

Barking and Dagenham's Local Plan

Habitats Regulations Assessment
Regulation 19 Consultation Version

Barking and Dagenham Borough Council

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Quality information

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1. Introduction

Background to the Project

- 1.1 AECOM has been appointed by the London Borough of Barking and Dagenham to assist in producing a report to inform the councils Habitats Regulations Assessment (HRA) of the potential effects of Barking and Dagenham Local Plan on the Bern Convention Emerald Network (previously known as Natura 2000 sites) and Ramsar sites. The objectives of the assessment are to:
- Identify any aspects of the Local Plan that would cause an adverse effect on the integrity of Bern Convention Emerald Network sites, otherwise known as internationally designated sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs), protected SPAs (pSPAs) and, as a matter of Government policy, Ramsar sites), either alone or in combination with other plans and projects; and
 - To advise on appropriate policy mechanisms for delivering mitigation where such effects were identified.
- 1.2 The HRA of the Barking and Dagenham Local Plan is required to determine if there are any realistic linking pathways present between an internationally designated site and the Local Plan and where Likely Significant Effects cannot be screened out, an analysis to inform Appropriate Assessment to be undertaken to determine if adverse effects on the integrity of the international sites will occur as a result of the Local Plan alone or in combination.

Legislative Context

- 1.3 The UK left the EU on 31 January 2020 under the terms set out in the European Union (Withdrawal Agreement) Act 2020 ("the Withdrawal Act"). However, the need for HRA is set out within British law by the Conservation of Habitats & Species Regulations 2017 (Box 1).
- 1.4 International sites (sites that contribute to the Bern Convention Emerald Network) can be defined as actual or proposed/candidate Special Areas of Conservation (SAC) or Special Protection Areas (SPA). It is also Government policy for sites designated under the Convention on Wetlands of International Importance (Ramsar sites) to be treated as having equivalent status and are thus included in this assessment.
- 1.5 The HRA process applies the 'Precautionary Principle'¹ to international sites. Plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the international site(s) in question. Plans and projects with predicted adverse impacts on international sites may still be permitted if there are no alternatives to them and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation would be necessary to ensure the overall integrity of the site network.
- 1.6 In order to ascertain whether site integrity will be affected, an Appropriate Assessment should be undertaken of the plan or project in question:

¹ The Precautionary Principle, which is referenced in Article 191 of the Treaty on the Functioning of the European Union, has been defined by the United Nations Educational, Scientific and Cultural Organisation (UNESCO, 2005) as: "*When human activities may lead to morally unacceptable harm [to the environment] that is scientifically plausible but uncertain, actions shall be taken to avoid or diminish that harm. The judgement of plausibility should be grounded in scientific analysis*".

Box 1: The legislative basis for Appropriate Assessment

Conservation of Habitats and Species Regulations 2017 (as amended)

The Regulations state that:

“A competent authority, before deciding to ... give any consent for a plan or project which is likely to have a significant effect on a European site ... must make an appropriate assessment of the implications for the plan or project in view of that site’s conservation objectives... The competent authority may agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site.”

- 1.7 In spring 2018 the ‘Sweetman’ European Court of Justice ruling² clarified that ‘mitigation’ (i.e. measures that are specifically introduced to avoid or reduce a harmful effect on a European site that would otherwise arise) should **not** be taken into account when forming a view on likely significant effects. Mitigation should instead only be considered at the Appropriate Assessment stage. This HRA has been cognisant of that ruling.
- 1.8 Appropriate assessment is not a technical term: it simply means ‘an assessment that is appropriate’ for the plan or project in question. As such, the law purposely does not prescribe what it should consist of or how it should be presented; these are decisions to be made on a case by case basis by the competent authority.
- 1.9 Over the years the phrase ‘Habitats Regulations Assessment’ has come into wide currency to describe the overall process set out in the Conservation of Habitats and Species Regulations from screening through to Imperative Reasons of Overriding Public Interest (IROPI). This has arisen in order to distinguish the process from the individual stage described in the law as an ‘Appropriate Assessment’. Throughout this report we use the term Habitats Regulations Assessment for the overall process.

Report Layout

- 1.10 **Chapter 2** of this report explains the process by which the HRA has been carried out. **Chapter 3** explores the relevant pathways of impact. **Chapter 4** summarises the Test of Likely Significant Effects of the policies and site allocations of the Plan considered ‘alone’ and ‘in-combination’. (The Test of Likely Significant Effects itself is undertaken in **Appendix B and C**). **Chapter 5** contains the Appropriate Assessment for any linking impact pathways that could not be screened out from potentially resulting in a Likely Significant Effect. **Chapter 6** contains the conclusion and a summary of recommendations.

² People Over Wind and Sweetman v Coillte Teoranta (C-323/17)

2. Methodology

Introduction

- 2.1 This section sets out the approach and methodology for undertaking the Habitats Regulations Assessment (HRA). HRA itself operates independently from the Planning Policy system, being a legal requirement of a discrete Statutory Instrument. Therefore, there is no direct relationship to the National Planning Policy Framework (NPPF) and the 'Tests of Soundness'.

A Proportionate Assessment

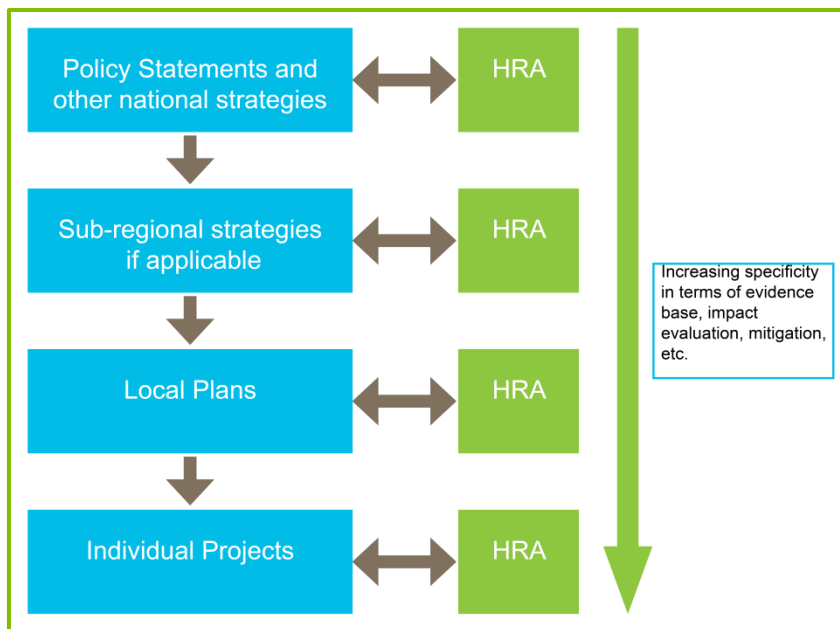
- 2.2 Project-related HRA often requires bespoke survey work and novel data generation in order to accurately determine the significance of effects. In other words, to look beyond the risk of an effect to a justified prediction of the actual likely effect and to the development of avoidance or mitigation measures.
- 2.3 However, the draft MHCLG guidance³ (described in greater detail later in this chapter) makes it clear that when implementing HRA of land-use plans, the Appropriate Assessment (AA) should be undertaken at a level of detail that is appropriate and proportional to the level of detail provided within the plan itself:
- 2.4 *"The comprehensiveness of the [Appropriate] assessment work undertaken should be proportionate to the geographical scope of the option and the nature and extent of any effects identified. An AA need not be done in any more detail, or using more resources, than is useful for its purpose. It would be inappropriate and impracticable to assess the effects [of a strategic land use plan] in the degree of detail that would normally be required for the Environmental Impact Assessment (EIA) of a project."*
- 2.5 In 2015, the Court of Appeal⁴ ruled that providing the Council (competent authority) was duly satisfied that proposed mitigation could be *"achieved in practice"* then this would suffice to meet the requirements of the Habitat Regulations. This ruling has since been applied to a planning permission (rather than a Plan document)⁵. In this case the High Court ruled that for *"a multistage process, so long as there is sufficient information at any particular stage to enable the authority to be satisfied that the proposed mitigation can be achieved in practice it is not necessary for all matters concerning mitigation to be fully resolved before a decision maker is able to conclude that a development will satisfy the requirements of reg 61 of the Habitats Regulations"*.
- 2.6 In other words, there is a tacit acceptance that AA can be tiered and that all impacts are not necessarily appropriate for consideration to the same degree of detail at all tiers as illustrated in **Box 2**.

³ MHCLG (2006) Planning for the Protection of European Sites, Consultation Paper

⁴ No Adastral New Town Ltd (NANT) v Suffolk Coastal District Council Court of Appeal, 17th February 2015

⁵ High Court case of R (Devon Wildlife Trust) v Teignbridge District Council, 28 July 2015

Box 2: Tiering in HRA of Land Use Plans



2.7 The most robust and defensible approach to the absence of fine grain detail at this level is to make use of the precautionary principle. In other words, the plan is never given the benefit of the doubt (within the limits of reasonableness); it must be assumed that a policy/measure is likely to have an impact leading to a significant adverse effect upon an internationally designated site unless it can be clearly established otherwise.

The Process of HRA

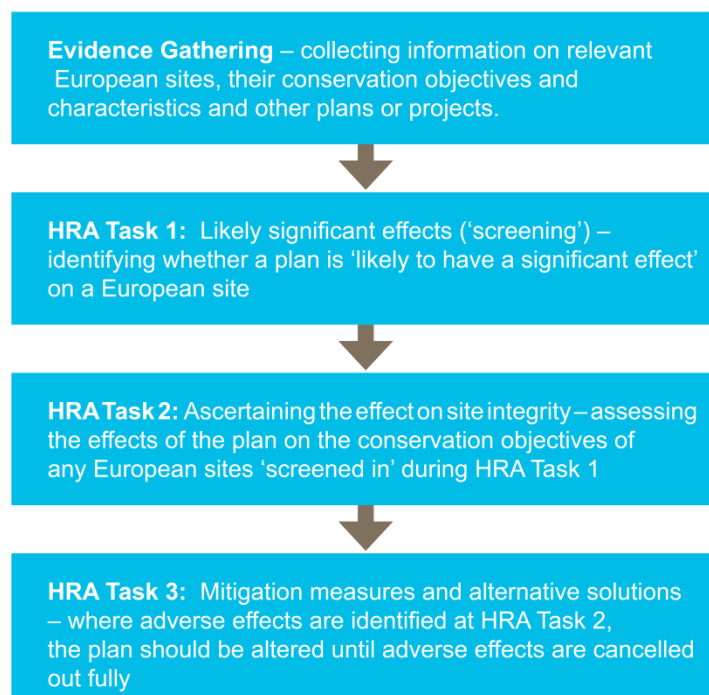
2.8 The HRA is being carried out in the continuing absence of formal central Government guidance. The former DCLG (now MHCLG) released a consultation paper on AA of Plans in 2006⁶. As yet, no further formal guidance has emerged from MHCLG on the assessment of plans. However, Natural England has produced its own informal internal guidance and central government have released general guidance on appropriate assessment⁷

2.9 **Box 3** outlines the stages of HRA according to the draft MHCLG guidance (which, as government guidance applicable to English authorities is considered to take precedence over other sources of guidance). The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations, and any relevant changes to the plan until no likely significant effects remain.

⁶ MHCLG (2006) Planning for the Protection of European Sites, Consultation Paper

⁷ <https://www.gov.uk/guidance/appropriate-assessment>

Box 3: Four-Stage Approach to Habitats Regulations Assessment



2.10 The following process has been adopted for carrying out the subsequent stages of the HRA.

Task One: Test of Likely Significant Effect

- 2.11 The first stage of any Habitats Regulations Assessment is a test of Likely Significant Effect - essentially a high-level assessment to decide whether the full subsequent stage known as Appropriate Assessment is required. The essential question is:
- 2.12 *"Is the Plan, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon European sites?"*
- 2.13 In evaluating significance, AECOM have relied on professional judgment and experience of working with the other local authorities on similar issues. The level of detail concerning developments that will be permitted under land use plans is rarely sufficient to make a detailed quantification of effects. Therefore, a precautionary approach has been taken (in the absence of more precise data) assuming as the default position that if a likely significant effect (LSE) cannot be confidently ruled out, then the assessment must be taken the next level of assessment Task Two: Appropriate Assessment. This is in line with the April 2018 court ruling relating to 'People Over Wind' where mitigation and avoidance measures are to be included at the next stage of assessment.

Task Two: Appropriate Assessment

- 2.14 International site(s) which have been 'screened in' during the previous Task have a detailed assessment undertaken on the effect of the policies on the international site(s) site integrity. Avoidance and mitigation measures to avoid adverse significant effects are taken into account or recommended where necessary.
- 2.15 As established by case law, 'appropriate assessment' is not a technical term; it simply means whatever further assessment is necessary to confirm whether there would be adverse effects on the integrity of any European sites that have not been dismissed at screening. Since it is not a technical term it has no firmly established methodology except that it essentially involves repeating the analysis for the likely significant effects stage, but to a greater level of detail on a smaller number of policies and sites, this time with a view to determining if there would be adverse effects on integrity.
- 2.16 One of the key considerations during Appropriate Assessment is whether there is available mitigation that would entirely address the potential effect. In practice, the Appropriate Assessment takes any policies or allocations that could not be dismissed following the high-level Screening analysis and analyse the potential for an effect in more

detail, with a view to concluding whether there would actually be an adverse effect on integrity (in other words, disruption of the coherent structure and function of the international site(s)).

The Scope

2.17 There is no guidance that dictates the physical scope of an HRA of a plan. Therefore, in considering the physical scope of the assessment we were guided primarily by the identified impact pathways rather than by arbitrary “zones”, i.e. a source-pathway-receptor approach. Current guidance suggests that the following international sites be included in the scope of assessment:

- All sites within the Neighbourhood Plan area boundary; and
- Other sites shown to be linked to development within the Neighbourhood Plan boundary through a known “pathway” (discussed below).

2.18 Briefly defined, pathways are routes by which a change in activity within the plan area can lead to an effect upon an international site. In terms of the second category of international site listed above, MHCLG guidance states that the AA should be “proportionate to the geographical scope of the [plan policy]” and that “an AA need not be done in any more detail, or using more resources, than is useful for its purpose” (MHCLG, 2006, p.6).

2.19 Locations of international designated sites are illustrated in **Appendix A, Figure A1**, and full details of all international designated sites discussed in this document can be found in **Appendix A**, specifying their qualifying features, conservation objectives and threats to integrity. Table 1 below lists all those international designated sites included in this HRA.

Note that the inclusion of international sites or pathway below does not indicate that an effect is expected but rather that these are pathways that will be investigated.

Table 1: Physical Scope of the HRA

International Designated Site	Location	Reason for Inclusion (pressures/ threats ⁸ associated with the international site that could link to the Plan.)	Other site vulnerabilities
Epping Forest SAC	At its closest, 4.9 km NW from the Borough	<ul style="list-style-type: none"> - Air pollution: impact of atmospheric nitrogen - Public access / disturbance - Water pollution 	<ul style="list-style-type: none"> - Undergrazing - Changes in species distribution - Inappropriate water levels - Invasive species - Disease
Lee Valley SPA and Ramsar	At its closest, 8.6 km NW of the Borough	<ul style="list-style-type: none"> - Water pollution - Public access / disturbance - Air pollution: risk of atmospheric nitrogen deposition 	<ul style="list-style-type: none"> - Hydrological changes - Inappropriate scrub control - Fisheries: fish stocking - Invasive species - Inappropriate cutting / mowing
Thames Estuary and Marshes SPA and Ramsar	At its closest, 19.7 km SE of the Borough	<ul style="list-style-type: none"> - Water pollution - Public access / disturbance - Air pollution: risk of atmospheric nitrogen deposition 	<ul style="list-style-type: none"> - Coastal squeeze - Invasive species - Change in species distributions - Fisheries: commercial marine and estuarine - Vehicles: illicit

⁸ As identified in the Site Improvement Plans or RAMS for European sites.

