINC designation.</p> <ul style="list-style-type: none"> <li>We are of the view that, for effectiveness, it would be clearer to extend the SIL boundary to the river, preferably through an additional modification to correct the extent of the boundary as the land is currently part of the wider SIL designation. In the updated Policies Map, it incorrectly cuts off slightly before the river edge.</li> </ul>
Stantec on behalf of Barking Riverside Limited (BRL) LP046	<ul style="list-style-type: none"> <li>Support removal of proposed Choats Road Gypsy and Traveller site</li> </ul>	<ul style="list-style-type: none"> <li>None required</li> </ul>
	<ul style="list-style-type: none"> <li>MM6 - To provide clarity the nature of the crossing should be confirmed. ‘...potential river <b>boat</b> crossing with the London Borough of Bexley”</li> </ul>	<ul style="list-style-type: none"> <li>We would like to keep this flexible as it's still in the early stages so would prefer to leave this at 'river crossing'. We do not think there are soundness reasons for the proposed change.</li> </ul>
	<ul style="list-style-type: none"> <li>Proposed addition to MM21 - 'Furthermore, BRL is now looking to diversity the range of developers to include specialist build to rent, <b>large scale purpose built shared living</b>, student housing and care. It is therefore anticipated that some student housing need could be met at Barking Riverside.'</li> </ul>	<ul style="list-style-type: none"> <li>We do not think the inclusion of large scale purpose built shared living wording is necessary for soundness.</li> </ul>
	<ul style="list-style-type: none"> <li>Include all of Site Allocation AA Barking Riverside within the Barking Riverside and Thames Road Transformation Area.</li> </ul>	<ul style="list-style-type: none"> <li>Whilst we do not object to this, we do not think the proposed change is necessary for soundness.</li> </ul>
	<ul style="list-style-type: none"> <li>Amend proforma with following wording changes in red:</li> </ul>	<ul style="list-style-type: none"> <li>We are of the view that the proposed amendments to the 20,000 homes text provide greater clarity and are needed for effectiveness to show that the additional delivery is expected beyond the Plan period, although as per the above we do not think reference to large scale purpose built shared living specifically is a necessary addition for soundness.</li> </ul>

	<ul style="list-style-type: none"> <li>Residential-led mixed use development including retail, employment, education, open space, other community and leisure uses. Potential to deliver 11,162 new homes <u>in the plan period with an overall site capacity of 20,000 homes</u> (1,628 homes delivered on original planning permission for 10,800 homes. (with the potential for additional <del>8,828</del> 2000 <u>9200</u> homes over and above original planning permission <u>of 10,800 homes</u> subject to further planning permission <u>and provision for necessary supporting infrastructure</u>).</li> </ul> <p>In respect of bullet 2 above, as identified in representations to MM21, there is scope for non self-contained residential accommodation to come forward on the site. This being consistent with MM26 which identifies such provision being appropriate in transformation areas of which Barking Riverside falls within. We would suggest the following addition:</p> <ul style="list-style-type: none"> <li><u>Residential use can also include care (Use Class C2 and C3), later life living, large scale purpose built shared living and student accommodation, in addition to Build to Rent.</u></li> </ul>	
<ul style="list-style-type: none"> <li>Site maps in proformas should be amended so that key differentiates between what constraints are on site and which are off site</li> </ul>		<ul style="list-style-type: none"> <li>We do not believe the proposed change is necessary for soundness.</li> </ul>
	<ul style="list-style-type: none"> <li>The 50m height, which broadly equates to 16 storeys is too low for Barking Riverside and not consistent with that already tested and deemed to be appropriate through the existing Outline Planning Permission (LPA Ref 18/00940/FUL) ('the OPP') currently being built out on site. The OPP includes an approved Maximum Building Heights Plan (Drawing No. 108F013 Rev T), which was subject to EIA testing, and identifies buildings of up to 95m AOD. This together with the approach of 'strong justification' being needed where the 50m height is exceeded is overly restrictive. To be justified and effective the tall building height for Barking Riverside should either reflect that already tested and approved, namely 95m AOD, or the policy and supporting text should signal that regard should be had to existing approved but not yet implemented storey heights in any assessments. This is on the basis that the Barking Riverside height of up to 95m AOD has been subject to testing through an TVIA and EIA and therefore evidenced as appropriate. Proposed wording:  'Development proposals for buildings taller than the height maximums set out in each SPP area policy will be considered on a case-by-case basis taking into consideration the criteria set out in Policy DMD 2 for Tall</li> </ul>	<ul style="list-style-type: none"> <li>We are of the view that the word 'strong' should be removed for effectiveness reasons with regards to the justification required for buildings taller than maximum heights as it is difficult to quantify. A more effective and less subjective approach would be to reference the need for any justification for buildings exceeding appropriate heights to be in line with part 4 of Policy DMD2.</li> <li>We also agree a change is needed for effectiveness to reference approved planning permissions when talking about case-by-case considerations for tall buildings.</li> </ul>

<p>Buildings and any grants of planning permission that have approved building heights taller than the SPP area height maximums. This includes the existing permissions for Barking Riverside (see those listed at Site Allocation AA).'</p>	
<ul style="list-style-type: none"> <li>For Policy DMH4 (Large Scale Purpose Built Shared Housing), request to delete criterion as it is inconsistent with the current approach in adopted Mayoral policy. The cross reference to the Mayoral policy is not needed. AND delete D (d. do not undermine the supply of self-contained housing) as not necessary.</li> </ul>	<ul style="list-style-type: none"> <li>On DMH4, for criterion a) our intention is to mirror the London Plan/LPG guidance on design standards and so we do not object to wording that reflect this (but we do think the cross-reference is helpful and we are not of the view that there are soundness reasons for removing it). For criterion d), we do not believe there are soundness or conformity reasons for removing it and, as discussed in the examination, family housing is a priority for us.</li> </ul>
<ul style="list-style-type: none"> <li>Object to 500sqm gross threshold for retail impact assessments. Whilst the 500sq.m. threshold is not considered to be justified, the MM should make clear that this threshold relates to applications for retail and leisure development outside town centres, which are not in accordance with an up-to-date plan. Accordingly, where a proposed application is consistent with the terms of a site allocation (such as Barking Riverside AA), it is not considered that an Impact Assessment would be required. Amend as per the above to make it clear that the provision only relates to retail and leisure development outside town centres, which are not in accordance with an up-to-date plan, including site allocations.</li> </ul>	<ul style="list-style-type: none"> <li>The 500sqm is recommended to in our Retail and Town Centres Study - Document E1. Therefore, we do not think there are soundness reasons for the change proposed.</li> </ul>
<ul style="list-style-type: none"> <li>Propose deletion of justification text paragraph on affordable workspace - It is not clear what the above paragraph is seeking to add to the application of Policy DME2 at MM37. It appears to seek to provide clarity as to what is deemed to be 'practicable or viable' however it is hard to follow and restrictive in its approach. If affordable workspace is not provided, it is for the individual planning application to make the case, no further detail is needed.</li> </ul>	<ul style="list-style-type: none"> <li>We proposed the justification text wording on affordable workspace to add clarity to the policy and we continue to think this is helpful. More clearly setting out the 'practicable or viable' point was an additional point of clarification for a few policies during the examination. Therefore, we do not believe the proposed change is required for soundness.</li> </ul>



	<ul style="list-style-type: none"> <li>• Correct mapping of active travel hub labelling - is included, this should move to the location of the station</li> </ul>	<ul style="list-style-type: none"> <li>• We are happy to correct the labelling location of the active travel hub on the figure - we think this can be done through an additional modification, but would welcome the Inspectors' steer.</li> </ul>
	<ul style="list-style-type: none"> <li>• Deletion of amendments to paragraph 4 of DMM1 requested. The above paragraph 4 then seeks to identify new matters not identified expressly in paragraph 1. There is a lack of clarity as to how these relate to both para. Moreover, there is a likely duplication with CIL and matters that would be covered by general taxation. Notably in respect of healthcare and education infrastructure. The 'list' of matters for the Planning Obligations SPD should be as per paragraph 1 with the addition to para 4 deleted.</li> </ul>	<ul style="list-style-type: none"> <li>• We do not think there is a conflict between paragraphs 1 and 4 of DMM1. The Main Modifications proposed additions to DMM1 seek to ensure better alignment with Policy DF1 of the London Plan. We therefore do not believe there are soundness reasons for the proposed change.</li> </ul>
	<ul style="list-style-type: none"> <li>• We maintain our objection to the following designations as per our Reg 19 representations and accordingly they are not identified in the above list: <ul style="list-style-type: none"> <li>○ Archaeological Priority Area (Policy DMD 4: Heritage assets and archaeological remains)</li> <li>○ Flood Risk Zone 3 (Policy DMSI 6: Flood risk and defences)</li> <li>○ Flood Risk Zone 2 (Policy DMSI 6: Flood risk and defences)</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• We are of the view that the Flood Zone and Archaeological Priority Area mapping should remain for consistency with other allocations. The evidence base shows the area to be an Archaeological Priority Area. Additionally, we are of the understanding that flood zone boundaries can only be changed by EA and so we do not have the authority to change this. We are therefore of the view that the proposed changes are not required for soundness.</li> </ul>
<p>Be First (on behalf of Hollybrook Homes) LP088</p>	<ul style="list-style-type: none"> <li>• Would like definition of Tall Buildings set to 30m</li> <li>• Object to removal of Tall Building wording from site XE (Ibescott Close Estate) proforma and argue that this is necessary for them to meet the capacity numbers</li> <li>• Argue there should be criteria for how tall buildings outside of tall building zones should be assessed</li> <li>• Argue there is a blurring throughout Local Plan relating to: <ol style="list-style-type: none"> <li>i. The over-arching definition of what is considered to be a tall building.</li> <li>ii. The definition of appropriate maximum building heights both within and outside of Tall Building Zones.</li> <li>iii. The policy test(s) that applies to proposals for tall buildings both within and outside of the Tall Building Zones.</li> </ol> This blurring of the definitions and their application causes confusion and makes the plan ineffective. </li> </ul>	<ul style="list-style-type: none"> <li>• As we set out in the hearings, flexibility on heights is important to us and good design is the main consideration for us for tall buildings. We welcome wording that allows a more flexible approach to tall buildings coming forward and suggest that this falls along the lines of what has been suggested by the GLA.</li> <li>• We are not of the view that a change to 30m is necessary is necessary for soundness. Heights were discussed a lot at the examination. As this representation suggests beyond both 18 and 30m would be required for the development, it seems that this would fall into a case-by-case scenario.</li> <li>• We have no objection to removing duplication between justification text and policy text for each SPP areas on</li> </ul>

- Proposed amendments shown in track below:

The following modifications (shown as tracked changes) are required to clarify the relevant definitions of tall buildings, tall building zones, and appropriate heights within tall building zones.

8. The definition of a tall building in the borough is any building that measures 30m or more from ground level to the floor of the uppermost level. Our overarching policy on tall buildings is set out in DMD 2. Zones that are considered to be potentially suitable for tall buildings are identified within each SPP Strategic Policy Area as 'Tall Building Zones'. ~~however, individual tall building zones are set out within each SPP Strategic Policy Area. Any development proposal exceeding these heights will require strong justification as part of their design and access statement as to why their proposal will not be detrimental to the area.~~

heights although we are not of the view it is necessary for soundness. If this is done for SPP5, we are of the view it should be done for all for consistency.

- We would be supportive of the removal of phrasing linked to buildings over 18m generally not being appropriate outside of Tall Building Locations for effectiveness. Whilst our objective was clarity, we acknowledge that this may appear more restrictive than intended and, as aforementioned regarding our commentary on the GLA response, flexibility is important to us.
- We do not suggest reinstating the tall building wording in the proforma - this was removed as per discussions in the examination to avoid any conflict between proformas and policies. We therefore do not think reinstating the text would be necessary for soundness reasons.
- We have clarified the tall building locations and these were discussed during the hearings/agreed in the SoCG with the GLA as being clearer. For this SPP area (and others where tall building locations do not cover the majority of the SPP area), the focus is on stations/district centres proximity.
- We do not think an additional criteria for tall buildings is required for tall buildings outside of tall building zones for soundness or general conformity reasons (although we do not object to what has been set out in this representation in terms of a proposed criteria). Section 4 already sets out a criteria for all developments that include tall buildings. We would be happy for an additional reference to clearly show this includes buildings outside of 'Tall Building Locations' to add clarity if deemed helpful alongside the text suggested on tall buildings not automatically being appropriate and needing to be assessed in wider policy context. We think

Area. Proposals for tall buildings outside of the 'Tall Building Zones' (as shown on the Policies Map) may be supported where they meet the criteria set out in DMD 2. This does not mean that all buildings up to these heights are automatically acceptable; such proposals will still need to be assessed in the context of other planning policies to ensure that they are appropriate for their location and do not lead to unacceptable impacts on the local area.

- ~~• We encourage the optimising of density. In Barking Town Centre, a maximum height for developments coming forward within the Tall Building Location has been determined considering the heights of developments already in the area. We therefore have assessed that buildings up to 95m may be appropriate. However, in certain parts of the Tall Building Location in SPP1, heights of up to 50m may be more appropriate to mitigate the impacts on cultural assets views, such as the views of Barking Abbey, which align with the character of the area, where the surrounding developments are a much smaller scale (e.g., terraced housing nearer to Becontree).~~
- ~~• This Plan uses the London Plan 2021 definition of tall buildings, and in areas outside of Tall Building Locations, the Plan uses the minimum tall building height of 18m set out in the London Plan 2021.~~
- Tall Building Locations-Zones have been targeted at the areas of the borough expecting to undergo the most transformation through significant increases in density. These are Barking Town Centre, Dagenham Heathway, Chadwell Heath, the Thames Riverside SPP area and the Dagenham Dock and Freeport SPP area. The latter, along with parts of Barking Town Centre and the River Roding SPP area, also form part of the London Riverside Opportunity Area where heights of up to 50 metres may be appropriate. For the relevant Tall Building Locations-Zones maximum appropriate heights in each area, see the relevant SPP Strategic Area Policy.
- Development proposals for buildings taller than the height maximums set out in each SPP area policy within Tall Building Zones will be considered on a case-by-case basis taking into consideration the criteria set out in Policy DMD 2 for Tall Buildings. Proposals for buildings taller than 30m outside Tall Building Zones (as shown on the Policies Map) may be supported where they meet the criteria set out in Policy DMD 2, Part 4.

the added flexibility from utilising the GLA wording on this in terms of 'appropriate heights' rather than 'maximum heights' will also sufficiently help meet our flexibility objectives.

- We have no objection to the use of zones rather than locations in terms of terminology.

The following modifications (shown as [tracked changes](#)) are required to set the definition of tall buildings at a justified 30m and to avoid duplication between Chapter 4 and each of the SPP policies/SPP justification text when discussing appropriate building heights within Tall Building Zones:

Tall Buildings

- The Council has ambitious proposals for regeneration within the borough and the delivery of high-quality tall buildings will be a core part of the strategy to revitalise and renew areas for the benefit of local residents. The main driver for any tall building will, therefore, be quality, in terms of high-quality design, how it relates to its surroundings, and the benefits it will bring for local communities as well as internally for those living and working within it.
- The definition of a tall building in the borough is any building that measures 30m or more from ground level to the floor of the uppermost level. Our overarching policy on tall buildings is set out in DMD 2, Tall Building Zones, which are considered to be potentially suitable for tall buildings are defined on the Policy map, and appropriate Tall Building Heights within these zones are identified within each SPP Strategic Policy

	<p>The following modifications (shown as <a href="#">tracked changes</a>) are required to set the definition of tall buildings at 30m and to explain how proposals for buildings tall than 30m outside of Tall Building Zones will be assessed. For this latter point, we suggest the wording used by LBBD at the Regulation 18 stage consultation would be appropriate.</p> <p>1. <del>Unless otherwise specified in localised Masterplan SPDs, Tall Buildings in the borough, are buildings that are taller than six storeys (or 18.30 metres) measured from ground to the floor level of the uppermost storey, as defined in Policy D9 of the London Plan 2021. The area specific policies define appropriate building heights for their respective areas, with SPP1- SPP6 having Tall Building Locations within them (as shown on the Policies Map).</del></p> <p>2. Development of Tall Buildings will be <a href="#">supported</a> <del>indirected towards appropriate Tall Building Locations Zones (as shown on the Policies Map and Figure 20 below) Proposals for Tall Buildings within Tall Building Zones and</del> must accord with latest relevant national policy <del>guidance</del>, London Plan policies and relevant policies within Chapter 3 of the Local Plan.</p> <p>3. <del>Any proposals that include Tall Buildings will be assessed on their own merits and will need to respond appropriately to identified sensitive locations including natural and built heritage assets.</del></p> <p><a href="#">Proposals for tall buildings outside of the Tall Buildings Zones (as shown on the policies map) may be supported where they:</a></p> <ul style="list-style-type: none"><li><a href="#">a) are located in sustainable locations with high public transport accessibility level (PTAL) ratings;</a></li></ul>	
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- b) are of exemplary architectural design and residential quality (to be determined by the Barking and Dagenham Quality Review Panel as part of the development process);
- c) respond appropriately to local context and character and do not adversely impact on the setting of heritage assets and important views.;
- d) individually or as part of a group reinforce the spatial hierarchy of the local and wider context and improve legibility and wayfinding; and
- e) avoid/mitigate against any adverse micro-climatic effects such as sun, reflection, wind and overshadowing.

4. All ~~D~~ Developments that include Tall Buildings must demonstrate how they:

a) will deliver benefits for the surrounding area and communities, including delivering high quality and accessible public realm, as well as promoting legibility and wayfinding; and

b) will create mixed and integrated communities and aim to appear “tenure blind”

c) do not constrain development potential on adjoining sites including sites within adjoining boroughs. Specific consideration should be given to the impacts on the amenity of existing residential neighbourhoods and publicly accessible and private open spaces.

d) Incorporate mitigation measures to help prevent suicide and accidental falls for example anti-climb methods, fences, barriers and rails. These will be well designed and should be integrated into the overall design of the building

e) address visual impacts of Tall Buildings, consistent with Policy D9 Tall Buildings of the London Plan 2021.

5. Development proposals that include Tall Buildings should be supported by:

i. an appropriate townscape analysis (including verified views to demonstrate how they positively contribute to the skyline) and must involve an assessment of impact upon the significance (including setting) of nearby heritage assets which demonstrates how any adverse impacts have been addressed, and

ii. a compatible modelling tool in agreement with the Council, which provides an accurate visual representation of what the change will look like, and the cumulative effect for the borough and surrounding areas.

The following modifications (shown as [tracked changes](#)) are required to remove inconsistencies between SPP policies and to set the definition of tall buildings at a justified 30m:

~~3. In Tall Building Locations-Zones in SPP5 (as identified shown on the Policies Map), heights up to 50 metres may be appropriate. This is in line with other Tall Building Locations in the borough located outside of Barking Town Centre.~~

~~4. In this area there is indicative capacity for 1,123 new homes and approximately 57,293 sqm additional industrial floorspace in the Plan period. Within the Tall Building Location identified on the Policies Map, heights up to 50 metres may be appropriate. Outside of the Tall Building Location, development taller than 18 metres would not generally be appropriate due to the low density and sensitivity of the area.~~

**Appendix A Full Initial Main Modifications  
Consultation Summary Report**



Working in partnership



**Barking &  
Dagenham**

**London Borough of Barking and  
Dagenham**

# **Initial Main Modifications Consultation Summary Report**

Prepared by Be First  
August 2023

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# Chapter 1

## Introduction

1.1 Be First, on behalf of the London Borough of Barking and Dagenham (LBBD), consulted on the Local Plan initial main modifications from 22<sup>nd</sup> June to 7<sup>th</sup> August 2023, receiving 49 individual responses.

1.2 The purpose of the Initial Main Modification was to address some preliminary matters raised by the inspectors during the Stage One Hearings. The Stage One Hearing Sessions on the Local Plan were held at Barking Town Hall during July 2022. As part of these, the Inspectors highlighted a number of matters that need to be addressed including visual/mapping discrepancies within the draft Local Plan (Documents C1 and C2 on the examination website) and between the draft Local Plan and the Policies Map (Document C3: Proposals Map, also available on the examination website) before the Local Plan could progress to the main examination hearings. These matters were also highlighted in the Inspector's Next Steps Letter, which paused the examination and requested the Council undertake further work associated with the **Green Belt and Gypsy and Travellers**, and to consult on a number of changes to the submission Local Plan to rectify **Drafting Errors** identified in the submission Local Plan and on the submission Policies Map. This consultation was to seek comments on the changes to the Local Plan being proposed to rectify the matters identified by the Planning Inspectors.

1.3 During the consultation, the Council consulted with a range of stakeholders, including both statutory and non-statutory bodies and local communities, in order to seek views and feedback on the proposed initial main modifications to the draft Barking and Dagenham 2037 Local Plan. The consultation was carried out in accordance with Regulation 19 of the *Town Planning and Country Planning (Local Planning) (England) Regulations 2012* (Regulation 19).

1.4 The proposed initial modifications to the Barking and Dagenham Submission Local Plan follow on from the Regulation 19 (1) consultation, which ran from 5<sup>th</sup> October to 29<sup>th</sup> November 2020, and Regulation 19 (2) consultation, which ran from 11<sup>th</sup> October to 28<sup>th</sup> November 2021.

1.5 This report contains a summary of the consultation and is prepared in accordance with Regulation 19. It provides an overview of the consultation responses received; and considers how these responses should be taken into consideration to inform the next iteration of the Local Plan. The key points to note are:

- All comments received have been read, and key points noted. Not all the individual points raised are included in the summaries. The summaries identify key themes raised and the general level of support for each.
- The value of the comment relates to its content, rather than how many times it has been said. This summary therefore does not quantify the number of comments received raising particular points.
- Summaries present the information as received. If a summary is considered not to be factually correct, the Council will check and verify information accordingly where required as part of the ongoing Local Plan process.
- The Council/Be First must operate within the General Data Protection Regulation (GDPR). Therefore, the addresses and contact details of individuals who have responded to the consultation are not published.

## Chapter 2

### Consultation Methods

**2.1** The Council applied a range of consultation mechanisms to allow people to share their views through their preferred method. Consultation mechanisms included:

- Online resources;
- Direct e-mail correspondence;
- Social media
- Plan available for viewing in Dagenham Library and Barking Town Hall

The details are set out below.

#### Online Resources

There is a dedicated webpage providing updates on the development of the draft Local Plan which informed the public of the initial main modifications consultation. The website also hosts the latest Local Plan evidence-base documents and provides a link to the Local Plan examination website.

Link to the Council's website:

<https://www.lbbd.gov.uk/planning-building-control-and-local-land-charges/planning-guidance-and-policies/local-plan>

<https://yourcall.befirst.london/examination-library>

<https://yourcall.befirst.london/submission-documents>

#### Direct Email Correspondence

Emails were sent to all statutory and non-statutory consultees on the Council's planning policy database.

#### Social Media

A variety of methods were used to engage with the public, including:

- Post on Be First's LinkedIn
- Posts on LBBD's Facebook and Twitter Accounts
- Advertised in the Council's weekly Citizen's Alliance Network newsletter

#### Plan available for viewing in Dagenham Library and Barking Town Hall

Copies of the documents being consulted on, alongside new relevant evidence, were distributed to Dagenham Library and Barking Town Hall for members of the public to view.

## Chapter 3

### Overview of Consultation Responses

3.1 This section summarises the main issues and comments raised during the consultation process. A full summary of responses is available to view in **Appendix A** of this report.

3.2 In total, the Council received written representations from 49 individuals or organisations and businesses. Of these, 15 were statutory consultees.

3.3 Responses were received via email and post. These responses came from:

- Individuals;
- Councillors;
- Statutory Bodies;
- Developers;
- Landowners;
- Organisations; and
- Businesses.

• The majority of comments received as part of this consultation relate to:

- Green Belt
- Gypsy & Traveller Sites
- SIL/LSIS Boundaries
- Site Allocation Boundaries and Mapping
- Natural Environment

The summary in the next chapter provides a snapshot of the key issues raised.

## Chapter 4

### Summary of Key Responses

#### Themes

4.1 A summary of the main issues raised during Initial Main Modifications Consultation is provided below, along with the Council's response to the comments received.

Table 4.1: Summary of Issues and the Council/Be First's Response

	Policy/Theme	Summary of Issue	Council/Be First Response
1	Green Belt	<ul style="list-style-type: none"> <li>Concerns over the release of a small part of the Green Belt at Eastbrookend Country Park, for the allocation of a traveller site, as part of "Exceptional Circumstances Topics Paper".</li> <li>Respondents are particularly concerned that the removal of the site from the Green Belt would cause substantial, sustained &amp; unnecessary damage including to current Green Belt land, destroy an area of protected species, remove breeding grounds for birds and threaten biodiversity, threaten security for park visitors and Discovery centre as well as having an adverse impact the adjacent cemetery, playground, outdoor gym, park &amp; fishing lakes.</li> <li>The Mayor of London considers the proposed mixed-use development (PMSPM511) to be inappropriate development in the Green Belt therefore, LBBD should revise the allocation boundary to remove that part which is Green Belt.</li> <li>Concerns from the Mayor of London regarding residential development in Lodge Avenue as over 50% of the site lies within MOL, which is afforded the same level of protection as Green Belt land. If LBBD is proposing a boundary change, evidence to demonstrate exceptional circumstances established through the examination process is required.</li> </ul>	<ul style="list-style-type: none"> <li>Concerns acknowledged but no amendments proposed to current proposal to extend Eastbrookend Country Park Gypsy and Traveller site. We have carried out an extensive process looking at over 60 sites trying to find a suitable location to accommodate the future growth of the borough's travelling community. Each attempt has proved unsuccessful for a variety of reasons, including land availability, suitability and cost; concluding unfortunately that no suitable alternative location could be found. This matter will be discussed further as part of the main hearings. A more general location has been proposed at Castle Green which may be able to meet the entirety of the Borough's Gypsy and Traveller need in the longer-term.</li> <li>Green Belt land and individual site allocations will be discussed further as part of the examination process.</li> <li>The Council are preparing an update statement on the Eastbrookend site explain the background, current status and next steps as set out in the Cabinet Paper on the issue May 23. Responses have also been provided to the Local MP and Ward Councillors who have raised questions to the council.</li> </ul>

2	Gypsy and Traveller Sites	<ul style="list-style-type: none"> <li>• Objections against proposed Traveller sites citing these areas are not suitable for pitches. These were mainly linked to concerns regarding loss of Green Belt and potential implications for the natural environment.</li> <li>• Further concerns that the Castle Green SIL site would result in the loss of industrial capacity and SIL capacity as well as the unsuitability of having heavy industrial uses and housing within proximity of each other.</li> <li>• Concerns from travellers that they have already had their names on the waiting list for the borough's only site but extra sites not available.</li> <li>• Emphasis that care will need to be taken when defining the precise location of the Gypsy and Traveller sites in the Castle Green Transformation Area as much of Castle Green area is located within Flood Zone 2&amp;3, particularly as Gypsy and Traveller sites are defined by Table 2 of the NPPF as being highly vulnerable (i.e., vulnerability of caravans).</li> <li>• Recommendation that a Health Impact Assessment (HIA) is undertaken and kept under review at the start of any master planning or other process for the identification of additional Gypsy and Traveller sites/pitches and kept under review throughout to inform decisions. The Gypsy and Traveller community face barriers to accessing a wider range of facilities and services including education, health and social care as well as employment and training. HIAs should also be used early in the process for options for expanding or new grounds for Travelling Show People.</li> <li>• Some support shown for the extension of the existing site at Eastbrookend Country Park as it would be possible for the Council to replace the loss of the Green Belt with additional Green Belt land as part of the developments underway as well as landscaping at the proposed traveller site.</li> </ul>	<ul style="list-style-type: none"> <li>• Travellers' sites are required in order to meet the identified need, the assessment of the suitability of the sites can be found in the evidence base documents. See also above response on Green Belt concerns raised.</li> <li>• Delivery of the proposed longer-term Gypsy and Traveller site at Castle Green will be addressed in more detail as part of the masterplan work for the area.</li> <li>• Modification proposed to reference Annex 3 of the NPPF on flood risk and site vulnerability.</li> <li>• Modification proposed to include reference to Health Impact Assessments.</li> </ul>
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3	SIL/LSIS Boundaries	<ul style="list-style-type: none"> <li>• Modifications required to Castle Green Strategic Industrial Land (SIL) designation to protect rail freight sites/infrastructure</li> <li>• Concerns that 1-8 Riverside Cottages has been designated as a SIL. Comments content that, in its current residential form, the designation of the Site for SIL purposes is not appropriate and therefore requests that it is removed from the designation.</li> <li>• Some Strategic Industrial Land/Locally Significant Industrial Land mapping inconsistencies noted between Policies Map and GLA datastore (including omission of Fresh Wharf Industrial Estate)</li> </ul>	<ul style="list-style-type: none"> <li>• Proposed modification to designate entirety of CF-Castle Green site as SIL.</li> <li>• Proposed modification to show LSIS designation of Fresh Wharf Industrial Estate on Policies Map</li> </ul>
4	Site Allocation Boundaries and Mapping	<ul style="list-style-type: none"> <li>• Lack of clarity raised for Figure 8 'Illustrative Locations of Larger Scale Development within the Thames Riverside Sub Area.' For example, there is no indication as to what the individual icons are intended to mean, no key to understand what the symbols represent.</li> <li>• Some mapping and boundary concerns raised for specific sites</li> </ul>	<ul style="list-style-type: none"> <li>• We currently do not propose a further amendment to this figure. To ensure it is illustrative and not setting out spatial policies, we have deliberately not included a key. The icons are intended to demonstrate general vicinities for industry/employment and housing.</li> <li>• Individual site allocations/boundaries will be discussed further as part of the site discussions or any mapping discussions at the main hearings.</li> </ul>
5	Natural Environment	<ul style="list-style-type: none"> <li>• A range of comments put forward from the Environment agency (see table in Appendix A for further detail)</li> </ul>	<ul style="list-style-type: none"> <li>• Previous comments considered as part of proposed main modifications and did not part of this initial main modification consultation. A response to this comment is addressed in 'Second Draft Local Plan (Reg 19) Summary Report'. Some main modifications have been proposed to address these comments.</li> </ul>



## **Appendix A Initial Main Modifications Consultation: Main Comments**

LP Ref	Rep Category (Stat/Dev/Other)	Organisation (if applicable)	Category (Theme): Housing, Industrial Land, Open Space, Waste,	Nature of Response (General/Support/Objection/Support but with suggestions)	Summarised Comment	Officer recommendation text - Summarise response briefly explaining why an amendment or no change to the Local Plan is necessary.
LP036	Stat	Port of London Authority	All	General	No comments.	No amendment required
LP077	Stat	Marine Management Organisation	Marine Management	General	Under Section 58(3) of Marine and Coastal Access Act (MCAA) 2009 all public authorities making decisions capable of affecting the UK marine area (but which are not for authorisation or enforcement) must have regard to the relevant marine plan and the UK Marine Policy Statement. This includes local authorities developing planning documents for areas with a coastal influence. We advise that all marine plan objectives and policies are taken into consideration by local planning authorities when plan-making. It is important to note that individual marine plan policies do not work in isolation, and decision-makers should consider a whole-plan approach. Local authorities may also wish to refer to our online guidance and the Planning Advisory Service: soundness self-assessment checklist. We have also produced a guidance note aimed at local authorities who wish to consider how local plans could have regard to marine plans. For any other information please contact your local marine planning officer. You can find their details on our gov.uk page.	No amendment required
LP062	Stat	Natural England	Natural environment	General	Natural England are content that the local plan will not have an adverse impact on the natural environment or designated sites and have no comments.	No amendment required
LP155	Resident		Traveller sites	Objection	Concerns raised over expansion of Eastbrookend Country Park Traveller Site. Also want to encourage families, elderly and lone females to feel safe and welcome.	No amendment proposed. We have carried out an extensive process looking at over 60 sites trying to find a suitable location to accommodate the future growth of the borough's travelling community. Each attempt has proved unsuccessful for a variety of reasons, including land availability, suitability and cost; concluding unfortunately that no suitable alternative location could be found.
LP080	Resident	N/A	Traveller sites	General	Traveller families have had our names on waiting list for the borough's only site for 17 years, asking council to build a new site/extend to no avail. Local Plan has never carried out its promise to build extra accommodation for us.	Concerns acknowledged. No amendment proposed. We are already proposing the extension of the current site at Eastbrookend Country Park and a future site at Castle Green.
LP067	Stat	Sport England	Sport facilities	General	Welcomes the removal of the rugby club from the allocations as it has no intentions to move so would protect the site for sport. However, not clear what the new allocation is proposing- is Abbey sport centre proposed to be lost/replaced/enhanced?	Support acknowledged. No amendment required. Clarity provided in email response that the Abbey Sport Centre site is the old sports centre and this allocation does not refer to its replacement (Abbey Leisure Centre).
LP076	Stat	Canal & River Trust	Waterways	General	Does not own or manage any waterways in the Barking and Dagenham area, and therefore have no comments to make	No amendments required
LP124	Resident	N/A	Green Belt	Objection	Concerns raised that extension of existing Gypsy and Traveller site in Eastbrookend Country Park will cause substantial, sustained & unnecessary damage including to current greenbelt land, destroy an area of protected species, remove breeding grounds for birds and threaten biodiversity, threaten security for park visitors and Discovery centre, impact the adjacent cemetery, playground, outdoor gym, park & fishing lakes. Find an alternative site on existing brown belt land.	No amendment proposed. We have carried out an extensive process looking at over 60 sites trying to find a suitable location to accommodate the future growth of the borough's travelling community. Each attempt has proved unsuccessful for a variety of reasons, including land availability, suitability and cost; concluding unfortunately that no suitable alternative location could be found.
LP125	Resident of Cornwall	N/A	Green Belt	Objection	Concerns raised that extension of existing Gypsy and Traveller site in Eastbrookend Country Park will cause substantial, sustained & unnecessary damage including to current greenbelt land, destroy an area of protected species, remove breeding grounds for birds and threaten biodiversity, threaten security for park visitors and Discovery centre, impact the adjacent cemetery, playground, outdoor gym, park & fishing lakes. Find an alternative site on existing brown belt land.	No amendment proposed. We have carried out an extensive process looking at over 60 sites trying to find a suitable location to accommodate the future growth of the borough's travelling community. Each attempt has proved unsuccessful for a variety of reasons, including land availability, suitability and cost; concluding unfortunately that no suitable alternative location could be found.
LP126	Resident of Cornwall	N/A	Green Belt	Objection	Concerns raised that extension of existing Gypsy and Traveller site in Eastbrookend Country Park will cause substantial, sustained & unnecessary damage including to current greenbelt land, destroy an area of protected species, remove breeding grounds for birds and threaten biodiversity, threaten security for park visitors and Discovery centre, impact the adjacent cemetery, playground, outdoor gym, park & fishing lakes. Find an alternative site on existing brown belt land.	No amendment proposed. We have carried out an extensive process looking at over 60 sites trying to find a suitable location to accommodate the future growth of the borough's travelling community. Each attempt has proved unsuccessful for a variety of reasons, including land availability, suitability and cost; concluding unfortunately that no suitable alternative location could be found.