The 'in Combination' Scope

- 2.20 It is a requirement of the Regulations that the impacts and effects of any land use plan being assessed are not considered in isolation but in combination with other plans and projects that may also be affecting the international designated site(s) in question.
- 2.21 When undertaking this part of the assessment it is essential to bear in mind the principal intention behind the legislation i.e. to ensure that those projects or plans which in themselves have minor impacts are not simply dismissed on that basis but are evaluated for any cumulative contribution they may make to an overall significant effect. In practice, in combination assessment is therefore of greatest relevance when the plan would otherwise be screened out because its individual contribution is inconsequential. The overall approach is to exclude the risk of there being unassessed likely significant effects in accordance with the precautionary principle. This was first established in the seminal Waddenzee⁹ case.
- 2.22 For the purposes of this HRA, we have determined that the key other documents with a potential for in-combination effects is the Draft London Plan 2019. This plan sets out the broad spatial development targets for the Greater London over the next 20 – 25 years, which covers 32 boroughs. In addition to this, other key documents include the Local Plans of those districts within 6.2 km of Epping Forest SAC. The distance 6.2km relates to the core recreational catchment area within which 75% of people that visit Epping Forest SAC reside that has been calculated from visitor surveys by Footprint Ecology in 2018¹⁰. The housing numbers within each of these districts will be relevant to assessing the 'in-combination' recreational pressure impact on Epping Forest.
- 2.23 The relevant Local Plan Documents within this 6.5 km zone are listed below:
- Epping Forest District Local Plan 2011 – 2033 (Regulation 19 Version)
 - Adopted London Borough of Redbridge Local Plan (2015 – 2030)
 - London Borough of Waltham Draft Local Plan 2020 – 2035 (Submission Version)
 - London Borough of Enfield Draft Local Plan 2036 (Regulation 18 Version – Issues and Options)
 - Adopted London Borough of Newham Local Plan (2018 – 2033)
 - London Borough of Tower Hamlets Local Plan 2031 (adopted January 2020)
 - London Borough of Hackney Local Plan 2033 (adopted July 2020)
 - Adopted London Borough of Haringey Strategic Policies 2013 (with alterations 2017)
 - Adopted London Borough of Haringey Site Allocations DPD (2017)
 - Harlow Draft Local Development Plan 2033 (Adopted December 2020)
 - Broxbourne Local Plan 2018 2033 (adopted June 2020)
 - Brentwood Draft Local Plan (Pre-Submission, Regulation 19 Version)
- 2.24 The London Plan originally set out the need for approximately 66,000 new homes per year across Greater London. It stated that *'there is capacity across London for approximately 40,000 new homes a year on large sites... [and] also shows that there is capacity for development on small sites for 24,500 new homes a year'*. The plan outlines the 10-year housing targets for each Planning Authority as contained in the London Plan is presented in Table 2 below.
- 2.25 As shown in the table, residential growth in the Barking and Dagenham Borough (at the top of the table) is only targeted to account for 3.71% of the growth in Greater London over the next 10-year period. Nevertheless, the potential for Barking and Dagenham's contribution – however small – to an in-combination effect arising from increased development throughout Greater London, must be considered.

⁹ Waddenzee case (Case C-127/02, [2004] ECR-I 7405)

¹⁰ Footprint Ecology, 2018. Epping Forest Visitor Survey 2017. Footprint Ecology, Dorset.

Table 2: 10-year targets for net housing completions (2019/20 – 2028/29)

Planning Authority	Residential Growth (dwellings)
Barking & Dagenham	19,440
Barnet	23,640
Bexley	6,850
Brent	23,250
Bromley	7,740
Camden	10,380
City of London	1,460
Croydon	20,790
Ealing	21,570
Enfield	12,460
Greenwich	28,240
Hackney	13,280
Hammersmith & Fulham	16,090
Haringey	15,920
Harrow	8,020
Havering	12,850
Hillingdon	10,830
Hounslow	17,820
Islington	7,750
Kensington & Chelsea	4,480
Kingstone	9,640
Lambeth	13,360
Lewisham	16,670
London Legacy Development Corporation	21,540
Merton	9,180
Newham	32,800
Old Oak Park Royal Development Corporation	13,670
Redbridge	14,090
Richmond	4,110
Southwark	23,550
Sutton	4,690
Tower Hamlets	34,730
Waltham Forest	12,640
Wandsworth	19,500
Westminster	9,850
Total	522,890

- 2.26 Following the Examination in Public of the Draft New London Plan, the Inspectors recommended that the total housing target for London be reduced from 649,350 to 522,890. Reflecting this reduction within the borough could lead to the delivery of around 19,440 houses between 2019 and 2029 (equivalent to 1,944 new homes per annum).
- 2.27 It should be noted that, while the broad potential impacts of the London Plan will be considered, this document does not carry out a full HRA of this Plan. Instead it draws upon existing HRAs that have been carried out on the Plan.

3. Pathways of Impact

3.1 The following pathways of impact are considered relevant to the HRA of the Plan:

- Recreational pressure
- Water Quality and Water Resources
- Air pollution (Atmospheric Nitrogen Deposition)

Recreational Pressure

3.2 Recreational use of an international site has the potential to:

- Cause disturbance to sensitive species, particularly ground-nesting birds and (where relevant) wintering wildfowl.
- Cause damage through erosion and fragmentation;
- Cause eutrophication as a result of dog fouling; and
- Prevent appropriate management or exacerbate existing management difficulties;

3.3 Different types of international sites are subject to different types of recreational pressures and have different vulnerabilities. Studies across a range of species have shown that the effects from recreation can be complex.

3.4 It should be emphasised that recreational use is not inevitably a problem. Many international sites also contain nature reserves managed for conservation and public appreciation of nature.

3.5 HRAs of Local Plans tend to focus on recreational sources of disturbance as a result of new residents¹¹.

Activities causing disturbance

3.6 Disturbing activities are on a continuum. The most disturbing activities are likely to be those that involve irregular, infrequent, unpredictable loud noise events, movement or vibration of long duration. The presence of people and dogs generate a substantial disturbance effects because of the areas accessed and the impact of a potential predator on bird behaviour. Birds are least likely to be disturbed by activities that involve regular, frequent, predictable, quiet patterns of sound or movement or minimal vibration. The further any activity is from the birds, the less likely it is to result in disturbance.

3.7 The factors that influence a species response to a disturbance are numerous, but the three key factors are species sensitivity, proximity of disturbance sources and timing/duration of the potentially disturbing activity.

3.8 The distance at which a species takes flight when approached by a disturbing stimulus is known as the 'tolerance distance' (also called the 'escape flight distance') and differs between species to the same stimulus and within a species to different stimuli.

3.9 The potential for apparent disturbance may be less in winter than in summer, in that there are often a smaller number of recreational users. In addition, the consequences of disturbance at a population level may be reduced because birds are not breeding. However, activity outside of the summer months can still cause important disturbance, especially as birds are particularly vulnerable at this time of year due to food shortages. Disturbance which results in abandonment of suitable feeding areas can have severe consequences for those birds involved and their ability to find alternative feeding areas. Several empirical studies have, through correlative analysis, demonstrated that out-of-season (October-March) recreational activity can result in quantifiable disturbance:

¹¹ The RTPI report 'Planning for an Ageing Population' (2004) which states that 'From being a marginalised group in society, the elderly are now a force to be reckoned with and increasingly seen as a market to be wooed by the leisure and tourist industries. There are more of them and generally they have more time and more money.' It also states that 'Participation in most physical activities shows a significant decline after the age of 50. The exceptions to this are walking, golf, bowls and sailing, where participation rates hold up well into the 70s'.

- Tuite et al¹² found that during periods of high recreational activity, bird numbers at Llangorse Lake decreased by 30% as the morning progressed, matching the increase in recreational activity towards midday. During periods of low recreational activity, however, no change in numbers was observed as the morning progressed. In addition, all species were found to spend less time in their 'preferred zones' (the areas of the lake used most in the absence of recreational activity) as recreational intensity increased;
- Underhill et al¹³ counted waterfowl and all disturbance events on 54 water bodies within the South West London Water Bodies Special Protection Area and clearly correlated disturbance with a decrease in bird numbers at weekends in smaller sites and with the movement of birds within larger sites from disturbed to less disturbed areas.

- 3.1 Human activity can affect birds either directly (e.g. through causing them to flee) or indirectly (e.g. through damaging their habitat). The most obvious direct effect is that of immediate mortality such as death by shooting, but human activity can also lead to behavioural changes (e.g. alterations in feeding behaviour, avoidance of certain areas *etc.*) and physiological changes (e.g. an increase in heart rate) that, although less noticeable, may ultimately result in major population-level effects by altering the balance between immigration/birth and emigration/death¹⁴. The impact of disturbance on birds changes during the seasons in relation to a number of very specific factors, for example the winter below freezing temperature, the birds fat resource levels and the need to remain watchful for predators rather than feeding. These considerations lead to birds apparently showing different behavioural responses at different times of the year.
- 3.2 The degree of impact that varying levels of noise will have on different species of bird is poorly understood except that a number of studies have found that an increase in traffic levels on roads does lead to a reduction in the bird abundance within adjacent hedgerows - Reijnen et al (1995) examined the distribution of 43 passerine species (i.e. 'songbirds'), of which 60% had a lower density closer to the roadside than further away. By controlling vehicle usage, they also found that the density generally was lower along busier roads than quieter roads¹⁵.

Mechanical/abrasive damage and nutrient enrichment

- 3.3 Most types of aquatic or terrestrial international site can be affected by trampling, which in turn causes soil compaction and erosion:
- Wilson & Seney (1994)¹⁶ examined the degree of track erosion caused by hikers, motorcycles, horses and cyclists from 108 plots along tracks in the Gallatin National Forest, Montana. Although the results proved difficult to interpret, it was concluded that horses and hikers disturbed more sediment on wet tracks, and therefore caused more erosion, than motorcycles and bicycles.
 - Cole et al (1995a, b)¹⁷ conducted experimental off-track trampling in 18 closed forest, dwarf scrub and meadow & grassland communities (each tramped between 0 – 500 times) over five mountain regions in the US. Vegetation cover was assessed two weeks and one year after trampling, and an inverse relationship with trampling intensity was discovered, although this relationship was weaker after one year than two weeks indicating some recovery of the vegetation. Differences in plant morphological characteristics were found to explain more variation in response between different vegetation types than soil and topographic factors. Low-growing, mat-forming grasses regained their cover best after two weeks and were considered most resistant to trampling, while tall forbs (non-woody vascular plants other than grasses, sedges, rushes and ferns) were considered least resistant. Cover of hemicyptophytes and geophytes (plants with buds below the soil surface) was heavily reduced after two weeks but had recovered well after one year and as such these were considered most resilient to trampling. Chamaephytes (plants with buds above the soil

¹² Tuite, C. H., Owen, M. & Paynter, D. 1983. Interaction between wildfowl and recreation at Llangorse Lake and Talybont Reservoir, South Wales. *Wildfowl* 34: 48-63

¹³ Underhill, M.C. et al. 1993. Use of Waterbodies in South West London by Waterfowl. An Investigation of the Factors Affecting Distribution, Abundance and Community Structure. Report to Thames Water Utilities Ltd. and English Nature. Wetlands Advisory Service, Slimbridge

¹⁴ Riley, J. 2003. Review of Recreational Disturbance Research on Selected Wildlife in Scotland. Scottish Natural Heritage.

¹⁵ Reijnen, R. et al. 1995. The effects of car traffic on breeding bird populations in woodland. III. Reduction of density in relation to the proximity of main roads. *Journal of Applied Ecology* 32: 187-202

¹⁶ Wilson, J.P. & J.P. Seney. 1994. Erosional impact of hikers, horses, motorcycles and off road bicycles on mountain trails in Montana. *Mountain Research and Development* 14:77-88

¹⁷ Cole, D.N. 1995a. Experimental trampling of vegetation. I. Relationship between trampling intensity and vegetation response. *Journal of Applied Ecology* 32: 203-214

Cole, D.N. 1995b. Experimental trampling of vegetation. II. Predictors of resistance and resilience. *Journal of Applied Ecology* 32: 215-224

surface) were least resilient to trampling. It was concluded that these would be the least tolerant of a regular cycle of disturbance.

- Cole (1995c)¹⁸ conducted a follow-up study (in 4 vegetation types) in which shoe type (trainers or walking boots) and trampler weight were varied. Although immediate damage was greater with walking boots, there was no significant difference after one year. Heavier trampers caused a greater reduction in vegetation height than lighter trampers, but there was no difference in effect on cover.
- Cole & Spildie (1998)¹⁹ experimentally compared the effects of off-track trampling by hiker and horse (at two intensities – 25 and 150 passes) in two woodland vegetation types (one with an erect forb understorey and one with a low shrub understorey). Horse traffic was found to cause the largest reduction in vegetation cover. The forb-dominated vegetation suffered greatest disturbance but recovered rapidly. Higher trampling intensities caused more disturbance.

- 3.4 Walkers with dogs contribute to pressure on sites through nutrient enrichment via dog fouling and also cause greater disturbance to fauna as dogs are less likely to keep to marked footpaths and also tend to move in a more erratic manner. Sites being managed by nature conservation bodies and local authorities frequently resort to hardening eroded paths to restrict erosion but at the same time they are losing the habitats formerly used by sand lizards and burrowing invertebrates. Motorcycle scrambling and off-road vehicle use can cause more serious erosion, as well as disturbance to sensitive species. Boats can also cause some mechanical damage to intertidal habitats through grounding as well as anchor and anchor line damage.

Water Quality and Resources

- 3.5 Increased amounts of housing or business development can lead to reduced water quality of rivers and estuarine environments. Sewage and industrial effluent discharges can contribute to increased nutrients on international sites leading to unfavourable conditions. In addition, diffuse pollution, partly from urban run-off has international identified during an Environment Agency Review of Consents process and a joint Environment Agency and Natural England evidence review, as being a major factor in causing unfavourable condition of international sites.

- 3.6 The quality of the water that feeds international sites is an important determinant of the nature of their habitats and the species they support. Poor water quality can have a range of environmental impacts:

- At high levels, toxic chemicals and metals can result in immediate death of aquatic life, and can have detrimental effects even at lower levels, including increased vulnerability to disease and changes in wildlife behaviour. Eutrophication, the enrichment of plant nutrients in water, increases plant growth and consequently results in oxygen depletion. Algal blooms, which commonly result from eutrophication, increase turbidity and decrease light penetration. The decomposition of organic wastes that often accompanies eutrophication deoxygenates water further, augmenting the oxygen depleting effects of eutrophication. In the marine environment, nitrogen is the limiting plant nutrient and so eutrophication is associated with discharges containing available nitrogen;
- Some pesticides, industrial chemicals, and components of sewage effluent are suspected to interfere with the functioning of the endocrine system, possibly having negative effects on the reproduction and development of aquatic life; and
- Increased discharge of treated sewage effluent can result both in high levels of macroalgal growth, which can smother the mudflats of value to SPA birds and in greater scour (as a result of greater flow volumes).

- 3.7 At sewage treatment works, additional residential development increases the risk of effluent escape into aquatic environments in addition to consented discharges to the catchment. In many urban areas, sewage treatment and surface water drainage systems are combined, and therefore a predicted increase in flood and storm events could increase pollution risk.

Atmospheric Pollution (Atmospheric Nitrogen Deposition)

- 3.8 The main pollutants of concern for international sites are oxides of nitrogen (NO_x), ammonia (NH₃) and sulphur dioxide (SO₂). NO_x can have a directly toxic effect upon vegetation. In addition, greater NO_x or ammonia

¹⁸ Cole, D.N. 1995c. Recreational trampling experiments: effects of trampler weight and shoe type. Research Note INT-RN-425. U.S. Forest Service, Intermountain Research Station, Utah.

¹⁹ Cole, D.N., Spildie, D.R. 1998. Hiker, horse and llama trampling effects on native vegetation in Montana, USA. Journal of Environmental Management 53: 61-71

concentrations within the atmosphere will lead to greater rates of nitrogen deposition to soils. An increase in the deposition of nitrogen from the atmosphere to soils is generally regarded to lead to an increase in soil fertility, which can have a serious deleterious effect on the quality of semi-natural, nitrogen-limited terrestrial habitats.

Table 3: Main sources and effects of air pollutants on habitats and species

Pollutant	Source	Effects on habitats and species
Acid deposition	SO ₂ , NO _x and ammonia all contribute to acid deposition. Although future trends in S emissions and subsequent deposition to terrestrial and aquatic ecosystems will continue to decline, it is likely that increased nitrogen emissions may cancel out any gains produced by reduced sulphur levels.	Can affect habitats and species through both wet (acid rain) and dry deposition. Some sites will be more at risk than others depending on soil type, bed rock geology, weathering rate and buffering capacity.
Ammonia (NH ₃)	Ammonia is released following decomposition and volatilisation of animal wastes. It is a naturally occurring trace gas, but levels have increased considerably with expansion in numbers of agricultural livestock. Ammonia reacts with acid pollutants such as the products of SO ₂ and NO _x emissions to produce fine ammonium (NH ₄ ⁺) containing aerosol which may be transferred much longer distances (can therefore be a significant trans-boundary issue.)	Adverse effects are as a result of nitrogen deposition leading to eutrophication. As emissions mostly occur at ground level in the rural environment and NH ₃ is rapidly deposited, some of the most acute problems of NH ₃ deposition are for small relict nature reserves located in intensive agricultural landscapes.
Nitrogen oxides NO _x	Nitrogen oxides are mostly produced in combustion processes. About one quarter of the UK's emissions are from power stations.	Deposition of nitrogen compounds (nitrates (NO ₃), nitrogen dioxide (NO ₂) and nitric acid (HNO ₃)) can lead to both soil and freshwater acidification. In addition, NO _x can cause eutrophication of soils and water. This alters the species composition of plant communities and can eliminate sensitive species.
Nitrogen deposition	(N) The pollutants that contribute to nitrogen deposition derive mainly from NO _x and NH ₃ emissions. These pollutants cause acidification (see also acid deposition) as well as eutrophication.	Species-rich plant communities with relatively high proportions of slow-growing perennial species and bryophytes are most at risk from N eutrophication, due to its promotion of competitive and invasive species which can respond readily to elevated levels of N. N deposition can also increase the risk of damage from abiotic factors, e.g. drought and frost.
Ozone (O ₃)	A secondary pollutant generated by photochemical reactions from NO _x and volatile organic compounds (VOCs). These are mainly released by the combustion of fossil fuels. The increase in combustion of fossil fuels in the UK has led to a large increase in background ozone concentration, leading to an increased number of days when levels across the region are above 40ppb. Reducing ozone pollution is believed to require action at international level to reduce levels of the precursors that form ozone.	Concentrations of O ₃ above 40 ppb can be toxic to humans and wildlife, and can affect buildings. Increased ozone concentrations may lead to a reduction in growth of agricultural crops, decreased forest production and altered species composition in semi-natural plant communities.
Sulphur Dioxide SO ₂	Main sources of SO ₂ emissions are electricity generation, industry and domestic fuel combustion. May also arise from shipping and increased atmospheric concentrations in busy ports. Total SO ₂ emissions have decreased substantially in the UK since the 1980s.	Wet and dry deposition of SO ₂ acidifies soils and freshwater, and alters the species composition of plant and associated animal communities. The significance of impacts depends on levels of deposition and the buffering capacity of soils.

3.9 Sulphur dioxide emissions are overwhelmingly influenced by the output of power stations and industrial processes that require the combustion of coal and oil. Ammonia emissions are dominated by agriculture, with some chemical processes also making notable contributions. As such, it is unlikely that material increases in SO₂ or NH₃ emissions will be associated with Local Plans. NO_x emissions, however, are dominated by the output of vehicle exhausts. Within a 'typical' housing development, by far the largest contribution to NO_x (92%) will be made by the associated road

traffic. Other sources, although relevant, are of minor importance (8%) in comparison²⁰. Emissions of NO_x could therefore be reasonably expected to increase as a result of greater vehicle use as an indirect effect of the Local Plan.

- 3.10 According to the World Health Organisation, the critical NO_x concentration (critical threshold) for the protection of vegetation is 30 µgm⁻³; the threshold for sulphur dioxide is 20 µgm⁻³. In addition, ecological studies have determined 'Critical Loads'²¹ of atmospheric nitrogen deposition (that is, NO_x combined with ammonia NH₃) for key habitats within international sites.

Local Air Pollution

- 3.11 According to the Department of Transport's Transport Analysis Guidance, "Beyond 200 m, the contribution of vehicle emissions from the roadside to local pollution levels is not significant"²².

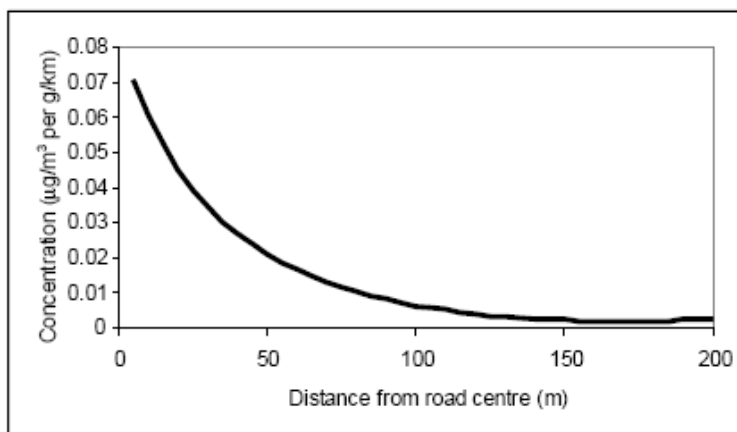


Plate 1. Traffic contribution to concentrations of pollutants at different distances from a road (Source: DfT)

- 3.12 This is therefore the distance that is used throughout the HRA process in order to determine whether an international site is likely to be significantly affected by development under a Plan.

4. Test of Likely Significance

Introduction

- 4.1 The initial scoping of international designated sites illustrated in Table 1 identifies that some sites are potentially vulnerable to:
- Recreational pressure
 - Water resources and water quality
 - Air pollution
- 4.2 An initial policy-by-policy Test of Likely Significant Effects for the Barking and Dagenham Local Plan policies and site allocations is presented in **Appendix B and C**. The assessment took into consideration the above potential vulnerabilities of the international sites included in Table 1. Appendices B and C therefore identify the impact pathways that require further discussion below to determine whether likely significant effects will actually occur.

²⁰ Proportions calculated based upon data presented in Dore CJ et al. 2005. UK Emissions of Air Pollutants 1970 – 2003. UK National Atmospheric Emissions Inventory. <http://www.airquality.co.uk/archive/index.php>

²¹ The Critical Load is the rate of deposition beyond which research indicates that adverse effects can reasonably be expected to occur

²² www.webtag.org.uk/archive/feb04/pdf/feb04-333.pdf

- 4.3 The following sections focus on Epping Forest SAC, Lee Valley SPA/Ramsar and Thames Estuary and Marshes SPA/Ramsar.

Recreational Pressure

- 4.4 A recent visitor survey²³ of the Epping Forest SAC concluded that the core recreational area, the area within which 75% of all visitors of the site reside, is a 6.2 km radius from the boundary of the site. Within this core recreational area new residential developments have been deemed to cause a likely significant effect. The London Borough of Barking and Dagenham falls partially within this 6.2 km zone of influence surrounding the SAC. As there is a likely significant effect for new dwellings within this area, these dwellings will require mitigation to ensure no adverse impact upon the integrity of Epping Forest SAC and therefore cannot be scoped out at this stage of the HRA.
- 4.5 It should also be noted that a new visitor survey of Epping Forest has been undertaken in 2019. Whilst the findings of the new visitor survey have not been publicly released at the time of writing (September 2020), Natural England have confirmed that they are content to stay with a 6.2km ZOI.
- 4.6 **Recreational pressure upon Epping Forest SAC will be discussed further within the Appropriate Assessment.**
- 4.7 Lee Valley SPA/Ramsar is vulnerable to recreational pressure. The part of the site closest to the London Borough of Barking and Dagenham (8.6km north west) has recently changed (2017) from a system of key holder and permitted access only to a publicly open wetland reserve funded by the Walthamstow Wetlands Project. Therefore, as the site is open to the public and the SPA/Ramsar is vulnerable to increases in recreational pressure, likely significant effects cannot be ruled out at this stage. **Recreational pressure upon Lee Valley SPA/Ramsar will be discussed further within the Appropriate Assessment.**
- 4.8 The Thames Estuary and Marshes SPA/Ramsar site is located 19.7km south east of the London Borough of Barking and Dagenham. This was given preliminary consideration with regards to recreational pressure but is considered to be too far from the borough for Barking and Dagenham to form part of its core regular recreational catchment²⁴. Therefore, this impact pathway can be scoped out from further discussion within this HRA in relation to Thames Estuary and Marshes SPA/Ramsar as the impact pathway is not considered to cause a likely significant effect upon this international site.

Water Quality and Resources

- 4.9 With regards to water quality (water pollution) Barking and Dagenham sewerage is treated by Beckton Sewerage Treatment Plant which is the largest sewerage treatment plant in Europe. The plant is located on the banks of the River Thames to the south west of the London Borough of Barking and Dagenham. The outflow of treated water goes straight into the River Thames and thereafter flows south west to the Thames Estuary. As both Epping Forest and Lee Valley are at least 4.9 km north west of the borough and the outflow of treated sewerage goes into the River Thames there is no link between development within the borough and either surface runoff or water pollution to either international site.
- 4.10 The Thames Estuary and Marshes SPA and Ramsar site is located 19.7km south east of the London Borough of Barking and Dagenham. This was given preliminary consideration with regards to wastewater impacts from London population growth, but Thames Water have invested extensively in infrastructure (such as expansions to Beckton, Mogden and Crossness Sewage Treatment Works, the Lee Tunnel and the Thames Tunnel) to ensure that water quality in the River Thames (and thus the SPA/Ramsar site downstream) improves notwithstanding the expected increase in the population of the catchment of WwTW that discharge to the tidal river. In addition, the Site Improvement Plan (SIP) for the Greater Thames Complex²⁵ which includes the Thames Estuary and Marshes SPA does not list water pollution as a threat to or pressure on the SPA. Therefore, the water quality impact pathway can be scoped out from further discussion within this HRA as the impact pathways is not considered to cause a likely significant effect upon any European sites.
- 4.11 Parts of the Lee Valley SPA/Ramsar are used to supply water to areas of north London within Thames Water supply areas. An increase in residential development within the supply area will increase the demand for water resourced and therefore potentially increase the level of abstraction at the SPA/Ramsar reservoirs. This could potentially have

²³ Footprint Ecology, 2018. Epping Forest Visitor Survey 2017. Footprint Ecology, Dorset. An updated visitor survey has since been undertaken but this reaffirms the same core catchment.

²⁴ The section of SPA/Ramsar site in Kent has been surveyed and a core catchment of 6km has been identified.

²⁵ <http://publications.naturalengland.org.uk/publication/6270737467834368> [Accessed 04/11/2019]

a likely significant effect upon the SPA/Ramsar. However, Thames Valley have produced a Water Resource Management Plan (WRMP) and a HRA of this WRMP. Within the HRA of the WRMP the Environment Agency have completed a 'Review of Consents' upon the existing abstraction consent limits at the competent authority for the regulation of the impact of abstraction on the natural environment. The Review of Consents considered all international sites within the Thames Valley supply area. The HRA details the process of the review *"The European sites were initially screened to identify all sites with water dependent habitat within the Thames Water's supply area. Those sites that contained water dependent habitat were then reviewed to assess whether Thames Water abstractions were located within the same groundwater or surface water catchment and therefore could have potential to affect the hydrogeological or hydrological regime of the sites. Any sites that were in the same catchment as a Thames Water licensed abstraction source were assessed in more detail to determine whether the abstraction would be likely to have a significant effect."* Within this process a number of Thames Water licenced sources within the SPA/Ramsar were assessed to determine if there was an adverse effect.

- 4.12 The Appropriate Assessment of the Review of Consents process concluded that there would be no adverse impact upon the integrity of the Lee Valley SPA/Ramsar with regards to abstraction. Therefore, water resources can be screened out of this HRA as the impact pathways are not considered to cause a likely significant effect upon any international sites.

Atmospheric Pollution (Atmospheric Nitrogen Deposition)

- 4.13 The only parts of the Lee Valley SPA/Ramsar within London are the Walthamstow Reservoirs. These are sealed reservoirs that are internationally designated for their populations of wintering gadwall and shoveler ducks. The Air Pollution Information System (APIS) website provides details of critical loads of atmospheric pollution which if exceeded could lead to habitat damage. However, no critical loads are provided for the habitat - open standing water - on which the bird species forming the reason for the international designation rely. The APIS website states that *'No Critical Load has been assigned to the EUNIS classes for meso/eutrophic systems. These systems are often phosphorus limited; therefore, decisions should be taken at a site-specific level'*. In this case, no likely significant effects are anticipated since the Lee Valley SPA/Ramsar, like most freshwater environments, is phosphate limited, rather than nitrogen limited, meaning that it is phosphate availability that controls the growth of macrophytes and algae.
- 4.14 Epping Forest SAC is known to be adversely affected by relatively poor local air quality alongside roads that traverse the parts of the site that lie in Epping Forest District and this has been demonstrated to have negatively affected the epiphytic lichen communities of the woodland as well as other features. The nature of the road network around Epping Forest is such that journeys between a number of key settlements around the forest by car, van or bus effectively necessitate traversing the SAC. However, in contrast to authorities located closer to the SAC data indicates that few daily journeys to work arising in the London Borough of Barking and Dagenham necessitate traversing Epping Forest SAC. This is illustrated by examination of 2011 census data. Journeys to work to the London Borough of Waltham Forest are those which are most likely to pass within 200m of the SAC. However, 2011 census data indicate that 747 commuters from Barking and Dagenham either drive a car or van (or are a passenger in such) into Waltham Forest. This is approximately 1% of journeys to work arising in Barking and Dagenham and not all of these will travel within 200m of the SAC. A negligible percentage of journeys to work arising in the London Borough of Barking and Dagenham thus involve passing the SAC.
- 4.15 In addition to the very low number of journeys to work potentially travelling within 200m of the SAC, the road most likely to be traversed for journeys to work between Barking and Dagenham is Waltham Forest is the North Circular, the A406. A National Vegetation Classification (NVC) survey was undertaken along the A406 as part of a report to inform the HRA for the Meridian Water development in Enfield²⁶ in March 2019. This survey specifically sought to assess the presence of SAC qualifying habitats within 200m of the A406. The survey found that the habitats within 200m of the A406 were aligned with NVC classification W10 - Oak Woodland, which is not a qualifying feature of Epping Forest SAC.
- 4.16 The very small number of trips past Epping Forest SAC expected to be associated with increased housing in Barking and Dagenham will also exist within the context of overarching measures to improve London's air quality being undertaken by the Mayor of London. The HRA of the London Plan²⁷ states that, *"the Mayor has been producing a number of other strategies including several that are intended to improve air quality and reduce NO_x and other emissions over the London Plan period and beyond"*. These include the London Environment Strategy and the Mayor's Transport Strategy. Among the actions in the Mayor's Transport Strategy over the duration of the London Plan period

²⁶ Meridian Water, Phase 2 and Strategic Infrastructure Works. Habitats Regulations Assessment, June 2019. ARUP for Enfield Council.