LP127	Resident	N/A	Green Belt	Objection	Concerns raised that extension of existing Gypsy and Traveller site in Eastbrookend Country Park will cause substantial, sustained & unnecessary damage including to current greenbely land, destroy an area of protected species, remove breeding grounds for birds and threaten biodiversity, threaten security for park visitors and Discovery centre , impact the adjacent cemetery, playground, outdoor gym, park & fishing lakes. Find an alternative site on existing brown belt land.	No amendment proposed. We have carried out an extensive process looking at over 60 sites trying to find a suitable location to accommodate the future growth of the borough's travelling community. Each attempt has proved unsuccessful for a variety of reasons, including land availability, suitability and cost; concluding unfortunately that no suitable alternative location could be found.
LP128	Resident	N/A	Green Belt	Objection	Concerns raised that extension of existing Gypsy and Traveller site in Eastbrookend Country Park will cause substantial, sustained & unnecessary damage including to current greenbely land, destroy an area of protected species, remove breeding grounds for birds and threaten biodiversity, threaten security for park visitors and Discovery centre , impact the adjacent cemetery, playground, outdoor gym, park & fishing lakes. Find an alternative site on existing brown belt land.	No amendment proposed. We have carried out an extensive process looking at over 60 sites trying to find a suitable location to accommodate the future growth of the borough's travelling community. Each attempt has proved unsuccessful for a variety of reasons, including land availability, suitability and cost; concluding unfortunately that no suitable alternative location could be found.
LP129	Resident	N/A	Green Belt	Objection	Concerns raised that extension of existing Gypsy and Traveller site in Eastbrookend Country Park will cause substantial, sustained & unnecessary damage including to current greenbely land, destroy an area of protected species, remove breeding grounds for birds and threaten biodiversity, threaten security for park visitors and Discovery centre , impact the adjacent cemetery, playground, outdoor gym, park & fishing lakes. Find an alternative site on existing brown belt land.	No amendment proposed. We have carried out an extensive process looking at over 60 sites trying to find a suitable location to accommodate the future growth of the borough's travelling community. Each attempt has proved unsuccessful for a variety of reasons, including land availability, suitability and cost; concluding unfortunately that no suitable alternative location could be found.
LP049	Resident	N/A	Green Belt	Objection	Concerns raised that extension of existing Gypsy and Traveller site in Eastbrookend Country Park will cause substantial, sustained & unnecessary damage including to current greenbely land, destroy an area of protected species, remove breeding grounds for birds and threaten biodiversity, threaten security for park visitors and Discovery centre , impact the adjacent cemetery, playground, outdoor gym, park & fishing lakes. Find an alternative site on existing brown belt land.	No amendment proposed. We have carried out an extensive process looking at over 60 sites trying to find a suitable location to accommodate the future growth of the borough's travelling community. Each attempt has proved unsuccessful for a variety of reasons, including land availability, suitability and cost; concluding unfortunately that no suitable alternative location could be found.
LP020	Stat	First Plan (on behalf of DB Cargo and Express Concret Ltd)	Transport	Clarifying information	IMM9, amends Figure 8 Key Diagram Illustrating Policy SPP2 and titled 'Illustrative Locations of Larger Scale Development within the Thames Riverside Sub Area'. Whilst it is understood that the Figure is intended to be illustrative – concern is raised at the lack of clarity in this Figure. There is no indication as to what the individual icons are intended to mean. Even an illustrative plan should be easily read and understood. Concern is raised with regard to the proposed labelling of the 'Eurohub and associated rail infrastructure'. The associated icon is in fact placed on the 'Barking Stora' Site rather than the Eurohub site. If Figure 8 is intending to illustrate larger scale development expected to come forward during the Plan period within the sub-area- then this should be more clearly shown. The Figure (even an illustrative one) which is seeking to reflect the spatial incidence of a Policy (SPP2 in this instance) should be clear and capable of being understood. If this is not done then, in the context of considering tests of soundness, the effectiveness of the Policy and hence the effectiveness of the plan, is likely to be compromised.	We do not propose a further amendment to this figure. To ensure it is illustrative and not setting out spatial policies, we have deliberately not included a key. The icons are intended to demonstrate general vicinities for industry/employment and housing.
LP020	Stat	First Plan (on behalf of DB Cargo and Express Concret Ltd)	Transport	General	Policy SPP2 currently makes reference to the Eurohub site and opportunities for enhanced rail/freight links from Europe and onwards across the UK by rail or road. Representations previously made for Express/DB Cargo have set out the reasons why reference should also be made within Policy SPP2 to confirm the location of the other existing rail sites (Ripple Lane Stora Site and Ripple Lane West Yard) and the fact that these also offer opportunities to support and increase the sustainable movement of freight.	We have proposed a modification in SPP2 to include reference to both the Ripple Lane Store Site and Ripple Lane West Yard

LP020	Stat	First Plan (on behalf of DB Cargo and Express Concret Ltd)	Transport	General	<p>Noted that the Castle Green Site Allocation has been changed from a 'Mixed Use' allocation as appeared on Figure 9 and is now listed under the 'Economic Site Allocations' which is welcomed. However, the asterisk note at the end of the Table negates that change by confirming that the Site Proforma is within the Strategic Housing Sites section as "subject to the right conditions coming forward (see policy SPP2) it would be suitable for major housing development. Currently it is being retained as SIL". Whilst the confirmation that the Castle Green site is being retained as SIL is again welcomed, fundamental issues remain with regard to the potential impact on the rail sites which are required by NPPF and London Plan to be safeguarded. Objection is maintained to any potential loss of rail freight capacity across the rail sites in the Castle Green area – noting that currently not all of the rail sites are fully subject to a SIL designation.</p> <p>In considering tests of soundness, IMM16 in concert with the wider Local Plan approach is not consistent. Text at the end of Table 2 proposed under IMM16 should be amended as follows (changes shown in red, bold and underlined).</p> <p>– Subject to the right conditions coming forward (see Policy SPP2) it would be suitable for major housing development. Currently it is being retained as SIL and with the requirement that there should be no loss of rail freight capacity across the rail sites within Castle Green.</p> <p>The proposed modification needs to be read in line with proposed modifications put forward in the November 2021 submission to the Revised Regulation 19 Consultation, and in particular with regard to Policy SPP2: Thames Riverside.</p>	Text at the end of Table 2 proposed under IMM16 to be amended to include red text below – "Subject to the right conditions coming forward (see Policy SPP2) it would be suitable for major housing development. Currently it is being retained as <b>SIL maintaining or increasing rail freight capacity across the rail sites within Castle Green.</b> "
LP020	Stat	First Plan (on behalf of DB Cargo and Express Concret Ltd)	Transport	General	<p>With specific reference to the mapping for 'CF-Castle Green' - the change made in replacing previous references to 'industrial land' to now specifically referencing this as 'SIL' are welcomed and supported. However, objections as previously stated are maintained as the defined area of SIL is incorrectly shown and omits parts of the Ripple Lane Stora site and Ripple Lane West Yard (Ripple Sidings) from the SIL. At minimum the SIL mapping should include all SIL areas shown on the GLA Datastore Mapping. In addition the Proforma Map for Castle Green should include the full extent of the rail sites within the SIL and appropriately define the full extent of each rail site and associated rail infrastructure. Modifications required:</p> <ul style="list-style-type: none"> <li>– Correct SIL mapping to at minimum reflect GLA Datastore SIL mapping (correct omissions of SIL on parts of the Ripple Lane Stora Site and Ripple Lane West Yard (Ripple Sidings)).</li> <li>– Amend SIL mapping to ensure all rail infrastructure (not just the adjoining land) is identified as SIL</li> <li>– Identify full extent of all rail sites in Castle Green.</li> </ul> <p>The modification proposed would address the points of soundness identified at Section 5 of this response in terms of 'effectiveness' and the requirement to be consistent with National Policy and in conformity with the London Plan.</p>	Amendment proposed to extend SIL designation to the whole of site CF - Castle Green. We do not propose amendments to identifying the individual rail sites within the Policies Map as the focus on the CF site is as a whole for large scale regeneration where the conditions are right for this to come forward.
LP024	Stat	Environment Agency	Environment	General	<p>It is disappointing to see that our previous comments regarding the lack of consideration for the environment within the Strategic Area Policies outlined in Chapter 3: Transforming Barking and Dagenham. We have previously commented on the constraints and opportunities within each sub-area, but these comments have not been taken on board.</p>	No amendments proposed. Previous comments considered as part of proposed main modifications and did not part of this initial main mods consultation. A response to this comment is addressed in 'Second Draft Local Plan (Reg 19) Summary Report'.
LP024	Stat	Environment Agency	Gypsy and Traveller Site	General	<p>Much of the Castle Green area is located within Flood Zone 2&amp;3. Annex 3 of the National Planning Policy Framework (NPPF) defines gypsy and traveller sites as being highly vulnerable. As defined by Table 2 of the NPPF, highly vulnerable development located within Flood Zone 3 should not be permitted, so care would need to be taken when defining the precise location of the gypsy and traveller sites in the Castle Green Transformation Area within the mentioned development of a Masterplan Supplementary Planning Document (SPD). The Regulation 19(2) Draft Local Plan 2021 also notes Eastbrookend Country Park as a potential gypsy and traveller site. Whilst some of Eastbrookend Country Park lies within Flood Zone 2&amp;3, this is concentrated around the River Beam and not where the intended gypsy and traveller site lies.</p>	Minor modification proposed to policy DMH 6 to reference Annex 3 of NPPF. No other amendments proposed. This will be considered as part of a future masterplan for the area.
LP024	Stat	Environment Agency	Gypsy and Traveller Site	Support but with sugges	<p>Support point (d) of Policy DMH 5 which recognises that gypsy and traveller accommodation sites should be located in 'a safe location (e.g., not located in an inappropriate area of high flood risk, including functional floodplains, given the particular vulnerability of caravans'. To strengthen this policy, we suggest the wording specifically references Annex 3 and Table 2 of the NPPF.</p>	Minor modification proposed to policy DMH 6 to reference Annex 3 of NPPF
LP024	Stat	Environment Agency	Environment	General	<p>It is disappointing that our comments relating to the wording of point 2b has not been considered. We believe this policy has been positively prepared, however as it currently reads it could be interpreted that if a site has zero, or negligible biodiversity, then it can be excluded from a net gain assessment. We recommend the worked is amended to list the types of small applications which are excluded and still make clear that all development proposals should strive for 10% net gain, not just compensate for biodiversity loss. We suggest the following wording '2. b) demonstrate a minimum of 10% biodiversity net gain, even where development proposals do not result in biodiversity loss, using the Biodiversity Metric. Applications for material change of use applications, alterations to buildings and house extensions are excluded from this requirement'.</p>	Previous comments considered as part of proposed main modifications and did not part of this initial main mods consultation. A response to this comment is addressed in 'Second Draft Local Plan (Reg 19) Summary Report'. A main modification is being proposed to address this comment.
LP024	Stat	Environment Agency	Environment	General	<p>since the initial development and submission of the Barking and Dagenham Local Plan, the DEFRA Metric has been renamed the 'Biodiversity Metric'. Your Draft Local Plan should be updated to reflect this.</p>	Modification proposed to address this comment.

LP024	Stat	Environment Agency	Water Environment	General	It is disappointing to see that our suggestion to alter the wording of point (h) has not been taken into consideration. We suggest the following wording '(h) provide a naturalised buffer zone between the proposed development and the top of bank modifications and did not part of this initial main mods consultation. A response to this comment is addressed in 'Second Draft Local Plan (Reg 19) Summary Report'. A main modification is being proposed to address this comment.
LP024	Stat	Environment Agency	Water Environment	General	As noted within our previous response point (6) should be amended to include the River Roding which is a tributary of the River Thames and tidally influenced with the same requirements for TE2100 flood defence raising. We suggest the following wording is included to strengthen this policy: 6) Development proposals along the Thames and tidal River Roding will be expected too...'. Previous comments considered as part of proposed main modifications and did not part of this initial main mods consultation. A response to this comment is addressed in 'Second Draft Local Plan (Reg 19) Summary Report'. A main modification is being proposed to address this.
LP046	Stat	Stantec; Barking Riverside Limited	Format of the Policies Map	Objection	The updating of the Policies Map and using the same mapping/designations for the Site Allocations Site Map is supported. However, there is a lack of clarity as to what has changed on the Policies Map and how the designations relate to each other and where they start and stop. There is also a lack of consistency between the Policies Map and the Site Allocations AA Site Map. There is a need to publish the Policies Map in a digital format that enables users to switch policy/designation layers on and off. Whilst IMMS7 states that the Site Allocations Site Map uses the revised Policies Map designations/key, there are still discrepancies between the two e.g. for Site Allocation AA, the Policies Map shows a brown dotted line along Choats Road but this is not shown in the key and is shown on the Site Allocation AA Site Map as a green dotted line with the Key noting this as a Green Grid. The Site Allocation AA Site Map does not include reference to the new Policies Map Transformation Area designation. From the Policies Map, it is not clear what the spatial extent of this is, however from the Local Plan it is understood that Barking Riverside should form part of this designation- this needs to be clarified. The Policies Map shows a proposed Gypsy and Traveller Site on Barking Riverside, this is not however shown on the Site Allocation AA Site Map. The location of the G&T Site on the Proposals Map has also changed. A new Proforma has been added into Appendix 2 for the Choats Road Gypsy and Traveller site (see IMM135). Whilst this falls within the Site Allocation AA area there are inconsistencies in the mapping of designations e.g. whilst the Site Allocation AA Site Map does not include reference to the new policies Map Transformation Area designation, the Choats Road Site Map does. Notwithstanding our objection to the inclusion of a Gypsy and Traveller Site to Site Allocation AA, there is a need for consistency in approach between the Policies Map and Site Allocation Site Maps. The key for the Site Allocation AA and Choats Road should also only show designations that fall within the redline of the allocation. At present it includes designations that are on adjacent or nearby land (i.e. SIL and LSIS)- the Key should distinguish between the on-site designations and those on adjacent land. No amendment proposed. Sites are shown separately, with a sepa
LP046	Stat	Stantec; Barking Riverside Limited	Redline Boundary	Objection	The redline boundary of the Site Allocation AA should be consistent with the terms of the OPP. The Barking Power Station site and the UKPN substation south of River Road are excluded from the OPP red line, and we would therefore suggest these areas also be removed from the site allocation red line, as BRL do not control these areas of land and to our knowledge are not available. The Pathways School is not currently included within the Site Allocation red line, but does fall within the OPP red line. In addition, the allocation should include blue land within BRL's ownership. No modification proposed. We are happy to discuss boundary amendments further as part of the site discussions at the main hearings.
LP046	Stat	Stantec; Barking Riverside Limited	Flood Zones	Objection	The Policies Map shows Flood Zones 2 and 3 across parts of Site Allocation AA. The Flood Zone 3 designation should be deleted. The site has been the subject of extensive remediation including land raising in accordance with the terms of the extant OPP. The effect of which is to raise the site above the level of the flood zone. No modification proposed. We are happy to discuss this further as part of the site discussions or any mapping discussions at the main hearings.
LP046	Stat	Stantec; Barking Riverside Limited	Archaeological Priority Area	Objection	The tiered approach of the Reg 19 Policies Map is removed in Policies Map in favour of one designation of Archaeological Priority Area. Site Allocation AA is still shown as falling within an Archaeological Priority Area. There is no reference to this in the adopted Local Plan or Proposals Map. The basis for this designation and land for inclusion is therefore not clear. Clarity is needed. No modification proposed. We are happy to discuss this further as part of the site discussions or any mapping discussions at the main hearings.
LP046	Stat	Stantec; Barking Riverside Limited	Gypsy and Traveller Site	Objection	The Reg 19 Policies Map did show the proposed allocation, but the approach was one of showing a broad location. Whilst this defined site may have been included in the evidence base that supported the preparation of the Local Plan, the Reg 19 Policies Map did not propose a defined site extent. Representations were submitted on this basis. BRL maintain its objection to Draft Policy DMH 6: Gypsy and Traveller Accommodation and the associated changes- these are not repeated herein, however in short the site is not suitable, available nor achievable for a Gypsy and Traveller Site. Modification already proposed to remove site

LP046	Stat	Stantec; Barking Riverside Limited	Figure 8	Objection	The above Initial Main Modification Reference IMM9 relates to Figure 8 which supports Area Policy SPP2 Thames Riverside including Barking Riverside. We had originally objected to this figure seeking clarification the purpose of the diagram and whether the items identified on the diagram were to be treated as designations in policy terms, namely: • District Centre; • Potential Open Space; • Potential London Underground Station; • River Passenger and Freight Services; • Potential River Roding Crossing. IMM9 proposes a new figure and approach. It no longer proposes designations and instead proposes symbols for the sites that fall in the Area Policy SPP2 area e.g. it proposes a factory symbol for some allocations, a house for others. There is no Key to understand what the symbols are to represent. The symbol for Barking Riverside is unclear. Whilst a simplification of approach is welcome, it is now such that it is not clear what the benefit or purpose of the Figure is. We would suggest that the use of symbols is effective in the Opportunity Area figures used in the London Plan 2021 (see Figure 2.7) where symbols and yields are used.	We do not propose a further amendment to this figure. To ensure it is illustrative and not setting out spatial policies, we have deliberately not included a key. The icons are intended to demonstrate general vicinities for industry/employment and housing.
LP130	Cllr.	Eastbrook and Rush Green Ward	Gypsy and Traveller Site	Objection	We have received representations from constituents and other interested parties relating to the identification of Eastbrookend Country Park, as the sole available site for an additional Travellers Site in the Local Action Plan, as part of the most recent consultation process. We do not consider the declassification of green belt land to be appropriate, to accommodate the proposed site. Eastbrookend Country Park is a Green Flag Park and has a unique environment of both wildlife and their habitats which should not be disturbed and damaged. This proposal directly impinges on the Green Belt and is not therefore considered by us to be a viable option either. We would ask that alternative site(s) are investigated and that these are used, without the inclusion of the Eastbrookend Country Park site, to further amend the Local Action Plan.	No amendment proposed. We have carried out an extensive process looking at over 60 sites trying to find a suitable location to accommodate the future growth of the borough's travelling community. Each attempt has proved unsuccessful for a variety of reasons, including land availability, suitability and cost; concluding unfortunately that no suitable alternative location could be found.
LP131	Stat	The British Horse Society	Transport	General	We would ask that any proposed improvements for cyclists and walkers included or proposed within the local plan should include equestrians unless there are evidence based reasons for their exclusion which cannot be overcome. This might include the use of a different blue sign showing 3 users (NP956.1) in place of the 2 user sign and, at a road crossing, the addition of a signal button higher up a post set back from the roadside (said post also likely to be of benefit to users in wheelchairs, mobility scooters, etc.).	No amendment proposed. Not a soundness issue - something we can consider outside Local Plan process
LP132	Developer	Riverside Properties	SIL Designation	Objection	The Agent has concerns with proposed modification Ref. PMSPM61 included within Document C3, as through the latest iteration of the draft Local Plan, the Site has now been designated as Strategic Industrial Land (hereinafter 'SIL'). The Client strongly contends that in its current residential form, the designation of the Site for SIL purposes is not appropriate and therefore requests that it is removed from the designation	No amendment currently proposed although individual site boundaries and designations will be discussed as part of the examination.
LP054	Resident	N/A	Gypsy and Traveller Site	Support but with suggestion	I support the extension of the existing site at Eastbrookend Country Park. Although the additional pitches would be located on what is currently green belt land, it would be possible for the Council to replace the small loss of this green belt land with additional new green belt land as part of the many new developments underway. I support a future additional site at Castle Green. It would be worth consulting, and involving the participation of, the Irish Traveller community in the design of the proposed Traveller site at Castle Green in due course.	Support acknowledged.
LP133	Developer	City & Suburban Ltd	Site Allocation BA	Support	The inclusion of Site Allocation BA within the emerging Local Plan 2037 will allow for redevelopment proposals to come forwards at Wellgate Community Farm, and for benefits associated with the adjacent farm to be realised. The redevelopment of the site will deliver benefits for the site's appearance and its openness, and will assist in providing housing within the Borough. The site is deliverable within the short term and has the potential to provide a range of housing types to meet the Council's needs, including affordable housing, and provides the opportunity to enhance the appearance of this previously developed site within the Green Belt.	Support of site inclusion acknowledged
LP048	Developer	A'Lake Limited (Archway Group Limited)	Site Allocation WC and CH	Support but with suggestion	Despite being shown on the 'Proposals Map Draft October 2021' (Document ID C3), details of the WC allocation were not included in the 'Second Revised Regulation 19 Consultation Version, Appendix Two: Proposed Site Allocations Autumn 2021' (Document ID C2). Details of the WC site allocation are now shown in 'Illustrative Clean Version of Appendix 2 Proposed Site Allocations June 2023' (Document ID EX98), which is strongly supported. It is considered that the description of the site allocation could go further. The timescale for producing the Supplementary Planning Document is not clear. The continued inclusion of the site, with its full development opportunity recognised, will ensure that the Local Plan is effective. The site WC (Selina's Lane) sits within the wider Chadwell Heath Industrial Estate area. The ambitious delivery objectives to comprehensively regenerate this area is supported.	Support acknowledged.
LP123	Stat	Network Rail	Unsound Plan	Objection	Network Rail considers the following sections of the Draft Local Plan to be "Unsound": Initial Main Modification: Document C1 IMM9, Document C1 IMM16, Document C1 IMM57; Initial Submission Policies Map Modification: Document C3 PMSPM5 & Document C3 PMSPM59. Sets out required modifications proposed for each. Network Rail does regard the Proposed Initial Main Modifications (June 2023) to be "Legally compliant" and "Complies with the Duty to co-operate".	See responses to rep LP020 above.
LP094	Stat	National Highways Limited	All	General	We have no objection to the proposed main modifications.	No amendments required
LP041	Stat	Transport For London	All	General	Due to the limited scope of this consultation, TfL does not have any comments to make at this time.	No amendments required

LP121	Stat	NHS London Healthy Urban Development Unit	Gypsy and Traveller Sites	General	We note the proposed changes and have no direct comments. However we recommend that a Health Impact Assessment is undertaken and kept under review at the start of any master planning or other process for the identification of additional Gypsy and Traveller sites/pitches and kept under review throughout to inform decisions. The Gypsy and Traveller community face barriers to accessing a wider range of facilities and services including education, health and social care as well as employment and training. HIAs should also be used early in the process for options for expanding or new grounds for Travelling Show People.	Modification proposed to include reference to health impact assessments
LP008	Stat	Greater London Authority (Mayor of London)	Gypsy and Traveller Site	General	In order for the Castle Green SIL to be considered a suitable location for Gypsy and Traveller pitches LBBB will need to address if the proposal would result in a loss of industrial capacity- which parts of SIL will be affected? Is LBBB proposing to downgrade parts of the SIL to LSIS? How much SIL capacity would be lost? Where would resulting losses of SIL capacity be re-provided in the borough? If applicable, when would SIL re-provision be likely to happen? also ensure that the challenges of bringing together in close proximity, heavy industrial uses with housing are taken into account to provide both good quality homes but also industrial areas that can operate effectively.	We are planning to bring this forward as part the future masterplan and will engage with the GLA in accordance with the Statement of Common Ground and Policy paragraph 9, SPP2.
LP008		Greater London Authority (Mayor of London)	Mapping; Green Belt	General	PMSPM511- The proposed use is for mixed use development (residential and community buildings) which the Mayor considers is inappropriate development in the Green Belt. LBBB should therefore revise the allocation boundary to remove that part which is Green Belt;	Green Belt matters will be discussed further as part of the examination process
LP008		Greater London Authority (Mayor of London)	Green Belt	General	PMSPM20- The southern part, which makes up more than 50% of the site area, lies within MOL which is afforded the same level of protection as Green Belt land, so the Mayor considers is inappropriate development in MOL, would require evidence to demonstrate and establish exceptional circumstances;	MoU Land will be discussed as part of the examination process
LP008		Greater London Authority (Mayor of London)	Green Belt	General	PMSPM46- LBBB are proposing to remove this part of the Green Belt to allow for the proposed development. The proposed boundary change would require evidence to demonstrate and establish exceptional circumstances through the examination process;	Green Belt matters will be discussed further as part of the examination process
LP008	Stat	Greater London Authority (Mayor of London)	Industrial Land	General	IMM16 and IMM64- must sufficiently demonstrate the ability to meet the borough's industrial capacity needs (with a loss of SIL capacity) and ensure that the challenges of bringing together in close proximity, heavy industrial uses with housing are addressed; PMSPM59- mapping inconsistencies between GLA and LBBB information in relation to the Castle Green SIL boundary	Modification proposed to address one of the inconsistencies (the inclusion of Fresh Wharf Industrial Estate as LSIS land on the policies map). No modification proposed to change how Dagenham Dock SIL currently shown.
LP008		Greater London Authority (Mayor of London)	Mapping	General	Omission 1- The entire Fresh Wharf (Southern Part) LSIS is missing from the proposed policies map and should be reinstated; Omission 2- Some parts of the boundary illustrated on LBBB's proposed policies map are inconsistent with GLA mapping.	Modification proposed to address one of the inconsistencies (the inclusion of Fresh Wharf Industrial Estate as LSIS land on the policies map). No modification proposed to change how Dagenham Dock SIL currently shown.
LP134		LBBB Public Health Team	Public health Interests	Support but with sugges	DME clause 7 - Modification : Development proposals for new hot food takeaways (sui generis), new betting shops, casinos and amusement arcades (sui generis) and pay day loan shops (sui generis) within the designated town centres should be discussed with the Council in advance of any application, must accord with Local Plan Policy DMD1:securing high quality design, and the 2021 London Plan and prepared policies on hot food takeaways, and where appropriate, be supported by: a) a cumulative impact assessment of other existing uses of hot food takeaway, or betting shop or pay day loan shop (including extant but unimplemented planning permissions) b) a health impact assessment (HIA) to demonstrate how potential harms to health and wellbeing have been minimised and contribute to reducing health inequalities.	Main modification proposed to reflect additional text.
LP134		LBBB Public Health Team	Public health Interests	Support but with sugges	SP2: The Council will promote high-quality design, providing safe, convenient, accessible and healthy, inclusive developments and interesting public spaces for all. This should take into account the following: Creating an environment that is conducive to healthy living – At present Barking and Dagenham residents and communities live in an environment that makes healthy choices difficult, e.g. fast food shops, advertising and availability of high fat and sugar products, transport to access employment and cultural opportunities, cycle and walkability, road infrastructure that creates pollution or segregates communities. In practice, how will this plan address this both in designing new places and improving existing places. Building community cohesion – The design of environments enables or hinders community interaction and cohesion (a core part of wellbeing), so how can this be protected and enhanced under the Local Plan.	Main modification proposed to reflect additional text.
LP134		LBBB Public Health Team	Public health Interests	Support but with sugges	DMH 6 Gypsy Travellers: Modification to 1d);3 f) the proposal supports the health and wellbeing of the occupiers of the site by providing appropriate facilities, layout and design quality and is supported by a Health Impact Assessment	Main modification proposed to reflect additional text.
LP134		LBBB Public Health Team	Public health Interests	Support but with sugges	SP3 - Ensure that homes are in accordance with London Plan policy on accessibility and adaptability and request that Dementia Friendly Design Principles and healthy homes principles are incorporated into any supplementary guidance. More broadly we also request that housing supplementary guidance ensures adequate measures are in place to protect against damp and mould and related health hazards; and that re-purposing of industrial sites includes review of potential health hazards related to prior industrial use.	No modifications proposed - already set out in London Plan guidance. Comments acknowledged on future supplementary guidance.

LP134		LBBB Public Health Team	Public Health Interests	Support but with sugges	SP4 Social and cultural Infrastructure “1b) securing the delivery of, or contributions towards enhanced or new social and cultural infrastructure facilities to meet the needs arising from development including affordable or no cost spaces.” There is increasing evidence of the decline in access to free play facilities (e.g. playgrounds, playing in the street) for children and many of these are not inclusive (e.g. for girls, people with disabilities, etc.) This is increasingly important given the local demography with a young and deprived population. As part of work going forward under the local plan, we are keen to encourage work with the North East London ICS Estate Team and relevant council/public health partners to ensure alignment of developing health infrastructure with the growing population. This should take into account the following: Access to facilities – Evidence suggests that healthy homes are connected to community, work and services and there is some national analysis which indicates reducing access to these in new homes. Access to a hospital – There is no hospital in Barking and Dagenham and poor attendance rates for appointments, so how can LBBB work with the NHS to enhance access to healthcare.	Main modification proposed to reflect additional text.
LP134	Stat	LBBB Public Health Team	Public Health Interests	Support but with sugges	Welcome the modifications put through in relation to health; namely requirement of Health Impact Assessments (HIAs) for major developments and suicide prevention measures for tall buildings. We would like to propose the following amendment to the modification below to be specific: DME clause 7= addition of wording; DMH 6 Gypsy Travellers- addition of wording and request a requirement of an HIA for the proposed expansion of sites and new sites at an early stage in the master planning process; and SP3- addition of wording.	Main modification proposed to include Health Impact Assessment
LP135	Resident	N/A	Green Belt	Objection	Concerns raised that extension of existing Gypsy and Traveller site in Eastbrookend Country Park will cause substantial, sustained & unnecessary damage including to current greenbely land, destroy an area of protected species, remove breeding grounds for birds and threaten biodiversity, threaten security for park visitors and Discovery centre , impact the adjacent cemetery, playground, outdoor gym, park & fishing lakes. Find an alternative site on existing brown belt land.	No amendment proposed. We have carried out an extensive process looking at over 60 sites trying to find a suitable location to accommodate the future growth of the borough’s travelling community. Each attempt has proved unsuccessful for a variety of reasons, including land availability, suitability and cost; concluding unfortunately that no suitable alternative location could be found.
LP136	Resident	N/A	Green Belt	Objection	Concerns raised that extension of existing Gypsy and Traveller site in Eastbrookend Country Park will cause substantial, sustained & unnecessary damage including to current greenbely land, destroy an area of protected species, remove breeding grounds for birds and threaten biodiversity, threaten security for park visitors and Discovery centre , impact the adjacent cemetery, playground, outdoor gym, park & fishing lakes. Find an alternative site on existing brown belt land.	No amendment proposed. We have carried out an extensive process looking at over 60 sites trying to find a suitable location to accommodate the future growth of the borough’s travelling community. Each attempt has proved unsuccessful for a variety of reasons, including land availability, suitability and cost; concluding unfortunately that no suitable alternative location could be found.
LP137	Resident	N/A	Green Belt	Objection	Concerns raised that extension of existing Gypsy and Traveller site in Eastbrookend Country Park will cause substantial, sustained & unnecessary damage including to current greenbely land, destroy an area of protected species, remove breeding grounds for birds and threaten biodiversity, threaten security for park visitors and Discovery centre , impact the adjacent cemetery, playground, outdoor gym, park & fishing lakes. Find an alternative site on existing brown belt land.	No amendment proposed. We have carried out an extensive process looking at over 60 sites trying to find a suitable location to accommodate the future growth of the borough’s travelling community. Each attempt has proved unsuccessful for a variety of reasons, including land availability, suitability and cost; concluding unfortunately that no suitable alternative location could be found.
LP138	Resident	N/A	Green Belt	Objection	Concerns raised that extension of existing Gypsy and Traveller site in Eastbrookend Country Park will cause substantial, sustained & unnecessary damage including to current greenbely land, destroy an area of protected species, remove breeding grounds for birds and threaten biodiversity, threaten security for park visitors and Discovery centre , impact the adjacent cemetery, playground, outdoor gym, park & fishing lakes. Find an alternative site on existing brown belt land.	No amendment proposed. We have carried out an extensive process looking at over 60 sites trying to find a suitable location to accommodate the future growth of the borough’s travelling community. Each attempt has proved unsuccessful for a variety of reasons, including land availability, suitability and cost; concluding unfortunately that no suitable alternative location could be found.
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LP148	Resident	N/A	Green Belt	Objection	Concerns raised that extension of existing Gypsy and Traveller site in Eastbrookend Country Park will cause substantial, sustained & unnecessary damage including to current greenbely land, destroy an area of protected species, remove breeding grounds for birds and threaten biodiversity, threaten security for park visitors and Discovery centre , impact the adjacent cemetery, playground, outdoor gym, park & fishing lakes. Find an alternative site on existing brown belt land.	No amendment proposed. We have carried out an extensive process looking at over 60 sites trying to find a suitable location to accommodate the future growth of the borough's travelling community. Each attempt has proved unsuccessful for a variety of reasons, including land availability, suitability and cost; concluding unfortunately that no suitable alternative location could be found.
LP149	Resident	N/A	Green Belt	Objection	Concerns raised that extension of existing Gypsy and Traveller site in Eastbrookend Country Park will cause substantial, sustained & unnecessary damage including to current greenbely land, destroy an area of protected species, remove breeding grounds for birds and threaten biodiversity, threaten security for park visitors and Discovery centre , impact the adjacent cemetery, playground, outdoor gym, park & fishing lakes. Find an alternative site on existing brown belt land.	No amendment proposed. We have carried out an extensive process looking at over 60 sites trying to find a suitable location to accommodate the future growth of the borough's travelling community. Each attempt has proved unsuccessful for a variety of reasons, including land availability, suitability and cost; concluding unfortunately that no suitable alternative location could be found.
LP150	Resident	N/A	Green Belt	Objection	Concerns raised that extension of existing Gypsy and Traveller site in Eastbrookend Country Park will cause substantial, sustained & unnecessary damage including to current greenbely land, destroy an area of protected species, remove breeding grounds for birds and threaten biodiversity, threaten security for park visitors and Discovery centre , impact the adjacent cemetery, playground, outdoor gym, park & fishing lakes. Find an alternative site on existing brown belt land.	No amendment proposed. We have carried out an extensive process looking at over 60 sites trying to find a suitable location to accommodate the future growth of the borough's travelling community. Each attempt has proved unsuccessful for a variety of reasons, including land availability, suitability and cost; concluding unfortunately that no suitable alternative location could be found.
LP151	Resident	N/A	Green Belt	Objection	Concerns raised that extension of existing Gypsy and Traveller site in Eastbrookend Country Park will cause substantial, sustained & unnecessary damage including to current greenbely land, destroy an area of protected species, remove breeding grounds for birds and threaten biodiversity, threaten security for park visitors and Discovery centre , impact the adjacent cemetery, playground, outdoor gym, park & fishing lakes. Find an alternative site on existing brown belt land.	No amendment proposed. We have carried out an extensive process looking at over 60 sites trying to find a suitable location to accommodate the future growth of the borough's travelling community. Each attempt has proved unsuccessful for a variety of reasons, including land availability, suitability and cost; concluding unfortunately that no suitable alternative location could be found.
LP152	Resident	N/A	Green Belt	Objection	Concerns raised that extension of existing Gypsy and Traveller site in Eastbrookend Country Park will cause substantial, sustained & unnecessary damage including to current greenbely land, destroy an area of protected species, remove breeding grounds for birds and threaten biodiversity, threaten security for park visitors and Discovery centre , impact the adjacent cemetery, playground, outdoor gym, park & fishing lakes. Find an alternative site on existing brown belt land.	No amendment proposed. We have carried out an extensive process looking at over 60 sites trying to find a suitable location to accommodate the future growth of the borough's travelling community. Each attempt has proved unsuccessful for a variety of reasons, including land availability, suitability and cost; concluding unfortunately that no suitable alternative location could be found.
LP153	Resident	N/A	Green Belt	Objection	Concerns raised that extension of existing Gypsy and Traveller site in Eastbrookend Country Park will cause substantial, sustained & unnecessary damage including to current greenbely land, destroy an area of protected species, remove breeding grounds for birds and threaten biodiversity, threaten security for park visitors and Discovery centre , impact the adjacent cemetery, playground, outdoor gym, park & fishing lakes. Find an alternative site on existing brown belt land.	No amendment proposed. We have carried out an extensive process looking at over 60 sites trying to find a suitable location to accommodate the future growth of the borough's travelling community. Each attempt has proved unsuccessful for a variety of reasons, including land availability, suitability and cost; concluding unfortunately that no suitable alternative location could be found.
LP154	Resident	N/A	Green Belt	Objection	Concerns raised that extension of existing Gypsy and Traveller site in Eastbrookend Country Park will cause substantial, sustained & unnecessary damage including to current greenbely land, destroy an area of protected species, remove breeding grounds for birds and threaten biodiversity, threaten security for park visitors and Discovery centre , impact the adjacent cemetery, playground, outdoor gym, park & fishing lakes. Find an alternative site on existing brown belt land.	No amendment proposed. We have carried out an extensive process looking at over 60 sites trying to find a suitable location to accommodate the future growth of the borough's travelling community. Each attempt has proved unsuccessful for a variety of reasons, including land availability, suitability and cost; concluding unfortunately that no suitable alternative location could be found.

# **Appendix B Full Second Draft Local Plan (Reg 19) Consultation Summary Report**

Working in partnership



**Barking &  
Dagenham**

**London Borough of Barking and  
Dagenham**

## **Second Draft Local Plan (Reg 19) Consultation Summary Report**

Prepared by Be First  
December 2021

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# Chapter 1

## Introduction

**1.1** Be First, on behalf of the London Borough of Barking and Dagenham (LBBD), consulted on the first revised draft Regulation 19 (1) Local Plan from 11<sup>th</sup> October to 28<sup>th</sup> November 2021, receiving 70 individual responses containing 439 individual comments.

**1.2** During the consultation, the Council consulted with a range of stakeholders, including both statutory and non-statutory bodies (see **Appendix A**) and local communities, in order to seek views on the draft Vision, Objectives and Draft Policies within the Draft Local Plan 2019 - 2037. The consultation was carried out in accordance with Regulation 19 of the *Town Planning and Country Planning (Local Planning) (England) Regulations 2012* (Regulation 19).

**1.3** This report contains a summary of the consultation and is prepared in accordance with Regulation 19. It provides an overview of the consultation responses received; and considers how these responses should be taken into consideration to inform the next iteration of the Local Plan. The key points to note are:

- All comments received have been read, and key points noted. Not all the individual points raised are included in the summaries. The summaries identify key themes raised and the general level of support for each.
- The value of the comment relates to its content, rather than how many times it has been said. This summary therefore does not quantify the number of comments received raising particular points.
- The summaries present the information as received. If a summary is considered not to be factually correct, the Council will check and verify information accordingly where required as part of the ongoing Local Plan process.
- The Council/BeFirst must operate within the General Data Protection Regulation (GDPR). Therefore, the names of individuals who have responded to the consultation are not published.
- This document does not list new site suggestions received. The information will be included in the next iteration of the Strategic Land Availability Assessment (SLAA).

# Chapter 2

## Consultation Methods

### Consultation Methods

2.1 The Council applied a range of consultation mechanisms to allow people to share their views through their preferred method. Consultation mechanisms included:

- Online resources;
- Direct e-mail correspondence;
- Press and social media
- Stakeholder engagement meetings (online)
- Plan available for viewing libraries

The details are set out below.

### Online Resources

2.2 There is a dedicated webpage providing updates on the development of the draft Local Plan, and informing the public of the new Local Plan consultation. The website also hosts the latest Local Plan evidence-base documents.

Link to the Council's website:

<https://www.lbbd.gov.uk/local-plan-review>

### Direct Email Correspondence

2.3 Emails were sent to all statutory and non-statutory consultees on the Council's planning policy database. Examples of the emails sent are included in **Appendix B** and **Appendix C**.

### Press and Social Media

2.4 A variety of methods were used to engage with the public, including:

- A featured article in 'Time 107.5" found in **Appendix D**;
- Editorial article in the Barking and Dagenham Postfound in **Appendix E**; and
- Posts to Be First's social media platforms (Facebook, Twitter, & Instagram).

### Consultation Meetings

**2.5** Two public events were held via MS Teams on 18.10.2021 and 03.11.2021 and one engagement meeting with the Thames Ward Community Project on 17.11.2021. During and post the consultation, LBBD held eight LocalPlan engagement meetings online with a number of key stakeholders to obtain feedback that related to the draft policies and proposed sites (see **Table 2.1**). Where appropriate, they have been fed into the development of policies in the next stage of the plan.

**Table 2.1: Local Plan Engagement Meetings**

Meeting with whom	Date
Local Plan Engagement meeting with the GLA	22/10/2021
Local Plan Engagement meeting with the GLA	09/11/2021
Local Plan Engagement meeting with London Borough of Redbridge	15/11/2021
Local Plan Engagement meeting with the Healthy Urban Development Unit	24/11/2021

### Plan available for viewing libraries

**2.6** Copies of the Plan were distributed to local libraries for member of the public to view



## Chapter 3

# Overview of Consultation Responses

**3.1** This section summarises the main issues and comments raised during the consultation process. A full summary of responses is available to view in **Appendix E** of this report.

**3.2** In total, the Council received written representations from 70 individuals or organisations and businesses. Of these, 21 were statutory consultees. These representations generated 439 individual comments in relation to the Local Plan.

**3.3** Responses were received via email, letter and the Council's consultation portal. These responses came from:

- Individuals;
- Councillors;
- Statutory Bodies;
- Developers;
- Landowners;
- Organisations; and
- Businesses.

**3.4** The large majority of comments are related to:

- Chapter 3: Sub area vision and area development strategy
- Appendix 2: Proposed site allocations, particularly on large industrial land
- Chapter 4: Design (tall buildings and heritage)
- Chapter 5: Housing (affordable housing and housing mix, Gypsy and Travellers)
- Chapter 6: Social Infrastructure
- Chapter 7: Economy (industrial land and town centre)
- Chapter 10: Transport (car-lite, cycle facility, freight)

The summary in the next chapter provides a snapshot of the key issues raised.