²⁷ Draft London Plan Habitats Regulations Assessment Update. July 2018. AECOM for Greater London Authority.

up to 2030, include but are not limited to; zero emission capable taxis, town centre Zero Emission Zones, electric single-deck buses and bus charging infrastructure, supporting low emission freight, deliver of 2000 electric vehicle charging points, further investment in charging and refuelling infrastructure, and an Extended Ultra Low Emission Zone.

- 4.17 As a result of these initiatives, the Mayor's Transport Strategy Supporting Evidence Outcomes Summary Report²⁸ concludes that '... with the actions identified in this strategy, a sustainable mode share of 80 per cent can be achieved, meaning that eight in ten journeys made in London will be made on foot, by bicycle or by public transport and just two in ten by car, taxi, private hire vehicle or motorcycle' and that 'Traffic reduction and improvements in vehicle technology will deliver large scale reductions of 94 percent in NOx'. In light of the evidence considered above, it is concluded that the Barking and Dagenham Local Plan will not result in likely significant effects via negative changes in air quality on either the Lee Valley SPA/Ramsar or Epping Forest SAC.

Summary of Test of Likely Significance 'Alone'

- 4.18 No policies within the Barking and Dagenham Local Plan are considered to have an effect on international sites 'alone'.
- 4.19 Policies considered to have an effect on international sites only 'in combination' with other plans and projects are discussed below.

Summary of Test of Likely Significance 'In Combination'

- 4.20 Of the 58 Local Plan policies, 13 policies, were considered to have the potential to result in a likely significant effect in combination:

- **SPDG 1: Delivering growth in Barking and Dagenham** – This policy regards delivering growth within the Borough of Barking and Dagenham. This policy supports the development of a minimum of 44,051 new homes and 20,000 new jobs across the borough. The delivery of this development is set out in Chapter 3 of the Local Plan.
- **SPP 1: Barking and the River Roding Area** – This policy provides for the broad location (Thames and the Riverside) of 16,175 new homes during the plan period. A portion of this strategic area is located within 6.2km of Epping Forest SAC.
- **SPP 2: Thames and the Riverside** - This policy provides for the broad location (Thames and the Riverside) of 15,619 new homes during the plan period. A portion of this strategic area is located within 6.2km of Epping Forest SAC.
- **SPP 3: Dagenham Dock, Beam Park and Stamping Plant** - This policy provides for the broad location (Dagenham Dock, Beam Park and Stamping Plant) of 6,011 new homes during the plan period.
- **SPP 4: Chadwell Heath and Mark's Gate** – This policy provides for the broad location (Chadwell Heath and Mark's Gate) of 4,839 new homes during the plan period.
- **SPP 5: Dagenham East and Dagenham Village** – This policy provides for the broad location (Dagenham East and Dagenham Village) of 1,200 new homes during the plan period.
- **SPP 6: Dagenham Heathway and Becontree** – This policy provides for the broad location (Dagenham Heathway and Becontree) of 1,194 new homes during the plan period.
- **SPP 7: Becontree Heath and Rush Green** – This policy provides for the broad location (Becontree Heath and Rush Green) of 285 new homes during the plan period.
- **SP 3: Delivering homes that meet people's needs** – This policy relates to delivering a net increase in new residential dwellings over the plan period through supporting the delivery of the most up-to-date London Plan. The Council will support proposals that contribute to the increase of a minimum of **44,051 additional quality homes** between 2019 and 2037.
- **DMH 3: Specialist housing for older persons** – Although this policy does not allocate a quantum of housing it does support the provision of specialist housing for older persons within the Borough.

²⁸ <https://tfl.gov.uk/corporate/publications-and-reports/travel-in-london-reports?intcmp=3120> [accessed 27/10/2017]

- **DMH 5: Gypsy and traveller accommodation** – This policy supports the development of new gypsy and traveller accommodation. Within the supporting text it highlights delivering 12 pitches at Eastbrookend Country Park and the remaining need at Collier Row Road and Choats Road over the Plan period.
- **DME 1: Utilising the borough's employment land more efficiently** - Although the policy is a design management policy and does not specifically promote an increase in industrial space in the Borough. The supporting text provides a table which states the indicative future capacity of several industrial land parcels.
- **DME4: Visitor accommodation** – This proposal supports the development of visitor accommodation within the borough. Visitor accommodation includes hotels and serviced apartments.

4.21 Ultimately it is concluded that having scrutinised the impact pathways to European sites in more detail, policy DME1 will not in fact lead to likely significant effects on European sites. However, the other policies above provide for the following realistic potential linking impact pathways that could result in likely significant effects on international sites in combination, because they all promote or seek to deliver residential growth:

- **Recreational pressure: as a result of new residential dwellings**

4.22 All remaining policies are development management policies that do not provide impact pathways that could potentially link to international sites.

4.23 The potential recreational pressure impact of the Local Plan is therefore the subject of the appropriate assessment that constitutes chapter 5 of this report.

5. Appropriate Assessment

'Alone' Assessment

- 5.1 Due to the distance from any international site discussed in the Test of Likely Significant Effects chapter, there is no potential for the growth within the Local Plan to lead to adverse effects 'alone', but only 'in combination' with other plans and projects. Therefore, the Appropriate Assessment focused on impact pathways 'in combination'.

'In Combination' Assessment

- 5.2 The 'in combination' assessment looked at the Barking and Dagenham Local Plan's planned growth with regards to impacts of recreational pressure and air pollution on the integrity of international sites, 'in combination' with the Draft London Plan 2019.

Recreational Pressure on Epping Forest SAC

- 5.3 The overarching Strategic Policy SPDG 1 – Delivering Growth in Barking and Dagenham of the Barking and Dagenham Local Plan states that the council “*will support the development of a minimum of 44,051 new homes across the plan period with ambitions to exceed this policy-driven target were possible*”. Policies SPP 1 to SPP 7 give detail the quantum of development in each area of borough. In addition to this, the supporting text of Policy DMH 5 (Gypsy and Traveller Accommodation) highlights the need for 25 new gypsy and traveller pitches within the borough up to 2037. There are several other policies relating to the provision of specialist housing including residential care housing for older people (DMH 3) and visitor accommodation e.g. hotels (DME 4) within the borough although these policies and supporting text do not specify a quantum of this development within the borough.
- 5.4 Recreational pressure is well known vulnerability of Epping Forest SAC. Epping Forest is a forest of national and international conservation importance. The Forest is made up of woodland, grassland and heathland and contains over 50,000 ancient pollard trees and 100 lakes and ponds spanning 2,400 ha²⁹.
- 5.5 The recreational impacts considered to be of concern within the SAC include:
- Eutrophication from dog fouling;
 - Trampling/wear, leading to soil compaction, vegetation wear, erosion and damage to veteran tree roots
 - Increased fire risk (and potentially difficulties in access for emergency vehicles if gates etc. are blocked);
 - Difficulties in establishing the best grazing management due to interactions between visitors and livestock;
 - Direct damage to veteran trees, for example from climbing on them;
 - Harvesting, for example fungi, deadwood;
 - Disturbance to invertebrates and other wildlife;
 - Spread of disease;
 - Spread of alien plants;
 - Staff time taken away from necessary management due to the need to deal with vandalism, breaches of byelaws etc.; and,
 - Direct damage and vandalism of infrastructure.
- 5.6 Visitor survey³⁰ of the SAC has concluded that the core recreational area, the area within which 75% of all visitors of the site reside, is a 6.2 km radius from the boundary of the site. The London Borough of Barking and Dagenham falls partially within this 6.2 km zone of influence surrounding the SAC. As there is no way to prevent new residents utilising

²⁹ <http://www.visiteppingforest.org/things-to-do/epping-forest-p1389551> [Accessed 07/11/2019]

³⁰ Footprint Ecology, 2018. Epping Forest Visitor Survey 2017. Footprint Ecology, Dorset. A more recent study was undertaken in 2019 which reaffirmed the core catchment

the SAC for recreational purposes within this zone of influence there is a need to undertake measures to mitigate these likely significant effects to ensure no effect on the integrity of the SAC.

- 5.7 The Barking and Dagenham Local Plan proposed residential development within the 6.2 km zone of influence for the Epping Forest SAC is restricted to the north west corner of the borough and includes the following developments in Table 4 below.

Table 4: Proposed Residential Development fully within 6.2 km of Epping Forest SAC

Site ID	Site Name	Proposed No. Dwellings	No. Dwellings with Current Planning Permission
BB	Tesco Car Park	1,500	514
DJ	Clockhouse Avenue	250	0
CD	London Road, Barking Town Centre	196	196
DO	Town Quay	160	0
AM	Crown House	396	396
EA	Barking Station including Trocoll House	1,182	198
DG	Bamford Road	98	0
HA	Wickes (Hertford Road)	899	0
HN	Ripple Road and Methodist Church	252	0
XC	Herts Lane Estate	1,501	78
YM	Phoenix House, 12-14 Wakering Road, Barking	188	0
HL	Small Housing Site Allocation (Hapag Lloyd House)	75	0
HO	Small Housing Site Allocation (14-34 London Road)	29	0
ZO	Cambridge House	76	0
HZ	Hertford Road Industrial Estate	957	0
HM	Small Housing Site Allocation (Old Granary)	6	0
DP	Abbey Retail Park (North)	1089	1089
HQ	Town Quay Wharf	147	147
CY	Artists Housing	12	12
	Total	9,013	2,033

- 5.8 Two developments lie only partially within the 6.2 km recreational catchment zone. These have been listed below in Table 5:

Table 5: Proposed Residential Development partially within 6.2 km of Epping Forest SAC

Site ID	Site Name	Proposed No. Dwellings	No. Dwellings with Current Planning Permission	Area of Development within 6.2 km of Epping Forest SAC	Total Area of Development
AK	Vicarage Field	900	900	3.00 ha	3.13 ha
WD	Small Housing Site Allocation	150	0	0.0058 ha	1.11 ha

- 5.9 The total housing proposed within developments in Barking and Dagenham that are fully situated in the 6.2 km zone of influence is 9,610 dwellings. A total of 2,630 of these houses currently already have planning permission, which leaves 6,980 without a current planning permission. There are also two sites situated partially within the 6.2 km zone of influence. The total number of dwellings associated with the sites located partially within 6.2 km is 1,050 dwellings. Site allocation AK (Vicarage Field) for 900 dwellings has already been granted planning permission. Site allocation WD (a Small Housing Allocation) for 150 dwellings, is not yet permitted. However, with this Site allocations only a small

portion of the site (0.0058 ha for WD) is located within the Epping Forest 6.2km ZoI and clearly no housing will be delivered on such a small area of the site.

- 5.10 A strategic approach to mitigating the effect of recreation of Epping Forest is currently being devised. However, interim advice from Natural England was published in March 2019 to all Local Authorities within 6.2 km radius of the SAC³¹. This advice note sets out the measures with which the Local Authorities must comply in regard to mitigation for Epping Forest until such time as the full Mitigation Strategy is completed. With regard to large sites e.g. those with 100 dwellings or more within the zone of influence, the preferred method of mitigating the effects of recreational pressure is to provide Suitable Alternative Natural Greenspace (SANG) - *“well designed open space/green infrastructure within the development. These sites will have to be of a certain size and quality to actively encourage visits away from the SAC.”*
- 5.11 Harts Lane Estate is a development site of approximately 32 ha. At this size it is recommended that opportunities for SANG delivery on site are explored to mitigate the ‘in combination’ effects on the SAC. In urban areas of London housing density can vary considerably from 35 units per ha up to 260 units per ha depending on the number of habitable rooms. However, with a site of 32 ha and a total of 1,501 dwellings based on the above densities, and assuming that some high-rise buildings may be involved, an average of 47 dwellings per ha is likely. This means that the site may be able to support a small SANG of approximately 5 ha.
- 5.12 If this is not possible within the development, there are a number of alternatives that can be explored by the applicant, such as improving and upgrading current green spaces within the vicinity of the development to provide a SANG style experience. One example of this is Barking Park, which is situated within the north east section of Barking that overlaps with the 6.2 km recreational catchment around Epping Forest SAC and lies much closer to Harts Lane Estate than does the SAC. Others are Abbey Green and improving the naturalisation of the banks of the River Roding. It is recommended that the developer seeks guidance from London Borough of Barking and Dagenham (LBBD) to provide enhancements to such features, particularly where owned by LBBD. These improvements would need to focus on more ‘natural’ recreation rather than formal pitches and play areas. For example, there are potentially areas within Barking Park that can be turned from short mown grass into a more ‘natural’ landscape. Alternatively, the developer should provide contributions to enable Strategic Access Management and Monitoring (SAMM) of the SAC with the funding secured by the developer or Local Authority prior to the occupation of the dwellings.
- 5.13 According to the Natural England advice SAMM contributions are not required for sites with fewer than 100 dwellings over 3 km from the boundary of the SAC. As the London Borough of Barking and Dagenham is over 3 km from the boundary of the SAC, sites put forward with less than 100 dwellings will not be required to provide contributions. Developments that have already been granted consent cannot be retrospectively required to make a financial contribution to the SAC mitigation strategy. That still leaves eight allocated sites of more than 100 dwellings which have not yet been entirely consented, other than Herts Lane Estate. These are Tesco Carpark (BB) for 1,500 new dwellings (514 permitted), Clockhouse avenue (DJ) for 250 new dwellings, Town Quay (DO) for 160 new dwellings, Barking Station Including Trocoll House (EA) for 1,182 new dwellings (198 permitted), Bamford Road (DG) for 98 new dwellings, Wickes (Hertford Road) (HA) for 899 new dwellings, Ripple Road and Methodist Church (HN) for 252 new dwellings, Phoenix House, 12-14 Wakering Road, Barking (YM) for 188 new dwellings and Hertford Road Industrial Estate (HZ) for 957 new dwellings. These developments are unlikely to be sufficiently large to provide SANG and would therefore need to make financial contributions to the emerging Epping Forest SAC SAMM strategy to comply with Natural England’s advice.
- 5.14 Site allocation WD is partially located within the 6.2km ZoI and provides 150 new dwellings, but due to the small portion of the site actually within the ZoI (0.0058 ha) the area would not contain any housing.
- 5.15 It should be noted that contributions will also be required for residential care homes (excluding nursing homes), gypsy and traveller sites and student accommodation if they are within the zone of influence.
- 5.16 Currently there is no mention in the Local Plan of mitigation required for the developments within the 6.2 km core recreational catchment area of the SAC and therefore, it is recommended that a paragraph stating compliance with the Interim Mitigation Advice from Natural England (March 2019) and when released the Full Mitigation Strategy, is inserted into the supporting text of Policy SPDG1 or DMNE3. It is recommended that the paragraph includes for example:

³¹ Natural England 2019. Emerging strategic approach relating to the Epping Forest Special Area of Conservation (SAC) Mitigation Strategy. Interim advice following feedback from London Borough's and Greater London Authority. Natural England. Cheshire.