## Chapter 4

### Summary of Key Responses Themes

**4.1** A summary of the main issues raised during the Regulation 19 (1) Consultation is provided below, along with the Council's response to the comments received.

**Table 4.1: Summary of Issues and the Council/Be First's Response**

	Policy/Theme	Summary of Issue	Council/Be First Response
1	Sub area vision and development strategy	<ul style="list-style-type: none"> <li>Concerns over the Council's approach to industrial land overall and how planning will help support employment in the area and with an increase in housing and job opportunities. A clear justification based on robust evidence should be provided to demonstrate the potential supply of sites for intensified industrial capacity, approach to delivering industrial intensification at the scale envisaged.</li> <li>Inconsistency of the overall housing number as set out in the vision statement and as in the policy statement (SP3). Clarification on the overall housing number should be provided in terms of how the Council have arrived at this level of residential growth over the plan period as it significantly exceeds the borough's London Plan housing target. The level of growth should not be at the expense of other forms of development where is identified need.</li> <li>Concerns over high density housing for environmental and heritage</li> </ul>	<ul style="list-style-type: none"> <li>The Council has published a new Industrial Land Strategy as part of its evidence base, which addresses the release and intensification of strategic industrial land in more detail.</li> <li>The housing numbers and plan period are being reviewed prior to submission of the plan including amendments to the site allocation figures</li> <li>The draft Local Plan is supported by Sustainability Appraisal, which assess the overall social, economic and environmental impacts of the plan.</li> </ul>
2	Proposed site allocations	<ul style="list-style-type: none"> <li>General support for the majority of the sites allocated in the Plan, with some objections raised against specific development proposals and development potentials.</li> <li>Proposals for a couple of new sites to be considered for additional site</li> </ul>	<ul style="list-style-type: none"> <li>All sites, including the new sites, have been reviewed and updated based on the strategic Land Availability Assessment. We have made a number of changes to sites in terms of its boundaries, potential capacities and delivery trajectories.</li> </ul>

	Policy/Theme	Summary of Issue	Council/BeFirst Response
		<p>allocations, including: Dagenham Heathway station, the former volunteer public house and land at Alfred's way.</p> <ul style="list-style-type: none"> <li>Concerns over lacking site details, particularly to help understand the Council's approach to industrial land in terms of provision of some existing industrial capacity.</li> </ul>	<ul style="list-style-type: none"> <li>The proposed site allocations have included more details, which helps to provide more site specific guidance.</li> </ul>
3	Industrial land strategy	<ul style="list-style-type: none"> <li>Lacking sufficient detail regarding approach to industrial land overall which gives rise to concerns over development being delivered in appropriate locations and is not supported by essential infrastructure; and it is not possible to raise where and on what grounds the agent of change might apply to co-location zones.</li> </ul>	<ul style="list-style-type: none"> <li>The Council has published an Industrial Land Strategy as part of its evidence base, which will address the release and intensification of strategic industrial land in more detail. The implementation of this strategy will be further developed in a strategic delivery framework such as a development brief, masterplan or design code etc.</li> </ul>
4	Small Sites	<ul style="list-style-type: none"> <li>Concerns over the insufficient number of small sites identified for housing development across the borough over the Local Plan period.</li> </ul>	<ul style="list-style-type: none"> <li>The potential to use small sites to meet housing need has been discussed in the Housing Evidence Topic Paper, which is published alongside the second revised draft Local Plan Reg 19 (2) consultation.</li> <li>The Council is allocating small sites, set out within Appendix 2, but considers that the context of LBBDD is such that larger sites provide the opportunity for the scale of transformation and regeneration required.</li> </ul>
5	Design	<ul style="list-style-type: none"> <li>Need to identify tall building locations on the map and where appropriate indicate tall building heights, for example, taller buildings should be allowed in locations where they make the best use of land, and on sites that have allocations that identify the potential for taller elements than their surroundings.</li> <li>Further clarifications on policy SP2 and DMD1 are required to help applicants understand what is actually required to comply with these policies.</li> </ul>	<ul style="list-style-type: none"> <li>Tall Building Locations have been included within the draft Local Plan, which is published alongside the second revised draft Local Plan Reg 19 (2) consultation.</li> <li>The policies contained in the Design chapter has been reviewed and updated to provide clarity.</li> </ul>

	Policy/Theme	Summary of Issue	Council/BeFirst Response
6	Housing	<p>Affordable housing</p> <ul style="list-style-type: none"> <li>Clarity is required on the current affordable housing target of 50%</li> <li>Clarity is required to follow the Mayor's Threshold Approach to affordable housing as set out in Policy H5 of the London Plan.</li> </ul> <p>Housing mix</p> <ul style="list-style-type: none"> <li>The borough -wide unit mix should acknowledge the need for private rented sector housing and consideration to the differentiated housing mix demand for this different housing product.</li> </ul> <p>Build to rent</p> <ul style="list-style-type: none"> <li>More specific policy approach to affordable housing on build to rent schemes should be provided.</li> </ul> <p>Gypsy, Traveller and Travelling Showpeople needs</p> <ul style="list-style-type: none"> <li>Objection against proposed Traveller sites citing these areas are not suitable for pitches</li> </ul>	<ul style="list-style-type: none"> <li>The policies contained in the Housing chapter have been reviewed and updated to provide clarity, and are in conformity with the London Plan 2021.</li> <li>The policy has been revised and updated to allow some flexibility where creation of a balanced community may require a different approach.</li> <li>LBBDD takes a positive approach to build to rent in accordance with the London Plan 2021, policy H11.</li> <li>Travellers site are required in order to meet the identified need, the assessment of the suitability of the sites can be found in the evidence base documents</li> </ul>
7	Transport	<ul style="list-style-type: none"> <li>Lacking clarifications appear to be required in terms of: cycle facilities, car-lite development, on-street parking spaces and bulk goods shopping etc.</li> </ul>	<ul style="list-style-type: none"> <li>The policies contained in the Transport chapter have been reviewed and updated to provide clarity, and are in conformity with the London Plan 2021.</li> <li>Borough Transport Strategy and Cycling and Walking Strategy has been published alongside the second revised draft Local Plan Reg 19 (2) consultation.</li> </ul>

	Policy/Theme	Summary of Issue	Council/BeFirst Response
8	Social infrastructure	<ul style="list-style-type: none"> <li>24 months Marketing period is too restrictive.</li> </ul>	<ul style="list-style-type: none"> <li>The relevant policies have been updated to allow flexibility in marketing period - not less than 12 months. This is except for public houses, which requires 24 months marketing period.</li> </ul>

## Appendix A

### List of Statutory and General Consultees

#### Statutory Consultees:

- Canal and River Trust
- Civil Aviation Authority
- Coal Authority
- Department for Education
- Environment Agency (London)
- Essex County Council
- Highways England
- Historic England
- Homes & Communities Agency /Homes England
- London Borough of Bexley
- London Borough of Greenwich
- London Borough of Havering
- London Borough of Newham
- London Borough of Redbridge
- London Legacy Development Corporation
- Marine Planning Authority
- Mayor of London / GLA
- National Grid
- Natural England
- Network Rail
- NHS Property Services (London)
- NHS Trust (London)
- Office of Rail Regulation
- Port of London Authority
- Primary Care Trust
- Sport England
- Thames Water
- Thurrock Council
- Transport for London

#### Non-Statutory Consultees:

- Ancient Monuments Society
- Borough Tenants and Residents Association
- Barking and Dagenham Bangladesh Welfare Association
- Barking and Dagenham Chamber of Commerce Ltd
- Barking and Dagenham Council for Voluntary Services
- Barking and Dagenham Cycling Campaign
- Barking and Dagenham Faith Forum
- Barking and Dagenham Friends of the Earth
- Barking and Dagenham leaseholders Association
- Barking Power Station
- Barking Riverside Ltd
- Campaign for the Protection of Rural England
- Crossrail Limited
- London Cycling Campaign
- London Gypsy and Traveller Unit
- National Trust
- NHS Property Services Ltd
- Sports England
- Sustrans
- Transport for London
- Barking and Dagenham College
- Essex County Council
- Barking and Dagenham Leaseholders Association Developers

## Appendix B

### Example Emails Sent to Statutory Consultees

#### Example Email Sent to Statutory Consultees

Subject: **Second Regulation 19 Consultation on the LBBB draft Local Plan 2037**

Dear consultee,

Second Regulation 19 Consultation on the LBBB draft Local Plan 2037

We are writing to let you know that London Borough of Barking and Dagenham are launching a period of public consultation on the new draft Local Plan. We undertook the Regulation 18 draft Local Plan consultation and its supporting evidence base documents between November 2019 and February 2020. The next consultation was carried out on the first Regulation 19 revised draft Local Plan from October to November 2020.

Responses to both these consultations informed the second Regulation 19 revised draft Local Plan, and its associated new and updated supporting studies.

This period of consultation will run from 11th October 2021 till midnight 28th November 2021 for a total of seven weeks. You can view and download a copy of the draft Local Plan and its supporting documents via our website: <https://www.lbbd.gov.uk/local-plan-review>. An updated Sustainability Appraisal and Habitats Regulations Assessment will be published later this week.

You can submit your comments by using the attached Representation Form and the Accompanying Guidance, return a completed form to us by email: [planningpolicy@befirst.london](mailto:planningpolicy@befirst.london) or by post to:

London Borough of Barking and Dagenham

Planning Policy

C/O BeFirst

9th Floor Maritime House

1 Linton Road

Barking IG11 8HG

Please note that we will not accept any late representation beyond 28th November 2021 as this is a statutory consultation.

We look forward to hearing from you.

Planning Policy Team

Be First Planning, Building Control & Land Charges is currently working remotely. It is generally business as usual, w/ meetings (etc) being done via phone, Skype and Microsoft Teams.

**Planning Policy | Be First**

9th Floor | Maritime House | 1 Linton Road | Barking | London IG11 8HG

[www.befirst.london](http://www.befirst.london) | @befirstLondon



working on behalf of Barking and Dagenham Council

## Appendix C

### Example Emails Sent to General Consultees

#### Example Email Sent to Non-Statutory Consultees

**Subject: Subject: Second Regulation 19 Consultation on the LBBB draft Local Plan 2037**

Dear Sir or Madam,

#### **We'd like your views on the draft Local Plan for Barking and Dagenham**

I am writing to invite you to give us your feedback on the final draft of our Local Plan.

The Local Plan is vitally important for the borough. It provides:

- A shared vision and clear strategy for the council and its partners, setting out how the borough will grow, where new homes will be built and jobs created, and what facilities are needed to support our changing population, together with
- Planning policies and guidelines to shape this growth and development up to 2037.

#### **How has the Local Plan changed?**

Because the Local Plan is so important to the borough, it has been through several phases of consultation. You can see details of these, together with earlier drafts, on our website.

We have revised and updated this version to reflect the many comments and suggestions we have received. In particular you will see extensive changes in the following areas:

- Site Allocations
- Industrial Land
- Housing
- Transport
- Waste

#### **How can I comment?**

You can see the latest draft Local Plan and its supporting documents, on our website: <https://www.lbbd.gov.uk/local-plan-review>

We would welcome any further feedback and suggestions before we submit this draft

You can submit your comments by sending the attached representation form to us by email: [PlanningPolicy@befirst.london](mailto:PlanningPolicy@befirst.london)

[Or you can send them by post to:](#)



[London Borough of Barking and Dagenham](#)  
[Planning Policy](#)  
[C/O Be First](#)  
[9<sup>th</sup> Floor Maritime House](#)  
[1 Linton Road](#)  
[Barking IG11 8HG](#)

Be sure to reply by **28th November 2021**.

Remember that we will not publish postal or email address but your comments are not confidential. Your name or company and comments will be made public online.

If you would like this consultation document in a different format, such as large print, please contact us either via email or by post at the address above.

If you no longer wish to be updated on future consultations on the LBBB Local Plan, please send an email to [PlanningPolicy@befirst.london](mailto:PlanningPolicy@befirst.london) and we will remove your details from our mailing list.

We look forward to hearing from you.

Planning Policy Team

*Be First Planning, Building Control & Land Charges is currently working remotely. It is generally business as usual, w/ meetings (etc) being done via phone, Skype and Microsoft Teams.*

**Planning Policy | Be First**

9th Floor | Maritime House | 1 Linton Road | Barking | London IG11 8HG  
[www.befirst.london](http://www.befirst.london) | @befirstLondon



working on behalf of Barking and Dagenham Council

## Appendix D

### Article in Planning 107.5

#### Barking and Dagenham residents encouraged to give views on borough's growth

📅 12 Oct 2021 11.43 am 👤 Lianna Bagley



*The final public consultation is running until Sunday, 28 November*

Residents in Barking and Dagenham are being encouraged to give their views on the growth of the borough.

A public consultation is running until Sunday, 28 November regarding the final draft of the Local Plan.

The plan sets out where and what kind of development will be encouraged in the borough between now and 2037.

It will set out the requirements for new infrastructure and facilities such as transport links, schools and health centres.

Barking and Dagenham Council will submit the final draft to an independent planning inspector for examination by the New Year.

The Local Plan is a legal requirement for councils. The technical document is used by planners to determine whether investors, developers and builders' plans are permissible.

Cabinet member for Cabinet Member for Regeneration and Economic Development, Cllr Cameron Geddes, said: "I cannot stress enough how important the Local Plan is - it will help to determine the scale, pace and quality of development that takes place in the borough over the next 20 years and sets out how we will ensure that local people really feel the benefit.

"We've strengthened this plan very significantly since the last draft, in response to the hundreds of comments and suggestions we've received. So, I must thank everybody that responded, but ask them to take a final look before we submit the final draft at the end of the autumn."

The Citizens Alliance Network is also hosting a series of online presentations and discussions.

Citizens Alliance Network project manager, Wayne Trevor, explained: "As well as determining what sort of homes and jobs are available to local people in the next few years, the Local Plan also talks about lots of key policy issues such as how we protect and enhance the environment, and how do we encourage residents to live more active, healthier and more sustainable lives.

"These issues are vitally important for the borough so we're keen to capture residents' views and suggestions through our online workshops."

To see and respond to the Local Plan, head to the [Barking and Dagenham Council website](#).

For more on this story, and the latest on our other local and national news, listen to [Time 107.5FM](#)

# Appendix E

## Article in Dagenham Post

[Barking and Dagenham Post](#) » [News](#) » [Housing](#)

### Residents urged to have a say on future development in borough

Michael Cox



Published: 11:02 AM October 12, 2021 Updated: 11:02 AM October 12, 2021



The council wants to hear from residents about the final draft of its Local Plan - Credit: Ken Meers

Residents are being urged to offer their views on plans for where developments could be built across Barking and Dagenham in the coming years.

The borough's final draft Local Plan sets out the kind of developments that will be encouraged, and where these could be put up to 2037.

Consultation began in 2019 and Cllr Cameron Geddes, the authority's cabinet member for regeneration, said the plan has been "strengthened very significantly" after hundreds of comments and suggestions in response.

He added: "I cannot stress enough how important the Local Plan is - it will help to determine the scale, pace and quality of development that takes place in the borough over the next 20 years and sets out how we will ensure that local people really feel the benefit."

The draft plan is expected to be submitted to an independent planning inspector for examination by the end of the year, with the public consultation running until November 28.



The Citizens Alliance Network is also hosting a series of online workshops about the plan.

ADVERTISEMENT



To view the final draft, take part in the consultation and find out more information, visit [bbd.gov.uk/local-plan-review](http://bbd.gov.uk/local-plan-review).

## **Appendix F**

### **Full Reg 19 (1) List of Representations**

## Appendix F: Index of Representations and List of Representations

	<b>Rep Category (Sta/Dev/Other)</b>	<b>Rep ID (Be First ) e.g. LP04 do Nt add the organisation/ Name</b>	<b>organisation</b>
1	Other	LP005	N/A
2	Sta	LP062	Natural England
3	Sta	LP099	Coal Authority
4	Dev	LP064	Picton
5	Other	LP049	B&D Heritage Conservation Group
6	Other	LP101	Marwood Group LTD
7	Sta	LP100	London Borough of Bexley
8	Sta	LP061	National Grid
9	Sta	LP081	London Borough of Newham
10	Sta	LP040	Metropolitan Police Service
11	Sta	LP077	Marine Management Organisation
12	Dev	LP102	Lok'nStore Group PLC
13	Sta	LP067	Sport England
14	Sta	LP085	London Borough of Redbridge
15	Dev	LP014	EcoWorld Quayside Limited
16	Sta	LP036	Port of London Authoirty
17	Cllr	LP054	Cllr
18	Dev	LP044	Shell Pensions Trust Limited c/o CBRE Global Investors
19	Other	LP103	N/A
20	Dev	LP032	Ropemaker Properties Ltd
21	Sta	LP066	Thames Water
22	Sta	LP024	Environment Agency
23	Dev	LP051	W.H. Brakspear & Sons Ltd
24	Sta	LP073	NHS Property Services
25	Other	LP106	N/A
26	Dev	LP071	Sabreleague Ltd
27	Dev	LP104	Mobin Properties Limited
28	Dev	LP105	Gill Aggregates (Holdings) Limited
29	Sta	LP074	TFL (CD)
30	Other	LP007	Theatres Trust
31	Other	LP107	Shurgard UK Ltd
32	Sta	LP039	CPRE London
33	Other	LP108	N/A
34	Dev	LP046	Barking Riverside Ltd
35	Dev	LP017	Inland Homes
36	Other	LP109	FedEx
37	Sta	LP041	TFL
38	Sta	LP056	Home Builders Federation

39	Other	LP016	Chatsworth Settlement Trustees
40	Dev	LP110	Bellway Homes and Oakwood Real Estate
41	Other	LP111	Swifts Local Network
42	Dev	LP088	Hollybrook Homes
43	Dev	LP027	Baymore Investing Ltd
44	Sta	LP045	Historic England
45	Dev	LP048	Archway Group Ltd
46	Sta	LP008	GLA
47	Dev	LP038	Countryside Properties Plc
48	Other	LP112	The Crown Estate
49	Other	LP037	UPS
50	Other	LP113 (LP046 on previous)	Chadwell Heath Residents Association
51	Dev	LP020	DB Cargo Ltd and Express Concrete
52	Internal	LP114	Be First
53	Dev	LP022	City of London Corporation
54	Dev	LP013	Millennium Group
55	Dev	LP026	Hapag-Lloyd
56	Dev	LP115	Bellway Homes
57	Dev	LP095	Westbury Group
58	Dev	LP011	SEGRO PLC
59	Other	LP116	N/A
60	Dev	LP033	Peabody Trust and Dagenham Dock Ltd
61	Other	LP117	N/A
62	Other	LP118	N/A
63	Other	LP089	N/A
64	Other	LP119	TWCP
65	Dev	LP031	Lagmar (Barking) Ltd
66	Dev	LP096	Valor Real Estate Partners
67	Cllr	LP120	N/A
68	Sta	LP121	NHS London Healthy Urban Development Unit
69	Sta	LP094	Highways England
70	Other	LP122	N/A

Rep Category (Sta/Dev/Other)	Rep ID (Be First ) e.g. LP04 do not add the organisation/Name	Category: Housing, Industrial Land, Open Space, Waste,	Nature of Response (General/Support/Objection/Support but with suggestions)	Comment ID	Relevant Chapter number (1,2,3,4,5,6,7,8,9, Appendix 1, Appendix 2, Appendix 3)	Policy Number (SPxx or DMxx) or Site Reference (e.g. AA Barking River Side)	Relevant Paragraph No. (e.g. Para 1.2)	Summarised Comment	Officer Recommendation - Please identify whether an amendment to the Local Plan is required in light of the comment (Yes, amendment is required or No, amendment is not required or Maybe)	Officer recommendation text - Summarise response briefly explaining why an amendment or no change to the Local Plan is necessary.
other	LP005	Housing		1	5		5.1	2019 to 2029 targets are vague. An update stating how much of the target has been fulfilled is required. Where it refers to a need to build 1557 homes each year, the timeframe needs to be made clear.	No	Reflects GLA housing target
other	LP005	Transport		1	10			Walking and Cycling strategy not in the public domain	No	Walking and cycling strategy is now in the public domain
other	LP005	Transport	Support with suggestion	1	10		10.1	"the resultant increase in traffic resulting from London's growth" – delete 'resultant'.	No	No change required
other	LP005	Transport	Support with suggestion	1	10		10.1	where it states "exceeding London's 2050 carbon neutral target", question is raised as to if this can be worded simpler. Also asked if it is a target for the borough and not just the council?	No	No change required
other	LP005	Transport	Support with suggestion	1	10	SP8	3a	"75% of all trips (based on the citywide target of 80%) in Outer London to be made by walking, cycling or public transport" is unclear. What is the basis of the target.	No	States that this is in the Mayor's Transport Strategy
other	LP005	Transport	Support with suggestion	1	10	SP8	6	Asked where CFR10 will go	No	Identified in Walking and Cycling Strategy
other	LP005	Transport	Support with suggestion	1	10			Change cycle routes to cycle links, cycle ways or cycle facilities	No	No change required
other	LP005	Transport	Support with suggestion	1	10	DMT1	7	"Development proposals should seek reduce the dominance of vehicles on London's streets" correct to 'motor vehicles' as cycles are vehicles	No	No change required
other	LP005	Transport	Support with suggestion	1	10	DMT1	7	reword to "Plans for any development that is likely to have a significant impact on the borough's transport network must include a robust"	No	No change required
other	LP005	Transport	Support with suggestion	1	10	DMT1	12	Reword to "For all developments, plans will be required to show how the development will contribute to promoting sustainable modes of travel and reducing/limiting car use, particularly for short journeys"	No	No change required
other	LP005		Support with suggestion	1				Add public before transport in the following "Developments in areas of poor/moderate transport accessibility will be required to be Car-lite"	No	Transport covers a wider range of modes
other	LP005		Support with suggestion	1				Mentioned "All developments must adopt the maximum London Plan cycle parking standards" is ambiguous and asked if LBBd is saying we should not exceed	No	Meets London Plan requirements
other	LP005		Support with suggestion	1				Remove the ambiguity by replacing 'sufficient' with 'required'	no	No change required

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other	LP005		Support with suggestion	1				Figure 22- isn't clear what proportion of all housing the pie chart includes.	No	Meets London Plan requirements
other	LP005		Support with suggestion	1				Regarding "The remaining 40% determined by the borough" please clarify what the 40% is of.	No	This is set out throughout the policy
other	LP005		Support with suggestion	1				Figure 23 is a useful table, which could be improved by inclusion of the %ages for each category,	No	This is not required in policy
other	LP005		Support with suggestion	1				The distinction between "Capped Target Rents set in accordance with government guidance" and "Capped rent level based on the formulas in the government guidance" is inordinately subtle and I think some explanation is warranted	No	No change required
other	LP005	General	Support with suggestion	1				References to " the borough/boroughs" instead of the Council/Councils".	Yes	Will consider how to clarify this
other	LP005	Social Infrastructure	Support with suggestion	1	6			The NHS estates plan is listed twice in the table of key evidence documents	Yes	The NHS estates plan to be listed once
other	LP005		Support with suggestion	1		DMT 1		"Vallance Avenue" -> Valence Avenue	Yes	To correct typo
other	LP005		Support with suggestion	1				Photo caption incorrectly reads "Vicarage Fields"	No	Development relates to Vicarage Fields
other	LP005		Support with suggestion	1				including pocket gardens, par klets, public realm spaces or cycling par king" -> "... cycle parking"	Yes	To change typo
Sta	LP062	General	No comments	2				No comments	No	No change required
Sta	LP099	General	No comments	3				London Borough of Barking and Dagenham lies outside the defined coalfield and therefore the Coal Authority has no specific comments to make on your Local Plans / SPDs etc.	No	No change required
Dev	LP064	General	Support with suggestion	4		SP5	3	a) retention of suitable locations (see Figure 26) to accommodate future employment growth, with partial or wholly residential use where this is identified within site specific allocations	No	This would undermine the industrial land strategy
Dev	LP064	General	Support with suggestion	4		DME1	10	10. The Council will support co-location of industrial and non-industrial land uses (including employment and residential uses) where appropriate and where this would meet the requirements of Policy E7 of the London Plan. This could involve a mix of industrial and residential and/or other uses on the same site, either side-by-side or through vertical stacking. Partial or wholly residential use is also advocated where this is identified within site specific allocations.	No	This would undermine the industrial land strategy



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Dev	LP064	General	Support with suggestion	4	Site Allocation XK Barking and Riverside Gateway Zone		Proposed Use(s)	Potential to deliver circa 538 new homes, and up to 10,800 sq. m (and significantly more for a wholly commercial development) industrial floorspace, (including storage, distribution and logistics etc) alongside flexible community / commercial uses and supported infrastructure.	Yes	Amend to include storage, distribution and logistics
Dev	LP064	General	Support with suggestion	4	Site Allocation XK Barking and Riverside Gateway Zone		Planning considerations and requirements	The site is suitable for industrial space for Cleaner industrial uses, as well as storage, distribution and logistics uses.	Yes	Amend to include storage, distribution and logistics
Other	LP049	General	Objection	5				Local Plan proposed excessive number of homes for social, environmental and health reasons. Should prioritise retaining and refurbishing remaining council and social housing stock	No	Local Plan seeks to deliver a wide range of types and tenures of new homes. This will be supported by relevant social infrastructure and environmental considerations
Other	LP101	Industrial	Objection	6			2.27	Need for modern commercial stock must be balanced with needs for local services. Redesignating site as residential means that we will have to move out of existing premises. There is still a need for industrial uses.	No	Any development will need to take place with agreement from existing landowners
Other	LP101	Industrial	Objection	6			3.9	Currently supplying local companies which will now be stopped if area is rezoned as industrial land.	No	Any development will need to take place with agreement from existing landowners
Sta	LP100	General	Support with suggestion	7		SP8		Acknowledge opportunity for better connectivity between Barking Riverside and Bexley Riverside including future potential river crossing which may be outside of both Bexley and Barking and Dagenham's plan period	Yes	Strategic policy could be updated to include reference to potential future river crossing
Sta	LP061	General	Support with suggestion	8	Site Allocation CI Thames Road			"...development will be required to provide: x. a strategy for responding to the National Grid underground cables present within the site which demonstrates how the National Grid Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design."	Yes	Accept change in full
Sta	LP061	General	Support with suggestion	8	Site AA Barking Riverside			"...development will be required to provide: x. a strategy for responding to the National Grid overhead lines, underground cables and substations present within the site which demonstrates how the National Grid Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design."	Yes	Accept change in full

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Sta	LP061	General	Support with suggestion	8	Site E_020 Plot 70 Segro Park			"...development will be required to provide: x. a strategy for responding to the National Grid overhead transmission lines present within the site which demonstrates how the National Grid Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design."	Yes	Accept change in full
Sta	LP061	General	Support with suggestion	8	Site Allocation E_029 Thames Road Economic Use			"...development will be required to provide: x. a strategy for responding to the National Grid overhead transmission lines present within the site which demonstrates how the National Grid Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design."	Yes	Accept change in full
Sta	LP061	General	Support with suggestion	8	Site Allocation E_038 Here East and Film Studios			"...development will be required to provide: x. a strategy for responding to the National Grid overhead transmission lines present within the site which demonstrates how the National Grid Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design."	Yes	Accept change in full
Sta	LP061	General	Support with suggestion	8		DMD 1		"x. taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites."	Yes	Accept change in full
Sta	LP081	Industrial	Support with suggestion	8				Ensure monitoring of individual SIL and LSIS sites to ensure no undue pressure is made for industrial land in Newham. Consider business relocation plans as part of masterplanning process.	Yes	Include a new monitoring clause for SIL and LSIS to ensure industrial needs continue to be met within the Borough
Sta	LP081	Waste	Support with suggestion	8				provide an additional commitment that in instances where proposals are found to comply with the requirements of London Plan Policy SI 9 (Safeguarded Waste Sites) points C and D that the capacity of existing waste management facilities will continue to be safeguarded or only released if an alternative site in borough is found. This approach will ensure that any options considered through review of the Joint Waste Plan are not pre-constrained by LBBB's Local Plan requirements	No	Policy SI 9 of London Plan already clear
Sta	LP081	Transport	Support with suggestion	8				Provide additional evidence on the future capacity of transport to inform future phasing of residential dwellings. Would also want to be part of future work on the A13 due to cross-boundary issues.	No	Consider as part of SPD but will involve Newham in the sub-regional group to be arranged by TFL
Sta	LP081	Infrastructure	Support with suggestion	8				We are hearing from NHS partners that there is concern about capacity in the health service (namely Newham Hospital) due to population growth within both Newham and Barking and Dagenham. We would suggest following up on these matters with the NHS and relevant partners within the health service to address these concerns.	No	An updated Infrastructure Delivery Plan will address this issue by working with the NHS and relevant partners

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Sta	LP040	Infrastructure	Support with suggestion	10		DMM 1		We suggest that it would be helpful to make clearer within the policy that emergency services, including the Metropolitan Police, will require s106 contributions to mitigate the impact of new developments. Other areas of proposed contributions have been listed, so this approach appears to be reasonable.	No	Change will reflected in an updated Infrastructure Delivery Plan
Sta	LP077	General	Support with suggestion	11			Page 132	Refer to the adopted South East Marine Plan	Yes	Accept change in full
Sta	LP077	General	Support with suggestion	11				Sets out relevant South East Inshore Marine Plan policies which should be taken into consideration	No	Comments noted
Dev	LP102	General	Support with suggestion	12				Supports the plan but would like policies to take into account site or development specific constraints and the impact on viability, each case should be considered on its own merits	No	Planning applications are considered on their own merits and policies will be applied proportionately
Sta	LP067	Open space	Support with suggestion	13	Chapter 6	SP4	iv	Policy SP4 iv that seeks to encourage the growth and expansion of educational facilities which often is on the playing field. Sport England notes the protection of playing field in Policy DMS 1 but it recommends that Strategic Policy SP4 is clear that expansion on the playing field would have to meet requirements of Sport England's' Playing Field Policy, the NPPF (paragraph 97) and Policy DMS 1.	Yes	Minor change to SP4 could be made to reflect proposed text
Sta	LP067	Economy	Support with suggestion	13	Chapter 7	SP5		Sport England strongly recommends that the Local Plan should consider sports uses; fitness clubs, gyms, climbing centres and five aside centres, to be acceptable on all employment sites as they do create sustainable employment opportunities and provide work experience and qualifications.	No	Social infrastructure already included
Sta	LP067	Open space	Support with suggestion	13	Chapter 8	SP6		Sport England, therefore, recommends that the references to playing pitches in Policy SP6 is amended to playing field to avoid confusion.	Yes	Accept change in full
Sta	LP085		Support	14				Overall believe the Plan and supporting evidence is positive and ambitious including interesting approaches to achieve growth and good sustainable development. Keen to develop cross boundary green corridors as part of Natural Capital Strategy. Welcome transport improvements but would like to work together to improve local bus services.	No	Support welcomed
Dev	LP014	Housing	Support with suggestion	15		Tesco Car Park site allocation		Currently in the process of preparing a full planning application for comprehensive development. Currently proposal will include 1,758 new homes along with replacement Tesco store, 549sqm of Class E commercial space and associated infrastructure works. Site allocation should be revised to circa 1750 homes	No	Site allocation reflects current position
Dev	LP014	Education	Support with suggestion	15		Tesco Car Park site allocation		Reference to education provision should be removed from the draft a llocation. Any contributions required towards education, arising from the population of the new development, can be met through the significant CIL monies generated by the development and which can be allocated specifically to the delivery of education, if required.	Yes	Agreed as part of planning application with education team

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Sta	LP036		Support with suggestion	16		SP5	part 4	the PLA considers this requires amendment to reference the fact that Safeguarded Wharves are protected by Ministerial Direction and therefore must be amended to the following: "All safeguarded wharves and maritime infrastructure will be protected and retained in line with Ministerial Safeguarding Directions, supported by with Mayoral policy and the Marine Management Organisation."	Yes	Accept change in full
Sta	LP036	General	Support with suggestion	16		SPP2	Figure 8	Figure 8 should be updated to highlight the location of the seven safeguarded wharves located in the transformation area	No	Map identifying protected wharves already in Plan Fig 25
Sta	LP036	General	Support with suggestion	16		SPP2	Part 10 (j)	(ii) creation of a river side walk along River Roding, with pedestrian crossing at Mayesbrook and A13 underpass enhancements, including a potential crossing from Barking Riverside to Royal Docks. Any proposed crossing must ensure it is sited and designed to allow the full range of river uses on the River Roding to continue."	No	Considered as part of the Plan and will be a key consideration in planning application
Sta	LP036	General	Support with suggestion	16		SPP2	Part 10 (k)	10: To deliver our vision (see Figure 8) development proposals should be consistent with the following principles: k) The use of existing rail, maritime and river transport infrastructure should be maximised within the wider area and the Thames Estuary as a whole"	Yes	To provide additional clarity
Sta	LP036	General	Support with suggestion	16		SPP2	Part 4 (e)	4: To deliver our vision (see Figure 8) development proposals should be consistent with the principles listed below. e) Strengthening the relationship with the adjacent Transformation Areas to ensure a comprehensive and joined-up delivery approach particularly for infrastructure schemes such as school provision and to ensure future development is designed in line with the Agent of Change principle	No	Can be considered as part of planning application
Sta	LP036	General	Support with suggestion	16		SPP3	Figure 10	Figure 10 must be updated to the highlight the location of the six Safeguarded Wharves located in this Transformation Area. (Dagenham Wharf, Pinnacle Terminal, No 1 Western Extension, East Jetty, No 4 Jetty and Ford Dagenham Terminal.)	No	Already have a map identifying safeguarded wharves in the Borough Fig 25
Dev	LP044	Housing	Support with suggestion		Site allocation document			We request that the site allocation area reverts to the boundary previously identified and the other sites are removed from the site allocation. We understand this to be a graphical error, given that the boundary is shown correctly in the Council's SLAA (see Appendix 3) which has fed into the Local Plan process	Yes	Revert to original site boundary
Other	LP103	Housing	Objection			DMD 2	Figure 20 site WF	Tall Buildings are inappropriate for 97-131 High Road Chadwell Heath as the site is close to existing 1930's terraced houses at the rear. Other surrounding buildings are low rise.	No	Making amendments to tall building zone in line with GLA engagement
Other	LP103	Parking	Objection		Site allocation document		WF 97-131 High Road Chadwell Heath	The existing car park is the only one available for access to Chadwell Heath High Road. Without this facility many shops would eventually close. There needs to be adequate parking for vulnerable groups.	No	Site allocation refers to provision of parking and need to comply with London Plan parking standards

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Dev	LP032	Economy	Objection		SPP4		Para 7	Policy SPP4 states that there will be an 'expectation that there will be no net loss of industrial floorspace' across the transformation area (Policy SPP4, Paragraph 7). It is considered that this requirement could be overly restrictive, particularly in the context of the Industrial Land Strategy that allows a loss of industrial use.	Yes	Change to provide additional flexibility and be in accordance with DME1 and London Plan Policy E4.
Dev	LP032	General	Support with suggestion		SPP4		Figure 12	The diagram includes our client's site within the 'Transformation Area' boundary but labels it as part of the Chadwell Heath Industrial Estate. For the avoidance of doubt, we would suggest that the annotations on this diagram are revised to make it clear that the Transformation Area boundary is not the same as the Chadwell Heath Industrial Estate. The area should be marked as the 'Chadwell Heath Transformation Area' and a 'Mixed Use' area allocation only.	No	Site allocations are identified as residential/mixed use/industrial in order to provide further context to the varying uses that are being proposed and do not represent formal designations
Sta	LP066	Environmental	Support with suggestion		Policies Map	Gascoigne Road Sewage Pumping Station		The SINC designation for the disused land within Thames Water ownership to the south of Gascoigne Road is not appropriate due to the lack of public access to the land and value of the site. The Proposals Map should therefore be amended to omit the designation from this area.	No	To be dealt with through changes to Policy Map during examination
Sta	LP024	General			Chapter 3			It is disappointing that there is a lack of consideration to the environment within the seven Strategic Area Policies. We previously commented on the constraints and opportunities within each sub-area but these comments haven't been taken on board. We understand that these areas are likely to be subject to further masterplanning and expect the environment to be a key consideration of these sub areas as their planning progresses. We have also reviewed the site allocations and append our detailed comments on each site to this response which we hope is useful.	No	The plan is to be read as a whole including natural environment policies
Sta	LP024	Gypsy and Traveller	Support with suggestion				DMH 5	Allocation of a traveller site at Choats Road is within Flood Zone 3 (high risk). Point (d) should specifically reference which parts of national policy and policy guidance this refers to.	No	Site will need to take into account existing policy constraints
Sta	LP024	Natural environment	Support with suggestion				DMNE 3	2 a) demonstrate the impacts of development on biodiversity and nature in accordance with the mitigation hierarchy set out in Policy G6 of the draft New London Plan Intend to Publish version	No	Minimise is currently stronger
Sta	LP024	Natural environment	Support with suggestion				DMNE 3	2 b) demonstrate a minimum of 10% biodiversity net gain, even where development proposals do not result in biodiversity loss, using the Biodiversity metric (or agreed equivalent). Applications for material change of use applications, alterations to buildings, and house extensions, are excluded from this requirement	Yes	To align with national planning policy and legislation

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								h) provide a naturalised buffer zone between the proposed development and the top of bank of any nearby watercourse, landward extent of a flood defence and its underground structures (including tie rods and anchors) or body of water as follows: i. at least 16m for tidal watercourses; ii. at least 8m for fluvial main watercourses; iii. at least 8m for an ordinary watercourse; iv. at least 5m buffer around ponds or other standing water bodies; v. buffer zones should not include development, hardstanding, paths or lighting, or be used for storage of materials. Land adjacent to flood defences should also be protected in line with Policy DMSI 5. Buffer zones should be designed to be dark (less than 1.0 lux) to protect their function as wildlife corridors; open up river corridors, making space for water through the creation of natural buffer zones adjacent to water courses, and increasing floodplain connectivity;		
Sta	LP024	Flooding	Support with suggestion			DMNE 4	1 (h)		Yes	To correct interpretation
Sta	LP024					DMSI 6	Para 6	6) Development proposals along the Thames and tidal River Roding will be expected to:	Yes	
Sta	LP024	General			Site allocation document			Proposed changes to various site allocations to highlight environmental considerations	Yes	Accept proposed text within site allocations
Dev	LP051	General	Support with suggestion			SPP1 Site Allocations		The Site is referred to as the 'Former Victoria Public House' in the key on Figure 7 'SPP1 Site Allocations' on page 31. However, as noted below, the existing Victoria Public House on the site is currently occupied. The word 'Former' needs to be deleted.	Yes	Change has been accepted in mapping
Dev	LP051	General	Support with suggestion			Policies Map		W.H. Brakspear & Sons Ltd requests that reference to the Site being a 'Music venue' is deleted from the Interactive Proposals Map.	Yes	Make small change to proposals map
Sta	LP073	Housing	Objection		Appendix 2	AK Vicarage Field		The site boundary includes land in the ownership of NHS Property Services. NHS property services consider the site could come forward without the inclusion of their land and do not wish their site to be included within the site boundary. Therefore the deliverability of the site is questioned and cannot be included within years 0-5 of the plan.	No	A public inquiry is to be held regarding the Compulsory Purchase Order (CPO) of the land. Whilst no date for this has yet been specified, this Inquiry will resolve the issues raised.
Sta	LP073	Housing	Objection		Appendix 2	AK Vicarage Field		There is no reserved matters application on the site for 874 units and therefore the 300 homes in the 2020-2025 period of the Council's Five Year Land Supply and the 574 units should be removed from the Council's Housing Trajectory.	No	A public inquiry is to be held regarding the Compulsory Purchase Order (CPO) of the land. Whilst no date for this has yet been specified, this Inquiry will resolve the issues raised.