- ***“An area of approximately 165 ha in the north west corner Barking lies between 3 and 6.2 km from the boundary of Epping Forest SAC. A recreational pressure zone of influence of 6.2 km around the SAC has been confirmed by visitor studies since 2017 (the most recent in 2019). Within this zone developers will be required to mitigate the impacts of recreational pressure upon the SAC in compliance with Natural England’s Interim Mitigation Advice (March 2019) and any subsequent Full Mitigation Strategy released. The interim advice requires developments of 100 dwellings or greater within this zone (3 km to 6.2 km) to provide mitigation in the form of Suitable Alternative Natural Greenspace (SANG) within the footprint of the development site. If this is not possible due to space constraints, contributions will be required for Strategic Access Management and Monitoring (SAMM) of the SAC. It is jointly the responsibility of the developer and the Local Authority to devise an appropriate mitigation package of mitigation measures on a site by site basis to ensure no adverse impact on the integrity of Epping Forest SAC. Any development which would cause an adverse impact upon the integrity of Epping Forest SAC will not be supported”***

6. Conclusions and Recommendations

- 6.1 This assessment undertook both a Test of Likely Significant Effects and Appropriate Assessment of the policies and any allocations within the London Borough of Barking and Dagenham Local Plan (Regulation 19)
- 6.2 The international designated sites, considered within the Appropriate Assessment for impact pathways that could not be screened out at the screening stage were:
- Epping Forest SAC
- 6.3 The impact pathway considered was recreational pressure.
- 6.4 There are several policies within the Barking and Dagenham Local Plan that allude to the provision of a minimum of 44,051 houses within the borough between 2019 and 2037. In addition, there is a policy supporting the development of specialist residential dwellings e.g. care facilities and student accommodation, a policy to support visitor accommodation and within the supporting text support for up to 24 new gypsy and traveller pitches. All of this accommodation will increase the recreational pressure upon international sites which are vulnerable to this impact pathway, where the accommodation is built in its catchment area.
- 6.5 The London Borough of Barking and Dagenham is partially within the core recreational catchment area for the Epping Forest SAC. An area of approximately 166 ha within the north west of Barking lies within the 6.2 km core catchment area. This catchment was devised by a visitor study undertaken by Footprint Ecology in 2017 and relates to the radius of where 75% of visitors to the SAC reside. It has been determined by Natural England that new developments within this core catchment area are likely to cause an effect upon the SAC either alone or in combination and therefore are required to mitigate the effect of this visitor pressure upon the SAC. A Mitigation Strategy is currently being developed to ensure that no development affects the integrity of the SAC, however, until this is complete Interim Mitigation Advice which was set out by Natural England in conjunction with the London Boroughs and the Greater London Authority in March 2019 should be followed. This advice sets out that any development where 100 or more dwellings are being built between 3 km and 6.2 km from the SAC boundary must provide a suite of mitigation measures for recreational pressure upon the SAC. The preferred method of this mitigation is to provide Suitable Alternative Natural Greenspace (SANG) within the development, however, if this is not possible the developer and Local Authority are advised to agree on developer contributions to the suite of management and monitoring measures which are to be undertaken within the SAC through Strategic Access Management and Monitoring (SAMM).
- 6.6 **Table 4** and **Table 5** in **Chapter 5** show the number of proposed dwellings within the 6.2 km core recreational catchment area which amounts to 9,013 dwellings fully within the zone of influence and additional 1,050 located in developments situated partially within the zone of influence. Of the sites fully within the 6.2 km of the SAC, 2,033 dwellings are yet to gain planning permission. Therefore, this is the number of dwellings likely to require mitigation within the Barking and Dagenham Local Plan. Those with planning permission granted after September 2021 are likely to already have secured mitigation to be approved through planning process.
- 6.7 At time of first writing of this HRA there was no mention of mitigation required for the developments within the 6.2 km core recreational catchment area of the SAC and therefore, it is recommended that a paragraph stating compliance with the Interim Mitigation Advice from Natural England (March 2019) and when released the Full Mitigation Strategy, is inserted into the supporting text of Policy SPDG1 or DMNE3. It is recommended that the paragraph includes for example:
- ***“An area of approximately 165 ha in the north west corner Barking lies between 3 and 6.2 km from the boundary of Epping Forest SAC. A recreational pressure zone of influence of 6.2 km around the SAC has been confirmed by visitor studies since 2017 (the most recent in 2019). Within this zone developers will be required to mitigate the impacts of recreational pressure upon the SAC in compliance with Natural England’s Interim Mitigation Advice (March 2019) and any subsequent Full Mitigation Strategy released. The interim advice requires developments of 100 dwellings or greater within this zone (3 km to 6.2 km) to provide mitigation in the form of Suitable Alternative Natural Greenspace (SANG) within the footprint of the development site. If this is not possible due to space constraints, contributions will be required for Strategic Access Management and Monitoring (SAMM) of the SAC. It is jointly the responsibility of the developer and the Local Authority to devise an appropriate mitigation package of mitigation measures on a site by site basis to ensure no adverse impact on the integrity of Epping Forest SAC. Any development which would cause an adverse impact upon the integrity of Epping Forest SAC will not be supported”***

- 6.8 Since they were made, the recommendations in paragraph 6.7 have been added to Policy DMNE 1: Parks, Open Spaces and Play Space. However, it is recommended that the above section of Policy DMNE 1 (paragraph 6.7 above) be moved to a more appropriate policy which talks about providing development within the borough; either Policy SPDG 1 or DMNE3 would be an appropriate policy.
- 6.9 In addition to this it was recommended that the existing wording of Policy DMNE3 is amended as follows:
- 6.10 1: Development should not lead to adverse effects on the integrity of Epping Forest Special Area of Conservation, or loss or degradation of Sites of Importance for Nature Conservation (SINCs), including local nature reserves and Epping Forest's Special Area of Conservation (SAC). All existing SINC boundaries are defined on the Policies Map.
- 6.11 The Recommendation in paragraph 6.10 has been added to Policy DMNE 3.
- 6.12 Given the incorporation of these recommendations, it can be concluded that the Plan document will not result in an adverse effect on the integrity of any international sites either alone or in combination.

Appendix A International Site Background Information and Locations

Epping Forest SAC

Introduction

Epping forest is a 2,400 ha area of Ancient woodland between Epping in Essex to the north and Forest Gate in Greater London to the south, straddling the border between London and Essex. It is a former Royal Forest. Epping Forest represents Atlantic acidophilous beech forest in the north-eastern part of the habitat's UK range. The long history of pollarding, and resultant large number of veteran trees, ensures that the site is also rich in fungi and dead-wood invertebrates. The site also has areas of heathland.

Conservation Objectives³²

With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site.

Qualifying Features³³

Annex I habitats that are a primary reason for selection of this site:

- Atlantic acidophilous beech forests with *Ilex* and sometimes also *Taxus* in the shrublayer (*Quercion roburi-petraeae* or *Ilici-Fagenion*)

Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site

- Northern Atlantic wet heaths with *Erica tetralix*
- European dry heaths.

Annex II species that are a primary reason for selection of this site

- Stag beetle *Lucanus cervus*

Environmental Vulnerabilities³⁴

- Air pollution: impact of atmospheric nitrogen deposition
- Undergrazing
- Public access / disturbance
- Changes in species distribution
- Inappropriate water levels
- Water pollution
- Invasive species

³² <http://publications.naturalengland.org.uk/publication/5908284745711616> [Accessed 30/10/2019]

³³ <https://sac.jncc.gov.uk/site/UK0012720> [Accessed 30/10/2019]

³⁴ <http://publications.naturalengland.org.uk/publication/6663446854631424> [Accessed 30/10/2019]

- Disease

Lee Valley SPA/Ramsar

Introduction

The Lee Valley SPA comprises a series of embanked water supply reservoirs, sewage treatment lagoons and former gravel pits that display a range of man-made and semi-natural wetland and valley bottom habitats.

Conservation Objectives³⁵

With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change;

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site.

Qualifying Features³⁶³⁷

The SPA qualifies under article 4.1 of the Directive (79/409/EEC) as it is used regularly by 1% or more of the Great Britain population of a species listed on Annex 1 in any season:

- Bittern *Botaurus stellaris* – 6 individuals (wintering) – 5 year peak mean 1992/93 – 1996/97 which is 6% of the GB over wintering population.

The SPA qualifies under article 4.2 of the Directive (79/409/EEC) as it is used regularly by 1% or more of the biogeographical populations of the following regularly occurring migratory species (other than those listed on Annex 1), in any season:

- Shoveller *Anas clypeata* – 406 individuals (wintering) – 5 year peak mean 1993/94 – 1997/98 which is 1% of the NW/Central Europe overwintering population.
- Gadwall *Anas strepera* – 456 individuals (wintering) - 5 year peak mean 1993/94 – 1997/98 which is 1.5% of the NW Europe over wintering population.

Non Qualifying species of interest: In addition, the site supports nationally important numbers of Cormorant *Phalacrocorax carbo*, great crested grebe *Podiceps cristatus*, tufted duck *Aythya fuligula*, Porchard *Aythya ferina* and grey heron *Ardea cinerea*.

The Ramsar qualifies for the following criteria:

Criterion 2

The site supports nationally scarce plant species whorled water-milfoil *Myriophyllum verticillatum* and the rare or vulnerable invertebrate *Micronecta minutissima* (a water-boatman)

Criterion 6

Qualifying species populations (as identified at designation):

³⁵ <http://publications.naturalengland.org.uk/publication/5670650798669824> [Accessed 30/10/2019]

³⁶ <http://archive.incc.gov.uk/pdf/SPA/UK9012111.pdf> [Access 30/10/2019]

³⁷ <http://archive.incc.gov.uk/pdf/RIS/UK11034.pdf> [Access 30/10/2019]

Species with peak counts in spring/autumn:

- Northern shoveller – 287 individuals representing an average of 1.9% of the GB population (5 year peak mean 1998/99 – 2002/03)

Species with peak counts in winter:

- Gadwall – 445 individuals representing an average of 2.6% of the GB population (5 year peak mean 1998/99 – 2002/03)

Environmental Vulnerabilities³⁸

- Water pollution
- Hydrological changes
- Public access/ disturbance
- Inappropriate scrub control
- Fisheries: fish stocking
- Invasive species
- Inappropriate cutting/ mowing
- Air pollution: risk of atmospheric nitrogen deposition

Thames Estuary and Marshes SPA/Ramsar

Introduction

The Thames Estuary and Marshes SPA is located on the south side of the Thames Estuary in southern England. The marshes extend for about 15 km along the south side of the estuary and also include intertidal areas on the north side of the estuary. To the south of the river, much of the area is brackish grazing marsh, although some of this has been converted to arable use. At Cliffe, there are flooded clay and chalk pits, some of which have been infilled with dredgings. Outside the sea wall, there is a small extent of saltmarsh and broad intertidal mud-flats. The estuary and adjacent grazing marsh areas support an important assemblage of wintering waterbirds including grebes, geese, ducks and waders. The site is also important in spring and autumn migration periods.

Conservation Objectives³⁹

With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change;

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site.

Qualifying Features⁴⁰⁴¹

With regards to the SPA:

³⁸ <http://publications.naturalengland.org.uk/publication/5864999960444928> [Accessed 30/10/19]

³⁹ <http://publications.naturalengland.org.uk/publication/4698344811134976> [Accessed 08/11/19]

⁴⁰ <http://archive.incc.gov.uk/default.aspx?page=2042> [Accessed 08/11/19]

⁴¹ <http://archive.incc.gov.uk/pdf/RIS/UK11069.pdf> [Accessed 08/11/19]

This site qualifies under Article 4.1 of the Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive:

Over winter:

- Avocet *Recurvirostra avosetta*, 276 individuals representing at least 21.7% of the wintering population in Great Britain (5 year peak mean 1991/92 – 1995/96)
- Hen harrier *Circus cyaneus*, 7 individuals representing at least 0.9% of the wintering population in Great Britain (5 year mean 1993/94 – 1997/98)

This site also qualifies under Article 4.2 of the Directive (79/409/EEC) by supporting populations of European importance of the following migratory species:

On passage:

- Ringed plover *Charadrius hiaticula*, 559 individuals representing at least 1.1% of the Europe/North Africa – wintering population (5 year peak mean 1991/92 – 1995/96)

Over winter:

- Ringed plover *Charadrius hiaticula*, 541 individuals representing at least 1.1% of the wintering Europe/North Africa – wintering population (5 year peak mean 1991/92 – 1995/96)

Assemblage qualification: A wetland of international importance

The area qualifies under Article 4.2 of the Directives (79/409/EEC) by regularly supporting at least 20,000 waterfowl.

Over winter the area regularly supports 33,433 individual waterfowl (5 year peak mean 1991/92 – 1995/96) including:

- Redshank *Tringa totanus*, Black-tailed Godwit *Limosa limosa islandica*, Dunlin *Calidris alpina alpina*, Lapwing *Vanellus vanellus*, Grey Plover *Pluvialis squatarola*, Shoveler *Anas clypeata*, Pintail *Anas acuta*, Gadwall *Anas strepera*, Shelduck *Tadorna tadorna*, White-fronted Goose *Anser albifrons albifrons*, Little Grebe *Tachybaptus ruficollis*, Ringed Plover *Charadrius hiaticula*, Avocet *Recurvirostra avosetta*, Whimbrel *Numenius phaeopus*.

The Ramsar qualifies for the following criteria:

Criterion 2

He site supports one endangered plant species and at least 14 nationally scarce plants of wetland habitats. The site also supports more than 20 British Red Data Book invertebrates.

Criterion 5

Assemblages of international importance:

Species with peak counts in winter:

- 45,118 waterfowl (5 year peak mean 1998/99 – 2002/03)

Criterion 6

Species/populations occurring at levels of international importance

Qualifying species/populations (as identified at designation):

Species with peak counts in spring/autumn:

- Ringed plover, *Charadrius hiaticula*. 595 individuals, representing an average of 1.8% of the GB population (5 year peak mean 1998/99 – 2002/03)
- Black-tailed godwit, *Limosa limosa islandica*. 1640 individuals, representing an average of 4.6% of the population (5 year peak mean 1998/99 – 2002/03)

Species with peak counts in winter:

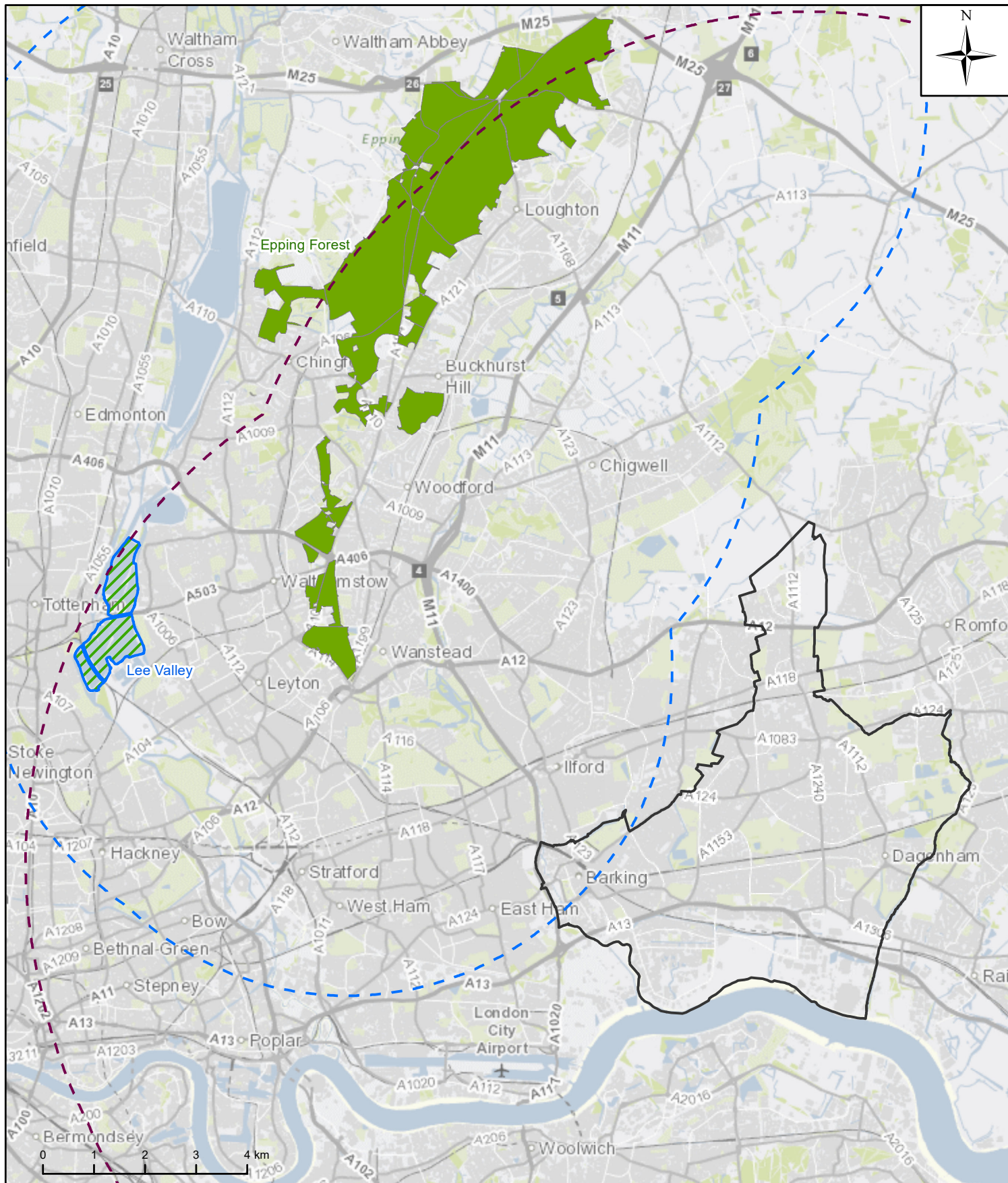
- Grey plover, *Pluvialis squatarola*. 1643 individuals, representing an average of 3.1% of the GB population (5 year peak mean 1998/99 – 2002/03)
- Red knot, *Calidris canutus islandica*. 7279 individuals, representing an average of 1.6% of the GB population (5 year peak mean 1998/99 – 2002/03)
- Dunlin, *Calidris alpina alpina*. 15171 individuals, representing an average of 1.1% of the population (5 year peak mean 1998/99 – 2002/03)
- Common redshank *Tringa totanus totanus*. 1178 individuals, representing an average of 1% of the GB population (5 year peak mean 1998/99 – 2002/03)

Environmental Vulnerabilities⁴²

The site improvement plan for this SPA also covers several other SPAs. The Greater Thames Complex consists of the Thames Estuary and Marshes SPA, the Medway Estuary SPA, the Swale SPA and Benfleet & Southend Marshes SPA.

- Coastal squeeze
- Public access/ disturbance
- Invasive species
- Change in species distributions
- Fisheries: Commercial marine and estuarine
- Invasive species
- Vehicles: illicit
- Air pollution: risk of atmospheric nitrogen deposition

⁴² <http://publications.naturalengland.org.uk/publication/6270737467834368> [Accessed 08/11/19]



<p>KEY:</p> <ul style="list-style-type: none"> Barking and Dagenham Borough Boundary 10km Buffer 6.2km Epping Forest Zone of Influence Ramsar Site Special Protection Area (SPA) Special Area of Conservation (SAC)

Client: **LONDON BOROUGH OF BARKING & DAGENHAM COUNCIL**

Project: **HRA FOR THE BARKING AND DAGENHAM LOCAL PLAN**

Title: **FIGURE 1 - EUROPEAN SITES**

4th Floor Portwall Place Portwall Lane Bristol BS1 6NA www.aecom.com		Tel +44 (0) 29 2035 3400 Fax +44 (0) 29 2035 3499
Design: AM	Drawn: AM	
Chk'd: CC	App'd: AK	
Date: November 2019	Scale at A3: 100,000	
Drawing Number: 60609166		A4

Appendix B Policy Screening: Likely Significant Effects

Policy	Description	Likely Significant Effects
<p>Policy SPDG1 – Delivering Growth in Barking and Dagenham</p>	<p>1. The Council will take a positive approach to development and will work with the local community, landowners, developers and other key stakeholders to proactively deliver the borough’s development vision and objectives.</p> <p>2. The Council will support the development of 50,000 new homes and 20,000 new jobs across the borough. This will be largely achieved through intensification and redistribution of borough’s industrial floor space and complementary commercial uses, particularly focusing on the existing sites south of the A13 including Castle Green and Box Lane, River Road and Creekmouth and Dagenham Dock; Chadwell Heath Industrial Estate; and Dagenham East.</p> <p>Intelligent use of our industrial land</p> <p>3. The Council will support the development of a minimum of 44,051 new homes across the plan period, with ambitions to exceed this policy driven target where possible, together with some 20,000 new jobs across the borough. This will be largely achieved through:</p> <ul style="list-style-type: none"> a) concentrating the existing industrial floor space capacity and jobs to the south of the borough as employment land and floor space by intensifying locations such as Dagenham Dock (including the Thames Freeport in Dagenham) b) releasing some industrial sites, balanced by re-provision and intensification of the borough’s industrial floor space capacity elsewhere c) where appropriate, co-location of industrial activities with other uses, including residential and other commercial activities. <p>4. Designated industrial areas are listed in Local Plan policy SP5 and shown on the Policies Map.</p> <p>Transformation areas</p> <p>5. Extensive and larger scale development will be focused primarily in Transformation Areas. These are:</p> <ul style="list-style-type: none"> a) Barking Town Centre and the River Roding b) Barking River side; c) Thames Road; d) Castle Green; e) Chadwell Heath and Marks Gate; f) Dagenham Dock and Beam Park g) Dagenham East h) Dagenham Heathway <p>6.</p>	<p>Likely Significant Effects</p> <p>This policy regards delivering growth within the Borough of Barking and Dagenham. This policy supports the development of 44,051 new homes and 20,000 new jobs across the borough. The delivery of this development is set out in Chapter 3 of the Local Plan.</p> <p>New development may cause an increase in some impact pathways which can cause a likely significant effect upon international sites in combination including:</p> <ul style="list-style-type: none"> a) Recreational pressure b) Air pollution c) Water resources d) Water quality

Policy	Description	Likely Significant Effects
	<p>These Transformation Areas offer the potential for higher density and taller development, particularly near existing and planned transport hubs. Existing residential neighbourhoods, including Becontree Estate and Dagenham Village, will be the focus of smaller-scale development and improvements</p> <p>7. Masterplan Supplementary Planning Documents (SPDs), Area Action Plans (AAPs) and other guidance may be prepared to support the achievement of cohesive communities across the Transformation Areas and adjoining areas.</p> <p>Town centres</p> <p>9. Barking's major town centre and the district centres of Chadwell Heath, Dagenham Heathway and Green Lane, together with proposed new district centres at Barking Riverside and Merrilands Crescent, will remain as our focus for retail development and complementary commercial, cultural and community uses. At a neighbourhood level, existing neighbourhood centres will also continue to have an important role in providing for convenience shopping.</p> <p>Key transport improvements</p> <p>10. Delivery of key transport improvements, which support strategic links into London, regionally and internationally will be promoted through providing greater access to the rail network, new and enhanced local public transport and walking and cycling connections, which address the north-south severance across the borough and the barrier created by the A13.</p> <p>11. We will plan and seek funding to deliver more sustainable travel programmes including Liveable Neighbourhoods, and continuing our School Streets Programme, which promote good streetscape, healthy streets, and road safety through more 20mph zones. This will provide benefits in terms of air quality and health, and with new infrastructure it will encourage cycling and walking and reduce reliance on car use.</p> <p>12. Our vision, proposals and delivery plans are set out in our borough-wide Transport Strategy and Chapter 10.</p> <p>Social and sustainable infrastructure</p> <p>13. We will seek the delivery of other social and sustainable infrastructure, identified in the Council's most up-to-date Infrastructure Delivery Plan, which will be prioritised as follows:</p> <ul style="list-style-type: none"> a) expanded education provision; b) primary health care facilities; c) parks and open spaces; d) new or improved community and cultural facilities; e) energy infrastructure including District Heat networks; and, f) improved digital infrastructure 	
<p>STRATEGIC POLICY 1. SPP1: Barking and</p>	<p>We are committed to the transformation of Barking town centre into a great place for people. Its historic past will be rediscovered</p>	<p>Likely Significant Effects</p>

Policy	Description	Likely Significant Effects
<p>the River Roding Area</p>	<p>and strengthened as part of its evolution into a 21st century town centre. This will mean new homes and reinvigorated shopping, leisure and workspace facilities, the rediscovery and animation of its historic buildings and the opening of the Roding River side to achieve the borough's new creative and cultural centre.</p> <p>2. Barking station will be strengthened by delivering new homes, offices and a hotel. The heritage listed concourse will be brought back to its former glory and become a gateway fit for the future. East Street will form a spine connecting life from the station to Abbey Green. A new riverside walk from Town Quay to the River Thames will animate the Roding with residential and commercial development, cafes and creative workspaces. We will also be bringing forward a comprehensive delivery plan for Gascoigne East and West to provide more and better homes for local people.</p> <p>Development potential</p> <p>3. In this area there is indicative capacity for 16,175 new homes in the plan period. The key site allocations are illustrated in Figure 7.</p> <p>Barking Town Centre and the River Roding Transformation Area</p> <p>4. To deliver our vision (see figure 6) development proposals should be consistent with the principles listed below.</p> <p>a) Planning for a comprehensive mixed-use development of retail, cultural and community uses alongside office and residential development. This will be supported by a broad range of social infrastructure, including schools, childcare facilities, health services, places of worship, libraries, youth facilities, sport and leisure facilities, all of which contribute to the quality of life and well-being of the population.</p> <p>b) Renewal of the Barking Station by working with the rail industry to upgrade access and capacity in line with Network Rail's increased passenger projections.</p> <p>c) Any buildings taller than prevailing heights must recognise the historic quality of the existing environment and realise the potential to increase its capacity and provide a fitting gateway to the town centre and the borough as a whole.</p> <p>d) Conserving and enhancing heritage and cultural assets, having regard to the Council's latest guidance on Barking Town Centre and Abbey Conservation Area.</p> <p>e) Working with existing operators to retain and develop Barking's street markets role as a commercial and community offer area in their current location.</p> <p>f) Continued improvements to the public realm between key buildings, the introduction of urban greening and the creation of a lively street culture and safe environment in East Street, reinforcing the role of this area as an important social asset for the borough.</p> <p>g) Continued improvements to the public realm around Barking Station, addressing anti-social behaviour, including trials to make the Station Parade area safer with pedestrian, taxi and bus only. Improving public transport and cycle access to the town centre and promoting car-free developments near the station.</p> <p>h) Reducing the perceived separation between the High Street, Abbey Green and the River Roding, repositioning Town Quay and Abbey Green as a focal point of the Town Barking Town Centre and the River Roding Transformation Area Centre and strengthening pedestrian and cycle routes and way-finding in the entire area, opening up access to and attracting visitors to the River Roding.</p> <p>i) Promoting further measures to improve access across the Town Centre, in line with the Barking Town Centre Movement Strategy.</p>	<p>This policy regards delivering growth within the Barking and River Roding Area. This policy supports the development of 16,175 new homes in the plan period.</p> <p>New development may cause an increase in some impact pathways which can cause a likely significant effect upon international sites in combination including:</p> <ul style="list-style-type: none"> e) Recreational pressure f) Air pollution g) Water resources h) Water quality

Policy	Description	Likely Significant Effects
	<p>Gascoigne Estate</p> <p>5.</p> <p>The emerging Gascoigne ‘Big Picture Neighbourhood Strategy’ is under development and will include design principles to support implementation of this policy in a co-ordinated and comprehensive fashion. Development proposals should be consistent with the principles listed below.</p> <ul style="list-style-type: none"> a) Locating community buildings in strategic places to create points of attraction and more active street frontages. b) Restoring the historic grid pattern in Gascoigne Estate through more legible connections and fine grain permeability that allows ease of movement and creates a more walkable environment. c) Establishing a clearly defined hierarchy of public, private and semi-private outdoor spaces, which are tailored to fit well in the context of the fine grain permeability and promotes activity and play. d) Enhancing biodiversity value throughout the area, including tree planting in appropriate locations and retention of the existing London Plane trees that line and characterise Abbey Road. <p>Barking Town Square</p> <ul style="list-style-type: none"> e) Deliver an integrated nature-based blue and green strategy, providing flood mitigation and adaptation measures to comply with the Local Plan policy DMNE4 and DMSI 6. f) Creation of new high-quality places through a clearly defined hierarchy of spaces, homes and articulated architecture to strengthen the identity of the place; the massing and typology should be varied across the site to allow for a different silhouette and scale depending on view. <p>Harts Lane Estate, Hertford Road Industrial Estate and Wickes</p> <p>6.</p> <p>Development proposals should be consistent with the principles listed below.</p> <ul style="list-style-type: none"> a) Planning for a comprehensive mixed-use development of commercial and community uses alongside residential development. This will be supported by a broad range of social infrastructure, including schools, open spaces, community centre, health care facilities, places of worship and a new river crossing. b) Deliver high quality design, amenity space and improvements to the public realm by working collaboratively with other developers and landowners from adjacent sites to form a north-south link along the river path. c) The scale and massing of development should contribute to the creation of a new coherent townscape which responds positively to its existing and emerging context. d) Provide river side towers and gateway blocks facing the Northern Relief Road. e) Create a green link at the heart of Harts Lane to link the River Roding to Barking Park with new civic space on the river front. f) Create a new legible hierarchy of pedestrian, vehicular and cycle routes into the existing fabric to connect the neighbourhood with an additional access from the Northern Relief Road (A124). g) Create a new pedestrian bridge across the River Roding to link the sites together and improve accessibility. h) Include a new green pedestrian link over rail to Barking Park towards the east. i) Enhancement of existing social infrastructure including an opportunity to expand existing schools. <p>Vicarage Field Shopping Centre</p> <p>7.</p>	

Policy	Description	Likely Significant Effects
	<p>Development proposals should be consistent with the principles listed below.</p> <p>a) Work collaboratively with key stakeholders to improve and transform the site as an important gateway opposite Barking Train Station, enhancing the immediate environment and create new housing and employment opportunities.</p> <p>b) Deliver comprehensive redevelopment of the Shopping Centre as a high-quality and high-density mixed-use development, which responds to the existing built form.</p> <p>c) Contribute to the vitality of the centre and reinstate it as a natural part of the pedestrian network with new routes connecting with existing streets and movement patterns.</p> <p>8. The preparation of a Master plan SPD is anticipated for Barking Town Centre (including Barking Station, East Street, Town Quay and Harts Lane). The emerging Gascoigne 'Big Picture Neighbourhood Strategy' is also under development and will include design principles to support the implementation of this policy where it relates to the Gascoigne Estate.</p> <p>9. Development within this area is to come forward in accordance with the relevant approved Masterplan SPDs and Neighbourhood Strategies and proposals will be expected to demonstrate how they deliver comprehensive and co-ordinated redevelopment in accordance with these documents.</p> <p>10. Proposals for piecemeal development which may undermine the delivery or viability of the comprehensive and co-ordinated redevelopment of these areas in accordance with the approved Masterplan SPDs or Neighbourhood Strategies will not be supported.</p>	
<p>STRATEGIC POLICY SPP2: Thames and the Riverside</p>	<p>1. Our plan is to create one new integrated community, a whole new Thames side district of London with more homes and better industry in improved, intensified space. Masterplan led growth will deliver new integrated sustainable communities. The new rail and river connections will join Thames Riverside to Barking town centre and the rest of London. The A13 will be improved, upgraded and, subject to funding and Government support, undergrounded to create one contiguous Borough community.</p> <p>2. Thames Road will be re-developed providing new homes and a new street network linking the rest of the Borough to Barking Riverside. Castle Green will have its industrial uses reduced, intensified, improved and pushed to the periphery with new homes delivered as part of the overall area's regeneration following the undergrounding of the A13. A new town centre will be born at the heart of Barking Riverside, anchored by culture, sustainability and life generating uses.</p> <p>Development potential</p> <p>3. In this area there is indicative capacity for 15,619 new homes and approximately 119,260 sq.m of industrial floorspace in the plan period. The key site allocations are illustrated in Figure 9 below.</p> <p>Barking Riverside Transformation Area</p> <p>To deliver our vision (see Figure 8) development proposals should be consistent with the principles listed below.</p> <p>4. A comprehensive and co-ordinated residential-led redevelopment of Barking Riverside, by working collaboratively with Barking</p>	<p>Likely Significant Effects.</p> <p>This policy provides for the broad location (Thames and the Riverside) of 15,619 new homes during the plan period. A portion of this strategic area is located within 6.2km of Epping Forest SAC.</p> <p>New development may cause an increase in some impact pathways which can cause a likely significant effect upon international sites in combination including:</p> <ul style="list-style-type: none"> i) Recreational pressure j) Air pollution k) Water resources