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Sta	LP073	Housing	Objection	Appendix 2	AL Gasgoigne Estate West	The Council's Five Year Housing Statement and Housing Trajectory set out that 600 dwellings will come forward between 2022-2025 yet there has only been one Reserved Matters application for 201 dwellings on the site. The Council should therefore remove 400 dwellings from the 5 Year Housing Land Supply and Housing Trajectory.	No	Assess the methodology to this - look at the assumptions made
Other	LP106		General	N/A	N/A	The plan is too complicated	No	N/A
Dev	LP071	Housing	Support but with suggestions	Chapter 3	SPP2 Thames Riverside	Support inclusion of commercial units 1 and 2 Rippleside Commercial Estate within the Castle Green sub-area. Welcome the production of an SPD for the area offering early engagement in the process.	No	Support welcomed
Dev	LP071	Housing	Support but with suggestions	Chapter 3	SPP1 Barking and River Roding	Support inclusion of Abbey Wharf within the CL 3022: Kingbridge Estate. However recommended to include a further section on Kingsbridge Estate setting out the development parameters, including minimum density capacities.	No	Within Appendix 4, in relation to the Kingsbridge Estate a link is provided to the River Road Employment Area SPD. This provides the additional information requested.
Dev	LP071	Housing	Support but with suggestions	Appendix 2	CF Castle Green	Support for the allocation within the plan as this is in line with the London Riverside Opportunity Area within the London Plan. However notes that the supporting text should refer to 12,000 new homes as opposed to 10,000 new homes.	Yes	Amend text to reflect the site allocation of 12,000 new homes.
Dev	LP071	Tall Buildings	Support	Chapter 4	DMD2 Tall Buildings	Support the policy approach	No	Support welcomed
Dev	LP104	Housing	Support but with suggestions	Appendix 2	DJ Clockhouse Avenue	Amended to reflect the planning history of the site: <i>A proposal to redevelop 34-42 East Street, which comprises roughly the north-eastern fifth of the site, has achieved in-principle support from officers and is in an advanced stage of planning. A planning application was received by the Council on 15 October 2021 (Ref. 21/01908/FULL)</i> . The site should also be updated to come forward in a timeframe of 0-5 years.	Yes	Remove 'N/A' and add the following text: <i>A planning application was received by the Council on 15 October 2021 (Ref. 21/01908/FULL) to provide a 5-8 storey building comprising up to 59 residential units (Use Class C3) with retail units (Use Class E) at ground and part first floors, with associated landscaping and highway works.</i>
Dev	LP104	Housing	Support but with suggestions	Appendix 2	DJ Clockhouse Avenue	The site allocation wording should specify that the covered courtyard is to be delivered outside of the existing live planning permission, proposing the following wording: <i>After "Extending east street market with a covered courtyard", add ", which can be accommodated anywhere within the site allocation. Proposals for a market extension should not prejudice market-led redevelopment of allocated land in private ownership or the ability of</i>	No	The housing numbers are calculated on the basis of the site area with assumptions made for other policy requirements. Furthermore, it is a question for the decision maker as to how to assess

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							<i>the site allocation to accommodate the target number of new homes”.</i>		individual applications that come forward prematurely of the Local Plan.
<b>Dev</b>	<b>LP104</b>	Housing	Support but with suggestions	Appendix 2	DJ Clockhouse Avenue		OAN housing delivery should be the key priority and delivery of other policy aspirations should be supported only where the delivery of housing is not compromised. Recommend the following wording: <i>Delivery of the target number of new homes will be prioritised, and applications providing a proportional number of new homes within the allocation will be supported in principle. Applications to deliver other objectives within this site allocation will also be supported in principle, provided they do not prejudice the delivery of the target number of new homes to be provided within this allocation in the plan period”.</i>	No	Delivery of the housing numbers within the plan is set out within Policy SPDG1 of the Local Plan.
<b>Dev</b>	<b>LP105</b>	Housing	Objection	Appendix 2	ZZ GSR and GILL site		The inclusion of a primary school has not been justified or supported by sufficient evidence. The planning permission, which has decision to grant subject to the Section 106 Agreement, does not include a school, land for a school or financial contributions toward a school. The application for 337 dwellings would not, by itself, necessitate the need for a two-form entry primary school. The total number of dwellings on the site should be increased to 700 residential dwellings to be in line with Policy SPD1 of the London Plan. Propose the following text: <ul style="list-style-type: none"> <li>Proposed use(s) to be amended to state: ‘Residential-led mixed use development, with potential to deliver a minimum of 700 new homes, circa 800sq.m of commercial floorspace and supported infrastructure including 1 new primary school (subject to development viability and design considerations).</li> <li>Supporting text: if DoE funding is secured by the Council post planning permission being granted for any wider planning application at the GILL site including the primary school at the full cost of the Applicant, then this funding should be used for affordable housing off-site (unless there is an agreed mechanism to allow on-site provision post funding decision) and/or other planning obligations that the Council consider appropriate; secured through the Section 106 agreement.</li> </ul>	No	Update the wording of the allocation to include reference to the planning application. Consider increasing the quantum of development to be proposed on the site. The Council will produce a topic paper on Education / The IDP is a live document and will be updated with the latest evidence to justify the position regarding education provision in the Borough.
<b>Dev</b>	<b>LP105</b>	Housing	Support but with suggestions	Chapter 3	SPDG1		To deliver the overall housing requirements, intensification of sites to the south of the A13 and Dagenham Dock is required.	No	This is set out in the Industrial Land Strategy



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Dev	LP105	Housing	Support		Chapter 3	SPDG1		Support for the focus of extensive and large-scale development in Transformation Areas, specifically Dagenham Dock. Welcome potential for high-density and taller buildings.	No	Support welcomed
Dev	LP105	Tall Buildings	Support		Chapter 4	DMD2 Tall Buildings		Supportive of the approach	No	Support welcomed
Other	LP007	Social infrastructure	Support		Chapter 6	SP4		Supportive of the strategic direction of the plan of supporting social and cultural infrastructure.	No	Support welcomed
Other	LP007	Social infrastructure	Support		Chapter 6	DMS1		Support the protection of the borough's valued facilities.	No	Support welcomed
Dev	LP107	Employment	Support but with suggestions		Chapter 1	SPP4	6 (b)	The list of potential uses should be expanded on to reflect Policy E4 of the adopted London Plan	No	The London Plan Policy E4 sets out the requirement that employment land across London should deliver these employment uses. The LBBB Local Plan is in conformity with the London Plan in providing a range of employment sites across the Borough.
Dev	LP107	Housing	Support but with suggestions		Chapter 1	SPP4	6 (d, i.)	Consider that 'the heart of the area' should be defined as ' <i>including but not limited to the areas along Freshwater Road and Selinas Lane</i> '.	No	The Chadwell Heath SPD will define this in more detail.
Dev	LP107	Employment	Support		Chapter 1	SPP4	7	Support the approach - in line with Policy E7 Part B of the London Plan	No	Support welcomed
Dev	LP107	Employment	Support		Chapter 1	SPP4	8	Support the approach to safeguarding and intensifying Locally Significant Industrial Sites for industrial use in accordance with policy E7 of the London Plan	No	Support welcomed
Dev	LP107	Employment	Support		Chapter 7	SP5		Support the approach to deliver jobs and to safeguard and intensify LSIS land.	No	Support welcomed
Dev	LP107	Employment	Support but with suggestions		Chapter 7	DME1	10	Recommend the following wording to ensure the policy is in line with Policy E7 of the London Plan. "The Council will support co-location of industrial and nonindustrial land uses (including employment and residential uses) where appropriate and where this is part of a plan-led or masterplanning process and would meet the requirements of Policy E7 of the London Plan. This could involve a mix of industrial and residential and/or other uses on the same site, either side-by-side or through vertical stacking."	No	The policy wording, as drafted, is considered to be in accordance with policy E7 of the London Plan
Dev	LP107	Employment	Support but with suggestions		Chapter 7	DME1	Table 1	Suggest the following additional wording to Table 1: "Digital/cultural creative industries such as small makers space, craft industry, etc and other ancillary industrial uses and related functions which are suitable for co-location with residential uses, as set out in Policy E7 of the London Plan".	Yes	An update to Table 1 is proposed
Dev	LP107	Employment	Support		Chapter 7	DME2		Support Policy DME2	No	Support welcomed

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Dev	LP107	Biodiversity	Support but with suggestions		Chapter 8	DMNE3	2 (b)	Suggestion to set out that industrial related uses should not necessarily be subject to the 10% biodiversity net gain	No	This is in line with the Environment Act 2021.
Dev	LP107	Employment	Support		Chapter 9	DMSI1		Support the approach	No	Support welcomed
Dev	LP107	Transport	Support but with suggestions		Chapter 9 and 10	DMT2 and DMSI 3		Consider that flexibility should be given to different trip generating characteristics and low employment densities of industrial uses such as B8, to ensure conformity with Policy T6.2 Part C of the London Plan	Yes	Reference already made to Policy T6 of the London Plan
Dev	LP107	Housing	Support but with suggestions		Appendix 2	CH Chadwell Heath Industrial Estate		Proposed to change the wording of the site allocation from support for digital/cultural creative industries to 'contemporary industrial sectors/suitable industrial uses'.	No	The policy wording sets out that 136,732 sqm. Industrial floorspace is required to support digital /cultural creative industries. This does not preclude contemporary industrial sectors or suitable industrial uses.
Other	LP039	Housing	Support		Chapter 1	SPDG1		Support prioritisation of brownfield land, the prioritisation of sustainable transport and the move away from the use of the car, and the creation of new accessible open spaces.	No	Support welcomed
Other	LP039	Housing	Objection		Appendix 2	AA Barking Riverside		Object to the inclusion of green spaces within these allocations as they include Sites of Importance for Nature Conservation (SINCs) and Local Nature Reserves, contrary to Policy DMNE3. Site contains Ripple Local Nature Reserve (RLNR) and this should be excluded from the development site.	No	The site is subject to planning permission (04/01230/OUT, 08/00887/FUL, 08/00846/REM, 16/01971/REM, 18/00940/FUL, 20/00130/REM), which has addressed/considered the issues raised.
Other	LP039	Housing	Objection		Appendix 2	CO Padnell Lake		Object to the inclusion of green spaces within these allocations as they include Sites of Importance for Nature Conservation (SINCs) and Local Nature Reserves, contrary to Policy DMNE3.	No	Site is subject to planning application 20/01686/FULL which has decision to grant subject to the signing of the Section 106 legal agreement.
Other	LP039	Housing	Objection		Appendix 2	XC Harts Lane Estate		Object to the inclusion of green spaces within these allocations as they include Sites of Importance for Nature Conservation (SINCs) and Local Nature Reserves, contrary to Policy DMNE3.	No	These are included within the allocation but not intended to be developed.
Other	LP039	Green Belt	Objection					Object to partial de-designations of areas of Green Belt and the review of this land.	No	The 2015 Greenbelt Review provided a methodological approach to the removal of Greenbelt.

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Other	LP108	Housing	Objection	Appendix 2	WF 97-131 High Road	Tall buildings not suitable for this area given the prevailing architecture and local character, which will have a detrimental impact upon nearby residential amenity.	Yes	Approach to Tall Building revisited prior to submission of the plan. Remove wording in the policy to reflect policy change.
Other	LP108	Parking	Objection	Appendix 2	WF 97-131 High Road	Must retain car park which is essential for vulnerable groups.	No	Approach to car parking must be in accordance with policies within the plan.
Other	LP108	Supermarket	Objection	Appendix 2	WF 97-131 High Road	Supermarket must be retained with adequate parking.	No	The supermarket is to be re-provided. Parking to be in line with parking policies within the plan.
Dev	LP046	Housing	Support but with suggestions	Appendix 2	AA Barking Riverside	Barking Riverside Limited welcomes the inclusion of allocation within the plan and continues to explore the opportunity to increase the quantum of homes that can be provided on the site by approx 6,000 above the 10,800 under the terms of the extant Outline Planning Permission. Increase the housing numbers to provide a gross figure rather than a net figure.	No	The site allocation utilises a methodological approach in line with all site allocations within the plan. There are, at present, no firm numbers in terms of provision on the site.
Dev	LP046	Housing	Objection	Appendix 2	AA Barking Riverside	The Council should re-visit CIL charging schedule and propose that the whole site be zero rated in order to avoid double counting.	No	The Council will continue to keep the CIL charging schedule under review
Dev	LP046	Housing	Support but with suggestions	Appendix 2	AA Barking Riverside	Amendment to the red line boundary of the allocation to align with the Outline Planning Permission. The Barking Power Station and UKPN substation should be removed and the Pathways School should be included. Consider that the allocation should be expanded to include land owned by BRL	No	The site has been allocated to take account of the Transformation Area as a whole in order to give consideration to the areas that may be outside of your control.
Dev	LP046	Housing	Objection	Appendix 2	AA Barking Riverside	Delete Flood Zone 3 designation from Barking Riverside site	No	This is not within the gift of the Local Authority to remove Flood Zone designations
Dev	LP046	Housing	Support but with suggestions	Appendix 2	AA Barking Riverside	Amend the plan to reflect Cycle Route Principles	No	Refer to Cycle and Walking Strategy which covers Barking Riverside
Dev	LP046	Housing	Support but with suggestions	Appendix 2	AA Barking Riverside	The allocation should be clear that any additional education provision sought will be required only to meet the needs of the development	No	Education provision is considered within the whole Plan
Dev	LP046	Housing	Support but with suggestions	Appendix 2	AA Barking Riverside	Remove reference to safeguarded wharfs	No	Not considered necessary

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Dev	LP046	Housing	Support but with suggestions	Appendix 2	AA Barking Riverside		Allocation only need refer to the outline planning permissions and the permissions granted for the Clippe and the extension to the London Overground 04/01230/OUT, 08/00887/FUL, 16/00131/OUT, 18/00940/FUL, TWA 16/APP/02, 20/01441/FULL	Yes	Consider amending the wording of the key development considerations within the site allocation policy.
Dev	LP046	Housing	Support but with suggestions	Appendix 5	Proposals Map		Inconsistency between the key diagram, policies map and site allocation boundary and District Centre.	Yes	Changes already being dealt with separately
Dev	LP046	Housing	Support but with suggestions	Appendix 5	Proposals Map		Inconsistency between housing Trajectory Sites and Housing allocation sites in the different maps	Yes	Update the maps to remove inconsistencies.
Dev	LP046	Housing	Support but with suggestions	Appendix 5	Proposals Map		Archeological priority area. Not referenced in the adopted Local Plan or on the proposals maps, clarity required.	Yes	To be considered as part of review of Policies Map
Dev	LP046	Housing	Support but with suggestions	Appendix 5	Proposals Map		Culture Location	No	Clarity required - do we refer to these in the plan?
Dev	LP046	Housing	Support but with suggestions	Figure 3	Key Diagram		The items on the Key Diagram are not on the policies map, what is the status of the things shown in the policies maps	Yes	Update the maps to remove inconsistencies.
Dev	LP046	Housing	Support but with suggestions	Figure 3	Key Diagram		Remove the potential London Underground Station and refer to 'potential London Overground station'	Yes	Amend the wording within the figure
Dev	LP046	Housing	Support but with suggestions	Appendix 4	Housing Trajectory		Split into an annual trajectory to provide further clarity.	Yes	A Housing Trajectory Topic Paper will be produced which sets out the detail for the main Transformation Areas.
Dev	LP046	Housing	Support but with suggestions	Chapter 2		Figure 4	Clarity around the delivery of the River Roding Bridge to City Airport	No	This is an aspirational policy requirement but is subject to other streams of funding.
Dev	LP046	Housing	Support	Chapter 4	DMD2		Support the tall building policy. The site currently has permission for 95m AOD in the District Centre and Stage 4 with reduced heights of 33m AOD allowed for the foreshore.	No	Support welcomed
Dev	LP046	Housing	Support but with suggestions	Chapter 5	DMH1: Affordable Housing	Figure 23	Clarity required in regard to when affordable rent policies apply. The policy should specify if 65%-80% cap is a fixed range or if the requirement to select local incomes could require a discount below 65%.	No	NPPF sets out that this should be at a minimum of 80%, but there is no maximum requirement.
Dev	LP046	Housing	Support but with suggestions	Chapter 5	DHM2: Housing Mix	1	More flexibility required for the determination of mix within schemes	Yes	This is proposed to be amended to set out this that is the Council's preferred housing mix, but acknowledge that not all sites will be able to deliver this mix.

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Dev	LP046	Housing	Support but with suggestions		Chapter 5	DHM3: Specialist Housing	2	Amend the need for a legal agreement to control operations / occupation	Yes	Consider setting out where appropriate? What if there is a market specialist care home?
Dev	LP046	Housing	Objection		Chapter 5 and Appendix 2	DHM6: Gypsy and Travellers and Allocation 51		The site at Choats Road should be for the following reasons: - The Land is not available - Located within the proposed Pylon Park - The site is identified as a Water Vole habitat area and the protected species are present in the stream between the north and east of the proposed site. This area of land is required as part of the Biodiversity Strategy (approved 2017) - Vehicular access to this strip of land will be removed by the stopping up of Choats Road between the Goresbrook and Northgate Road. Not appropriate site due to level changes between the platform and the road level, rendering the site inaccessible. -Utilities along Choats Road and north of the proposed site includes a cadent strategic intermediate pressure gas main and a sludge main between Beckon STW and Rainham STW. There is also a water main, underground Extra high voltage cable, overhead cables and comms infrastructure along Choats Road.	No	The Council considers that land within BRL ownership can come forward for development within the plan period.
Dev	LP046	Industrial	Objection		Chapter 7	Policy SP 5 and Policy DME1	Figure 25, Figure 26	BRL consider that the area of Creekmouth represents an important opportunity area for redevelopment of Barking Riverside.	No	The safeguarding of Wharves and SIL land is in line with the London Plan.
Dev	LP046	Industrial	Objection		Chapter 7	DME 2: Affordable Workspace		Too prescriptive and seeks to interfere in the market. The policy should be made more flexible.	No	This is to meet the future employment requirements of the Borough. This is also subject to viability.
Dev	LP046	Housing	Objection		Chapter 7	DME 3: Vibrant Town Centres	2	The policy should amend active frontage with 'safe, secure, inviting and active public realm'	No	Active frontage does not preclude uses, it merely seeks to ensure that the frontages are active, i.e. there are no blank walls increasing crime or the perception of the risk of crime. A number of types of uses are set out in the policy, but it specifically states that this is not a closed list.
Dev	LP046	Housing	Support but with suggestions		Chapter 9	DMS1: Sustainable Design and Construction	2	BREEAM has a limited track record and is not considered to provide significant environmental value.	No	The policy refers to 'or updated equivalent', allowing the possibility to adhere to updated guidance regarding sustainable design.

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Dev	LP046	Housing	Support but with suggestions		Chapter 9	DMS1: Sustainable Design and Construction	2 (b)	Amend to state 'BREEAM Non-domestic refurbishment and Fit-out (RFO)'	Yes	The policy refers to 'or updated equivalent', allowing the possibility to adhere to updated guidance regarding sustainable design. Amend the policy wording to state 'BREEAM Non-Domestic refurbishment and Fit-out (FRO)'
Dev	LP046	Housing	Support but with suggestions		Chapter 9	DMS2: Energy, Heat and Carbon Emissions	6	Clarity required in regard to net zero	No	Net-zero is clear
Dev	LP046	Housing	Support but with suggestions		Chapter 9	DMS3: Nuisance		The Council should use powers to ensure the agent of change principle is applied. Further the policy would benefit from additional wording	No	The Council consider that the policy is clear.
Dev	LP046	Housing	Objection		Chapter 11	policy Number (SPxx or DMxx) or Site Reference (e.g. AA Barking River Side)	3	Remove the timing of contribution	No	Policy DMM1 sets out the approach that will be taken, but does not specify timing.
Dev	LP017	Housing	Support		Chapter 3	Policy SPDG 1		Support the approach to brownfield land development and the ambitious growth strategy	No	Support welcomed
Dev	LP017	Housing	Support but with suggestions		Chapter 3	Policy SPP2		Suggest the centrality of the Masterplan SPD is made clearer within the policy text, by specifically referencing the River Road Employment Area SPD.	No	SPD name may change in the future
Dev	LP017	Housing	Support but with suggestions		Chapter 3	Policy SPP2	13	Suggest amending the wording to set out that: 'the Borough will take a proactive approach to working with landowners, developers and stakeholders to assemble larger development parcels that enable the delivery of strategic development objectives'.	No	The Council will take a proactive approach, but the intention of the policy is to ensure that all the land is developed and piecemeal development can undermine delivery of larger sites.
Dev	LP017	Housing	Support but with suggestions		Chapter 3	Policy SPP2	10 a-j	Reinforce the need within the policy for developer contributions towards strategic and green infrastructure objectives to be secured through Section 106	No	The IDP is a live document and as this is updated the wording within the policy will reflect this.
Dev	LP017	Housing	Support but with suggestions		Appendix 2	CI Thames Road		Should refer to 'minimum' number of dwellings	No	These are minimums due to Policy SP3

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Dev	LP017	Housing	Support but with suggestions		Appendix 2	CI Thames Road	The plan should set out where the site-specific development solutions are to be achieved, i.e., where are the residential areas, co-location zones etc.	No	This will be set out within the Masterplan SPD
Dev	LP017	Housing	Support but with suggestions		Chapter 4	Policy SP2	Suggest innovative design solutions should be referenced within the policy to reflect the need to unlock complex and challenging sites	No	This is reflected in Chapter 4 on design
Dev	LP017	Design	Support		Chapter 4	Policy DMD1	Support, but would highlight the value of Planning Performance Agreements.	No	Support welcomed
Dev	LP017	Tall Buildings	Support		Chapter 4	Policy DMD2	Support the approach	No	Support welcomed
Dev	LP017	Housing	Support		Chapter 5	Policy SP3	Support the approach	No	Support welcomed
Dev	LP017	Affordable Housing	Support but with suggestions		Chapter 5	Policy DMH1	Support but highlight that this is not always easy to achieve on brownfield land, should add a caveat subject to viability	No	Planning applications will be assessed on a case by case basis on their own merits
Dev	LP017	Housing mix	Support but with suggestions		Chapter 5	Policy DMH2	Should be more flexible.	Yes	Amend policy wording to make more flexible
Dev	LP017	Industrial land	Support		Chapter 7	Policy SP5	Support the approach	No	Support welcomed
Dev	LP017	Industrial land	Support		Chapter 7	Policy DME1	Support the use of masterplans		Support welcomed
Dev	LP017	Environment	Support		Chapter 8	Policy DMNE2	Target is difficult to achieve	No	This is in line with London PPlan Policy G5
Dev	LP017	Environment	Support		Chapter 8	Policy DMNE3	Support	No	Support welcomed
Dev	LP017	Sustainable Infrastructure	Support		Chapter 9	Policy SP7	Support		Support welcomed
Dev	LP017	Sustainable Infrastructure	General		Chapter 9	Policy DMSI 3	Pragmatic solutions required for noise mitigation in regard to the Agent of Change principle	No	Comments noted
Dev	LP017	Transport	Support		Chapter 10		Support the approach	No	Support welcomed
Dev	LP017	Transport	Support		Chapter 10	Policy SP 9	Support the proactive approach	No	Support welcomed
Other	LP109	Industrial Land	Support		Appendix 2	E 029 : Thames Road Economic Use	Support the allocation within the plan	No	Support welcomed
Other	LP109	Industrial Land	Support			Policy DME 1	Support the inclusion of wording that seeks to protect nearby industrial uses from residential development	No	Support Welcomed
Other	LP109	Industrial Land	Object				Object to the change of designation from SIS to LSIS	No	The industrial land strategy sets out how the borough will adapt existing industrial land to meet the projected needs throughout the Local Plan period
Other	LP109	Industrial Land	Object		Appendix 2	CI Thames Road	Object to the site being allocated within the plan as this may threaten future operations with residential development nearby. This is contrary to Policy DME 1. Object to the site on the basis of noise, air quality and safety. The site also has poor public transport (low PTAL area)	No	Planning applications will be required to mitigate any impacts on neighbouring businesses in line with Agent of Change

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Other	LP109	Industrial Land	Object		Appendix 5			Policies map shows housing allocation/housing trajectory on designated employment land. Contrary to Policy DME1.	No	Policies map will be updated prior to submission of the Local Plan
STA	LP074	Housing	Support		Chapter 3	Policy SPP6		TfL CD support the inclusion of Dagenham Heathway Station (Ref HT E080) as a site allocation within Dagenham Heathway and Becontree strategic sub area.	No	Support welcomed
STA	LP074	Housing	Support		Chapter 5	Policy SP3		Support for Build to Rent in the policy	No	Support welcomed
STA	LP074	Tall Buildings	Support but with suggestions		Chapter 4	Policy DMD2		The proposed Tall Building Locations are generally supported. It is considered there may be potential for a taller building around Becontree Station, particularly given the level changes, and so this location should be considered as well for designation as a Tall Building Location.	No	Tall building zones have already been defined.
STA	LP074	Housing	Objection		Appendix 2	CV Land North of Becontree Station		The site was included previously and still appears within Figure 17 in Policy SPP6. The site is now not included and is considered that it should be	No	Site selection process informed by a robust site selection methodology
STA	LP074	Housing	Objection		Appendix 2	Former 'The Volunteer' Public House and Land at Alfred's Way		Site not allocated within the Local Plan but should be	No	Site selection process informed by a robust site selection methodology
STA	LP074	Housing				Policies Map		Dagenham Heathway not included on the Policies Map	Yes	Policies Maps to be updated prior to submission
STA	LP056	Plan Period	General		Front Cover			Amend to set out plan period 2019 - 2037	Yes	Amend the front cover of the plan to set out the plan period.
STA	LP056	Housing	Object		Chapter 5	Policy SP3		No justification provided for the over-delivery of houses. This should be supported by policy wording as set out in Appendix 4 which sets out that higher densities are assumed. The annual figure needs to be clear for monitoring purposes	No	The Council seek to produce a topic paper in regard to Housing Delivery, which will address these points.
STA	LP056	Small sites	object		Chapter 5	Policy SP3 Supporting Text	5.1	Set out that 10% will be delivered from small sites but no small sites allocated within the plan.	No	The Council is allocating small sites, set out within Appendix 2, but considers that the context of LBBB is such that larger sites provide the opportunity for the scale of transformation and regeneration required.
STA	LP0456	Affordable Housing	Object		Chapter 5	Policy DMH 1		Unsound as paragraph 1 (b) is not consistent with Policy H5 of the London Plan	No	Consider this is in accordance with the London Plan



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STA	LP0456	Specialist Housing	Object		Chapter 5	Policy DMH 3		Need to reference to the London Plan target of 70 units per annum in the borough. Would also like to see a trigger where presumption in favour would apply if the target has not been met over a three year period	No	This is the target to which the policy is monitored in Appendix 3. If the target is not met and need can be identified then greater weight would be given for a greater need in the decision making process.
STA	LP0456	Specialist Housing	Object		Chapter 5	Policy DMH 3		Cross refer to Paragraph 4.13.4 of the London Plan which defines specialist older person housing.	No	Refence to Policy H 13 of the London Plan is made in the policy wording
STA	LP0456	Industrial Land	Support but with suggestions			Policy DME 1		Consider the following wording: "Proposals for residential elements will be refused unless exceptional circumstances can be demonstrated to justify introducing a residential element without any net loss of industrial floor space."	No	To be consistent with London Plan
Other	LP016	Housing	Support		Appendix 2	CH Chadwell Heath Industrial Estate		Support the Inclusion of the site within the Local Plan	No	Support welcomed
Other	LP016	Housing	Support			Policy SPP4 and SPP6		Support the site's location within the Chadwell Heath and Marks Gate sub area	No	Support welcomed
Other	LP016	Housing	Objection		Appendix 5	Policies Map		The policies map has not been amended to include CH in the Chadwell Heath and Marks Gate sub area	Yes	The policies maps will be updated prior to the submission of the plan.
Dev	LP110	Site Allocation	Objection	40		SPP4, Figure 13		The map outlines the site in green indicating economic use and the key identifies the site as "E079: Former White Horse Pub, Chadwell Heath". The supporting text or appendices do not detail out what is meant by this allocation, nor does the supporting Site Allocations document.We consider that the allocation should be changed to be a mixed use allocation instead of an economic one.	Yes	Will consider site allocation designations as part of review

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Other	LP111	Biodiversity	Objection	41		DMNE3		Nature conservation and biodiversity 2(b) is not sound, because it is not fully consistent with national/ London policy, incompletely applying the London Plan 2021 Policy G6, where nest sites are proposed for potentially all developments (except where exclusions apply), rather than just major developments. Please copy paragraph 4 (g) text about nesting and roosting sites into paragraph 2(b), so that this policy applies to all developments (except where exclusions apply), not just major developments; i.e. 2 (b) to state: "demonstrate a minimum of 10% biodiversity net gain using the DEFRA metric (or agreed equivalent). Create new, appropriately located nesting and roosting sites for wildlife (for example through integrated nesting and roosting bricks, towers and boxes together with street trees, green walls and green roofs). Applications where loss or degradation of habitat would be negligible, such as material change of use applications, alterations to buildings, and house extensions, are excluded from this requirement"	No	Already covered in DMNE 3 4 (g)
Dev	LP088	Housing	Support with suggestion	42		SPP4		The strategic principle of developing Chadwell Heath is supported; however, it is considered that the draft policy fails to create an effective strategy to allow the realisation of the Council's proposed ambitious residential delivery target. Request: <del>While the ILS identifies scope for the loss of industrial floor space in Chadwell Heath, the Council is committed to delivering employment space alongside new homes and the expectation is that there will be no net loss of industrial floor space across the Chadwell Heath Transformation Area.</del> Any release of Local Significant Industrial Land within the Transformation Area is only to come forward in accordance with the approved masterplan SPD, Policy DME1 and London Plan Policy E4.	Yes	Already accepted from previous comments
Dev	LP088	Housing	Objection	42		DME1	Part 12, sub section a	It is considered that the draft policy fails to create an effective strategy to allow the realisation of the Council's proposed ambitious residential delivery target for this area. It is considered that the requirement to link sites via a s106 agreement should be removed, as set out below. 12. Applicants must clearly demonstrate that the proposal: a) contributes to meeting the future industrial capacity targets (as set out in Table 1 below). Where industrial capacity will be re-provided off-site, relocation arrangements should be secured through a legal agreement to ensure that the delivery of operational industrial capacity is prioritised over other uses. In place of the proposed s106 requirement to link industrial relocation, the Council could consider implementing a monitoring regime that will allow the development of housing and industrial floorspace in a more flexible manner than currently proposed.	Yes	Remove reference to no net loss in line with adopted London Plan 2021

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Dev	LP088	Industry	Support with suggestion	42		DME1	Part 11	In order to support a mixed and vibrant employment area, it is recommended that additional use classes are explicitly supported within the borough's industrial areas. Modifications to Policy DME 1 are recommended as set out below: 11. In Locally Significant Industrial Sites the following uses for industrial type activities and relation functions, including ancillary facilities, will be permitted and safeguarded: a) Class B2 and B8 x b) Class E(g)(i), E(g)(ii) and E(g)(iii), only where the permitted function cannot change to any other E use class. c) Sui Generis or other employment generating uses.	No	London Plan 2021 requires LSIS to set out specific industrial uses allowed which make it a special designation compared to any other employment designations in the Borough
Dev	LP088	Housing	Support with suggestion	42		Allocation CH		The strategic principle of developing Chadwell Heath for residential uses is supported; however, it is considered that the draft site allocation fails to create an effective strategy to allow the realisation of the Council's proposed ambitious housing delivery target. It is advised that the site allocation is modified to remove the western portion of the Chadwell Heath Transformation Area from the proposed LSIS designation.	No	This would undermine Industrial Land Strategy
Dev	LP027	Housing	Support with suggestion	43		Allocation HA (Hertford Road)		Our client continues to support the allocation. We also note the more general reference to circa in reference to the unit numbers and also agree with this change. However we request that the unit numbers set out within the draft site allocation are amended to accurately reflect the realistic capacity of the Site. We request that the allocation is amended to read: 'a comprehensive residential-led mixed use development. Potential capacity of delivering circa. 990 new homes, flexible commercial/community floorspace and other supporting infrastructure.'	No	Require robust evidence to support increase in housing numbers. Current allocation is not a maximum figure to be provided on site
Dev	LP027	Maps		43		Allocation HA (Hertford Road)		Allocated site HA now includes not only our client's site, but also a much wider area including Bridge House, Jhumat House to the south; as well as TFL land in front of Jhumat House and Hertford Road itself. As such we contend that the Regulation 19 version of the allocation significantly underplays the contribution and dwelling yield which the combined site can deliver. Although the extent of the draft site allocation (Site ref: HA) has now expanded in size, the actual detail set out within the draft allocation does not account for this.	No	Robust methodology has been applied to assess site capacity

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Sta	LP045	Heritage	Support with suggestion	44		SPP1		We would suggest that clause c) could be made clearer in this respect by the following amendment: 'Any proposed buildings taller than prevailing heights must recognise the historic quality of the existing environment and local character and respond appropriately in order to realise the potential to increase ...' We would also suggest that the policy would better reflect the requirements of London Plan policy HC1 if it included an explicit reference to the status of the scheduled monument on the Heritage at Risk register and encouraged new development to help seek a solution to this.	Yes	Change already agreed regarding Tall Buildings
Sta	LP045	Heritage	Support with suggestion	44		SP2		We welcome this policy, including its alignment with London Plan policy D3 through clause a) to ensure the optimisation of density through a design-led process. We would point out that the related policy in clause h) covering the historic environment is incorrectly titled 'visitor accommodation'.	Yes	Further work with Historic England to clarify policy
Sta	LP045	Heritage	Support with suggestion	44		DMD1		In broad terms, this policy is to be welcomed. However, we note that clause g) in relation to archaeology only indicates that it should be 'assessed', rather than applying active management of archaeological harm as part of good design as set out in London Plan policy HC1. We would therefore suggest that the policy could also helpfully include using the required assessment work it requires to explore archaeological heritage as a cue for design, interpretation and presentation opportunities in a successful design of a development proposal. We assume that clause h) relates to other types of heritage asset, as well as to broader townscape character impacts. This should be made clear, while it would also be helpful to make reference to the concept of heritage significance here.	Yes	Further work with Historic England to clarify policy
Sta	LP045	Tall Buildings	Support with suggestion	44				We note and welcome the definition of what is to be regarded as a tall building within the borough at clause 1. Nevertheless, we consider that there are elements to the draft policy that are sufficiently ambiguous as to potentially inadvertently encourage inappropriate development proposals to come forward, contrary to NPPF para 16b. Should clearly set out appropriate locations and consider the impact of appropriate heights on heritage assets	Yes	Change agreed with GLA

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Sta	LP045	Heritage	Support with suggestion	44		DMD4	<p>We consider it would be helpful if the policy were to start with a clear commitment to sustain and enhance the significance of the borough's historic environment as per para 190 of the NPPF. While we welcome the thrust of the first three paragraphs of the policy as currently set out, we consider that making it clear that effects on heritage significance are the measure by which development proposals are to be judged is necessary. We also have concern over the wording in clause d), which suggests proposed uses for heritage assets that cause the 'least harm' will be acceptable. We assume clause e) is referring to conservation areas as in the previous consultation version of the draft Plan, although given clauses l) and m) this would appear superfluous. Clauses n) and o) also require clarification. We would suggest that the second sentence of n) as set out implies that any potential effects on archaeology would mean the relevant proposal would be refused. However, o) then implies that the submission of an Archaeology Impact Statement would be sufficient for approval. This does not reflect NPPF para 194 ie the desirability of desk based archaeological assessment accompanying development applications (especially those in Archaeological Priority Areas, which should also be reference here), possibly followed by field evaluation to inform a decision. The policy should also be clear that development impacts on archaeological remains of equivalent significance to scheduled sites will be resisted, rather than all impacts. We note clause p) in relation to the scheduled monument. We consider this could go further in indicating that its significance will be protected and where possible enhanced through nearby development proposals.</p>	Yes	Further work with Historic England to clarify policy
Dev	LP045	Site Allocation	Objection	45		General	<p>We have concerns that certain site allocations are not underpinned by appropriate assessment of any potential impacts on heritage assets (including cumulative effects in the case of sites in Barking town centre), and as such may conflict with overarching aims to conserve and enhance the historic environment. Without adequate consideration and identification of potential heritage issues at the plan-making stage, there is also the possibility that such site allocation policies will not provide for conservation and enhancement of the historic environment (NPPF para 20), not be based on up to date and relevant evidence (para 31) and may contain unacceptable ambiguity (para 16b). We strongly suggest undertaking a significance-based approach to site allocations, as set out in our guidance on this subject: The Historic Environment and Site Allocations in Local Plans (<a href="http://historicengland.org.uk">historicengland.org.uk</a>).</p>	Yes	Further work with Historic England to clarify policy