Policy	Description	Likely Significant Effects
	<p>Riverside Limited and Transport for London to provide significant transport infrastructure including:</p> <ul style="list-style-type: none"> i. The extension of London Overground; ii. The extension Thames Clipper Services; iii. Significant investment in bus services; and, iv. On site walking and cycling. <p>a) Intensifying residential, commercial and leisure development in the new District Centre</p> <p>b) On-site social infrastructure projects that create capacity for additional new homes and accelerate delivery, enabling new primary school provision</p> <p>c) Sustainable places that create a new local identity and distinctive character within the area, each defined by location, density, form and materiality. Provide a sensitive design response to the riverside and focusing on higher density development and taller building forms within the new District Centre and elsewhere where appropriate</p> <p>d) 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</p> <p>e) A central boulevard to create a central spine through the area with a dedicated bus-only route</p> <p>f) High-quality, new open space across the entire site, divided between public parks and a more natural landscape</p> <p>g) East-west green links connecting existing green infrastructure assets and:</p> <ul style="list-style-type: none"> i. Linking Barking Riverside to River Road; ii. Removing physical and perceptual barriers between Barking Riverside and Thames View Estate; and, iii. Prioritising access to the Riverside by opening up 2km of riverfront to walkways and cycle ways. <p>h) High-quality design that reflects the 10 'Healthy New Town Principles' in development.</p> <p>Castle Green Transformation Area</p> <p>5. Castle Green is an industrial area currently allocated as Strategic Industrial Land (SIL) but identified as a key Transformation Area to be developed during and beyond the plan period to deliver new local and regional benefits. Castle Green has potential to deliver a major new community with circa 10,000 new homes, new jobs, supported by community infrastructure and new green space.</p>	<p>I) Water quality</p>

Policy	Description	Likely Significant Effects
	<p>The eastern section contains the existing Euro-hub site with opportunities for enhanced rail/freight links from Europe and onward across the UK by rail or road.</p> <p>6. Development is currently blighted by the existing A13 Lodge Avenue flyover (see below) which severs the Borough, dividing communities. The Borough is working with key stakeholders (Government, TfL and Homes England) to examine options to replace the flyover, which is no longer fit-for-purpose and a safety hazard. Plans include undergrounding the A13 to remove the physical severance, as part of a comprehensive masterplan solution benefiting Castle Green and also the London Riverside Area.</p> <p>7. The tunnel would be part of an overall transport vision for the area, including a new overground station at Castle Green and supported by additional public transport and cycling and walking links to create a new, sustainable community.</p> <p>8. The business case for A13 improvements and the Castle Green Masterplan will be brought forward over the next two years. This is supported by the evidence in the Industrial Land Strategy which identifies scope for releasing some industrial floorspace at Castle Green in the longer term. However, the ILS makes clear that such consideration is subject to the delivery of schemes to tunnel the A13 and a new station.</p> <p>9. The SPD for Castle Green will also identify key infrastructure requirements and accommodate the delivery and phasing of A13 improvement works necessary to provide suitable environmental conditions for residential use. Any proposals for the release of SIL or change of use within the Transformation Area is only to come forward in accordance with the approved masterplan and comprehensive delivery strategy as per Policy DME1 and London Plan Policy E7. Proposals for piecemeal development which may undermine the delivery or viability of the comprehensive and co-ordinated redevelopment in accordance with this approach will not be supported.</p> <p>Thames Road Transformation Area</p> <p>10. Development proposals should plan positively to deliver the place vision (see Figure 8) by delivering the following:</p> <ul style="list-style-type: none"> a) A thriving mixed-use neighbourhood characterised by a rich mix of industrial and commercial space alongside new homes, community uses, schools and open space, in accordance with the latest Masterplan SPD b) incorporate innovative typologies that intensify land use and optimise site potential, including multi-storey industrial and co-located industrial and residential uses c) provide high quality, mixed tenure housing for local people and working Londoners with new homes and jobs near to and stitched together d) create an improved streetscape and active frontages to industrial and commercial plots e) deliver additional pocket squares and gardens to support a new mixed-use centre, plant new trees and vertical greening to improve air quality and introduce new sustainable drainage systems f) create a new legible identity and sense of place for Thames Road whilst retaining its distinctive industrial character g) promote sustainable modes of transport including car lite and car free principles 	

Policy	Description	Likely Significant Effects
<p>STRATEGIC POLICY SPP3: Dagenham Dock, Beam Park and Stamping Plant</p>	<ol style="list-style-type: none"> 1. Dagenham Dock is the Borough’s economic heart. A home to the next generation of sustainable industries, London’s wholesale markets and potentially opportunity for a freeport. International rail access providing unrivalled opportunity for investment and industrial intensification leading to more and better jobs. Ford’s 20th century car production will be encouraged to evolve into the 21st century sustainable industry, creating jobs and opportunity for the future. 2. New housing at Beam Park and the former Stamping Plant will bring thousands of new homes, supported by an improved public realm, sustainable transport modes and social infrastructure to create a cohesive new community. These new residential districts will be anchored by a motoring heritage attractor of regional significance. <p>Development potential</p> <ol style="list-style-type: none"> 3. In this area there is indicative capacity for 6,011 new homes and approximately 647,636 sq.m of industrial floorspace in the plan period. The key site allocations are illustrated in Figure 10 below. <p>Dagenham Dock Transformation Area</p> <ol style="list-style-type: none"> 4. To deliver our vision (see Figure 10) development proposals should be consistent with the following principles: <ol style="list-style-type: none"> a) Redevelopment of the area, incorporating sustainable and green industries and building on the location's logistics, food and energy operations b) Capitalising on the extensive road, rail and river infrastructure connections, which provide national and international connections, including a rail hub as part of the proposed Freeport c) Having full regard to the consented scheme at Barking Riverside and to engage with Barking Riverside Limited in the common interest of securing the benefits and comprehensive regeneration of London Riverside and Strategic Opportunity Area d) The successful relocation and consolidation of London’s three wholesale city markets – Billingsgate, Smithfield and New Spitalfields, enabling development that will support its operation within the Borough e) Expansion and intensification of employment floorspace enabling wider regeneration opportunity for the Thames Freeport in Dagenham (see also below) f) Supporting the development of existing rail, maritime and river transport infrastructure to be utilised within the wider area and the Thames Estuary as a whole g) A new secondary school to the north of the area, at the Ford Stamping Plant site; and a new primary school at the GSR & Gill site 	<p>Likely Significant Effects.</p> <p>This policy provides for the broad location (Dagenham Dock, Beam Park and Stamping Plant) of 6,011 new homes during the plan period.</p> <p>New development may cause an increase in some impact pathways which can cause a likely significant effect upon international sites in combination including:</p> <ul style="list-style-type: none"> m) Recreational pressure n) Air pollution o) Water resources p) Water quality

Policy	Description	Likely Significant Effects
	<p>h) Strengthening links to Dagenham Dock Station with a clear hierarchy of movement routes through the site up to New Road. There will be a strong focus on improved visual connections, including new bus cycle walking links incorporating enhanced green infrastructure.</p> <p>i) improving road and bus links along Kent Avenue to improve access to the Freeport and the City Markets</p> <p>j) removing the ser vice bridge across Chequer s Lane to improve the visual appearance in this area and public realm .</p> <p>k) 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.</p> <p>5. The Council may also develop a vision plan for the south of the Borough in order to set out how the Masterplan SPDs will integrate with each other and how the spaces between them will be managed.</p> <p>Thames Freeport in Dagenham</p> <p>6. The Thames Freeport is an economic zone connecting Ford's Dagenham engine plant to the global ports at London Gateway and Tilbury, with an emphasis on introducing electric and autonomous vehicle technology. The Freeport will combine a customs zone with tax zone deigned to incentivise and encourage new investment.</p> <p>7. The Ford estate will diversify through reuse, redevelopment and intensification of industrial use with new businesses moving in. River connectivity will be improved and works undertaken to allow larger ships to access the wharves. The site also offers unrivalled international rail connectivity.</p> <p>8. Development of an open access international intermodal rail terminal will be supported and any development proposals on the Ford site will need to demonstrate they do not prejudice the potential for delivery of such a rail terminal.</p> <p>9. The Council may develop a vision plan for Dagenham Dock in order to set out how the Freeport will be delivered and integrated with the surround area.</p> <p>Beam Park Transformation Area</p> <p>10. The Council will continue to support the comprehensive redevelopment of Beam Park by working collaboratively with the Greater London Authority, London Borough of Havering and other stakeholders to support development that contributes to the delivery of a thriving, mixed-use residential neighbourhood supported by health, education and other community infrastructure in line with the Council's latest Infrastructure Delivery Plan. The Council will support development that delivers:</p> <p>a) New affordable family homes with low rise housing terraces;</p>	

Policy	Description	Likely Significant Effects
	<p>b) Two new primary schools and a new medical centre;</p> <p>c) A station square to provide a new retail and commercial focus to the area, integrated with the planned new transport interchange – Beam Park Station;</p> <p>d) New park and community meeting spaces in an open space and parkland setting to form a natural meeting place for the neighbourhood;</p> <p>e) New hierarchy of routes for safe connections within and between neighbourhoods; a street pattern provides wide shared footpaths and cycle routes;</p> <p>f) A landscape identity that creates clear wayfinding links to and from the park; visible verdant environments that can double for amenity and ecological value;</p> <p>g) A green corridor providing a pedestrian connection to the station and enhancements to the pedestrian and cycle network across the area.</p> <p>h) Strengthen the relationship with adjacent land/areas, including Dagenham Dock and Castle Green Transformation Areas and Merrielands Crescent</p> <p>i) Provide flood mitigation and adaptation measures to comply with Local Plan DME4 and DMSI 6.</p> <p>Ford Stamping Plant</p> <p>11. The Council will support development in this location which:</p> <p>a) Provides a comprehensive residential-led mixed-use development including flexible community and commercial floorspace</p> <p>b) Supportive social infrastructure including a 10-form intake secondary school, cultural facilities and open space</p> <p>c) Creates a coherent townscape which responds positively to its existing and emerging context, including amenity space and improved public realm</p> <p>d) Integration of improved public transport links including new accessible bus stops and improved accessibility to Dagenham Dock station</p> <p>e) Create an improved walking environment to allow access to employment sites, retail hubs and the proposed secondary school.</p>	

Policy	Description	Likely Significant Effects
	<p>Merrielands</p> <p>12. The Council will support development in this location which:</p> <ul style="list-style-type: none"> a) Strengthens the relationship with adjacent land/areas including Merrielands Crescent One and the Transformation Areas at Beam Park and Dagenham Dock b) Contributes to the creation of a new district centre for the wider area c) Provides flood mitigation and adaptation measures in line with Local Plan policy DMNE4 and DMSI6 d) Promotes sustainable modes of transport and incorporates car free and car lite principles <p>GSR and Gill Sites</p> <p>13. The Council will support development in this location which:</p> <ul style="list-style-type: none"> a) delivers outstanding design and makes a positive contribution to the local character and neighbourhood b) Improves links with the site to the north and Stamping Plant and new public realm and accessibility to the station to the south as well as the roads to the north and west c) Delivers improvements to the overall quality of the greenway d) The scale and massing of development should contribute to the creation of a new coherent townscape which responds positively to its existing and emerging context. e) Seeks to minimise car parking in the location with the delivery of car lite and car free principles 	
<p>STRATEGIC POLICY SPP4: Chadwell Heath and Mark's Gate</p>	<p>1. Chadwell Heath is one of the biggest remaining regeneration opportunities at a Crossrail station. The industrial estate will be comprehensively redeveloped to create new homes as well as improved and intensified industrial space. This will see new homes stitched into the existing residential neighbourhoods, adding new services and social infrastructure, improvements to local transport and the renewal of the whole public realm.</p> <p>2. North of Chadwell Heath, Marks Gate will be sensitively improved to deliver more and better homes with further work to review the existing flatted parts of the estate and improvements to wider infrastructure necessary for any further expansion, including the impact of the development of the neighbouring de-designated Green Belt land in Redbridge.</p>	<p>Likely Significant Effects.</p> <p>This policy provides for the broad location (Chadwell Heath and Mark's Gate) of 4,839 new homes during the plan period.</p> <p>New development may cause an increase in some impact pathways</p>

3. Masterplan SPDs for the Chadwell Heath and Marks Gate Transformation Areas will provide further details and policy guidance to shape proposals for these Transformation Areas.
4. Development proposals will be expected to demonstrate how they deliver comprehensive and co-ordinated redevelopment in accordance with the relevant Masterplan SPD. Proposals for piecemeal development which may undermine the delivery or viability of the comprehensive and co-ordinated redevelopment of the area in accordance with the Masterplan SPD will not be supported.

Development potential

5. In this area there is indicative capacity for 4,839 new homes in the plan period. The key site allocations are illustrated in Figure 12 below.