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Sta	LP045	Site Allocation	Support with suggestion	44		Site AC		Merriellands Crescent This site very possibly contains the find spot of the Neolithic Dagenham Idol in the 1920s. This will require appropriate archaeological assessment and evaluation of new development to inform a decision. Design issues may come in to play to secure preservation and enhancement of important remains. Suitable requirements should be included as design parameters.	Yes	Add to site allocation
Sta	LP045	Site Allocation	Support with suggestion	44		Site AH		Fresh Wharf Estate Please see comments above in relation to SPP1 and DMD2. This site is identified as potentially appropriate for tall buildings. We consider that that further detail (guided by assessment of potential effects) should be included as design parameters, including locations, maximum heights and guidance as to how effects on the historic environment should be avoided.	Yes	Change is being proposed to tall building policy
Sta	LP045	Site Allocation	Support with suggestion	44		Site BB		Tesco Car Park Please see comments above in relation to SPP1 and DMD2. This site is identified as potentially appropriate for tall buildings. We consider that further detail (guided by assessment of potential effects) should be included as design parameters, including locations, maximum heights and guidance as to how effects on the historic environment should be avoided. This is the site of bronze age timber platforms and trackways found in the 1990s. As with AC, it is likely to need appropriate archaeological evaluation in order to inform a design, with appropriate information as design parameters included here.	Yes	Add to site allocation
Sta	LP045	Site Allocation	Support with suggestion	44		Site DJ		Clockhouse Avenue We would point out this site is within the Abbey & Barking Town Centre conservation area, rather than adjacent to it.	Yes	Amend to state that it is within the Conversation Area
Sta	LP045	Site	Support with suggestion	44		Site DP		Abbey Retail Park North -Please see comments above in relation to SPP1 and DMD2. This site is identified as potentially appropriate for tall buildings. We consider that further detail (guided by assessment of potential effects) should be included as design parameters, including locations, maximum heights and guidance as to how effects on the historic environment should be avoided.	Yes	Already agreed amendments to Tall Building Policy

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Sta	LP045	Site	Support with suggestion	44		Site HA		Wickes-Please see comments above in relation to SPP1 and DMD2. This site is identified as potentially appropriate for tall buildings. We consider that further detail (guided by assessment of potential effects) should be included as design parameters, including locations, maximum heights and guidance as to how effects on the historic environment should be avoided. This site is in close proximity to site BB, and will also need appropriate archaeological evaluation to inform any design.	Yes	Further work with Historic England to clarify policy
Dev	LP048	Site Allocation	Support with suggestion	45		SPP4		Greenburn Centre: Our client's site is included in the L-SIS and Housing allocation designations but there is a boundary around it on the Proposals Map which suggests the site is excluded. This should be confirmed by the Council as it is not explained anywhere in the Plan. We strongly recommend the boundary is removed and the site is included in the overall area. AGL support the majority of the site being included in the mixed-use / housing area and recommend the site is included. AGL objects to the partial exclusion of the Site from the housing allocation.	Yes	Will consider as part of review of Policies Map
Dev	LP048	Industrial	Support	45		DME1		We acknowledge the Council's decision to identify the site and wider estate for mixed-use and smaller forms of workspace in the Industrial Strategy. We also support the Industrial Strategy's recommendation to move large-scale industrial units away from the site.	No	Support welcomed
Dev	LP048	Housing	Support with suggestion	45		SPP4		AGL supports the identification of the area for comprehensive redevelopment to create new homes. AGL welcomes the recognition at paragraph 7 of Policy SPP4 that the Industrial Land Strategy identifies the scope for the loss of industrial floorspace in Chadwell Heath. It does however object to the policy expectation that there will be no net loss of industrial floorspace across the Transformation Area. We therefore recommend the approach of the policy and the requirement for no net loss of industrial floorspace is removed as this is neither justified nor effective.	Yes	Alredy taken into account following previous comments
Stat	LP008	General	Support	46				This latest version of the draft Plan resolves some of these earlier general conformity issues, specifically those related to the threshold approach to affordable housing and waste issues - and these positive changes are very welcome.	No	Support welcomed

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Stat	LP008	Housing	Support	46				The draft Plan, at paragraph 5.1, recognises and reflects the borough's housing target as set out in the Table 4.1 of the LP2021 to deliver 19,440 new homes between 2019 and 2029 and this is welcome. The draft Plan also recognises and reflects the borough's small housing sites target which is set out in Table 4.2 of the LP2021 to deliver 199 new homes a year, and this too is welcome.	No	Support welcomed
Stat	LP008	Housing	Support with suggestion	46		SP3		Policy SP3 should include a commitment to meet the borough's small sites target, recognising it as a significant element of the borough's overall housing delivery. In order to facilitate and catalyse the delivery of new homes from small sites, boroughs are advised to follow the guidance set out in paragraph 4.2.5 of the LP2021 to prepare area-wide housing design codes, in particular for residential conversions, redevelopment, extensions of houses and/or ancillary residential buildings.	Yes	Change has been included
Stat	LP008	Affordable Housing	Support with suggestion	46		SP3		The draft Plan should reflect that the Mayor is seeking 50% affordable housing from all housing delivery and not just from the private sector and LBBB are strongly advised to amend this so that it is entirely consistent with the Mayor's strategic target. Part 1b of Policy DMH 1 could make it clearer that early and late stage viability review mechanisms only apply to applications taking the Viability Tested Route (VTR) and those schemes where an agreed level of progress has not been reached in a specified time for Fast Track Route (FTR) applications. To be clear, where offsite or cash in lieu affordable housing is considered acceptable it must result in additional affordable homes, and all sites are expected to deliver at least the threshold level of affordable housing and any cash in lieu or off-site contribution should deliver units in addition to this. In accordance with paragraph 4.4.13 it should be noted that the policy target for schemes delivering off-site affordable housing or in lieu contributions is 50% provided across the main site and any linked sites when considered as a whole. Part 2 of Policy DMH 1 should be amended to reflect this.	Yes	Proposed changes will be implemented following further discussions with the GLA. A statement of common ground will be agreed to set out a programme for agreeing policies in line with responses received.
Stat	LP008	Affordable Housing	Support with suggestion	46				LBBB are proposing an affordable housing tenure split of 50/50 social rented and London Affordable Rent to intermediate housing products. LBBB should revisit the approach and apply a presumption in favour of social and London Affordable Rented housing. LBBB are advised to make it clearer that in order for residential proposals to qualify for the FTR they are required to meet the borough's tenure split requirements. This is set out clearly in Policy H5C of the LP2021 and the draft Plan should be amended to reflect this.	Yes	Proposed changes will be implemented following further discussions with the GLA. A statement of common ground will be agreed to set out a programme for agreeing policies in line with responses received.



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Stat	LP008	Specialist Housing	Support with suggestion	46				In the absence of a figure for specialist older persons housing LBBB should rely on the Mayor's indicative benchmark figure which is set out in Table 4.3 of the LP2021 and which for LBBB is for the delivery of 70 new homes a year. In accordance with Policy H13 of the LP2021 LBBB should work in collaboration with providers to identify sites which may be suitable for specialist older persons housing and could be included as part of proposed site allocations.	Yes	Proposed change accepted
Stat	LP008	Travellers Sites	Support with suggestion	46		DMH6		It is noted and welcomed that Policy DMH6 makes a clear commitment to deliver 12 pitches by expanding the existing public site at Eastbrookend Country Park within the first five years of the Plan period. The policy recognises the remaining need to provide an additional 13 pitches over the Plan period and commits to providing these at Collier Row Road and/or Choats Road. Both these sites should be considered for inclusion as site allocations as part of this Local Plan to safeguard them for this purpose and to provide certainty and a firm commitment to delivering the borough's pitch requirements. LBBB should note that the Mayor has committed to initiating a London-wide Gypsy and Traveller accommodation needs assessment, and will work to support boroughs in finding ways to make provision for Gypsy and Traveller accommodation as set out in paragraph 4.14.2 of the LP2021.	Yes	Comment noted and change reflected in policy
Stat	LP008	Industrial	Support with suggestion	46		SPP2 10		Part 10b should also require industrial units to be developed in ways that are suitable for a broad range of industrial occupiers, with appropriate floor loading, loading bays, layouts, spans, etc.	Yes	Proposed changes will be implemented following further discussions with the GLA. A statement of common ground will be agreed to set out a programme for agreeing policies in line with responses received.
Stat	LP008	Industrial	Support with suggestion	46		SPP2 10		This policy should also require development to provide high quality and co-ordinated servicing routes and yard space for industrial uses, in order to ensure that the introduction of residential uses does not result in conflicts that would undermine the ability of industrial occupiers to operate freely.	Yes	Proposed changes will be implemented following further discussions with the GLA. A statement of common ground will be agreed to set out a programme for agreeing policies in line with responses received.

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Stat	LP008	Maps	General	46		Table 1	Page 118	Kingsbridge is identified as LSIS – this is presumably an error, as it is identified as SIL in the interactive proposals map and site allocation E_022. It is very well-located for a wide range of uses including logistics, and Table 1 states that it would be required for accommodating relocation from Gascoigne South and accommodate demands of logistics industry, which is likely to mean larger warehouses with substantial vehicle movements. It is currently SIL in the adopted Local Plan and should remain as having a SIL designation. Figure 7 in Local Plan has the whole area as a “mixed use” site allocation – this should be economic use.	Policies map will be updated prior to submission of the Plan	Proposed changes will be implemented following further discussions with the GLA. A statement of common ground will be agreed to set out a programme for agreeing policies in line with responses received.
Stat	LP008	Industrial	Support	46		DME1	Part 7	The refusal of residential uses with SIL is strongly supported. Given the borough’s highly ambitious approach to intensification and release of industrial land, it is vital that retained SIL is protected in the long term for industrial-type uses only. Residential development within retained SIL would be detrimental to the ability of the widest range of industrial uses to function, including the heaviest industrial uses, which SIL must be able to support.	No	Support welcomed
Stat	LP008	Industrial	Support with suggestion	46		DME1	Part 8	While this is welcomed, it should go further, given the borough’s highly ambitious approach to intensification and release of industrial land. Developments should not only be exploring all options for intensification but there should be a clear preference for those options that would provide a greater quantum of well-designed industrial floorspace, and development should be seeking to increase the quantity of floorspace over and above what is already there. Exceptions might be appropriate for non-floorspace based industrial activity (for example wharf and waste functions), to ensure the borough is able to meet this type of demand. The approach currently appears to be to refer to guidance (via footnote 37) in the Industrial Land Strategy in terms of minimum and targeted plot ratios for each area. It's not clear precisely what this refers to in the ILS and it would be helpful to bring this into the Plan	Yes	Proposed changes will be implemented following further discussions with the GLA. A statement of common ground will be agreed to set out a programme for agreeing policies in line with responses received.
Stat	LP008	Industrial	Support with suggestion	46		DME1	Part 10	This refers to Policy E7 of the London Plan, which sets out the process by which SIL or LSIS might be intensified in order to support the delivery of residential or other (non-industrial) uses. That process is either a plan-led one, or one that comes forward through a masterplan. It may be helpful to clarify that any residential co-location would need to be supported by a masterplan, if this is the intended approach.	Yes	Proposed changes will be implemented following further discussions with the GLA. A statement of common ground will be agreed to set out a programme for agreeing policies in line with responses received.

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Stat	LP008	Industrial	Objection	46		DME1	Part 11b	This suggests that Class E g i is industrial, which isn't the case – these are offices. While some ancillary office use may be part of an industrial development, offices are not an appropriate use in LSIS, and London Plan policy E1 makes clear the suitable locations for offices. Given the borough's ambitious approach, permitting offices in LSIS could result in erosion of industrial floorspace overall.	Yes	Proposed changes will be implemented following further discussions with the GLA. A statement of common ground will be agreed to set out a programme for agreeing policies in line with responses received.
Stat	LP008	Chadwell Heath	Support with suggestion	46			Page 55	Talks about "any release of LSIS" coming forward in accordance with the SPD – however a designation can only be released through a Local Plan. So, the site should still be an LSIS throughout the lifetime of this Plan.	Yes	Proposed changes will be implemented following further discussions with the GLA. A statement of common ground will be agreed to set out a programme for agreeing policies in line with responses received.
Stat	LP008	Dagenham East	Support with suggestion	46			Figure 14	The Key Diagram indicates mixed use across the LSIS, but the site allocations suggest economic uses only. Amendments should be made to ensure consistency and certainty.	Yes	Key diagram will be updated prior to submission of the plan
Stat	LP008	Maps	Support with suggestion	46			Figure 7	Kngsbridge Estate is illustrated as an area for mixed use. The site is currently SIL and the draft Plan should be clear to retain this designation	Yes	Policies map will be updated prior to submission of the Local Plan
Stat	LP008	Maps	General	46			Site allocation E_038 Here East and Film Studios	The location plan / site plan appears to be incorrect and this should be corrected.	Yes	Policies map will be updated prior to submission of the Local Plan
Stat	LP008	Site Allocation	Support with suggestion	46			Site CI	We advise that Thames Road site allocation is split into different site allocations for the proposed residential and co-located parts of the site. Even so, there needs to be a consideration how each interfaces with each other, in particular with the SIL at the western end of the area.	Yes	Proposed changes will be implemented following further discussions with the GLA. A statement of common ground will be agreed to set out a programme for agreeing policies in line with responses received.

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Stat	LP008	Tall Buildings	Support with suggestion	46				To be in general conformity with Policy D9 of the LP2021, the draft Plan should identify specific locations where tall buildings are considered to be acceptable and appropriate/maximum heights should be set out for specific locations. These suitable locations and appropriate heights should be set out clearly in maps. LBBB should also note that a strategic view clips the very northernmost part of the borough, close to Marks Gate and this should be reflected in the draft Plan. That area falls within the backdrop of the King Henry's Mound to St Paul's Cathedral strategic view as set out in the London View Management Framework and the guidance in Policy HC3 of the LP2021 should be followed.	Yes	Proposed changes will be implemented following further discussions with the GLA. A statement of common ground will be agreed to set out a programme for agreeing policies in line with responses received.
Stat	LP008	Industrial Land	Support with suggestion	46		SP5		Economy and industrial land Policy SP5 of the draft Plan sets out the intention to protect office floorspace in the borough in accordance with Policy E1 of the LP2021 and this is welcome. Also welcome is the intention to protect, strengthen and intensify land within Strategic Industrial Locations (SILs) and Locally Significant Industrial Sites (LSISs). Table 1 on page 118 of the draft Plan sets out the future indicative industrial floorspace capacities for 12 of the borough's designated industrial areas. This information is not supported by an explanation and therefore it isn't clear what it represents and how it is applicable to the draft Plan. There is little in the way of supporting text, so it is difficult to comprehend fully LBBB's proposed strategic approach to industrial land.	Yes	Proposed changes will be implemented following further discussions with the GLA. A statement of common ground will be agreed to set out a programme for agreeing policies in line with responses received.
Stat	LP008	Industrial Land	Support with suggestion	46		Tables 1 & 2		Tables 1 and 2 on pages 7 and 8 of the addendum illustrate how industrial land could be reconfigured over the life of the Plan and this could be included in a Policy as indicative within the draft Plan. This could be achieved via a series of maps, setting out areas for intensification, areas for co-location, and areas for release and accompanied by explanatory text. We note that paragraph 1.4 of the Industrial Strategy Addendum makes it clear that the Strategy is 'not intended to define a single approach to meeting future needs or rigidly prescribe how each site in the borough should be brought forward' but we consider that an indicative framework would be helpful.	Yes	Proposed changes will be implemented following further discussions with the GLA. A statement of common ground will be agreed to set out a programme for agreeing policies in line with responses received.
Stat	LP008	Industrial Land	Support with suggestion	46				LBBB therefore has a more certain plan for the reconfiguration for some of its industrial capacity in these areas and where this is possible should be set out clearly in Policy SP5. This is necessary to illustrate what will be achieved via the redevelopment of these areas in terms of industrial capacity in relation to floorspace, designation and use class. In contrast, the policy could also be clearer about those industrial areas where there is much less certainty and where more flexibility might be required, for example, Castle Green, Gascoigne South and others.	Yes	Proposed changes will be implemented following further discussions with the GLA. A statement of common ground will be agreed to set out a programme for agreeing policies in line with responses received.

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Stat	LP008	Industrial Land	Support with suggestion	46				It is clear that LBBB want considerable flexibility in the reconfiguration of the borough's reservoir of industrial land. This is, however, a potential high-risk strategy and one which could result in the loss of a significant amount of London's industrial land if it isn't managed effectively. . In order for LBBB to have the flexibility that they so wish, they must develop a robust system to plan, monitor and manage industrial capacity coupled with a detailed commitment to regularly review and update it. This is necessary to be consistent with Policy E4C of the LP2021. LBBB should put in place an appropriate and effective policy mechanism whereby certain conditions need to be fulfilled before industrial land can be released. In particular, industrial (re-)provision must be delivered ahead of any planned release of industrial land/capacity on an ongoing basis through the Plan period.	Yes	Proposed changes will be implemented following further discussions with the GLA. A statement of common ground will be agreed to set out a programme for agreeing policies in line with responses received.
Stat	LP008	Industrial Land	Support with suggestion	46				It is important that the draft Plan establishes clearly where designated industrial land is to be released, re-designated or where boundary changes are going to happen. To be consistent with part B of Policy E7 of the LP2021 this must be included in Local Plan maps and cannot be brought about through a Supplementary Planning Document (SPD) or masterplans. Viability evidence is also essential to establish if LBBB's proposed sources of industrial supply capacity are realistic and deliverable.	Yes	Proposed changes will be implemented following further discussions with the GLA. A statement of common ground will be agreed to set out a programme for agreeing policies in line with responses received.
Stat	LP008	Affordable Floorspace	Support with suggestion	46				The Mayor welcomes LBBB's intention to provide flexible affordable workspace but the approach should be consistent with LP2021 Policies E2 and E3. Policy E2 sets out that development proposals for business floorspace of 2,500sqm or more (or a locally determined lower threshold) should consider the scope for the provision of flexible workspace or smaller units. Policy E3 sets out that planning obligations can be used to secure affordable workspace for specific social, cultural or economic development purposes set out in the policy.	Yes	Proposed changes will be implemented following further discussions with the GLA. A statement of common ground will be agreed to set out a programme for agreeing policies in line with responses received.
Stat	LP008	Urban Green Factor	Support with suggestion	46				The draft Plan intends to use the LP2021 suggested urban green factors as set out in Policy G5. LBBB should note that the factors set out in Policy G5 could be used in the interim and that boroughs can base their UGF on the factors set out in Table 8.2 of the LP2021 but tailored to local circumstances. LBBB should note that the Mayor has now published draft guidance on the Urban Greening Factor <sup>6</sup> and this should be followed in developing the right approach for the borough and tailored to local circumstances	Yes	Proposed changes will be implemented following further discussions with the GLA. A statement of common ground will be agreed to set out a programme for agreeing policies in line with responses received.

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Stat	LP008	Air Quality	Support with suggestion	46				The Mayor welcomes the draft Plan's ambitions to improve air quality and recognition of the borough's three Air Quality Focus Areas which is consistent with part B2D of Policy SI 1 of the LP2021. LBBB should note part C of Policy SI 1 of the LP2021 which sets out that masterplans and development briefs for large scale development proposals subject to an Environmental Impact Assessment should consider how air quality can be improved across the areas as part of an air quality positive approach. This is particularly important as LBBB are bringing forward a number of masterplans for the redevelopment of parts of the borough to deliver good growth. The Mayor has published pre-consultation Air Quality Positive guidance <sup>7</sup> which LBBB should reference, follow and incorporate into the draft Plan.	Yes	Proposed changes will be implemented following further discussions with the GLA. A statement of common ground will be agreed to set out a programme for agreeing policies in line with responses received.
Stat	LP008	Transport	Support with suggestion	46				We welcome the work completed in the Industrial Land Strategy which analyses the sites by access to public transport and the strategic road network. To enable a sustainable delivery of this intensification, we recommend that the borough actively safeguards and provides additional bus garaging to serve the growing population and intensification anticipated in the borough and further details of their bus strategy identifying areas for new bus stops and spaces for bus stands.	Yes	Proposed changes will be implemented following further discussions with the GLA. A statement of common ground will be agreed to set out a programme for agreeing policies in line with responses received.
Stat	LP008	Safeguarded Wharves	Support with suggestion	46				The Mayor is pleased that the borough's safeguarded wharves are set out clearly in Figure 25 of the draft Plan. The Mayor also welcomes the intention in draft Policy SP5 to protect and retain all safeguarded wharves and maritime infrastructure in line with Mayoral policy. However, part of the policy states that opportunities for intensification of wharf use, or rationalisation of wharves and infrastructure will require discussions with the Port of London Authority but there is no detail to explain what that means. As set out in the LP2021, there may be opportunities to consolidate wharves as part of strategic land use change, however, this would need to ensure that existing and potential capacity and operability of the wharves is retained as a minimum and where possible expanded. The approach to rationalisation suggested in the draft Local Plan implies a reduction in wharf capacity which would not be acceptable. Policy SP5 should therefore be amended, to make it clear that rationalisation would only be acceptable where it would not lead to a reduction in wharf capacity.	Yes	Proposed changes will be implemented following further discussions with the GLA. A statement of common ground will be agreed to set out a programme for agreeing policies in line with responses received.

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Stat	LP008	Waste	Support with suggestion	46				<p>The Mayor welcomes that the draft Plan sets out clearly the borough's intention to meet its waste apportionment targets as set out in Table 9.2 of the LP2021 for 505,000 tonnes up to 2021 and 537,000 tonnes up to 2041. It is noted that work has begun on a new East London Waste Plan (ELWP) and this is welcome. In the meantime LBBB have produced a Waste Need Assessment as a part of the evidence base which establishes that LBBB has surplus capacity to meet its own waste needs. While the Mayor is pleased that a review of the ELWP is underway that draft Plan could provide a clearer commitment to delivering the strategy by setting out a clear timetable for its adoption and through establishing a wider commitment to delivering the waste plan via an agreed Statement of Common Ground signed by the East London Waste Boroughs. The Mayor notes and welcomes recognition of the circular economy principles and reference to Policy SI7 of the LP2021 in the draft Plan (Policy SP 7). It should be noted that while the Mayor requires boroughs to provide Circular Economy Statements as part of referable planning applications, LBBB should note and consider that some other boroughs are going beyond this requirement, but only where it would not negatively impact on the effective implementation of other policies in the LP2021.</p>		<p>Proposed changes will be implemented following further discussions with the GLA. A statement of common ground will be agreed to set out a programme for agreeing policies in line with responses received.</p>
Stat	LP008	Town Centres	Support with suggestion	46				<p>Where new district centres are proposed these should be supported by appropriate and up-to-date evidence of demand, ensuring that where LBBB intends to create them that they provide a range of goods and services, and social infrastructure for the local communities they will serve and that they are accessible by public transport, walking and cycling. The new district centres should typically contain between 5,000 and 50,000 sqm of retail, leisure and service floorspace. LBBB should provide further clarity regarding its plans for these new district centres and should include maps setting out clearly the proposed (or indicative at this stage) town centre boundaries for each. Town centre strategies for the proposed new centres and others could be beneficial and would help to positively inform the draft Plan.</p>		<p>Proposed changes will be implemented following further discussions with the GLA. A statement of common ground will be agreed to set out a programme for agreeing policies in line with responses received.</p>
Stat	LP008	Transport	Support with suggestion	46				<p>We welcome the updated and newly created transport evidence and strategy documents, particularly the transport strategy and walking and cycling strategy, but we would like to suggest further and closer alignment of these supporting documents with the local plan vision.</p>	No	<p>We note TfL welcome the new Transport Strategy and cycling strategy. We are working closely with TfL officers in Planning and Surface on several schemes around the A13, Rail capacity Bus Priority and cycling We believe the Local</p>

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										Plan adequately covers this work and we will continue to expand transport issues through up and coming SPD masterplans and the whole A13 options process with TfL and Homes England
Stat	LP008	Transport	Support with suggestion	46				The walking and cycling strategy is particularly strong in setting out clear priority routes that form a coherent network, as well as a timeline for delivery. However, delivery mechanisms for the plan need to be strengthened regarding bus infrastructure, bus and rail capacity, and funding to provide more certainty that environmental and capacity impacts associated with the identified growth are addressed in full.	Yes	Additional paragraph proposed and topic papers can be provided prior to examination updating on on ongoing studies/current position covering work with Homes England/TfL (A13), Beam Park (GLA), City Markets (COL/TfL), Levelling up bids for Barking Town Centre, Dagenham Heathway.
Stat	LP008	Transport	Support with suggestion	46				The local plan should recognise the uncertainty of deliverability and funding of some transport schemes and create options to deliver development sustainably, if the schemes do not come forward as envisaged within the planned timescales. Buses maybe more important for supporting development – at least in the shorter to medium term -given the current uncertainty of some of the rail-based transport improvements. It is vital that the borough actively safeguards (and provides additional) bus garaging to serve the growing population and intensification anticipated in the borough and further details their bus strategy identifying areas for new bus stops and spaces for bus stand	Yes	The transport plan contains many schemes which are essential to support good growth in the borough and the also sub-regional economy. However, we recognise the current uncertainties around funding both nationally and in London. We will continue to work with government and our sub -regional partners (DeLUP/TFL/Rail Industry, Homes England) and developers to make sure this plan is prioritised and deliverable and regularly update the IDP as necessary.



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Stat	LP008	Transport	Support with suggestion	46				We fully support the Council's overall intention of reducing car use, however the car parking policy DMT2 allows car-free developments only in areas of existing and proposed PTAL 5 and 6, which is contrary to London Plan Policy T6 which does not restrict it in this way and encourages it wherever possible.	Yes	We could hinge the wording of DMT2 on "wherever possible". eg: change proposed "Car-free developments should be the starting point for all development proposals, where supported by well-connected access to amenities, public transport and the walking and cycling network."
Stat	LP008	Transport	Support with suggestion	46				It should also be noted that car clubs count toward parking requirements	No	This will require 4(e) of DMT 2 to be amended. Car-free sites would not allow for Car Club vehicles. No change we want greater use of Evs and car clubs
Stat	LP008	Transport	Objection	46				Policy DMT 2 seems to require developments to adopt maximum London Plan car parking standards. Maximum standards are just that –maximum -and instead the aim is to minimise car parking. Policy DMT 2 also appears to sometimes require higher than maximum London Plan standards to enable family housing. This makes DMT 2 both contrary and non-conforming to the London Plan parking policy and does not align with the borough's vision.	No	This is not the case - it states parking nearer but still within the LP max. No change. Regardless, LP Table 10.3 allows for higher standards to support family housing for 3+ bed units in PTAL 0-1 zones. No change. Amend DMT2 (3) to better reflect that it specifically applies to 3+bed PTAL 0-1 sites. Change proposed
Stat	LP008	Transport	Objection	46				We are particularly concerned about the draft parking guidance which seems to require greater justification for car-free and car-lite development than for applications proposing up to 50 per cent over the maximum set out in the London Plan. We would strongly encourage the Council to be more proactive in further reducing parking provision to ensure conformity with the London Plan. Opportunity Areas should have lower maximum car parking standards in line with the London Plan.	No	There is no allowance for 50% over the maximums. Required justifications are based on a threshold of 50% of the maximum. Assuming this is a wording issue and they still take issue with the level of justification, possible solutions are: a) remove reference to the Parking Guidance

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										note in the Local plan; see below b) adjust Parking Guidance note wording to equalize justification levels between high/low parking sites, and made more clear the intention is not to block low -car sites but to ensure the impacts are known / fully mitigated. Change proposed
Stat	LP008	Healthy Streets	Support	46				We appreciate the mention of the approach upfront and in the transport chapter and specifically identifying the Healthy Streets Approach for particular corridors. It will help to re-emphasise the Healthy Streets Approach in the sub areas and transformation areas to ensure that the Approach is at the centre of transport strategy in the new local plan.	No	Support welcomed.
Stat	LP008	Low Traffic Neighbourhoods	Support with suggestions	46				We suggest that the Council applies an area-wide approach in schemes such as, closing Broadway to general traffic and enhancing walking routes to Abbey Green and considers complementary measures that may enable delivery of successful LTNs. LBBB should consider other areas where the use of LTNs may positively benefit neighbourhoods, encouraging active travel, plus reducing noise and air pollution. We would be happy to help in identifying areas and design of LTNs.	No	Noted, LBBB are focusing on the successful School Streets programme and encouraging Cycling and Walking .
Stat	LP008	Site Allocations	Support with suggestions	46				We welcome the updated Site Allocations appendix to show where land will be retained for industrial intensification or mixed-use including industry. The Site Allocations document should include PTAL and transport as planning considerations for each site, particularly larger strategic sites.	Yes	Proposed changes will be implemented following further discussions with the GLA. A statement of common ground will be agreed to set out a programme for agreeing policies in line with responses received.

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Stat	LP008	Editing	Support with suggestion	46			Both 'Transport' and 'Enabling Delivery' are Chapter 10 in the document. All documents should be checked for consistency, i.e. the transport strategy and local plan Strategic Policy SPDG 1 (part 2) quote 50,000 homes to be delivered during the plan period while the local plan states that 44,051 will be delivered. Similarly, for the Castle Green site, the Site Allocations document sets site capacity at ca.12,000 while the local plan sets it at ca.10,000. Figure 4 also mentions 12,000 homes for Castle Green area. We welcome the changes in the document towards using 'walking and cycling', where appropriate, instead of 'pedestrians and cyclists' so that the terms refer to modes, rather than categorising people by their modes. There are still a couple of areas where changes could be made. Collectively, the term active travel is appropriate.	Yes	Noted. We will include ref to TfL ptal site guidance in footnote of transport chapter <a href="https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat">https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat</a>
Stat	LP008	General	Support with suggestion	46	Chapter 1		TfL supports the inclusion and recognition of improved active travel and public transport links as key to delivering the local plan's ambitions. Particularly, the local plan highlights the key role that investing in public transport infrastructure and reducing severance from major roads in the borough will play in enabling the highly ambitious targets for housebuilding during the plan period. As acknowledged in the borough's transport strategy, the plan should recognise that car trips cannot materially increase and in fact need to reduce above today's levels, to meet 10 per cent traffic reduction within the plan period. This will also be critical to achieve 75 per cent sustainable mode share target by 2041. TfL also supports the local plan's highlighting the borough's unique transport connections which will allow for freight to shift from the already congested and polluted road network to sustainable modes, including rail and river freight. Suggested edits: Paragraph 2.6 – "The work presents a greater emphasis on how we connect and strengthen links between new and existing communities with an emphasis on active travel and improved public transport while recognising car use is still a vital part of Barking and Dagenham's heritage, economy and day-to-day life. While the car forms a part of Barking and Dagenham's economy and day-to-day life, a shift to sustainable modes is needed to enable the objectives of this plan to be realised."	Yes	Proposed changes will be implemented following further discussions with the GLA. A statement of common ground will be agreed to set out a programme for agreeing policies in line with responses received.

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Stat	LP008	Transformation Areas	Support with suggestion	46				We welcome prioritising walking and cycling over cars, with enhanced legibility, permeability, new pedestrian links, route hierarchies, wayfinding, green infrastructure, public realm improvements, etc. We welcome the prominent inclusion of bus priority measures in the transport strategy, with specific recommendations set out for each of the transformation areas. We encourage the Council to include further specificity for improvement in bus infrastructure and services, including planning for bus stops, new bus stands, bus routes and safeguarding land for bus operations, as was suggested in our Regulation 18 response, especially for Barking Town Centre and the River Roding area.	Yes	Proposed amend - While the car still forms an essential part of Barking and Dagenham's economy and day to life, a shift to sustainable modes is needed to support the objectives of this plan.
Stat	LP008	Parking	Support with suggestion	46		SPP1		We welcome the Council's commitment to car-free developments around Barking station, improving station capacity and the public realm in the area while focusing on the East Street and Station Parade environments. We suggest that the commitment to car-free development be extended to the whole transformation area in line with the excellent access to public transport that already exists in the area, as well as the potential for further improvements to public transport, walking and cycling networks.	No	Noted, but subject to specific development applications and case by case basis as is happening already
Stat	LP008	Sustainable Transport	Support with suggestion	46		SPP1		We welcome that you have clearly recognised the proposed Cycleway between Barking Riverside and Ilford through Barking Town Centre along with prioritising the needs of bus passengers. We also strongly support the reference to upgrading access and increasing capacity at Barking station to support growth and mitigate pressures on the transport network. We strongly recommend cycling be accommodated on Station Parade to link into/complement the local cycling network, including the proposed cycleway between Barking Riverside and Ilford. Not permitting cycling on Station Parade would result in significant severance of the cycle network, resulting in detours of approximately 1km.	No	Noted – station parade is on cycle route 10 -
Stat	LP008	Infrastructure	Support with suggestion	46		SPP1		We support the pedestrianisation of Broadway, making Highbridge Road one-way and including a new cycle bridge over the River Roding. We strongly recommend including coordination with Transport for London in the implementation of these schemes.	No	Noted, we are exploring potential levelling up bid for Barking Town Centre as per Arup report (not included yet in evidence base due to deliverability and funding issues)

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Stat	LP008	Sustainable Transport	Support with suggestion	46		SPP2		We welcome the strong commitment to sustainable modes made throughout the policy. A clear reference to the Healthy Streets Approach would also be supported in order to ensure that walking, cycling and public transport provision is not just about the infrastructure, but creating a place that is pleasant to travel by sustainable modes and accessible to all. We note that the River Road bus garage is included in site allocations E_029 and E_088. While we support the principle of intensification, bus garaging capacity must be retained either on-site or off-site in a location agreed with TfL in the immediate vicinity in line with policy T3 of the London Plan and the emerging London Planning Guidance on Sustainable Transport, Walking and Cycling. This is necessary to allow expanded bus services to support development proposed in the area. The bus strategy for Barking Riverside should also be referenced in this section and the transport chapter within the local plan. <a href="http://content.tfl.gov.uk/review-of-bus-services-in-london-riverside-east.pdf">http://content.tfl.gov.uk/review-of-bus-services-in-london-riverside-east.pdf</a>	Yes	Proposed changes will be implemented following further discussions with the GLA. A statement of common ground will be agreed to set out a programme for agreeing policies in line with responses received.
Stat	LP008	Maps	Support with suggestion	46		SPP2		Figure 8: CFR10 cycle route, which is committed, should be represented on the map. We suggest that the dedicated bus only route proposed through the central boulevard for Barking Riverside in paragraph2(e) should be clearly shown in the map.	Yes	Change agreed - Amend Fig 27 to show CSR 10
Stat	LP008	Maps	Support with suggestion	46		SPP2		Editorial comment: In Figure 8, the Thames Road Local Centre is mislabelled as the "Chadwell Heath Local Centre".	Yes	Proposed changes will be implemented following further discussions with the GLA. A statement of common ground will be agreed to set out a programme for agreeing policies in line with responses received.

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Stat	LP008	A13	Support with suggestion	46			It is noted that the transport strategy sets the ambition to deliver the A13 scheme in '5-10+ years.' While we welcome the aspiration outlined here, the recommendations of the London Riverside Opportunity Area Transport Strategy are to continue to develop the plans to renew the A13 flyover at Lodge Avenue in line with the current DBFO contract, alongside undertaking further work to develop the business case for the tunnel. While further work on the tunnel has been undertaken, the plans seem highly uncertain due to cost and other complexities and if they were to proceed would be likely to have longer timescales than 5-10 years, dependent on government support in the delivery of the tunnel. Based on this context, we recommend that the proposals for Castle Green transformation area should reflect this constraint in delivery of A13 tunnelling and put forward development proposals that can be supported if schemes are not delivered within the plan period. We are keen to continue to work closely with BeFirst and the Council to look at deliverable alternative options for the A13 that maximise development opportunities, while maintaining its strategic highway function. We would also like to clarify that the delivery of Castle Green station, while it needs a strong business case, is not dependent on the delivery of A13 tunnelling.	No	Noted, LBBB object to the DBFO proposals and believe strongly it is the wrong solution. We are continuing to work with TFL /GLA and Homes England to find the right solution and delivery route which balances the needs of the borough and tFL . This will be covered in the Castle Green SPD in due course
Stat	LP008	Sustainable Transport	Support	46		SPP3	We support proposals to improve bus, cycling and walking links in the area of Dagenham Dock station. In paragraph 10, we recommend including Transport for London to discuss strategic transport improvements envisioned around Beam Park station. It will also be important to ensure that walking and cycling routes, and those for buses, join up with those being planned and delivered in Havering.	No	This is happening anyway led by the GLA.
Stat	LP008	Sustainable Transport	Support with suggestion	46		SPP3	The development of an intermodal rail terminal is generally supported, although consideration should be given as to how the impact on the road network will be minimised and mitigated. The proposals also create an opportunity for a new freight consolidation centre which could allow for more efficient use of vehicles and more appropriate vehicles for last mile journeys into London. In para.10 (e), we suggest that you remove 'shared' from this phrase 'wide shared footpaths and cycle routes' as shared paths are generally not supported except where both foot and cycle traffic are expected to be very low. For any specific context where shared walking and cycling paths need to be proposed we recommend that Government and TfL guidance is followed and a reference is made to such guidance in the local plan, where appropriate	No	This will require 4(e) of DMT 2 to be amended. Car-free sites would not allow for Car Club vehicles. No change we want greater use of Evs and car clubs

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Stat	LP008	Sustainable Transport	Support with suggestion	46		SPP3		Para. 4(h) needs 'commas' and should read "including new bus, cycling and walking links"	Yes	Proposed changes will be implemented following further discussions with the GLA. A statement of common ground will be agreed to set out a programme for agreeing policies in line with responses received.
Stat	LP008	Sustainable Transport	Support with suggestion	46		SPP5		While we support the general ambition to improve transport and connectivity, TfL does not support the proposed reopening of Dagenham East NR station (see detailed comments in Appendix B). Greater consideration should be given toward how local transport connectivity can be improved in order to enable modal shift for local journeys in particular.	No	Shame and very short sighted. Dagenham East would link into to Beam Park as a much needed metro service for the area. TfL provided a letter of support for our L?U1 bid so this commnet should be removed. We need to work closely with NR and GLA together to promote rail services in the Thames Estuary corridor.
Stat	LP008	Sustainable Transport	Support with suggestion	46		SPP6		We welcome the Council's support for developments that improve the public realm, transport connectivity around stations and low-traffic neighbourhoods. We strongly support the principle of 'rationalising car parking' and welcome the amendments in this iteration of the draft local plan which explicitly state that car parking will be minimised in Dagenham Heathway. We encourage additional details regarding how and to what extent car parking will be rationalised in the wider Becontree Estate.	No	There is a roll out of CPZ in Becontree currently out for consultation. No change proposed
Stat	LP008	Sustainable Transport	Support with suggestion	46		DMD1		In paragraph 2(c), although the policy is generally welcomed, we strongly recommend deleting the phrase 'where appropriate' as it is appropriate to enable active lifestyles through pedestrian and cycle infrastructure in nearlyall circumstances. All developments impact on the public realm in some regard, therefore even small developments can support walking and cycling. Additionally, we recommend that the Healthy Streets Approach is mentioned explicitly so that development has regard to all aspects which encourage and enable walking and cycling	No	No change proposed, adequately covered
Stat	LP008	Sustainable Transport	Support with suggestion	46		DME3		In point6, we recommendan additional bullet:e) demonstration that the design of the walking route(s) are safe and wide, and include greenery and rest areas, where possible,to enable convenient walking for all ages and abilities.	Yes	Change agreed

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Stat	LP008	Sustainable Transport	Support with suggestion	46	Chapter 10			As previously stated, we welcome the commitment to supporting sustainable modes and the MTS sustainable mode share target. We welcome amendments made to the chapter in response to our previous comments, including amendments to Figure 27, which no longer shows unsupported schemes and now refers to general "A13 Improvements", subject to funding from Government. We also note that the transport strategy covers the proposed schemes in greater detail which is welcomed.	Yes	Proposed changes will be implemented following further discussions with the GLA. A statement of common ground will be agreed to set out a programme for agreeing policies in line with responses received.
Stat	LP008	Car Parking	Support with suggestion	46		DMT2		In paragraph 1, we appreciate the support for London Plan Policy T6 which recognises that car parking standards are set with the intent to drive modal shift, however the policy is phrased in a way that is contradictory to both the following paragraph (see below) and the London Plan. We do not wish to see all developments aiming for the maximum car parking standard set in the London Plan. We want to see all developments strive to be car free or have as little car parking as possible. Therefore, we recommend the following edits: "... reducing car use by <del>adopting the maximum</del> complying with the car parking standards set out in the London Plan <del>car parking standards...</del> "	Yes	Just a wording issue - I would take "adopting the maximum" to mean complying within it rather than aiming to achieve the maximum. TfL's suggested wording should solve this change agreed
Stat	LP008	Car Parking	Support with suggestion	46		DMT2		As stated in our previous consultation responses, we also appreciate the recognition of London Plan Policy T6 B which sets out that car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport. We welcome that some of our recommendations have been taken on board, however some changes are still needed. The wider intention of the policy is lost because of the way the DMT2 policy is drafted with well-connected being defined only as PTAL 5 and 6 (which we dispute and would recommend deleting as set out in our comments in the previous Regulation 19 response).	No	This will require 4(e) of DMT 2 to be amended. Car-free sites would not allow for Car Club vehicles. No change we want greater use of Evs and car clubs



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Stat	LP008	Car Parking	Support with suggestion	46		DMT2	<p>Further, the policy of car-lite development for areas that are less well-connected is watered down by no longer defining it as the 'minimum necessary parking'. The London Plan requires all developments in PTAL 5 or 6 to be car-free, not car-lite (NB car free development includes provision for Blue Badge holders). The standards are expressed as maximums so particular circumstances can and should lead to more ambitious reductions in provision locally. Since the Council is eager to improve walking and cycling connections in addition to bus infrastructure across the borough, this should be clearly and strongly reflected in the local plan car parking policies. Car parking is one of the most essential policies to achieve the MTS aims as well as the goals that the Council has set for the borough, including reducing traffic, congestion (with many roads over or near capacity now as per transport impact assessment evidence), road danger and emissions, and creating space for safe and attractive walking and cycling. Evidence indicates that car parking induces car use; this is true regardless of connectivity by sustainable modes. This is why it is essential that development is well located and designed, as well as in areas with access to amenities that can enable car-free or car-lite lifestyles.</p>	Yes	<p>Suggest we use some of the wording from the previous versions (see the tracked change version sent), but also keep the latest keep the latest text on public realm: change proposed below "Developments in areas of poor transport accessibility will be required to minimise parking in line with the London Plan. They will be required to maximise sustainable transport opportunities through local improvements and high quality public realm that encourages walking, cycling and public transport use. In areas of low transport accessibility, early engagement with the Council is recommended to discuss appropriate car parking levels."</p>
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Stat	LP008	Car Parking	Support with suggestion	46		DMT2		We support the proposals in item 4b to repurpose existing car parking to public space, green space and/or cycle parking and welcome the borough taking on board our previous suggestions. The 'LBBB Parking Guidance' which accompanies the local plan should be amended to not require evidence for providing less parking than maximum London Plan standards. Any references to providing car parking levels higher than London Plan standards should be removed as this will present a non-conformity issue with the London Plan. There is no evidence provided to support higher than maximum London Plan parking standards. As stated in previous comments, it is worth noting in the policy that the London Plan applies lower maximum parking standards in Opportunity Areas (e.g. London Riverside), reflecting their potential to deliver more sustainable, planned growth alongside improvements in sustainable transport, compared to areas with more incremental or background growth. We expect this approach to be mirrored in local plans throughout London.	No	we're not requiring evidence solely due to car parking being below the max. The evidence is to ensure the development won't lead to unacceptable impacts and / or to inform appropriate mitigation. Change not agreed. no allowance is made for sites proposing to exceed LP maximums. This is evidenced in Section 4.6 of the parking guidance document. Change not agreed. there is no proposal to allow parking higher than LP maximums change not agreed
Stat	LP008	Sustainable Transport	Support with suggestion	46		DMT3		We welcome the focus on cycle parking policy, alignment with London Plan Policy T5, and reference to London Cycling Design Standards for parking design and layout.	Yes	Proposed changes will be implemented following further discussions with the GLA. A statement of common ground will be agreed to set out a programme for agreeing policies in line with responses received.
Stat	LP008	Sustainable Transport	Support with suggestion	46		DMM1		In item 1, public transport improvements/mitigation should be given joint highest priority with affordable housing in line with the London Plan. The important role of planning obligations in delivering transport infrastructure (which underpins growth and housing delivery) is currently not adequately conveyed. Public transport, active travel facilities and public realm improvements should be set out separately in the list so that the 'local plan policy SP8: Planning for integrated and sustainable transport' is successfully delivered.	No	A new planning SPD is being prepared for consultation which includes lots of requirements for buses and highways. We believe the plan makes clear our priorities and we will keep working with TfL. Change not agreed

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Stat	LP008	Developer Contributions	Support with suggestion	46		DMM1		There is now greater flexibility in terms of how CIL and s106 work together and fund infrastructure, which requires a certain level of detail to understand what infrastructure is intended to be funded through CIL and which is to be funded through s106 (or a combination of the two). Recent changes in government guidance now also require that any formulaic approach to s106 obligations are set out in the local plan, and as the previous Planning Obligations SPD was adopted in 2015, you may wish to consider the obligations that could be addressed through a standard calculation or tariff based approach, and clearly set those out within the new local plan. You may also consider updating the Planning Obligations SPD in parallel with the local plan process to ensure that your approach to developer contributions is clear and robust.	No	A new Planning SPD will be issued for consultation in Spring 2022 which includes strengthened obligations on transport including bus provision. We can discuss any further amendments during examination.
Dev	LP038	Parking	Support with suggestion	47		SPP3		Beam Park policy should recognise the capped parking ratios and a parking strategy.	No	See Chapter 10
Dev	LP038	Infrastructure	Support with suggestion	47		SPP3		Beam Park policy should recognise that it is a development which spans 2 Councils and will provide a range of infrastructure across the site capable of serving both. Detail could be provided on the location of different services etc.	No	Subject to site specific considerations
Dev	LP038	Affordable Housing	Support with suggestion	47		SPP3		10a) Should be amended to simply refer to affordable housing (possibly highlighting 50% provision subject to viability), including appropriate family accommodation.	No	
Dev	LP038	Sustainable Transport	Support with suggestion	47		SPP3		Detail relative to the Stamping Plant site should pick up linkages through it (cycle and pedestrian). There is a need for adjacent sites to have regard to one another and provide appropriate interfaces.	No	
Dev	LP038	Infrastructure	Support with suggestion	47		SPP3		Detail relative to provision of the station should be revisited in light of on-going queries being raised by the Department of Transport. Flexibility would therefore seem appropriate.	No	
Dev	LP038	Editing	Support with suggestion	47		SPP3		Wording assigned to Beam Park Local Centre needs to be clarified to prevent confusion. This appears, however, to be assigned to the Ballards Road or the McDoalds roundabout. Technically this area sits outside of the Beam Park site/ ownership.	No	
Dev	LP038	Housing	Support with suggestion	47		SPP3		6,011 homes are mentioned as the capacity in this area. It is highlighted that this figure should be viewed as a minimum and scheme optimisation across the area is sought.	No	Site allocation numbers are not a maximum figure

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Dev	LP038	General	Support but with suggestions	47		SP2		We welcome the encouragement of 'optimising density and site potential' (point a) in line with the guidance within the NPPF and the new London Plan. The Council's proactive approach to development is supported, although it should be recognised [in the text] that development will sometimes need to create its own context/ sense of place, where one does not exist or there is a clear need for improvement to take an area forward, much like Beam Park.	No	
Dev	LP038	Tall Buildings	Support	47		DMD2		The fact that all of the London Riverside Opportunity Area is identified as potentially suitable for tall building provision is welcomed and considered appropriate and vital to enabling delivery of much needed housing and optimisation of site potential	No	Support welcomed
Dev	LP038	Mixed Use	Support with suggestion	47		DMH2		The desire to see the provision of a mix of dwelling types is understood, although not every development is able or appropriate to provide the complete mix of unit types set out and greater flexibility is required. There may be instances where creation of a balanced community requires a different approach which can be discussed and agreed pre submission. Wording should be changed to be 'Development proposals will be required to provide range of unit sizes (including family housing), to be discussed and agreed with the Council pre submission, which will recognise the Council's preferred housing size mix table'. This flexibility should be reflected in part 2 of the policy.	Yes	Already changed following previous comments
Dev	LP038	Community Facilities	Support with suggestion	47		DMS2		Relative to DMS2 3) the suggested requirement for applications to be accompanied by a Community Needs Strategy is noted. This said, it appears that the LPA will have the main role within this process. Should it not be a case of LBBB discussing and detailing need at pre app stage and the applicant demonstrating compliance or justifying divergence. It is only where provision falls short, or takes an alternative form, that the applicant should be required to drive production of the suggested document3) to be rewritten as 'Applicants are to engage with the Council pre application stage to understand any community need aspirations. Where the applicant is not able to deliver the agreed requirements, full justification is to be provided as part of any planning application'	No	Information requirements are considered on a case by case basis

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Dev	LP038	Community Facilities	Support with suggestion	47		DMNE6		The aspirations detailed in 2 are noted and although the benefits of community food growing are understood and broadly supported, not all developments will be able to include such features. Proposals should be viewed in the context of the various site constraints while balancing the open space needs of the community based upon context and existing assessments rather than there being a blanket requirement. Amend wording of 2 to 'Major residential-led developments are encouraged to provided...'	No	
Dev	LP038	Parking	Support with suggestion	47		DMT2		Further clarification required regarding on street parking and ongoing maintenance	No	See Chapter 10
Dev	LP038	Viability	Support with suggestion	47		SP9		The Council's desire to front load infrastructure provision is noted, although this cannot be at the cost of scheme viability. Recognition of scheme viability needs to be added into policy.	No	Viability considered on a case by case basis
Dev	LP038	S106	Support with suggestion	47		DMM1		In assessing any obligations to be paid, it is important to viability to ensure that there is no double counting as LBBB has an operative Community Infrastructure Levy payment system. Any requirement must also satisfy the national tests. Concerning 3, although agreement to obligations will be pre development, to assist with cash flow some elements could reasonably be paid in line with other trigger points which could be agreed with the Council. Change 3 to 'The timing of payments secured as planning obligations will be defined within the relevant agreement to ensure timely provision of facilities, which will assist with minimising any adverse impact on cash flow/ scheme viability'	No	Trigger points to be negotiated on a case by case basis
Dev	LP038	Transport	Support with suggestion	47		DMT1		Point 10 highlights that: Developments likely to generate significant amounts of movement should be supported by a Travel Plan (TP) as part of a planning application...It is highlighted that for large scale outline application it would be normal for applicants to issue a Framework Travel Plan. Full Travel Plans at outline stage are unlikely to be effective as they will not be tailored to the end user. Full Travel Plans would more appropriately accompany a fully detailed planning application. Point 15 states that: Strategic developments should provide bus access and safeguard the land required for bus standing. This does not discern between sites and does not define who will determine the extent or presence of the indicated requirement. Clarity is sought on whether TPs will be conditioned for outline applications and outline elements of hybrid applications. Further detail is required for point 15	No	Still require a Travel Plan at an outline stage where relevant

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Other	LP112	Travellers Sites	Objection	48		DMH6	<p>The site is under private ownership of TCE as part of their wider rural estates portfolio and tenanted for agricultural purposes. The use of the site for gypsy and traveller accommodation would prevent the agricultural operations on the land.</p> <p>Based on LBBB's assessment, it is felt that the sites at Crabtree Avenue and Keir Hardie Way should be prioritised as they are not located within the Green Belt nor near listed buildings and have the same nature designations ratings as the three shortlisted. The site is occupied by an agricultural tenant and is privately owned. The site is unavailable and on this basis, therefore it is undeliverable over the plan period.</p>	No	Remove site from site allocations due to not being deliverable
Other	LP037	Co-Location	Support with suggestions	49			<p>Thames Road Transformation Area - concerned regarding the potential of relocating current businesses and the emphasis on a "residential-led" neighbourhood. UPS is located at the western edge of Thames Rd adjacent to River Rd and we support plans to retain the purely industrial nature of this area. Any intensification or mixed use development should consider vacant or under-utilised commercial properties first for re-development, rather than long standing businesses which provide employment opportunities. We also support residential properties being located at the eastern end of Thames Road.</p> <p>The nature of our business necessitates operations starting very early in the morning, from 3.00am, and running late into the evening, until around 22.00. In addition, there are intense periods of vehicle movements from 7am-9am in the morning and 5pm-7pm in the late afternoon. We are concerned that these operations are not conducive to being in close proximity to residential properties. This could cause an increase in noise complaints which could become a management issue for both UPS and the Council. However, by creating a natural barrier with more mixed use developments being situated in the central section of Thames Rd, this should minimise any disruptions.</p>	No	Agent of change will be considered as part of planning application for nearby residential development and on site mitigations will need to be included

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Other	LP037	Freight	Support with suggestions	49				D1..In regards to freight consolidation we would urge further discussions with current businesses at as early a stage as possible in regards to any proposals for freight consolidation. Whilst consolidation centres may also provide value for smaller delivery companies or operators that do not carry full loads, it could cause duplicate package handling and increase vehicle movements. It also needs to be clear once packages are handed over to a consolidation centre – who now owns the final mile delivery, including the cost, and how is the package data retained to provide visibility and transparency for the customer (data protection restrictions), end consumer and the logistics companies. Rather than taking the risk associated with consolidating urban deliveries onto a single final mile operator, UPS supports expanding its innovative last-mile solutions developed to reduce carbon emissions and improve efficiency which are outlined below.	No	Will continue discussions as part of planning application
Other	LP037	Transport	Support with suggestions	49				We also support the use of electric and low or zero emissions vehicles and e-cycles for final miles deliveries...the availability of parking locations and charging stations in central locations are essential to making this a commercially viable operation.	No	Support welcomed
Other	LP037	Parking	Support with suggestions	49				Car Free Parking Developments - We support efforts by the Borough to reduce the number of cars on the road. We would like to highlight that due to the operational hours of the facility and the shifts that our employees work...we would highlight that car parking will still be required for some time at our facility.	No	Comments noted
Other	LP113 (LP046 on previous)	Consultation	General	50				complex and confusing format..restricting completion of the form. The Local Plan needs to be made easily accessible to all residents of Chadwell Heath, via letters/leaflets, with proposed dates for meetings– along with information on how to voice opinions – clearly identified. Further communication via such sites as Nextdoor.com, along with posters/local advertising hoardings displaying general reminders would enable wider access for the community. Some communication has clearly been prevented due to the current Covid crisis; this could be taken in to consideration, with some extension of the discussion process, to ensure that the majority of residents have the opportunity to learn about the proposals and contribute if they wish	No	Comments noted
Other	LP113 (LP046 on previous)	Building Heights/Density	General	50	Chapter 3	Area policy SPP4 (p27-29. Appendix 2 – proposed site allocations:		Lacking clarity in a number of areas. Point 4D appears to end with “Urban Grain focusing” (without explanation). It then refers to “larger-scale development, including buildings significantly taller than prevailing heights scaling upwards to the heart of the area”. I am concerned by the apparent focus	No	Tall building policy has been amended following previous comments from GLA

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						P23 site ref: CH Chadwell Heath Industrial Estate P47 site ref: 97- 131 High Road Chadwell Heath		on high-rise building throughout the Chadwell Heath area.		
Other	LP113 (LP046 on previous)	Heritage	General	50				I would like to know more about (i)“enhancement and refurbishment of buildings with local heritage value.” Currently,the High Road consists of numerous empty buildings, including derelict properties–portraying a negative image of the area - and a limited range of shops, predominantly take-away food shops and beauty parlours.With the expansion of Crossrail, the local area desperately needs a wider range of facilities, and a sense of value. There are already sites awaiting further development (eg The White Horse, Bairstow Eves and the site next to the Baptist Church). Surely, these areas need to be addressed before further demolition of properties, including Sainsbury’s site which currently provides a much-needed store–especially for elderly locals who prefer to shop locally, and essential car-parking for those who are less able to use public transport? Generally, there seems to be an over-emphasis on the regeneration of Selina’s Lane/Freshwater Road, while paying scant attention to the heritage and much-needed support required to improve the High Road.	No	The Borough is seeking to deliver housing in multiple ways including repurposing existing buildings and new development
Other	LP113 (LP046 on previous)	Social Infrastructure	General	50	Chapter 6			I feel strongly that “social infrastructure” (chapter6) is something that requires urgent consideration. While the Local Plan suggest that Schools will be provided in the proposed redevelopment of Chadwell Heath Industrial Estate, these, along with health services, are already needed urgently, and cannot be considered for medium-long term plans.	No	Local Plan addresses need for new social infrastructure alongside the Infrastructure Delivery Plan
Other	LP113 (LP046 on previous)	Car Parking	Objection	50		Appendix 2 Proposed Site Allocations, Map Wf		The suggestion of minimising car parking at the proposed development site at 97-131 High Road Chadwell Heath is unacceptable. This car park is an essential asset for all residents to access Chadwell Heath town centre High Street facilities including Bank, Post Office, Dentists, Opticians, Vet services, Pharmacies and all retail shops. It is important to consider the need of the many Chadwell Heath residents who are disabled, elderly or who have small children and cannot walk or cycle and rely on their car. Short and medium-term car parking must be available for those who find car travel essential.	No	Development will need to take into account car parking policies in rest of Local Plan and London Plan 2021



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Other	LP113 (LP046 on previous)	Tall Buildings	Objection	50		Appendix 2 Proposed Site Allocations, Map Wf	The document (re: site reference WF) states: Tall building development may be appropriate in this location." I believe that tall buildings are totally inappropriate for Chadwell Heath High Road and surrounding area as these are not in keeping with the traditional style of the local area. Most of the local housing was built in the late 19th and early 20th Centuries in a certain traditional style and original few commercial buildings were under 6 storeys.	No	Change already agreed regarding Tall Buildings
Dev	LP020	Freight	Objection	51			In summary DBC and Express are keen to ensure that: i) the two rail freight sites and Ripple Sidings are expressly safeguarded, by identification on relevant Figures within the Local Plan and on the Proposals Map as well as by direct policy reference, as rail sites and should be retained as SIL; ii) that neither site is subject to any housing or mixed use allocation; and iii) that any housing/mixed use allocations in close proximity to safeguarded rail sites/sidings are expressly required by policy to ensure they are planned, laid out, designed and mitigated so as not to prejudice the future operation of the rail depot in accordance with the Agent of Change principle and other national and London Plan requirements. Any departure from the above approach, i.e. proposals for housing or mixed use development that would lead to the loss of any part of either rail site, are objected in the strongest terms. Any proposals for relocation would also be objected to	Yes	Identify safeguarded rail freight interchange in Eurohub within site allocation map. Redevelopment of Castle Green will only happen comprehensively through a Masterplan SPD
Internal	LP114	Maps	Support with suggestion	52		Proposals Map	The proposals map illustrates the incorrect boundary for the allotment to the rear of properties on Reede Road, Dagenham Heathway. There is a small area of hardstanding, which is vacant brownfield land, to the western end of the current boundary which does not form part of the allotment. This area of hardstanding has no known planning history. Be First/LBBD are in discussions with neighbouring landowners at the Iceland, Lidl and BT sites which form part of the existing allocation and the intention would be to bring forward this area of hardstanding as part of any future development of the Dagenham Heathway site. Mod 1: The allotment to the south of Reede Road should be amended to exclude the vacant brownfield hardstanding area marked in blue on the below plan. Please also refer to the Title Plan which evidences that this area is owned by LBBD and is not subject to any leases. Mod 2: The modification to extend the red line of the Site Allocation (reference DM), is outlined in blue (on rep)., the extended site should include this additional area of land which is currently vacant and not in use is in single ownership by LBBD	Yes	Policies map will be updated

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Dev	LP022	General	Support	53				<p>The opportunity: CoLC welcome the reference to MCP and how it will support new jobs and create opportunities for food industry employment. Additionally, it supports the reference to LBBB working with CoLC and other stakeholders to create a major new logistics hotspot. CoLC recommend that the references to MCP in the opportunity section are carried through to the next stage of the Local Plan Review. The key driver for Local Plan Policies: CoLC support the inclusion of the City Markets in Figure 4 (p.18) 'A vision for South of the borough'. CoLC support the improvements of the A13 and other parts of the road network in order to continue unlocking growth through infrastructure investment. CoLC support LBBB to continue working together and with other stakeholders to unlock the opportunities in the London Riverside area. Chapter 3: CoLC continue to support the ambition to prepare a masterplan to coordinate developments in Dagenham Dock around the freeport Government initiative. CoLC note paragraph 4i) (p.49) references improving road and bus links along Kent Avenue to improve access to the City Markets. CoLC support these improvements and would like to be involved in any discussions about their delivery. In addition, paragraph 4j) refers to the removal of the service bridge. CoLC would like to be provided further details to understand whether the bridge should be replaced or improved. In Figure 10 CoLC support the inclusion/safeguarding of an area for a future international/intermodal Rail Terminal. It also supports mention of the Wharves being protected and enhanced. In paragraph 4 k) (p.49) CoLC welcome the recognition that along the A13 road and railway would be an appropriate place for taller buildings subject to design quality. CoLC also welcomes the references to rail and river connections in Dagenham Dock. Any strategic improvements to transport infrastructure in the area should be informed by the Strategic Transport Study that was carried out by Jacobs. CoLC is supportive of the level of detail in the planning consideration requirements section for the former Barking Reach Power Station, in particular the reference to how tall buildings might be appropriate in this location. CoLC understand and supports the additions that have been made to Plot 64 SEGRO Park. For the proposed uses CoLC note the inclusion of logistics, warehousing, industrial, food and energy operations. Also, CoLC support the following reference: "Development should contribute to the sub area vision and strengthen the relationship with adjacent land area".</p>	n/a	General statement of support
Dev	LP022	Editing	Support with suggestion	53		SPP3	Figure 10	CoLC note that Kent Avenue is incorrectly referred to as Kent Lane and requests that it is updated to avoid confusion.	Yes	To be updated following update to figures

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Dev	LP022	Transport	Support with suggestion	53		SPP3	Figure 10	CoLC note that parts of the Local Plan do not always reflect discussions and commitments that have taken place. For example, Figure 10(p.45) does not appear to include the cycle improvement works proposed in the engrossed S106 agreement for the OPA. CoLC would also like to be closely involved in any discussions about the new bus route proposed to run alongside the new market's site to Kent Avenue, and to confirm the yellow dotted line on Figure 10 is indicative subject to further discussions.	No	Figure shows general overview of what development will come forward in the area. Cycle routes are dealt with in more detail in the Cycling and Walking Strategy and Transport Strategy. Will continue to work proactively with applicant.
Dev	LP022	General	Support with suggestion	53		SPP3		In previous Regulation 19 (1) representations CoLC recommended that paragraph 4 of Strategic Policy SPP3 was updated to state that:"the scale and massing of development in this area should contribute to the creation of a new coherent townscape and be proportionate to the role, function and importance of Dagenham Dock as a Transformation Area with significant potential for intensification to create an organised, unified character".CoLC note that this amendment has not been made. CoLC would like to stress that this area will be subject to significant change and improvements to the supporting infrastructure will therefore need to be viewed in a holistic way and require careful coordination to ensure its success in unlocking the full potential of the area.	No	We have stated throughout the Plan that development must come forward in a comprehensive way and intensification is a core part of the plans for the Borough. Consider this has been addressed throughout the Plan
Dev	LP022	Co-Location	Support with suggestion	53		SPP3	4d	in paragraph4 d) (p.49) CoLC recommend that the word "consolidation" be changed to "co-location" to reflect the preferred terminology when describing the MCP.	Yes	Change will better reflect proposal
Dev	LP022	Evidence Base	Support with suggestion	53				CoLC's request from the previous Regulation 19 (1) representations was that the Barking Town Centre Regeneration Strategy 2020-2030, that was approved by Cabinet Members on 20 October2020, is included within the evidence base in the draft Local Plan. Our request to refer the Barking Town Centre Strategy2020-2030 still stands as it has not been included in the evidence base.	Yes	Will add this to the submission documents
Dev	LP022	Market	Support with suggestion	53				In the draft Local Plan Regulation 18 (2) Consultation, on behalf of CoLC, Deloitte submitted the former Barking Reach Power Station to LBB/BeFirst in a Call for Sites exercise which took place between 12 April and 17 May 2019. The submission identified the proposed use for "Consolidated wholesale market (sui generis) and connected/supporting uses (which could include food processing, logistics, food education and retail opportunities)".In the draft Local Plan Regulation 19 (1) Consultation the site allocation pro-formas lacked detail and only provided very basic information. CoLC appended revised versions which added in detail around the following:•Description of the site •Current use •Design principles •Tall buildings •Infrastructure •Flood risk •Affordable workspace	Yes	Will reflect previous comments received in the site allocation document

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Dev	LP022	Freight	Support with suggestion	53				In the proposed uses for the former Barking Reach Power Station CoLC support the mention of transport improvements and the use of the River Thames to move freight to and from the markets in the proposed uses section. CoLC is supportive of the inclusion of the broader list of supporting uses to include food processing, logistics, food education and retail. However, CoLC encourage LBBB to change the wording to include the word “exploring” when referring to the use of the River Thames.	Yes	Will reflect in site allocation
Dev	LP022	General	Support with suggestion	53				CoLC note that the existing use of “Industrial warehouse and refining plant” is incorrect and that the planning history section is missing the full planning permission for remediation works. CoLC recommend that the existing use should be updated to “The site currently comprises the disused Barking Reach Power Station, which ceased operation in October 2014”.The reference for the full planning permission for the remediation works should be added to the relevant planning history (20/01094/FULL)as well as the prior notification of demolition (20/00129/PRIOR4).	Yes	Will include in the site allocation
Dev	LP022	Infrastructure	Support with suggestion	53		SPDG1		CoLC requestthat paragraph 8 is updated to state “key transport improvements, which support strategic links into London, regionally and internationally, such as the A13.”	No	A13 already referenced
Dev	LP022	A13	Support with suggestion	53		SPP2		CoLC request that the following sentence is updated to state: “The A13 will be improved and upgraded to support development in the south of the Borough.Subject to Government funding and support, it could be undergrounded to create one contiguous borough community.”CoLC request that the Strategic Transport Studyrecommendations are more accurately incorporated into the draft Local Planto ensure that a comprehensive and coordinated approach is taken to infrastructure delivery.Table 10.3 identifies that policies SP 8, DMT 1, DMT 2, DMT 3 and DMT 4 are supported by six pieces of key evidence, including the Jacobs study. If the recommendations of the study are not fully incorporated into the draft Local Plan before submission, then these policies could be found unsound by a planning inspector as it forms a key piece of evidence for the policies.	No	A13 is in early stages and no recommendation has been made on how it should be delivered
Dev	LP022	General	Support with suggestion	53		DME 1		CoLC note that a Masterplan SPD might not be developed, but requests that reference is added to LBBB working collaboratively with the landowners in the area to deliver the necessary infrastructureupgradesto support the area’s development.	No	LBBB will continue to work collaboratively on infrastrcuture needs through continous updates of the Infrastructure Delivery Plan
Dev	LP022	Affordable Workspace	Support with suggestion	53		DME 2		No further recommendations (Reg 19 -1- response: CoLC note that the affordable workspace requirement will be subject to development viability and supports this.	No	Support welcomed

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Dev	LP022	Sustainable Transport	Support with suggestion	53		DMNE 2		CoLC continue to recommend that to ensure draft Policy DMNE 2 is sound, it is updated to state “target score of 0.3 should be achieved for commercial development (excluding B2 and B8 uses and similar industrial uses that are defined as Sui Generis).”	No	This is not in accordance with the London Plan policy
Dev	LP022	Biodiversity	Support with suggestion	53		DMNE 3		CoLC propose that part 4(e) of draft Policy DMNE 3 ‘Nature conservation and biodiversity’ is updated to read “use a suitable mixture of native and non-native species in soft landscaping schemes within 250m of Sites of Importance for Nature Conservation, waterways and wildlife corridors, and on green/brown roofs and roof gardens.” CoLC recommend that Part 2(b) of draft Policy DMNE 3 ‘Nature conservation and biodiversity’ is updated to state “demonstrate a minimum of 10% biodiversity net gain using the DEFRA metric (or agreed equivalent). Where this is not possible on site, off-site provision or an offsetting contribution could be appropriate, subject to appropriate evidence.”	No	Policy will be amended in line with recommendations from the Environment Agency to correctly reflect biodiversity net gain requirement
Dev	LP022	Design	Support with suggestion	53		DMD 1		CoLC propose that draft Policies DMD 1 ‘Securing high quality design’ and DMSI 3 ‘Nuisance’ are carried through to the next stage of the Local Plan Review	No	Support welcomed
Dev	LP022	Water	Support with suggestion	53		DMNE 4		CoLC propose that draft Policy DMNE 4 ‘Water Environment’ is carried through to the next stage of the Local Plan Review.	No	Support welcomed
Dev	LP022	Carbon Off-Setting	Support with suggestion	53		SP7		CoLC suggest that Policy SP 7 cross references Policy DMSI 2 to ensure it is clear that there is provision for alternative offsetting arrangements where required and appropriate	No	Plan should be read as a whole
Dev	LP022	Energy	Support with suggestion	53		DMSI 2		To avoid confusion and ensure draft Policy DMSI 2 is sound, CoLC continue to request that draft Policy DMSI 2 is updated to replace “Overheating Assessment” with “Energy Strategy including an Overheating Assessment where appropriate”.	No	No change is considered to be needed
Dev	LP022	Transport	Support with suggestion	53		SP8		CoLC recommend that a sentence is added to draft Policy SP 8 ‘Planning for integrated and sustainable transport’ that states: “Strategic transport plans for the Borough will be informed by the Strategic Transport Study”. CoLC also recommend that draft Policy SP 8 ‘Planning for integrated and sustainable transport’ is updated to confirm that the policy can be applied flexibly to reflect the specific nature of development proposals, where the need for such flexibility is identified in site allocations. CoLC also recommend that part 2(d) of draft Policy SP 8 ‘Planning for integrated and sustainable transport’ is updated to state “exploring the feasibility and business case of wider strategic schemes to improve the A13, and a potential future link across the River Roding that aim to reduce severance and improve environmental conditions. The feasibility and business case should be informed by the Strategic Transport Study but the delivery of strategic transport	No	LBBB will continue to work collaboratively and apply applications on a case by case basis on their own merits.

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								improvements should not delay the delivery of development in Transformation Areas.”		
Dev	LP022	Transport	Support with suggestion	53		DMT 1		CoLC continue to suggest that part 1 of draft Policy DMT 1 ‘Making better connected neighbourhoods’ is amended to recognise that the policies should be applied and considered relative to the specific nature of individual development proposals. CoLC also continue to request that part 8 is updated to state “Any development which is likely to have a significant impact on the borough’s transport network will be required to submit a robust Transport Assessment (TA) or Transport Statement (TS) and a Travel Plan, in accordance with Policy T4 of the London Plan: assessing and mitigating transport impacts. However, the delivery of strategic transport improvements should not delay the delivery of development in Transformation Areas.” CoLC suggest that part 6 of draft Policy DMT 1 ‘Making better connected neighbourhoods’ is updated to reference contributions to mitigating transport measures being led by a strategic coordinated plan.	Yes	LBB will continue to work proactively with applicants and consider each individual planning application on a case by case basis and considered on its own merits
Dev	LP022	Parking	Support with suggestion	53		DMT 2		CoLC continue to propose that draft Policy DMT 2 ‘Car Parking’ confirms that the policy can be applied flexibly to reflect the specific nature of development proposals, where the need for such flexibility is identified in site allocations. CoLC also continue to propose that part 2(b) of draft Policy DMT 2 ‘Car Parking’ is updated to clarify: “New office development should comply with the parking standards as set out in Table 10.4 (Maximum office parking standards) and policy T6.2 of the New London Plan Intend to Publish version. Policy T6.2 should also apply to industrial, storage and logistics and distribution development, but trip generating characteristics of such development should be reflected in the quantum of vehicle parking provided.” CoLC also request that part 2(d) is updated to state “some flexibility may be applied where retail, industrial, storage and logistics and distribution uses are redeveloped outside of town centres in areas which are not well served by public transport.”	Yes	LBB will continue to work proactively with applicants and consider each individual planning application on a case by case basis and considered on its own merits

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Dev	LP022	Sustainable Transport	Support with suggestion	53		DMT 3		CoLC continue to propose that draft Policy DMT 3 'Cycle Parking' confirms that the policy can be applied flexibly to reflect the specific nature of development proposals and evolution of the area's cycle facilities.	Yes	LBBB will continue to work proactively with applicants and consider each individual planning application on a case by case basis and considered on its own merits
Dev	LP013	Maps	Support with suggestion	54				It is highlighted that there is a discrepancy in the revised draft Local Plan. Notably, Figure 13 at Page 54 of the appears to indicate that the site is allocated for housing use (Site HR), yet the Proposals Map does not show any allocation at the site, and instead shows the site as retained in Green Belt use.	No	The policies maps will be updated prior to the submission of the plan.
Dev	LP013	Housing	Support with suggestion	54				The City Pavilion has been in use as a leisure complex for since 1988 (88/00659/TP). Since this initial application, a number of planning permissions have been granted that enforce the prolonged use of the site. As shown on the policies map, the site is located within the Metropolitan Green Belt. The draft Local Plan Review Regulation 19 consultation currently does not propose any change to the designation of the site as Green Belt. Subject to further detailed design and densities it is anticipated that the site could provide for approximately 125 to 175 homes to meet housing needs within the Borough. Car and cycle parking, amenity space, landscape and potential biodiversity enhancements would be incorporated within the scheme. Alternatively, there would be potential for the redevelopment of the Elmstead Nurseries site to provide for residential use, with the City Pavilion site being retained for leisure use. We commend the Council's intention for the Local Plan exceed the minimum figures set out in the London Plan (which it does at draft Strategic Policy SP 3), however we do raise two concerns with the approach applied. This matter is explored in detail in the response report provided in respect of MG land at Kind Edwards Road. Whilst the site holds good potential for residential use, Council should in any case be ensuring that the Local Plan maximises use of sustainable locations which comprise underutilised previously developed land. Redevelopment of this site would do that, but also deliver wider benefits to local landscape and character. The site is currently included within the Metropolitan Green Belt however as noted above contains a considerable extent of existing development, has been subject to previous planning permission, and is well enclosed. It is held that the land does not at present contribute positively to the intrinsic character and openness of the Green Belt. For clarity, it is not part of the Representation to seek the	No	Site allocation is not being considered as part of the Plan and its inclusion in the site allocation diagram was an error which will be corrected prior to submission of the plan

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							removal of the site from the Green Belt. It is held that the proposals prepared by RMA represent a scheme which, by virtue of the overall scale, mass and positioning of buildings, together with existing and proposed landscaping, would result in a scheme which could retain the openness of the Green Belt. MG is therefore seeking the allocation of the site as Previously Developed Land in the Green Bel for housing.		
Dev	LP013	Site Allocation	Support with suggestion	54			Whilst MG support the principle for allocating it's land at King Edward's Road and Gascoigne Road for new residential/residential-led development, there are significant discrepancies within the revised draft Local Plan in respect of the site allocation for the MG land, and indeed all of the land between King Edward's Road, Alfred's Way, Gascoigne Road, and Saint Paul's Road. To avoid any ambiguity, it is proposed that: <ul style="list-style-type: none"> <li>• In our view, separate residential land use allocations is made for the MG land itself, based on the red line areas provided at Appendix A.</li> <li>• The remainder of the land previously located within site DN could then be disaggregated into different allocation parcels.</li> <li>• Alternatively, if the MG land is grouped together with other land parcels, any allocation should clarify the land uses for the various areas, and make clear that proposals can be brought forward separately (noting the various land ownerships in this area).</li> </ul>	No	Site allocation represents the development in a strategic and comprehensive way and does not restrict individual parcels of land coming forward seperately



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Dev	LP013	Housing	Support with suggestion	54				Proposed allocation for MG land - For the reasons set out in this report it is held that residential-only development is appropriate in respect of the MG land identified in Appendix 1. Due to the approach set out in the Site Allocations document it is not possible to ascertain the Council's proposed capacity for the MG land. However, as set out in these representations, it is held that an indicative site capacity of 340 - 375 homes for the MG eastern site alone would represent an optimal and efficient use of this land, in an identified Transformation Area. For the western site it is held that an indicative site capacity of 39 – 43 homes would be appropriate. The MG is keen to work closely with adjoining landowners but the site could come forward independently, as early phase(s) of development.	No	Support welcomed
Dev	LP013	Transformation Areas	Support with suggestion	54				'It also states at Paragraph 29: 'Where a capacity figure was not available, a formula-based approach to capacity calculation was undertaken. This reflected the formula based approach of the GLA SHLAA 2017 which assumes different development densities according to the character of the area (whether it is central, urban or suburban), defined density areas (opportunity areas and town centres defined by GLA are areas with potential for higher density) and accessibility, which was assessed using the Transport for London Public Transport Accessibility Levels (PTALs) 2021 scenario. Whilst we do not disagree with the application of a formula-based approach (where a more detailed understanding of site capacity is not known), we do raise some concern with the approach taken, based on the above text. In particular, we consider that any formula-based approach should provide an uplift for sites within Transformation Areas, which are locations that are likely to be subject to more extensive growth and development with the 'potential for higher density and taller development', as identified in the draft Local Plan at Paragraph 3.12 and Strategic Policy SPDG1 (parts 4 and 5). Conclusion In our view, the approach taken currently is not positively prepared, or justified, as it appears that the formula-based approach does not make optimal use of the development sites in Transformation Areas – it would appear to apply the same formula-based approach across the borough, regardless of the spatial strategy set out in the Local Plan.	No	The formula based approach has been applied consistently across all sites and does not represent a maximum figure for the delivery of housing

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Dev	LP013	Housing	Support with suggestion	54				The housing requirement of 44,051 homes set out at Strategic Policy SP 3 appears to be based on the identified site capacities of the draft allocation sites. In our view, the approach to identifying these site capacities is flawed, and therefore so is the methodology for arriving at the 44,051 figure. There is concern that the formula based approach does not recognise draft Local Plan Policy SPDG 1 which identifies Transformation Areas as areas with potential for higher density and taller development. Any formula for identifying site capacities should accordingly factor in an uplift for Transformation Areas.	No	The formula based approach has been applied consistently across all sites and does not represent a maximum figure for the delivery of housing
Dev	LP013	Housing	Support with suggestion	54				Draft Local Plan Strategic Policy SP 3 indicates that the Council will support the delivery of at least 44,051 new homes across the borough between 2019 and 2037. It appears that the housing requirement for the borough set out in draft Policy SP 3 is derived from the identified site allocation indicative capacities, and an assumption on the level of housing being delivered through windfall sites. Whilst we commend the Council's intention to exceed the minimum figures set out in the London Plan, we do raise two concerns with the approach applied. Firstly, the plan period of 2019 to 2037 set out at draft Policy SP 3 differs from the 2020/21-2036/37 period set out at Table 2 of Appendix 4 (page 177) of the draft Local Plan, and Paragraph 29 of the Housing Evidence Topic Paper. As such, it is unclear which period the housing requirement covers. Secondly, we are concerned that the method used for calculating the site capacities (and therefore the 44,051 home target) does not relate to the spatial strategy of the borough set out elsewhere in the draft Local Plan. We also understand that there are a number of sites identified as site allocations in Figures 7, 9, 11, 13 15, 17, and 19 which are not accompanied by site allocation pro-formas, and so it is unclear whether these sites are in fact allocated. It is also unclear whether these sites have been counted toward the 44,051 figure.	No	The housing numbers and plan period are being reviewed prior to submission of the plan including amendments to the site allocation figures

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Dev	LP026	Site Allocation	Support with suggestion	55		Site Allocation Reference: HL	Hapag-Lloyd welcomes and supports the continued allocation of the Hapag-Lloyd House site. Appendix 2 lists the site allocations, and the Hapag-Lloyd House site is identified in this list as a "small housing site allocation" which is considered to be acceptable. Nevertheless, there look to be some inconsistencies to references of the Hapag-Lloyd site allocation. We note that the site is referred to in the Key for Figure 7 (SPP1 Site Allocations) of the Draft Local Plan, however, it is not shown on the map itself. Figure 7 (SPP1 Site Allocations) of the Draft Local PlanThe map needs to be updated to include site allocation reference HL (Hapag-Lloyd House site).Draft Local Plan, Appendix Two: Proposed Site AllocationsThis document should be updated to include to the Hapag-Lloyd House site (HL). As per the standard proforma used for other site allocations, we confirm that the following information for site allocation HL should be used: •Location & Existing Use: Offices •Proposed Use(s):Residential •Planning Considerations & Requirements:High level noise area; PTAL 6 •Relevant Planning History:00/00603/FUL •Indicative Minimum Capacity: 75 new homes •Anticipated Delivery Timescale (Years): 5-10 Years	No	The site allocations are being updated prior to submission of the plan due to a number of inconsistencies identified
Dev	LP026	Tall Buildings	Support	55		DMD2	We support the inclusion of this policy and the proposed tall building locations which includes the Hapag-Lloyd site.	No	Support welcomed
Dev	LP026	Housing Mix	Support with suggestion	55		DMH2	We welcome the acknowledgement in the policy that the Council will consider different housing mixes based on tenure split requirements for affordable housing, and up to date housing need assessments. It would be beneficial if a further reason was provided to reflect site circumstances and context. We recommend the following text be added to the policy:"2c) the individual site circumstances including location, site constraints, viability 2d) the achievement of mixed and balanced communities."	No	Applications will be considered on their own merits
Dev	LP115		Support	56			We support the vision for the sub-area which is driven by sustainability, with a focus on extensive development of well-connected sites and recognises the need to optimise housing delivery. We strongly support the aims of Policy SPDG1 and the inclusion of the land at Barking Riversidewithin the Transformation Area. Policy SDG1 Part 2 confirms the Councils ambitions to exceed the minimum target and this is supported. The Councils ambitions to exceed the London Plan minimum target are supported and the future proposals on the land at Barking Riverside have the potential to significantly contribute to this over the plan period.	No	Support welcomed

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Dev	LP115	Housing Mix	Support with suggestion	56		DMH2	DMH2as proposed is highly prescriptive in setting out the required unit mix for new developments. It is noted that the policy has been re-drafted to remove consideration of site specific circumstances, including housing type, site characteristics, viability, location and other constraints. In considering the requirements of Paragraph 35 of the NPPF, it is considered that the revised draft policy is not justified or effective. Furthermore, it does not conform with the London Plan. The preferred housing mix is considered to be unrealistic to achieve, for example, we would challenge the preferred mix which requires 38% of all Intermediate homes to be 3+ bed and 50% of the social homes to be 3+ bed. Furthermore, the requirement for 35% of the private housing to be 3+ bed housing is also challenging, having regard to viability constraints and market demand and affordability considerations (including the ability of purchasers to secure mortgages).	No	Amendment to the housing mix has been changed to reflect recommended elsewhere
Dev	LP095	Housing	Support with suggestions	57		SPP1	We are strongly supportive of LBB's draft policy SPP1 that encourages the redevelopment of the wider Barking Town Centre area. We also welcome the aspiration to transform the area to a thriving 21st-century town centre, with an intensified range of activities and uses to support existing and new communities. It is therefore crucial that retail, service, leisure, recreation and other appropriate uses are continued to be provided in these areas and that the predominant town centre function of Barking is maintained. The draft policy should include the proposed use(s) and minimum capacity sought for each allocated site. Evidence based documents, including 'The Housing Land Availability Assessment' and 'Five Year Land Supply Statement (September 2021)', state that site allocation HO (14-34 London Road) could deliver 29 units as part of a mixed-use development on the site. This anticipated figure does not reflect the development potential of the site. Not only does the site benefit from being located in the Barking Town Centre area, it is also located within an area that is considered to be acceptable for tall buildings (see draft Policy DMD2). To justify the minimum indicative capacity as stated for this draft policy, the breakdown of the capacity should also be included alongside with the identified site allocations. i.e., Site HO, 14-34 London Road: Capacity TBC Units plus, subject to feasibility.	No	The formula based approach has been applied consistently across all sites and does not represent a maximum figure for the delivery of housing

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Dev	LP095	Housing	Support with suggestions	57	Draft Site Allocation: Site HO	<p>Site allocation HO (14-34 London Road) is identified as a “small housing site allocation”. We understand that the reference to “small housing” is in accordance with the evidence-based documents, including ‘The Housing Land Availability Assessment’ and ‘Five Year Land Supply Statement (September 2021)’, which state the site is considered to have capacity to deliver 29 units. Not only does the site benefit from being in a town centre location, it is also located within an area that is considered to be acceptable for tall buildings (see draft Policy DMD2). It is imperative that the Council undertake further consideration of the site allocation to ensure the development potential of the site is optimised and that this is reflected in the wording of the allocation, and its identification in Appendix 2. Full details of the site allocation have also not been provided at this stage of consultation and need to be included as part of the draft Local Plan. We note that Site Allocation HO formed part of Site Allocation CD at Regulation 18 Consultation of the Draft Local Plan. To allow for the comprehensive redevelopment of the site, we strongly support re-combining the two site allocations and encourage the Council to consider this. Propose “Mixed Use (Residential Led) Development Site Allocation” as opposed to “Small Housing Site Allocation”. Since the site allocation is currently missing from the draft Site Allocations document, we want to re-emphasise our recommended wording for the proposed use which is set out below. We have put ‘TBC’ for the capacity of the site as the 29 unit figure needs to be re-considered. Proposed Use: Residential-led development with a potential to deliver a capacity of TBC units plus, subject to feasibility. Other uses could include retail, service, business, leisure, recreation, and other appropriate town centre uses.</p>	No	The formula based approach has been applied consistently across all sites and does not represent a maximum figure for the delivery of housing
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Dev	LP095	Site Map	Support with suggestions	57		Draft Site Allocation: Site CD	<p>We are strongly supportive of 'Land at the Corner of London Road and North Street' being allocated under Site Allocation CD. However, at the Regulation 18 consultation of the Draft Local Plan, we note that 14 – 34 London Road formed part of Site Allocation CD. The Site Allocation has since been divided into Site Allocation HO (14-34 London Road) and Site Allocation CD (Land at the Corner of London Road and North Street, Barking Town Centre). We are disappointed at the division of larger Site Allocation CD. The larger site allocation allowed for greater development potential that was more in line with the vision of the emerging Local Plan. Separating the two sites puts limitations on the type of developments that can come forward and could lead to standalone and fragmented developments. We are supportive of Site Allocations HO and CD merging into one, as previously proposed, and strongly encourage the Council to consider this. Following the acceptability of merging Site Allocations HO and CD, we recommend the below updates be undertaken to reflect this. For Figure 7 of the Draft Local Plan, we recommend merging Site Allocations HO and CD and identifying the whole site as Site Allocation CD. In Appendix 2, we recommend omitting Site Allocation HO and amending the site name for Site Allocation CD to read as follows: Land at the Corner of London Road and North Street (Former Site of White Horse PH and Omnibus Park) and 14-34 London Road In the draft Site Allocations, we advise that the merged Site Allocation be included and that the proposed use for the new Site Allocation CD read as follows: Proposed Use: Residential-led development with a potential to deliver a capacity of TBC units plus, subject to feasibility. Other uses could include retail, service, business, leisure, recreation, and other appropriate town centre uses.</p>	No	<p>The formula based approach has been applied consistently across all sites and does not represent a maximum figure for the delivery of housing. The Plan also encourages comprehensive development and landowners working together to achieve this. The Plan would not seek to prevent this coming forward</p>
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Dev	LP095	Tall Buildings	Objection	57		DMD2	With reference to the Regulation 18 Draft Local Plan, Draft Policy DM12 confirmed the Council will support tall buildings where they are located in sustainable locations with high public transport accessibility level (PTAL) ratings. However, the associated wording has now been removed in this Regulation 19 Draft Local Plan. It is considered that the policy wording of this draft policy is not sound on the basis that is contrary to regional planning policy and preceding local policy. Nos 14-34 London Road is situated in both the Barking Town Centre and London Riverside Opportunity Area, as well as within a Transformation Area, as identified in Draft Policy SPP1. The site is therefore considered to be acceptable for tall buildings, due to its highly accessible town centre location. To ensure the soundness of the draft policy, the following policy wording is recommended to be included: 3. For tall buildings to be considered acceptable they should be located in areas of high public transport accessibility (PTAL) levels or as set out in the localised planning framework. [...] In addition, it is also recommended that tall buildings will be considered acceptable within the designated 'Transformation Area', within the Strategic Development Strategy Policy.	No	The Tall Buildings policy has been updated to reflect the London Plan 2021
Dev	LP095	Housing Mix	Support with suggestions	57		DMH2	We welcome the acknowledgement in the policy that the Council will consider different housing mixes based on tenure split requirements for affordable housing, and up to date housing need assessments. It would be beneficial if a further reason was provided to reflect site circumstances and context. We recommend the following text be added to the policy: "2c) the individual site circumstances including location, site constraints, viability 2d) the achievement of mixed and balanced communities."	No	Housing tenure policy already proposed to be updated following previous comments

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Dev	LP095	Affordable Housing	Objection			DMH1	<p>Policy DMH1 is not consistent with London Policy regarding Affordable Housing contributions with respect to Build to Rent. Paragraph 4.1.1.2 of the London Plan notes that there is a need for a specific policy approach to the affordable housing model for Build to Rent given its distinct characteristics. The London Plan Policy states that where a scheme meets certain criteria fulfilling their definition of a 'Build to Rent' Development, the affordable housing offer can be Discounted Market Rent (DMR) at a genuinely affordable rent, preferably London Living Rent level. If developments provide at least 35 per cent affordable housing they can follow the fast-tracked route, and not provide a viability assessment. Schemes must also meet all other requirements of Part C of Policy H5 Threshold approach to applications. However at least 50 percent affordable housing is required where development is on public sector land or industrial land appropriate for residential uses in accordance with Policy E7. Where a development must be viability tested the differences between Build to Rent and Build for Sale development should be considered. The policy also notes that at least 30 per cent of DMR homes to be provided at an equivalent rent to London Living Rent with the remaining 70 per cent at a range of genuinely affordable rents. The current drafting of Policy DMH1 does not set out an exception for the unique requirements of this housing model. DMH1 should be revised to include the following additional paragraph: 3. The Specific approach for the affordable housing offer for Build to Rent developments should be followed as set out in the Draft London Plan</p>	No	We will consider how to reflect discounted market rent prior to the submission of the plan
				57					
Dev	LP095	Open Space	Support with Suggestion	57		DMD1	<p>It is contended that Policy DMD1 in relation to provision of amenity space and public open space on Site is not sufficiently justified. The reference to the provision of public realm and amenity space should recognise that this provision is affected by the Site's specific circumstances. As drafted, the policy does not take into account the context or proposed users of different Sites, which is an important consideration for the provision of public realm and amenity space, and to inform the appropriate balance of between the different forms of amenity space on Site. In addition, the policy should enable the applicant to provide evidence against any limitations in provision with regards to Site specific circumstances. Part 3d should be amended to note: 3. All development proposals should: d) clearly demonstrate consideration of the individual and cumulative impact on amenity, neighbouring buildings, skyline, infrastructure and the natural and historic environments, provision of public realm, amenity space (private, communal and child play space); e) provide a range and mix of publicly accessible open</p>	No	Provision of open space within developments is set out throughout the Plan



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								space that promote biodiversity, safety, health and well-being; All sites should be accessed on a Site-specific basis with regards to the provision of public realm and amenity space (private, communal and child play space).		
Dev	LP095	Housing	Support	57		SP3		We support the amendment of the proposed policy to include reference to Build to Rent	No	Support welcomed
Dev	LP095	Community Facilities	Objection	57		DMNE6		Policy DMNE6 states that all major residential-led developments are expected to provide community food growing opportunities and to provide a strategy for the ongoing management of this. This policy is not justified. It fails to consider the particular Site circumstances and should be subject to viability. Part 2 should be amended to state: Major residential-led developments, subject to Site circumstances and viability, are expected to provide community food growing opportunities and to provide a strategy for the ongoing management of this.	No	All applications will be considered on a case by case and on their own merits
Dev	LP095	Biodiversity	Objection	57		DMNE3		The requirement for a 10 percent increase in Biodiversity Net Gain is not consistent with other policies within the Local Plan. Policy DMM1 notes that obligations may be sought, for example measures or payment to increase biodiversity where net gain is not feasible on-site. This should be included within Policy DMNE3. Part 2 of Policy DMNE3 should be amended to state: Demonstrate a minimum of 10% biodiversity net gain using the DEFRA metric (or agreed equivalent). Applications where loss or degradation of habitat would be negligible, such as material change of use applications, alterations to buildings, and house extensions, are excluded from this requirement. Obligations may be sought, for example measures or payment to increase biodiversity where net gain is not feasible on-site.	No	Biodiversity net gain policy will be updated in line with comments from the Environment Agency

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Dev	LP095	Transport	Support with suggestion			DMT1		Policy DMT1 states that Strategic developments should provide bus access and the land required for bus standing which is vital for making new services operable. Development should also design and implement new junctions and road connections to allow buses to travel through the site. It notes that the borough will seek cycle facilities and local cycle routes to be provided within individual development sites to form a series of routes which would integrate locally into the National Cycle Network (NCN). This policy is not justified and should be dependent on the specific Site Circumstances. Part 16 of Policy DMT1 should be amended to state: Subject to feasibility, Strategic developments should provide bus access and the land required for bus standing which is vital for making new services operable. Development should also design and implement new junctions and road connections to allow buses to travel through the site. The borough will seek cycle facilities and local cycle routes to be provided subject to Site circumstances within individual development sites to form a series of routes which would integrate locally into the National Cycle Network (NCN).	No	All applications will be considered on a case by cases and on their own merits
				57						
Dev	LP095	Culture	Objection			Policies Map		The Policies Map should not define the night club/pub as a Culture designation within the site allocation for 14-34 London Road. It is not a justified designation. This is because it is not a viable or appropriate for the continued use of this Site which is designated within the Local Plan as a housing site allocation. It is also argued that it is not compliant with the London Plan to include this night club/pub within the definition of a Culture designation. Policy HC5 of the London Plan notes that boroughs are encouraged to develop an understanding of the existing cultural offer in their areas, evaluate what is unique or important to residents, workers and visitors and develop policies to protect those cultural assets and community spaces. With regards to pubs, Policy HC7 notes that pubs will be protected where they have heritage, economic, social or cultural value to local communities, or where they contribute to wider policy objectives for town centres, night-time economy areas, Cultural Quarters and Creative Enterprise Zones. The London Plan therefore clearly states that it should be assets with high value which are protected rather than every night club/pub. It is not understood that these venues are of any particular community value. Furthermore, it is evident from Policy HC7 that where proposals would not contribute to wider policy objectives, such as being harmful to residential amenity, the re-provision would not be supported. To ensure the draft Local Plan is and justified and consistent with regional policy through the amendment of this policy and supporting text.	No	Policy is considered to be compliant with London Plan
				57						

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Dev	LP095	Culture	Objection			DMS1 and DMS3	The requirements detailed under Policy DMS1 are too onerous, and therefore not justified. There is the need to submit 24 months of marketing. However, this is not viable in a current and post-Covid environment, with the lack of demand for these types of uses, and requirement for repurposing for vacant and underused town centre floorspace. As such this requirement should be amended to be more flexible. Furthermore, the policy is not justified because it does not consider that some locations are not appropriate for certain types of cultural uses. It is also argued that it is not compliant with the London Plan to include all nightclubs/pubs within the definition of Cultural Infrastructure covered by this Policy. Our comments with regards to DMS1 also apply to DMS3. This is because the policy states development proposals resulting in the loss of a public house will be strongly resisted unless justified by robust and up-to-date planning and marketing evidence in accordance with policy DMS1 Protecting and Enhancing existing Facilities. We propose the following additions to DMS1: b) there is no longer an identified need or demand for the existing use of the facility. In such circumstances, the applicant must provide robust evidence to demonstrate: • It is not an appropriate or feasible location for the proposed use; or • active marketing over a continuous 6-month period of time for alternative forms of social and cultural infrastructure on the site, taking into account the needs of the future local community, including if the facility was refurbished and/or multi-functional; or • demonstrate that the loss of the facility would not lead to a shortfall in provision for the specified use for the population that it serves.	No	Policy requires 12 months of marketing
				57					
Dev	LP011	Allocations	Support	58		SPP3	SEGRO supports the initiatives of the policy which encourage intensification of industrial uses and employment floorspace. SEGRO continues to be supportive of the six proposed site allocations at SEGRO Park Dagenham [Plots 62, 63, 64, 65, 67, 70], . The policy recognises Dagenham Dock as the borough's 'economic heart' being the location of the next generation of sustainable industries, London's wholesale markets and the new Thames Freeport. Given the approved planning applications for flexible E(g) (former B1) / B2 / B8 uses as part of the development of SEGRO Park Dagenham, it is requested that the policy also recognises the importance of both traditional and innovative forms of industrial and logistics development. SEGRO proposes the following changes to paragraph 1 of the policy to ensure the draft Local Plan is effective and justified: • "Dagenham Dock is the borough's economic heart. A home to the next generation of sustainable industries, London's wholesale markets,	No	Paragraph reflects general ambition for the area

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								traditional and innovative forms of industrial/logistics development and the new Thames Freeport”.		
Dev	LP011	Dagenham Dock	Support	58		SPP3	5	The draft Local Plan 2037 states that “the Council may also develop a vision plan for south of the borough. In order to set out how the Masterplan SPDs will integrate with each other and how spaces between them will be managed”. SEGRO is pleased that the reference to a Masterplan SPD for Dagenham Dock has been added again to the draft Local Plan 2037 as previously suggested. SEGRO welcomes this approach and continues to propose that a Masterplan SPD should be prepared collaboratively between LBB and the major stakeholders in the area to ensure there is a joined-up approach to the regeneration of the Dagenham Dock Area. SEGRO would expect to be closely involved in its preparation as a key stakeholder in the area’s future development.	No	Support welcomed
Dev	LP011	Dagenham Dock	Support	58				SEGRO notes the reference to the recognition that LBB is working with SEGRO and other landowners to regenerate and unlock regeneration in the Dagenham Dock area has been deleted. SEGRO is committed to continuing to work with LBB to deliver SEGRO Park Dagenham, and therefore proposes that the reference is added to paragraph 4 again.	No	Support welcomed
Dev	LP011	Dagenham Dock	Support	58				SEGRO supports the Council’s vision for Dagenham Dock. However, it is essential that the area should be available to meet the needs of a wide range of modern employers, including Use Classes E (light industrial), B2 and B8 in accordance with Policies E4 and E5 of the London Plan (2021). The occupiers of these uses have an important role to play within Strategic Industrial Land (SIL).	No	Support welcomed
Dev	LP011	Dagenham Dock	Support with suggestion	58				SEGRO notes that in paragraph 4(a) the additions (in bold) which were suggested in previous representations have not been made. SEGRO again would like to make the following suggestion to the wording to avoid confusion about the area’s role and to ensure other industrial uses are not restricted from being developed in the area: “redevelopment of the area, incorporating sustainable and green industries	No	Policy will support a wide range of different industrial uses

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								building on the location’s logistics, warehousing, industrial, food and energy operations”		
Dev	LP011	Industry Intensification	Support with suggestion	58				SEGRO continues to support the Council’s aim to intensify employment in this location, particularly to the south of the A13 in the Dagenham Dock Transformation Area, where there is no residential development to cause issues of impact on amenity. However, developments must still be practical and include sufficient external hardstanding areas to accommodate the operational needs of occupiers in terms of storage and parking etc. The draft Policy should require better utilisation of sites where it would be inconsistent with the operational requirements of potential occupiers. Whilst SEGRO is endeavouring to meet the Mayor and LBB’s aspiration for intensification of industrial, Dagenham Dock is a more marginal location for multi-storey development, given sensitivity to variables including, supply of land rent, yield, development costs and planning obligations etc. As such, viability is much more challenging than higher values areas in West London. SEGRO would welcome the opportunity to work strategically with the GLA and LBB to deliver multi-storey floorspace within Dagenham Dock, for instance, to help decamp occupiers from Thames Road / River Road and release these areas for housing.	No	Industrial Land Strategy is clear that multistorey development is an important part of delivering new industrial spaces and LBB will support all developers to achieve this
Dev	LP011	Industry Intensification	Support with suggestion	58				SEGRO supports draft Policy SPP3’s indication of support for “expansion and intensification of employment floor space”. However, SEGRO would like to recommend the wording in paragraph (e) is changed as follows (additions in bold): “e) expansion and intensification of employment floor space enabling wider regeneration opportunity for the Thames Freeport in Dagenham and active encouragement for developers to explore means of optimising and intensifying the delivery of new floorspace on vacant sites (e.g. where feasible, through the provision of multi-level industrial buildings)”.	No	The plan does not limit development on vacant sites, intensification policy has been made clear in Economy chapter

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Dev	LP011	Transport Infrastructure	Support with suggestion	58				SEGRO notes the emphasis on the A13 as a key route and central government intervention is required to ensure it is fit for purpose to support major residential and commercial development currently underway and proposed. SEGRO also welcomes the references to rail and river connections in Dagenham Dock. Any strategic improvements to transport infrastructure in the area should be informed by the London Riverside Opportunity Area Transport Strategy with TfL and City of London (2020) (former Strategic Transport Study) that was carried out by Jacobs. SEGRO recognises that a comprehensive and coordinated approach towards transport decisions and infrastructure delivery is still needed, as the study does not provide a definitive option but just sets out and discusses three different options. SEGRO strongly reiterates that it is essential that development in the study area should not be prevented from coming forward whilst the feasibility and business case for strategic transport improvements is being considered	No	Plan has made clear that any change following an agreed approach to the A13 will be made in a comprehensive way through an adopted Masterplan SPD
Dev	LP011	Editing	Support with suggestion	58				SEGRO requests that the planning application references for Plot 67 (now known Plot 2) (Ref. 21/00023/FUL) and Plot 65 (now known Plot 3) (Ref. 21/01355/FUL) are included in the 'Relevant Planning History' section	Yes	Will include in the site allocation
Dev	LP011	Waste	Support with suggestion	58				In relation to waste uses, SEGRO requests that the site allocations recognise that the Council consider the capacity requirements of the Joint Waste Plan have been surpassed by planning consents post adoption of the Framework. This was concluded by Officers as part of the Committee Reports for the submitted	No	A detailed waste needs assessment has been carried out by the Council and forms part of the Local Plan evidence base
Dev	LP011	Transport	Support with suggestion	58				SEGRO requests that the relevant PTAL score (0, 1a and 1b) is added to the 'Planning Considerations' section for each proposed site allocation as this informs the appropriate levels of vehicle parking for future occupiers	Yes	Will include in the site allocation
Dev	LP011	Site Allocations	Support with suggestion	58				In terms of Indicative Minimum Capacity (Years) – SEGRO is looking to bring forward all the sites at the earliest opportunity (0-5 years) and suggests that this is updated accordingly for the six proposed site allocations.	Yes	Will include in the site allocation
Dev	LP011	Transformation Areas	Support	58			SPDG1	SEGRO is pleased to see that the policy continues to reference Dagenham dock as a transformation area and is satisfied that the sub-heading for paragraph 4 has been changed to read "Transformation Areas".	No	Support welcomed

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Dev	LP011	Employment	Support with suggestion	58		SPP3		SEGRO notes and supports that paragraph 4 (k) has been added, which reads “the areas along the A13, railway line and the River Thames are particularly appropriate to building significantly taller than prevailing heights, subject to design quality.” SEGRO recommends that in paragraph 4(e) that wording is changed to “expansion and intensification of employment floor space enabling wider regeneration opportunity for the Thames Freeport in Dagenham, and active encouragement for developers to explore means of optimising and intensifying the delivery of new floorspace on vacant sites (e.g. where feasible, through the provision of multi-level industrial buildings)”.	No	Already referenced in other policies in the Economy chapter
Dev	LP011	Industrial	Support with suggestion	58		SP5		SEGRO continues to support the policy principles of draft Policy SP 5. However, SEGRO continues to seek clarification in part 7d) of the policy that the utilisation of industrial development should reflect the operation requirements of potential occupiers. The plot ratio of developments should reflect how sites will be used.	No	The industrial land strategy sets out how industrial land is anticipated to change in the Plan period
Dev	LP011	Energy	Support with suggestion	58		SP7		SEGRO has noted that the recommendation made in the representations submitted to the Regulation 19 (1) Local Plan has not been incorporated. Therefore, SEGRO continues to suggest that a sentence is added to part 1(b) of draft Policy SP 7 ‘Securing a clean, green and sustainable borough’ to state “Where it is not possible for developments to achieve net zero carbon on site, off-site provision or a cash in lieu contribution to a Carbon Offset Fund will be appropriate.”	No	Carbon Offset policy is already clear
Dev	LP011	Transport	Support with suggestion	58		SP8		SEGRO has noted that the recommendation made in the representations submitted to the Regulation 19 (1) Local Plan has not been incorporated. Therefore, SEGRO continues to suggest that part 2(e) of draft Policy SP8 ‘Planning for integrated and sustainable transport’ to be updated to read “improve public transport access across the borough and into the town centres in respect of Policy DMD3: Development of Town Centres. This will include identifying locations for new bus priority infrastructure as well as the upgrading of existing services to meet future growth aspirations and should not delay the delivery of industrial development in Transformation Areas.”	No	Planning applications will be considered on a case by case basis and on their own merits

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Dev	LP011	Employment	Support with suggestion	58		DME1		SEGRO continues to be supportive of this policy, however, suggest that the following paragraph to be added: "The Council will support development proposals where they deliver employment floorspace (within use classes E (light industrial) / B2 and B8, as identified in New London Plan (Policies E4 and E5)." SEGRO suggests that paragraph 6 is updated to read "Where financially viable, industrial intensification may involve placing smaller industrial units above or alongside larger warehouses and hybrid office/ industrial activity in multi-use buildings accommodated at higher plot ratios to deliver additional capacity."Table 1 (Proposed Future Industrial Capacity) notes that the future indicative capacity of Dagenham Dock is 1,346,520 sqm (as evidenced in the Industrial Land Strategy, 2021). However, Area Policy SPP3 states that there is indicative capacity of approximately 647,636 sqm. SEGRO requests that the difference in the indicative capacity is clarified and that the figures are updated to ensure consistency throughout the draft Local Plan.	Yes	Table 1 will be updated prior to submission of the Local Plan
Dev	LP011	Affordable Workspace	Support with suggestion	58		DME2		SEGRO continues to seek the inclusion of a sentence in part 2 of Draft Policy DME 2 'Providing flexible, affordable workspace' to state that "affordable workspace and a payment in lieu will not be required where justified by the specific use of a development, or where identified in a site allocation". The supporting text should also specify that "affordable workspace is not expected to be required in the development of industrial uses".	No	Planning applications will be considered on a case by case basis and on their own merits
Dev	LP011	Employment	Support with suggestion	58		DME4		DME4: The reference to the locations which support the function of employment and strategic industrial land included in the Regulation 19 (1) Local Plan, has been deleted. SEGRO requests that the original wording to be added again to emphasise the importance of providing visitor accommodation to support employment sites, and Strategic Industrial Land.	No	Policies are considered to be in accordance with regional and national planning policy
Dev	LP011	Tall Buildings	Support with suggestion	58		DMD2		SEGRO considers that the Local Plan should support multi-level industrial buildings without requiring them to be treated as tall buildings. SEGRO proposes that Draft Policy DM12 'Tall buildings' should include reference to "allowing taller buildings in locations where they make the best use of land, and on sites that have allocations that identify the potential for taller buildings than their surroundings"	No	Polices are in accordance with London Plan



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Dev	LP011	Design	Support with suggestion	58		DMSI1	Part 2 (B) requires all new non-residential development over 500 sqm floor space (gross) to be designed and built to meet or exceed a BREEAM 'Excellent' rating. SEGRO is committed to eliminating, as far as possible, the carbon emissions from the development of new buildings and the operation of existing buildings. For example, at SEGRO Park Dagenham, SEGRO aim to ensure that their new buildings comply with BREEAM 'Excellent'. However, minimum BREEAM certificate level of 'Excellent' should only be required if feasible and viable. It may not always be financially viable or technically feasible to achieve these BREEAM standards. Therefore, SEGRO suggests that flexibility is added to the policy to allow BREEAM 'Very Good' to be achieved if BREEAM 'Excellent' is not viable or feasible.	No	Planning applications will be considered on a case by case basis and on their own merits
Dev	LP011	Energy	Support with suggestion	58		DMSI 2	SEGRO has noted that the recommendation made in the representations submitted to the Regulation 19 (1) Local Plan has not been incorporated. Therefore, SEGRO continues to suggest that draft Policy DMSI 2 should be updated to replace "Overheating Assessment" with "Energy Strategy including an Overheating Assessment where appropriate."	No	Planning applications will be considered on a case by case basis and on their own merits
Dev	LP011	Nuisance	Support with suggestion	58		DMSI 3	SEGRO continues to recommend that part (d) of draft Policy DMSI 3 'Nuisance' is updated to read: "manage nuisance resulting from development in areas where industrial and residential land uses are co-located; the emphasis should be on the developer of the sensitive use to provide accommodation that provides an acceptable level of amenity, particularly where this sensitive use will be located nearby an established industrial area, including those that operate 24 hours a day."	No	Policy is considered to be compliant with London Plan
Dev	LP011	Biodiversity	Support with suggestion	58		DMNE 3	SEGRO's preferred position would be achieve no net loss of biodiversity particularly for industrial applications where land is limited. However, SEGRO is committed to providing high-quality landscaping and planting as part of their developments, but there is conflict between better intensifying industrial sites and net biodiversity gain. SEGRO has noted that the recommendations made in the representations submitted to the Regulation 19 (1) Local Plan have not been incorporated. SEGRO continues to propose that part 4(e) of draft Policy DMNE 3 'Nature conservation and biodiversity' is updated to read "use a suitable mixture of native and non[1]native species in soft landscaping schemes within 250m of Sites of Importance for Nature Conservation, waterways and wildlife corridors, and on green/brown roofs and roof gardens". SEGRO continues to recommend that Part 2(b) of draft Policy DMNE 3 'Nature conservation and biodiversity' is updated to state "demonstrate a minimum of 10% biodiversity net gain using the DEFRA metric (or agreed equivalent). Where this is not possible on site, off-site provision or an offsetting	No	Policy will be amended in line with recommendations from the Environment Agency to correctly reflect biodiversity net gain requirement

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							contribution will be appropriate." SEGRO also suggests that paragraph 2 (c) is updated to read "Subject to the type of development proposed, where appropriate, prepare a long-term monitoring and management plan of biodiversity net gain sites for a period of 30 years, preferably within the development area".		
Dev	LP011	Water	Support with suggestion	58		DMNE 4	SEGRO continues to recommend the following sentence is added to draft Policy DMNE 4 'Water environment': "Developments will not be required to address every single part of this policy, and the response should be proportionate to the scale of the waterway impacted by or in close proximity to the development in question".	No	Planning applications will be considered on a case by case basis and on their own merits
Dev	LP011	Transport	Support with suggestion	58		DMT 1	SEGRO notes that the previous recommendations have not been incorporated. Therefore, SEGRO continues to suggest that part 1 of draft Policy DMT 1 'Making better connected neighbourhoods' should be updated to read: "Strategic and major mixed-use development proposals should be located where employment, housing and supporting facilities and services are within easy reach of each other and connected by high-quality, safe and attractive cycling and walking routes, both new and existing. Due to its specific nature, this policy does not apply to SIL." SEGRO also continues to propose that part 8 is updated to state "Any development which is likely to have a significant impact on the borough's transport network will be required to submit a robust Transport Assessment (TA) or Transport Statement (TS) and a Travel Plan, in accordance with Policy T4 of the London Plan: assessing and mitigating transport impacts. The delivery of strategic transport improvements should not delay the delivery of industrial development in Transformation Areas."	No	The policy is considered to be proportionate and necessary

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Dev	LP011	Industrial	Support with suggestion	58		DMT 2	Last-mile logistics provide a significant number of jobs being operational 24 hours a day – this results in an increased need for car parking spaces in comparison to other employment uses (e.g., offices). In addition, a significant proportion of the car parking is often required for ‘operational’ parking, with last-mile parcel distribution sites seeing an increasing trend towards the use of contract drivers who own and operate their own delivery vehicles (small LGVs and cars). Besides, Dagenham Docks is poorly served by public transport and, as a result, it contributes to the heavy congestion on the A13. SEGRO notes that the previous recommendations have not been incorporated. Therefore, SEGRO stresses it is important that the policy can be applied flexibly to reflect the specific nature of development proposals, where the need for such flexibility is identified in site allocations. Therefore, SEGRO continues to suggest that the following sentence is added to both draft policies: “For certain sites and occupiers, such as industrial uses in SIL and B2 / B8 uses, the requirements should be applied flexibly on a site by site basis to take account of different trip[1]generating characteristics.”	no	Planning applications will be considered on a case by case basis and on their own merits
Dev	LP011	Developer Contributions	Support with suggestion	58		DMM 1	SEGRO continues to seek the addition of the text below to make clear that planning obligations should only be sought if the development will have harmful impacts that cannot be mitigated: “The Council may use planning obligations if a development will have harmful impacts that cannot be mitigated. This may include Planning Obligations, only where necessary as defined by legislation, applied in line with the requirements set out in the rest of this Local Plan and the Planning Obligations SPD...”	No	Planning obligations will only be agreed where they meet policy and legislative requirements
Dev	LP011	A13	General	58		Table 10.3	SEGRO notes that the “A13 Strategic Study” has been updated to “London Riverside Opportunity Area Transport Strategy (Jacob’s Consulting) with TfL and City of London (2000)”.	No	Comment noted
Other	LP116	Open Space	Objection	59		SPP4	The unnecessary development on Green Space at Padnall Lake should be halted, given they plan to exceed housing requirements/targets by such a considerable amount. The LP seeks to ‘prioritise’ parks and open spaces SP6 – Social and sustainable infrastructure 9c. While intending to build on green space at Padnal Lake.	No	All impacts of the development were considered at the planning application stage

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Other	LP116	Housing	Objection	59		SPP4		The LP is unsound, it seeks to overdevelop LBBB unnecessarily especially Chadwell Heath and Marks Gate. Exceeding housing requirements by 38,864. There is no evidence to support this 'ambition'. ONS Population projections fell from 2014 to 2018, meaning that projected new houses will be 3 times what is needed.	No	The Local Plan seeks to significantly increase the number of new homes to meet a wide range of needs including affordable homes, accessible homes and homes for older people. It also seeks to regenerate and renew the Borough and is considered to be an appropriate strategy
Dev	LP033	Dagenham Dock	Support	60		Page 23		We support these aspirations for the sub-area which are driven by sustainability, with a focus on extensive development of well-connected sites and recognises the need to optimise housing delivery.	No	Support welcomed
Dev	LP033	Site Allocation	Support	60		Site Allocation XJ		Site Allocation XJ: We strongly support the allocation of the Former Ford Stamping Plant as site allocation XJ. It is noted that Figure 11 refers to the allocation as 'XJ E011', whilst Appendix 2 and the Site Allocations Plan refer to only 'XJ'. It is not clear what the E011 refers to and. E011 should therefore be deleted.	No	Site allocation document is to be updated prior to submission
Dev	LP033	Site Allocation	Support with suggestion	60		Site Allocation XJ		It is noted that since the previous version of the Regulation 19 Draft Local Plan (September 2020), the allocation boundary for the Ford Stamping Plant has been amended to better reflect the site ownership; this is supported. We propose the following wording for the 'Proposed Uses(s)' outlined for the allocation: "A comprehensive residential-led mixed use development. Potential capacity of delivering circa. 3,500 new homes, flexible community/commercial floorspace and supported infrastructure including 5 acres of land for a secondary school to the southern part of the site and open spaces etc..." [reflecting comments on housing number, school and community infrastructure]	Yes	Will be updated within site allocation document
Dev	LP033	Site Allocation	Support with suggestion	60		Site Allocation XJ		We would finally note that the planning history section of the allocation refers only to the decommissioning of the Site. Given the Outline Planning Application (ref. 21/01808/OUTALL) was submitted in September 2021, this should be included in the site history. With regard to other aspects of the site allocation, these are supported, particularly the reference to tall buildings being appropriate in this location, noting that the Outline Planning Application robustly demonstrates that tall buildings are suitable on this Site.	Yes	Will be updated within site allocation document

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Dev	LP033	Editing	Support with suggestion	60		SPP3	The Dagenham Dock and Freeport sub-area is outlined under Policy SPP3. The Policy refers to the area as 'Dagenham Dock and Freeport', whereas pg.23 refers to the area as 'Dagenham Dock, Freeport' and Policy SPDG1 refers to 'Dagenham Dock and Beam Park'. The Draft Local Plan should be updated so that it is consistent	Yes	Will update prior to submission of the Local Plan
Dev	LP033	Maps	Support with suggestion	60		Figure 10	It is understood that Figure 10 provides an overarching framework for the area only, and this shows the former Ford Stamping Plant as being located within the 'Beam Park Transformation Area'. The subsequent policy wording is broken down into transformation areas and also specific sites, with the policies relating to the Beam Park Transformation Area (Part 10) appearing to relate to the Beam Park development exclusively rather than the wider transformation area (which includes the former Ford Stamping Plant and other sites). It is considered that the structure of the policy is unclear and should be amended to provide clarity. Figure 10 also indicates that there are three proposed District Centres at Merrilands Crescent, Dagenham Dock station and at the junction of Kent Avenue and New Road. This is not justified and is assumed to be an error, noting other parts of the Draft Local Plan refer to a proposed District Centre at Merrilands Crescent only. Related to this, Figure 4 indicates a Local Centre being provided at Merrilands Crescent; again, this is assumed to be an error and should be amended to 'District Centre' instead. The Draft Local Plan should be amended to ensure that the intentions for the District Centre at Merrilands Crescent are clear and unambiguous to ensure the Plan is effective.	Yes	Policies map and figures are intended to be updated prior to submission of the Plan
Dev	LP033	Maps	Support with suggestion	60		SPP3	Part 3 identifies an indicative capacity of 6,011 new homes, and approx. 647,636sqm of industrial floorspace across the sub-area. The number of homes is inconsistent with Figure 4 which states c. 10,000 new homes for Stamping Plant and Beam Park. The number is also significantly below the quantum of homes already proposed or approved at allocated sites within this area, which we understand exceeds 7,000. The quantum outlined within the Plan should therefore be increased. With reference to the Outline Planning Application for the Site, the development will contribute up to 3,502 homes and between 4,000- 5,000sqm of industrial floorspace.	Yes	Policies map and figures are intended to be updated prior to submission of the Plan
Dev	LP033	Site Allocation	Support with suggestion	60		Figure 11	The Site is identified as Site Allocation XJ E011 for mixed use development, which whilst we do not object to in principle, we query the approach taken across the various sites. For example, Merrilands Crescent Two is identified as a 'Housing Use' site despite the plans for it to contribute to the creation of the proposed District Centre.	No	The allocation of housing/mixed use only provides a high level indication of the variation of sites being proposed

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Dev	LP033	Transformation Areas	Support with suggestion	60		SPP3		Part 4 outlines a number of principles that development proposals should be consistent with in the Dagenham Dock Transformation Area. Figure 10 indicated that the Site is not within this transformation area. As such any references to the Site within Part 4 should be moved under a sub-heading for the Site, under the overall heading of Beam Park Transformation Area in which the Site is located according to Figure 10. This includes 4(g) which refers to the new secondary school at the Site, and 4(h) which refers to links between Dagenham Dock Station and New Road. It is additionally noted that 4(j) gives support to the removal of the service bridge across Chequers Lane so this should also be moved.	No	Seek to clarify the relationship between the transformation area and policy context for other sites in the area
Dev	LP033	Transformation Areas	Support with suggestion	60		SPP3		Part 5 outlines LBBB may develop a vision plan for the south of the Borough to set out how the Masterplan SPDs will integrate with each other and how the spaces will be managed. It is unclear whether this relates to the former Ford Stamping Plant site, which is north of the railway and not located within the Dagenham Dock Transformation Area, according to Figure 10. Nevertheless, a masterplan for the Site has been created in consultation with LBBB (as submitted for approval in the Outline Planning Application); therefore, an SPD for this Site would not be necessary.	No	This would be taken into account when developing a Masterplan SPD
Dev	LP033	Transformation Areas	Support with suggestion	60		SPP3		As noted above, Part 10 relates to the 'Beam Park Transformation Area' but this appears to relate exclusively to the Beam Park development (not including the site or other sites to the north of the railway line). The structure and content of the Figures and policy wording therefore need comprehensive review and modification to provide a clearer policy framework for the sub-area	No	Seek to clarify the relationship between the transformation area and policy context for other sites in the area
Dev	LP033	Transformation Areas	Support	60		SPP3		Part 11 supports comprehensive residential led mixed use development at the former Ford Stamping Plant site, including flexible community and commercial floorspace which is strongly support. We support the remainder of Part 11 (c, d & e), which relate to the creation of a coherent townscape with amenity and public space, improved public transport links and accessibility to Dagenham Dock Station, and an improved walking environment to allow better access within the site and to the wider area.	No	Support welcomed
Dev	LP033	Transformation Areas	Support with suggestion	60		SPP3		Part 12 refers to Merrields Crescent and is also supported, albeit the wording of part a) needs to be reviewed as this suggests that Merrields is distinct from the Transformation Areas at Beam Park and Dagenham Dock, whereas Figure 10 indicates that Merrields is part of the Beam Park Transformation Area. Part 13 refers to the GSR and Gill Sites and is	No	Seek to clarify the relationship between the transformation area and policy context for other sites in the area

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								also broadly supported, although this should be expanded to incorporate Part 4(g) of the policy.		
Dev	LP033	Site Allocation	Support	60		SPDG1		We strongly support the aims of Policy SPDG1 and the inclusion of the Site within the Transformation Area. We consider the proposals submitted for the Site under the Outline Planning Application positively contribute to meeting the aims of the emerging Policy.	No	Comment in support of policy
Dev	LP033	Viability	Support with suggestion	60	Chapter 3			The Draft Local Plan, at paragraph 3.6, states that LBBD has tested the individual and cumulative effects of policies on development viability and the assessment demonstrates that the approach is deliverable, with reference to the 2020 LBBD Local Plan Viability Report. Savills have reviewed the evidence base document and comments are included at Appendix 1. A key outcome of the evidence base study is recognition of the viability challenges affecting the delivery of high density development in the borough, including the Site which was tested as a strategic site. These viability challenges continue to affect the ability to deliver development on the Site and we would emphasise that the Council's viability evidence concluded that the Site would not be able to meet the full requirements of the Local Plan. As such, whilst the Draft Local Plan contends that the policy 'asks' of development as set out in the Local Plan have been tested, we would stress that there is also an identified need for flexibility within the viability evidence base. Flexibility should therefore be built into the Draft Local Plan and its policies to allow for this flexibility.	No	Planning applications will be considered on a case by case basis and on their own merits
Dev	LP033	Housing Mix	Support with suggestion	60		DMH2		Policy DMH2 has been re-drafted to remove consideration of site specific circumstances, including housing type, site characteristics, viability, location and other constraints. It is considered that the draft policy wording is not justified or effective. By removing the flexibility previously drafted into the housing mix policy, the Councils approach would be contrary to that which is clearly necessary to ensure the effectiveness of the plan in terms of ensuring that developments can be brought forward viably. It is also noted that the Councils viability evidence base for the strategic site, has also not rigidly applied the preferred housing mix set out in the draft policy wording	No	Housing mix policy already proposed to be updated following previous comments

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		Planning Obligations	Support with suggestion	60		DMM1	We request the following amends to Policy DMM1 to ensure that the Draft Local Plan is effective and justified: Part 2: "...Requirements for planning obligations will be assessed on a case-by-case basis, including having regard to scheme viability, and used where they meet the legal tests set out in Community Infrastructure Levy Regulations (2010) as amended". Part 6 b): "75 per cent of market-tenure units have been sold or rented."	No	Planning applications will be considered on a case by case basis and on their own merits
Dev	LP033								
Dev	LP033	Tall Buildings	Support	60		DMD2	Policy DMD2 identifies the Site is located within an area identified as appropriate for tall buildings which is strongly supported. It has been demonstrated through the Outline Planning Application that the Site is appropriate for tall buildings.	N/a	Commnt in support of policy
		Heritage	Support with suggesion	60		DMD4	Overall, it is encouraging to see that the Council has a heritage strategy in place, albeit we note it relates to the period 2016-2020 so is dated. 1.16 states: "If taken forward, support the establishment of an East London Industrial Heritage Museum at the former Ford Stamping Plant". As noted above, the Draft Local Plan refers to a motoring heritage attractor provided in the new residential districts, and following discussions with LBBB officers, it is understood that this is planned to be provided outside of the Former Ford Stamping Plant site. It is also noted that no allowance has been made for this within the Councils viability evidence base for a museum on the Site. In addition, it is noted that Priority 4 (Inspirational learning) in the Heritage Strategy, while commendable as such, concentrates on the museums and historic houses with their collections and exhibits. It therefore misses the opportunity to engage more with local communities to develop a broader range of themes, such as those being considered at the Site through the Outline Planning Application. In order to be consistent with national planning guidance on the historic environment, part n) of Policy DMD4 should be amended to apply to only identified non-designated heritage assets of an archaeological nature that are "demonstrably of equivalent significance to scheduled monuments and are therefore considered subject to the same policies as those for designated heritage assets". The following amends should be made to the part n: "...all new development must protect, or enhance, and promote archaeological heritage (both above and below ground) within the borough. Proposals that would adversely affect or have the potential to adversely affect archaeological heritage assets which are demonstrably of equivalent significance to scheduled monuments, or their setting will be not supported"		
Dev	LP033							No	Further engagement with Historic England required to ensure policies are compliant



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Dev	LP033	Social Infrastructure	Support with suggestion	60	Chapter 6		we are broadly supportive of the approach taken in the Infrastructure Delivery Plan, however we note the document is predicated on the housing trajectory over the period of the Draft Local Plan from 2019 to 2037, while LBBB has not published an Annual Monitoring Report since 2016/17. The amount of housing that is being delivered is therefore unclear and it is equally unclear as to whether the level of social infrastructure planned in the IDP is actually required over the plan period	No	Updated AMR will be published alongside submission documents
Dev	LP033	Site Allocations	Support with suggestion	60		DME1	Part 13 of the Policy should be amended to ensure the Plan is effective and in conformity with the London Plan Policy E7, in relation to site allocations in the Draft Local Plan. We proposed the following amendment: "13. ....Unless allocated for mixed-use or residential development proposals, development proposals that would result in the net loss of viable employment floorspace outside of SIL or LSIS areas will be required (in accordance with London Plan policy E7: industrial intensification, co-location and substitution) to demonstrate that the site has 'no reasonable prospect' for industrial related purposes and will be required to comply with London Plan Policies H4 and H5 in respect of affordable housing".	No	Engagement with GLA ongoing to ensure all local plan policies are in accordance with the London Plan
Dev	LP033	Affordable Workspace	Support	60		DME2	We would emphasise the viability challenges associated with high density development and the strategic sites in the borough as recognised in the Councils viability evidence base, and would therefore confirm our support for viability to be a key consideration in the ability of a development to provide affordable workspace.	No	Planning applications will be considered on a case by case basis and on their own merits
Dev	LP033	Maps	General	60		DME3	Policy DME3 refers to the Policies Map, which is said to define the location of town, district and neighbourhood centres. Merrielands Crescent is identified as a 'Potential District Centre' which is supported. However, it is highlighted that the Policy states "the boundaries clearly relate to the application of the sequential and impact tests" yet Merrielands Crescent is identified by a star shape so there is no defined boundary against which consideration can be given to the need for further assessment. The Council should clearly define the boundary of the proposed district centre. F	No	The policies maps will be updated prior to the submission of the plan.

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		Transport	Support with suggestion	60		DMT1		We support the location of strategic and major development proposals near to employment, housing and supporting facilities and services which are connected by safe and high-quality cycling and pedestrian links. However...concerns regarding (Part 16) the requirement for strategic development to provide bus access and land for bus standing, as well as designing and implementing new junctions and road connections for bus travel through the site. This matter requires site-specific consideration having regard to the existing transport infrastructure, the nature and scale of development, and the impacts arising from a development; therefore, the policy wording should acknowledge that this will not be required in every case through rewording, as follows: "Strategic developments should consider provide bus access and the land required for bus standing which is vital for making new services operable. Developments should also design and implement consider the need for new junctions and road connections to allow buses to travel through the site" We also note a drafting error in the policy naming which switch between DMT and DMSI in Chapter 10.		Engagement with TFL is ongoing to ensure policies align with London Plan. All applications will be considered on their own merits on a case by case basis
Dev	LP033								No	
Dev	LP033	Design	Support with suggestion	60		DMSI1		We support the objectives of Policy DMSI1 which requires all development to incorporate sustainable design and construction principles. Part 2 of the Policy outlines the information that must be included within a sustainability statement submitted with major applications. Part 2(a) specifically outlines that all new non-residential development over 500sqm floorspace (gross) must be designed to meet or exceed BREEAM Excellent. We interpret this to apply to spaces over 500sqm such that the requirement would not apply to small non-residential units below 500sqm. As such, for clarity the wording should refer to non-residential units over 500sqm. At Part 3, the Policy outlines that all new residential development should meet a Home Quality Mark Star 3. Having regard to our earlier comments regarding the viability challenges associated with development in the borough, including on the Site, we consider this part should be deleted. These standards are not a requirement of the NPPF or the London Plan, and the Councils viability evidence base does not explain whether the implications of achieving the Home Quality Mark standard has been considered in the testing.	No	Policy is considered to be clear. All applications will be considered on their own merits on a case by case basis.
Dev	LP033	Waste	Support with suggestion	60		DMSI8		Policy DMSI8 outlines that major residential development is required to incorporate high-quality on-site waste collection systems that are based on current best practice and do not include traditional collections and wheeled bin methods, with regard to operational waste. This has not been justified via the evidence base and therefore should be deleted.	No	Policy is considered to be proportionate and necessary

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Dev	LP033	Maps	General	60				We have identified inconsistencies between the interactive and PDF versions of the map, which make it difficult to interpret. For example, the former Ford Stamping Plant is covered by the following designations on each map: Interactive Map: Air Quality Management Area (Flood Risk Zone 3 on PDF), Housing Trajectory Site (Housing Allocations Site on PDF), Riverside Opportunity Area (London Riverside Opportunity Area on PDF), Archaeological Priority Area Tier 2 (same on PDF), Dagenham Dock and Beam Park sub area (Strategic sub are [with title] on PDF). We therefore reserve the right to comment further once a corrected and consistent approach to the Policies Map is made available.	No	Policies map and figures are intended to be updated prior to submission of the Plan
Other	LP117	General	Objection	61				Robust and clear communication not just through social media and the local newspaper; write to the tenants and make them FULLY AWARE. Consultation with the elderly and disabled tenants in a clear and timely manner, ensure that they are fully aware and included. Vulnerable adults need more time to absorb change. It was communicated that there was a hard copy at Dagenham Library. There was not and the LBBB council employees at the library knew nothing about it. It states in the appendices that the scheduled implementation for Ibscott Close in the plan is 5 – 10, 11+ years; however, it does not state when this was scheduled to start, and I am very concerned that this is misleading information. It is possible that implementation is sooner than expected due to the obfuscation and lack of communication. I can see no information regarding re allocation of tenants while demolition and rebuild takes place – when will the tenants be notified? I am a disabled tenant, in a ground floor flat; I am rather concerned that there appears to be no consideration given to the disabled tenants in this plan and that I personally could be placed in accommodation that will not be like for like and as I have a deteriorating condition, that there is the possibility that I could be discriminated against in the reallocation raffle. Under the new plan, it is likely that Ibscott Close and the surrounding area will be a 'green zone'; whilst consideration will be given to people with disabilities, there does not appear to be robust consultation plans...	No	Comments are noted. Council made significant efforts to ensure members of the community were aware of consultation through newspapers, articles and through social media

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Other	LP118	General	Objection	62		OMD2, Fig 20 / SPP4 Site Ref WF 97/131 High Rd Chadwell Heath	4AC, page 48	My major objection is the environmental impact, with building work that will cause noise and excess pollution. This area is already vastly overcrowded, with parking problems and lack of access to NHS facilities (doctors and dentists are overrun with patients and it is impossible to get an appointment). - High rise flats are out of character with the area, reduce light and impact on privacy. -The loss of the Sainsburys supermarket will be devastating. This is a community hub and removing this will particularly impact the elderly disabled and parents with young children. Environmentally appropriate building materials and a focus on green spaces (the outcome should not be a concrete jungle). -Any new building should be low rise and less intrusive. -The site should have a major supermarket chain (like Sainsburys and not a Sainsburys Local which hikes prices), and parking for all residents (especially the elderly and disabled who have trouble walking).	No	Local Plan takes into account all of the infrastructure needs that will be required throughout the Plan period and the Infrastructure Delivery Plan will be continuously updated. Environmental impacts will be considered at the planning application stage against the relevant Local Plan policies
		Housing	Objection	63		SPP4 Chadwell Heath, Site ID: WF 97-131 High Road (currently Sainsburys). P 47		Other than Sainsbury's, there are only smaller stores in Chadwell Heath centre. Asda and Lidl are the next nearest but these still need driving to. People I have spoken to would prefer to go to larger stores in Romford, so it is reasonable to expect that the closure of this store would increase the amount of vehicles on what is already a very busy single road, and I would urge you to consider the impact on the environment of forcing even more vehicles onto the road. The plan seems to be directing local shoppers to Dagenham Heathway, but surely that will serve only to get even more cars on the road – with very limited parking spaces in Dagenham, apart from Morrisons – or force everyone onto public transport. Many of the elderly residents do not have private cars, which means that the closure of this store will necessitate them using buses, putting an even greater strain on an already busy public transport network. There are already plans approved for 52 homes in the White Horse pub and with the proposed 365 units at this site, that would make 417 new homes in a relatively small area. My key concern would be how the local infrastructure would cope with another 1000 (?) people moving into the area. Pre lockdown there was already a 2 ½ week waiting list to see the local doctor	No	The site allocation requires the replacement of the existing supermarket. The Local Plan and Infrastructure Delivery Plan has considered the infrastructure requirements throughout the Plan period.
Other	LP089									

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Other	LP119	Sustainable Transport	Support with suggestion	64		SPP2	Page 40. 4a	1. iv. on-site walking and cycling. surely this should not just be on site, but linking also to the wider world? Why is this confined to a narrow part of the ward rather than an integrated scheme beyond Riverside, covering Thames View and Barking and the wider borough? Propose: iv. on-site walking and cycling (both within Barking Riverside and the wider borough with special attention made to ensuring an integrated walking and cycling infrastructure in mitigation of the increased congestion resulting from intensive building work and increased population pressures on physical and social infrastructure)	No	The Cycling and Walking Strategy and Transport Strategy considers how to improve walking and cycling across the whole Borough and not just Barking Riverside
Other	LP119	Design	Support with suggestion	64		2PPG	Page 40. 4a	6. i) High-quality design that reflects the 10 'Healthy New Town Principles' in development. The plan should list these 'principles' since there is no standard meaning for this term. The Healthy New Town Principles are found here (and / or suggest liaison with LBBB public health and BRL) <a href="https://modgov.lbbd.gov.uk/Internet/documents/s111474/Healthy%20New%20Towns%20-%20report.pdf">https://modgov.lbbd.gov.uk/Internet/documents/s111474/Healthy%20New%20Towns%20-%20report.pdf</a>	No	The Healthy New Town Principles are available online and a link has been provided in the Plan
Other	LP119	Transport	General	64	Chapter 1		Page 1	Diagram lists 0 residents left behind. This is facile and inaccurate – hence undermines the integrity of an otherwise thorough local plan. A significant number of residents have had to leave the borough because of the lack of affordable housing – a direct consequence of the approach taken to housing development. LBBB housing advisers have made it clear that the first question they are likely to ask residents who present at risk of being homeless is a choice of housing outside of London, often in the North of England. These residents, when moved out of the borough, have clearly been left out of the land value uplift enjoyed by those who remain in the borough, who are perhaps, not left behind. Either list the number of resident leaving the borough because they cannot afford the housing costs that come with living in the borough Or leave out the 'no resident left behind' item on the chart	No	The Local Plan sets out how the Borough will significantly increase the number of affordable homes
Other	LP119	Maps	General	64		SPP2, Figure 8		Figure 8 (about Thames Ward) shows "Chadwell Heath Local Centre" in the middle of Thames Road. Presumably it needs to read Sue Bramley Centre	No	Policies map will be updated prior to submission of the Local Plan

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Other	LP119	Transformation Areas	General	64		SPP2, Figure 8	What does it mean that the Thames Road Transformation Area boundary runs along Bastable Road so the southern part of TV estate is INSIDE and the northern half OUTSIDE. Then a different Transformation Area lies to the north, called Castle Green. Looks inconsistent or potentially disjointed. Don't you want both parts of TV Estate treated the same? Suggestion that both parts of Thames View Estate are treated the same and the transformation areas are clearly delineated rather than having the southern part of TV estate INSIDE and the northern half OUTSIDE. With a different Transformation Area to the north, called Castle Green.	No	The transformation areas set high level principles for different character areas in the Borough. Policies for sites that are between areas will be applied in a proportionate way
Dev	LP031	Housing	Support with suggestion	65		SPP1	We support the designation of Barking and the River Roding as a 'transformation area' and the Council's commitment to create a great place for people. The policy states an indicative capacity of 16,175 homes across the transformation area. Whilst this illustrates the scale of opportunity, it is important that the Local Plan makes it clear that this figure is not intended to guide development proposals or restrain the number of homes that are actually delivered. It is important that highly accessible brownfield sites seek to optimise the delivery of new homes.	No	This figure is not a maximum and should not restrain development proposals
Dev	LP031	Site Allocation	Support with suggestion	65		SPP1	Part 7) of Policy SPP1 specifically refers to the Vicarage Field Shopping Centre , which recognises that the site is an important gateway. We share the Council's objectives to collaboratively work with key stakeholders to deliver the site transformation envisioned in the outline consent. We also agree that it's important that the site is comprehensively redeveloped to create a high-quality and high-density mixed-use scheme. However, it should be noted that the outline planning consent includes additional properties other than the 'Shopping Centre' and therefore the policy wording needs to be updated to reflect this and acknowledge the wider opportunity for comprehensive development. The correct extent of the site is identified in the draft Site Allocation (ref: AK). The Site Allocation title and reference in SPP1 should be updated to refer to the Vicarage Field development site. The policy states that the Council will prepare a Masterplan SPD for Barking Town Centre. This approach is supported and will help ensure that the benefits of regeneration across the Town Centre are maximised and coordinated. We would welcome the opportunity to actively be part of this process and ensure that the masterplan fully reflects our vision for the Vicarage Fields redevelopment.	Yes	Site allocation will be updated. Support Welcomed

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Dev	LP031	General	Support with suggestion	65		SPP1		we support part 10) of the policy that states that proposals for “piecemeal development which may undermine the delivery or viability of the comprehensive and co-ordinated redevelopment of these areas.” It is important that the policy fully acknowledges the benefits of comprehensive redevelopment and how this will result in a better quality place for all, a co-ordinated and exemplar architectural vision, a high standard of residential homes and it will maximise the range and scale of public benefits that can be generated. We agree that piecemeal development would fail to realise these benefits of comprehensive redevelopment.	No	Support welcomed
Dev	LP031	Site Allocation	Support with suggestion	65		Site Allocation AK		We note that the Vicarage Field site is identified as a formal Site Allocation. The Site Allocation correctly includes the shopping centre and other adjoining properties that form part of the outline planning consent. We note that the Site Allocation refers to the delivery of circa 900 new homes. This is referred to as an indicative minimum capacity figure. It should be noted that the approved Development Specification that forms part of the outline planning consent refers to a minimum and maximum floorspace figure for the residential aspect of the development (rather than a unit number). The actual number of homes that will be delivered will be determined by the detailed design of the buildings/ layouts and the unit mix. The draft Site Allocation also refers to “an increase of new high-quality retail floorspace of up to 25,560 sqm and up to 1,250 sqm”. We presume the 1,250sqm refers to B1 office floorspace. A non-material amendment application (ref: 21/01764/NONMAT) was approved on 27 October 2021 to update the Development Specification to refer the proposed use classes to reflect the 2020 amendment to the Use Classes Order. The Site Allocation text should be updated to reflect the amended Development Specification. It should instead refer to “up to 30,900 sqm of commercial, business and services floorspace (Use Class E), up to 5,000 sqm of leisure and drinking establishments and the option to deliver a hotel”. We trust our comments will be taken on board in progressing the Local Plan and we look forward to engaging further with you in the future.	Yes	The site allocation will be updated
Dev	LP096	Maps	General	66		DME7		Policy DME1 sets out policies for land designated as SILs and LSISs. As Gascoigne Industrial Estate, Kings bridge and Thames Road are all defined as such on the Policies Map, Policy DME7 should apply to such 4 locations. However, this is confused by the additional Site Housing Allocation designation and the mixed use proposals of (separately bound) Appendix 2.	No	The policies maps will be updated prior to the submission of the plan.

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Dev	LP096	Maps	General	66				The boundary of the River Road area appears to extend further east on the Policies Map than in Figure 26.	No	The policies maps will be updated prior to the submission of the plan.
Dev	LP096	Industry	Support with suggestion	66				Valor considers that the draft Plan lacks clarity in the terminology used for industrial sites and the geographical extent of them. It is suggested that LBBB simply uses the SIL and LSIS terms used for designated industrial land in the London Plan and includes a new appendix to define the precise boundary of each designated industrial area at a suitable scale. For the purposes of these representations below we refer to Kingsbridge as a SIL, Thames Road as part SIL/ part LSIS and Gascoigne Industrial Area as a LSIS.	No	The policies maps will be updated prior to the submission of the plan.
Dev	LP096	Maps	Support with suggestion	66	Chapter 3	SPP1		The Key Diagram for it (Figure 6) shows allocated sites in purple, SIL's in beige and no designation for LSIS's. Kingsbridge is in beige (outwith the TA) is a SIL; Gascoigne Industrial Area within the TA has no allocation reflecting its LSIS status. Valor considers that Gascoigne Industrial Area should be defined on Figure 6 as an LSIS. The subsequent text in this chapter of the plan goes on to reference key sites; neither Kingsbridge nor Gascoigne Industrial Area are identified. However, paragraph 7 states that the key site allocations of this TA are illustrated in Figure 7. This includes Kingsbridge Estate (Site CLE022) and Gascoigne Industrial Area (CME036) which are defined for mixed use. Arising from this, careful examination of the Policies Map (above) shows that not only are the Thames Road and Gascoigne Industrial Area defined as employment sites but also as "Housing Allocation Sites". This is confusing and unclear. Paragraph 3 in relation to Policy SPP1 states that there is capacity for 16,175 new homes in the SPP1 are within the plan period, but does not define where or when these homes will come forward.	No	The policies maps will be updated prior to the submission of the plan.
Dev	LP096	SPD	Objection	66		Thames Road		As noted above, earlier this year Valor objected to the draft Masterplan SPD.	No	Comment noted



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		Employment	General	66	Chapter 3 Chapter 7		The draft Plan does not explain in chapters 3 or 7 how the employment target of 20,000 jobs is derived or where the figure is calculated. It is not stated how many of the required 20,000 additional jobs will come forward within the SPP1 area. There is no assessment within the draft Plan as to how the target breaks down between employment that is likely to need locations on traditional industrial land, of which should be provided in other locations such as town centres. Furthermore, there is no assessment set out as to how this employment target translates into forecast floorspace requirements for development on industrial land. In terms of the Barking and River Roding TA, and the Thames Riverside TA, there is no employment target for these areas, nor an indication as to how this breaks down between industrial sites and other locations. There is said to be a need for 119,260sqm of additional industrial floorspace in the Thames Riverside TA but no explanation as to how this is calculated or justified.	No	The 20,000 jobs figure is an ambitious target. The industrial land strategy provides information on the types of jobs and industrial stock required to meet future demand
Dev	LP096								
Dev	LP096	Maps	General	66			The draft Plan is unclear, and to a certain extent misleading, in its approach to defining the land use allocations of sites. Figure 26 clearly indicates that sites such as Gascoigne Industrial Estate are defined as an LSIS and this is carried through onto the Policies Map. However, it is clear from other plans (such as Figures 7 and 9) that many such sites are in fact allocated for a mix of uses, which is borne out by a closer inspection of the Policies Map. There also appears to be a discrepancy in the definition of the eastern end of the Thames Riverside TA in Figure 26 and the Policies Map. Furthermore, the terminology of the SIL and LSIS sites differs in the key to the Policies Map. Collectively this makes the Plan unclear. Such confusion is exacerbated by the terminology used in the key diagrams for the TA's and Appendix 2. Key diagrams such as Figure's 6 and 8 identify "Allocated Sites" but do not specify what the allocation is for. Appendix 2 simply identifies the allocated sites by reference to the individual site reference numbers (which in the case of the Barking and River Roding TA, and the Thames Riverside TA is shown on Figure's 7 and 9 respectively. ) and the ward within which the sites are location. The introduction to Appendix 2 refers to site proforma's in an unreferenced separate document that is available online. This is a separate document, confusingly also referenced Appendix 2, is entitled Proposed Site Allocations. This includes annotated plans for each site, with matters such as industrial land, open space and flood zone 3 identified, but not housing. Therefore, in the case of 33 Thames Road, this is shown on a plan referenced C1 as being within	No	The policies maps will be updated prior to the submission of the plan.

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								outwith industrial land and within Flood Zone 3. Notwithstanding the acknowledged multiple ownerships throughout the designated area, the supporting schedule seeks a comprehensive mixed use development of the area.		
Dev	LP096	Thames Road	General	66				Reference is made to in light industrial and commercial uses but there is no indication as to whether there is demand for such uses, rather than general industrial and warehousing uses, in this part of the Borough and what contribution this will make towards the required 20,000 additional jobs said to be required. There is no indication in the draft Plan as to how its objectives can be achieved on the land available. Whilst reference is made to the draft Masterplan SPD, this was subject of a substantial objection by Valor and potentially by other parties. Two relevant planning applications are noted, but not to the planning permission for 33 Thames Road which as led to the letting of this substantial property to Amazon.	No	The 20,000 jobs figure is an ambitious target. The industrial land strategy provides information on the types of jobs and industrial stock required to meet future demand

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Dev	LP096	Gasgoine	General	66				The entire Gasgoine Industrial Area is identified on plan reference CM as industrial land. It is incorrectly stated to be in the ownership of LBBB, and is also identified for comprehensive redevelopment. The allocation goes on to state that this should be for residential led mixed-use development, delivering 2,289 new homes and an unspecified range and amount of additional uses. Whilst its existing industrial use and its LSIS status is noted as a planning consideration and requirement, the schedule does not indicate how the loss of such uses would be addressed. No relevant planning history is identified and yet there is a current planning application for the refurbishment and extension to New England Estate within the Gasgoine Industrial Area.	Yes	The management of gains and losses of industrial land are considered within the Industrial Land Strategy. Amendments to the site allocation are to be made in order to provide further clarity
Dev	LP096	Industry	General	66				Such allocations, and the draft Plan as a whole, appears to be predicated on the basis that multi storey industrial uses and co-location schemes will come forward to optimise the use of existing industrial sites to deliver additional employment (based upon industrial floorspace) and the provision of substantial new homes. However, the Barking and River Roding/ Thames Riverside TA's have traditionally been based upon single level general industrial and warehousing uses. There is no evidence that the market is seeking floorspace for light industrial and other commercial uses instead of general industrial and warehousing. Rather the evidence of letting such as to Amazon is quite the reverse. Furthermore, and notwithstanding this, even if there is such demand multi-level and co-location developments are relatively untested in the UK. Whilst some such schemes may come forward within the borough, it is unsound to base the strategy of the new Local Plan on such schemes coming forward in sufficient quantity to release the land required by the Council to fulfil the strategy of the draft Plan.	No	Aware that stacked industrial is an untested model, however it has been identified as a necessity in order to deliver more homes and upgraded industrial stock within the constraints of London. LBBB has shown that it can be delivered on its own land and therefore a viable model to consider in the future.
CIlr	LP120	Housing (inc Traveller Sites)	Objection	67				I do not support the local plan. I do not support the CH Sainsbury's site being redeveloped and do not support the proposed gypsy / travelers site located in collier row road. Moreover, it's really disappointing to see it in the plan without ever being spoken to about such plans. The plan for Sainsbury's will kill the high street and make it even harder for elderly residents/ MG residents get groceries- especially when we are so insistent in reducing car usage. Moreover, the gypsy / travelers site is not a reasonable / proper place, would bring additional anti social behavior and could impede our future development plans for the estate. In addition, I am really concerned with the proposed development in a Redbridge RE the decommissioned green belt and would be most grateful to hear the plan of action to address the inevitable increase in traffic on / around the MG estate	No	The site allocation states that the superstore will be replaced as part of the development. Car parking will be addressed through the Local Plan and the Transport Strategy. Traveller site is required in order to meet the identified need, the assessment of the suitability of the sites can be found in the evidence base documents

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Sta	LP121	Health	Support with suggestion			SP2	1	1. The Council will promote high-quality design, providing safe, convenient, accessible and healthy, inclusive developments and interesting public spaces for all through:	Yes	Accept change
Sta	LP121	Health	Support with suggestion			DMD 1	3	Major and strategic development proposals (including estate regeneration schemes) should must: a) provide a Health Impact Assessment (HIA) in the design process to identify opportunities for maximising potential health gains, minimising harm, and addressing health inequalities and detail the measures taken to achieve these.	Yes	Accept change
Sta	LP121	Health	Support with suggestion					This policy requires amendment to be in conformity with London Plan Policy S1 Developing London's social infrastructure clauses F and G. Clause G references F "Redundant social infrastructure should be considered for full or partial use as other forms of social infrastructure before alternative developments are considered, unless this loss is part of a wider public service transformation plan (see Part F2)" We propose that the Council incorporates a new clause 1c) which would exclude the development proposals from the marketing required in clause 2 where the loss of social infrastructure is part of a wider public sector transformation programme	Yes	Accept change
Sta	LP121	Health	Support with suggestion			DMD2	4	d) Incorporate mitigation measures to help prevent suicide and accidental falls for example anti-climb methods, fences, barriers and rails, these will be well designed and should be integrated into the overall design of the building.	Yes	Accept change
Sta	LP121	Health	Support with suggestion			DME 3	7	Development proposals for new hot food takeaways (sui generis), new betting shops, casinos and amusement arcades (sui generis) and pay day loan shops (sui generis) within the designated town centres should be discussed with the Council in advance of any application, must accord with Local Plan Policy DMD1:securing high quality design, and where appropriate, be supported by: a) a cumulative impact assessment of other existing uses of hot food takeaway, or betting shop or pay day loan shop (including extant but unimplemented planning permissions) b) a health impact assessment (HIA) to demonstrate how potential harms to health and wellbeing have been minimised and contribute to reducing health inequalities.	Yes	Accept change
Sta	LP121	Health	Support with suggestion		Appendix 3			Indicators should include the provision of new or improved social infrastructure including health and community uses.	Yes	Will consider how to incorporate health indicators
Sta	LP121	Health	Support with suggestion		Appendix 4			The housing trajectory shows 45% of the new homes being delivered in the middle of the three phases of delivery. This will require significant investment in infrastructure and for developers to contribute in advance of their homes being completed/occupied.	No	Comment noted

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Sta	LP121	Health	Support with suggestion		Site Allocation	Vicarage Fields	The site allocation makes no reference to the existing health centre and the requirement for re-reprovision. We are aware that NHS Property Services has submitted a representation regarding the site. We would welcome discussion with the Council to ensure that the site allocation 's wording ensures that health infrastructure is adequately provided to meet the growth set out in the draft plan.	Yes	Amend site allocation to make reference to the existing health facility
Sta	LP094	Transport	Support with suggestion				We therefore need to understand the full volume and routing of such trips as demonstrated by your highway modelling using the ELHAM strategic assignment tool. The model ought to be able to provide details of additional development flows, queues and delays on the M11 within London and the A13 and M25 outside. This will allow us to judge whether further detailed assessment work is required to ascertain potential impacts upon these parts of the National Highways SRN. We also note that the Transport Evidence Base Final Draft Report does not examine the weekday PM peak hour. For the SRN, we need to consider any impacts during this time, as often conditions on the SRN in terms of queues and delays are at their worst during the evening peak period. As advised previously, National Highways consider that a Statement of Common Ground (SOCG) would be a useful tool to monitor and manage the ongoing collaboration between us both now and as we move through your final processes before the Plan is submitted to the Planning Inspectorate seeking adoption.	No	Further engagement and statement of common ground to consider how to resolve issue