Chadwell Heath Transformation Area

6. Development proposals should plan positively to deliver the place vision (see Figure 11) by appropriate delivering the following:
- a) A comprehensive delivery of a new liveable mixed-use neighbourhood is planned – optimising the development potential arising from Crossrail – to deliver new homes and jobs that are integrated with existing neighbourhoods
 - b) Intensification and modernisation of industrial activities and integration of these with, potentially, new media, film and gaming uses as part of a mixed-use neighbourhood including residential. Innovative new typologies that enable the co-location of industrial and residential uses will be encouraged and supported in the appropriate locations
 - c) New homes supported by expanded social infrastructure, including two primary schools and one secondary school
 - d) Development that is seamlessly woven into the surrounding context with an appropriate massing strategy that responds to the existing context and urban grain focusing:
 - I. larger-scale development, including buildings significantly taller than prevailing heights scaling upwards to the heart of the Area
 - II. smaller, lower-scale buildings on the perimeter to respond to the existing terraced housing.
 - e) Establishing a 'sense of place' and local identity through the creation of distinctive character areas across the neighbourhood, each defined by location, density, form and materiality
 - f) Improvements to Freshwater Road and Selina's Lane for vehicular access and public transport

which can cause a likely significant effect upon international sites in combination including:

- q) Recreational pressure
- r) Water resources
- s) Water quality

Policy	Description	Likely Significant Effects
	<p>g) Improvements to the pedestrian environment and connections throughout the Area, including markers for intuitive wayfinding and links into the existing surrounding neighbourhoods</p> <p>h) Improvements to the green infrastructure network, including a green spine through the area connected to a variety of public realm spaces including parks and squares which are pedestrian and cycle friendly and integrated with existing street and movement patterns</p> <p>i) Enhancement and refurbishment of buildings with local heritage value.</p> <p>7. While the ILS identifies scope for the loss of industrial floorspace 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 floorspace across the Chadwell Heath Transformation Area. 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.</p> <p>8. Proposals resulting in the net loss of industrial floorspace across the Transformation Area will only be supported in accordance with Policy DME1 of the Local Plan, and will be expected to robustly demonstrate why this is justified through, for example, re-provision elsewhere in the Borough, a significant demonstrable uplift in the number and quality of jobs, and/or other significant material benefits that demonstrably meet the Council's regeneration aspirations as set out in this Local Plan.</p> <p>Marks Gate and Padnall Lake Transformation Area</p> <p>9. Marks Gate will be a focus of estate renewal and improvements to community facilities through proactive consultation and engagement with the existing community.</p> <p>10. A vision document will be developed to inform the strategic vision for the area which will seek to enhance the area through:</p> <p>a) Delivery of improved sustainable transport connectivity to surrounding neighbourhoods and open spaces, including east west connections throughout Marks Gate, and in particular connections across the A12 and towards Chadwell Heath station</p> <p>b) Enhancements to public realm, streetscape and open spaces, including maximising opportunities for greening to reflect the landscape character of the wider area</p> <p>c) Improving the vibrancy and facilities offered within the local centre.</p> <p>11. Further area specific guidance is likely to be set out in a Planning Brief, Masterplan SPD or similar appropriate guidance.</p>	

Policy	Description	Likely Significant Effects
	<p>12. The Council will work in partnership with the London Borough of Redbridge to ensure proposals complement housing development to the west of Marks Gate in terms of sustainable transport connections and community infrastructure.</p> <p>13. The Padnall and Reynolds Court and Padnall Hall site will be subject to estate renewal, seeking to:</p> <ul style="list-style-type: none"> a. Enable delivery of new, high quality homes with an improved public realm b. Improve sustainable transport links throughout the sites c. Provide supporting commercial and community uses. <p>14. The Padnall Lake site will be a significant focus on placemaking activity to create a more liveable residential area that development in this location must contribute to:</p> <ul style="list-style-type: none"> a) enabling delivery of more homes set in an improved public realm b) reconfigured and better located open space that improves quality, access and function c) provide small-scale community use d) enhancing areas for wildlife and biodiversity around Padnall Lake as part of any future development masterplans. 	
<p>STRATEGIC POLICY SPP5: Dagenham East and Dagenham Village</p>	<p>1. Dagenham East is now developing a new life as the centre of London's ever-growing film sector. Other businesses are also beginning to wrap the film studio site including University College London's transport research facility (PEARL), a tech business hub and the data industry. We will turn Dagenham East into a centre for modern media and research-based business.</p> <p>2. We are seeking to reopen the adjoining mainline station to provide faster connections to central London and the Thurrock Freeports. We will develop the area around the station into a gateway to provide new homes and a hotel. In the wider area we will support future intensification of industrial uses and residential areas will be sensitively improved and enhanced, bringing village character to post war suburban development. This will provide more and better homes and a great place for people to live.</p> <p>Development potential</p> <p>3. In this area there is indicative capacity for 1,200 new homes in the plan period. The key site allocations are illustrated in Figure 14 below.</p>	<p>Likely Significant Effects.</p> <p>This policy provides for the broad location (Dagenham East and Dagenham Village) of 1,200 new homes during the plan period.</p> <p>New development may cause an increase in some impact pathways which can cause a likely significant effect upon international sites in combination including:</p> <ul style="list-style-type: none"> t) Recreational pressure u) Water resources

Policy	Description	Likely Significant Effects
	<p>Dagenham East Transformation Area</p> <p>4. To deliver our vision (see figure 14) Development proposals should be consistent with the principles listed below.:</p> <ul style="list-style-type: none"> a) A residential-led mixed-use development at Ibscott Close which should aim to deliver outstanding design and have regard to its local context, making a positive contribution to the local character and neighbourhood b) A new media, science and technology cluster is planned alongside the expanded development of new homes that are well integrated with existing residential neighbourhoods c) London's newest and largest film studios on the former May and Baker site d) Special education needs school provision e) Improvements to the environmental quality and public realm in the district centre f) Improvements to the Green infrastructure network including: <ul style="list-style-type: none"> I. new Green Infrastructure grid route – Wood Lane and Rainham Road North II. Reede Road, Rainham Road and Foxlands Crescent III. linkages to Thames Chase Community Forest IV. new Green Infrastructure grid route – Wood Lane and Rainham Road North V. Reed Road, Rainham Road and Foxlands Crescent VI. linkages to Thames Chase Community Forest <p>Dagenham Village</p> <p>5. Dagenham Village is the historic heart of Dagenham, and the design will need to respond to this unique and sensitive development context. Development proposals must comply with the local plan policies and the Dagenham Village Conservation Area Character Appraisal (or its updated equivalent) to preserve and where possible enhance the Borough's</p>	<p>v) Water quality</p>

Policy	Description	Likely Significant Effects
	<p>historic environment.</p> <p>6. The Council will support and enable the delivery of infrastructure to support communities in Dagenham East and Village to ensure development is sustainable. Key infrastructure interventions and projects planned include:</p> <ul style="list-style-type: none"> a) flood defences including measures to reduce flood risk at Dagenham East Station and numerous defence structures along the Wantz Stream b) transport and connectivity improvements, including the new C2C station at Dagenham East and Dagenham East Station Accessibility Scheme c) digital infrastructure enhancements including telecommunications and fast broadband d) healthcare facilities (e.g. new primary care hub) e) early years facilities f) parks and open spaces g) community centres and faith spaces h) children's play and youth facilities a) 	
<p>STRATEGIC POLICY SPP6: Dagenham Heathway and Becontree</p>	<ul style="list-style-type: none"> 1. Dagenham Heathway is currently the Borough's second town centre despite its modest size, serving the wider Becontree area. Our plan is to reinvigorate the Heathway as the heart of the Becontree and Dagenham community, and build on its gateway connection on the District Line. 2. We will pursue the redevelopment of the shopping centre and make it fit for the 21st century, including options to provide new dwellings above the centre. 3. The historic Becontree estate will see the least development in the Borough in order to protect its existing character. We will support light touch interventions to help it thrive into the future. <p>Development potential</p> <ul style="list-style-type: none"> 4. In this area there is indicative capacity for 1,194 new homes in the plan period. The key site allocations are illustrated in Figure 16 below. 	<p>Likely Significant Effects.</p> <p>This policy provides for the broad location (Becontree) of 1,194 new homes during the plan period.</p> <p>New development may cause an increase in some impact pathways which can cause a likely significant effect upon international sites in combination including:</p> <ul style="list-style-type: none"> w) Recreational pressure x) Water resources y) Water quality

Policy	Description	Likely Significant Effects
	<p>Dagenham Heathway Transformation Area</p> <p>5. To deliver our vision (see figure 16) development proposals should be consistent with the following principles:</p> <ul style="list-style-type: none"> a) A comprehensive mixed-use redevelopment of Dagenham Heathway shopping centre to comprise of modern retail accommodation which better services the needs of local residents b) Ensure that the redevelopment of the shopping centre provides continuity of trade by retaining existing retailers in the new scheme c) Improved public realm and permeability of the shopping centre to provide a more accessible and pedestrian friendly environment. d) Deliver a coordinated approach with the surrounding area, including incorporation of the Lidl and Iceland stores e) Improvements to transport and connectivity, with new cycle lanes, improved bus priority and improved road junctions including Gale Street and Reede Road f) Dagenham Heathway station access improvements g) Deliver outstanding design and have regard to its context, making a positive contribution to local character within its neighbourhood h) Minimise car parking in the location to create liveable or low-traffic neighbourhoods, with measures to improve safety, health and air quality <p>Becontree Estate</p> <p>6. All development (including any extensions) must integrate with the existing character of the area and enable preservation and restoration of the historic fabric of the estate. A detailed design code may be prepared to support the delivery of the Local Plan to supplement this policy.</p> <ul style="list-style-type: none"> a) Inclusion of the urban 'set pieces' and street types that are unique to the area b) Improvements to the public realm, including greening and tree planting, , street furniture, signage and lighting 	

Policy	Description	Likely Significant Effects
	<ul style="list-style-type: none"> c) Improvements to Parsloes Park, including the expansion of sports facilities d) Rationalised car-parking and improved cycle links to the new Crossrail Station at Chadwell Heath e) Retention of small shops and services where they meet community needs f) Improvements to shopfronts and reintroducing awnings g) Improvement to the Green infrastructure network, including the east-west green grid route (Porters Avenue and Parsloes Avenue) h) Improvements to transport and connectivity, including Becontree Station access improvements i) Creation of liveable or low-traffic neighbourhoods, with measures to improve safety, health and air quality including measures to reduce speeding and rat-running j) Digital Infrastructure improvements e.g. fast broadband k) Early years facilities, primary and secondary school places l) Special education needs school provision m) Parks and open spaces n) Indoor and outdoor sports facilities o) Community centres and faith spaces p) Children’s play and youth facilities. <p>A Masterplan SPD for Dagenham Heathway is proposed and will provide further details and policy guidance to shape proposals for this part of the Transformation Area including the approach to the design and delivery of the required supporting infrastructure. Development within the Masterplan SPD area is only to come forward in accordance with the adopted Masterplan SPD. Development proposals will be expected to demonstrate how they deliver comprehensive and co-ordinated redevelopment in accordance with the Masterplan SPD. Proposals for piecemeal development which may undermine the delivery or viability of the comprehensive and co-ordinated redevelopment of the area in accordance with the Masterplan SPD will not be supported.</p>	

Policy	Description	Likely Significant Effects
<p>STRATEGIC POLICY SPP7: Becontree Heath and Rush Green</p>	<p>1. Becontree Heath is home to Coventry University London and provides a thriving community and commercial hub. This will be strengthened with spot redevelopment interventions delivered as part of an illustrative masterplan identifying opportunities to deliver more and better homes.</p> <p>Development potential</p> <p>2. In this area there is indicative capacity for development of 258 new homes. The key site allocations are illustrated in Figure 18 below.</p> <p>3. The Council will support environmental and connectivity improvements across the area and build on the successful integration of Coventry University's new campus by expanding education and other social infrastructure. The Council will also support development that contributes to:</p> <ul style="list-style-type: none"> a) smaller-scale development of new homes that are well-integrated with the existing area b) improvements to pedestrian routes through the area including strengthening east-west walking and cycle links c) a continuous walking or cycling route, running through the green belt edge and waterways that follow the eastern edge of through to Hainaut Country Park d) restoration and improvements that preserve or reinstate original features in existing 1930's suburban homes that are characteristic of the northern part of Rush Green e) active ground floors in development that comes forward on Dagenham Road public realm improvements throughout the area, in particular Rainham Road High and the area of Dagenham Civic Centre and other key points of interest in this area f) improvements to the Green infrastructure network, including a new Green Infrastructure grid route at Wood Lane and Rainham Road North and improved linkages to Thames Chase Community Forest. <p>4. Infrastructure that is required to support sustainable development, identified in the Infrastructure Delivery Plan will be supported, including:</p> <ul style="list-style-type: none"> a) transport and connectivity improvements, for example, Wood Lane roundabout b) improvements to bus services and connections to ensure good public transport access 	<p>Likely Significant Effects.</p> <p>This policy provides for the broad location (Becontree Heath and Rush Green) of 258 new homes during the plan period.</p> <p>New development may cause an increase in some impact pathways which can cause a likely significant effect upon international sites in combination including:</p> <ul style="list-style-type: none"> z) Recreational pressure aa) Water resources bb) Water quality

Policy	Description	Likely Significant Effects
	<ul style="list-style-type: none"> c) digital infrastructure improvements d) fire and rescue service e) early years facilities, primary and secondary schools f) parks and open space g) community centres and faith spaces h) children’s play and youth facilities. 	
<p>STRATEGIC POLICY SP 2: Delivering a well-designed, high-quality and resilient built environment</p>	<p>1. The Council will promote high-quality design, providing safe, convenient, accessible and inclusive developments and interesting public spaces for all through:</p> <ul style="list-style-type: none"> a) adopting a design-led approach to optimising density and site potential by responding sensitively to local distinctiveness b) ensuring that developments relate to their local context, incorporating and interpreting local character and, where applicable, using this to inform detail, materials and landscape, which will reinvent the Borough as a distinctive place in its own right c) ensuring developments create well-designed homes that are flexible enough to accommodate different ways of living and respond to social infrastructure needs over time d) supporting development that aims to create attractive, engaging spaces which are more likely to be well-used and resilient for the future e) supporting development that improves and facilitates active lifestyles, and improves the wellbeing of new and existing communities f) supporting development that harnesses the potential for improved quality and innovative Modern Methods of Construction (MMC), and adheres to the Local Plan policy DMSI 1: sustainable design and construction 	<p>No Likely Significant Effects</p> <p>This policy outlines the provision of well-designed, high quality and a resilient built environment. There are no linking impact pathways present and thus, no likely significant effects.</p>

Policy	Description	Likely Significant Effects
	<ul style="list-style-type: none"> g) adopting the Circular Economy principles in the design of developments, demonstrating actions taken to reduce resource use and embodied carbon throughout the building lifecycle and aiming to achieve net zero-waste. A Circular Economy Statement should be submitted with referable planning applications, in line with requirements of the London Plan Policy SI 7: reducing waste and supporting the circular economy h) preserving or enhancing the Borough's heritage such as Eastbury Manor House, Valence House Museum, the Abbey Ruins and Dagenham Village, as well as conservation areas, and both designated and non-designated heritage assets in accordance with the Local Plan policy DMD 4: visitor accommodation i) protecting important identified views and vistas within the Borough in accordance with the Local Plan policy DMD5: local views. 	
<p>POLICY DMD 1: Securing high-quality design</p>	<ol style="list-style-type: none"> 1. The Council will support development proposals that make a positive contribution to the character of the surrounding area, have regard to the National Design Guide and/or its updated equivalent, design codes developed in accordance with the National Model Design Code and other local guidance. 2. All development proposals should expect: <ul style="list-style-type: none"> a) where appropriate, to be required to use mechanisms such as Section 106 agreements and planning conditions, to ensure that design quality is carried through into the detailed design and construction of the development. Amendments to the design of major applications may be subject to appropriate Section 106 monitoring contributions if the original architects or landscape architects are not retained for the detailed design stage. b) where appropriate, to demonstrate high-quality design as a result of early engagement with Planning Officers and the Barking & Dagenham Quality Review Panel (QRP)⁴³ in accordance with its Terms of Reference, or its equivalent j) where appropriate, to enable active lifestyle by designing for walkable neighbourhoods with attractive public realm and supporting infrastructure for walking and cycling⁴⁴, taking inspiration from Barking Riverside, London's first healthy new town⁴⁵; and Active Design Principles and guidance⁴⁶ (or its updated equivalent) 	<p>No Likely Significant Effects</p> <p>This policy outlines the provision for securing high quality design. There are no linking impact pathways present and thus, no likely significant effects.</p> <p>This is a positive policy as it encourages and supports sustainable transport such as walking and cycling.</p>

⁴³ For details, please visit: <https://www.lbbd.gov.uk/quality-review-panel>

⁴⁴ Please refer to the Council's latest walking and cycling strategy for information. – can we include a link?

⁴⁵ The 10 Healthy New Town Principles are available at: <https://www.england.nhs.uk/ourwork/innovation/healthy-new-towns/>

⁴⁶ <https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design>

Policy	Description	Likely Significant Effects
	<p>c) to be creative and innovative, recognising that existing local character and accommodating change is not mutually exclusive. Architecture should be responsive, inclusive, authentic, engaging, and have an enduring appeal.</p> <p>d) to seek to maximise opportunities for urban greening and biodiversity, and demonstrate that appropriate measures have been taken to protect or enhance the natural environment in accordance with Local Plan policies: DME 2: providing flexible, affordable workspace and DME 3: encouraging vibrant, resilient and characterful town centres</p> <p>e) to consider the impact on the amenity of neighbouring properties</p> <p>f) to assess how development may affect a site's archaeology in accordance with the Archaeological Priority Areas Appraisal (or its updated equivalent) and best practice guidance⁴⁷</p> <p>g) to demonstrate how avoidance or minimisation of harm to the local character and setting has been achieved through design and or mitigation; and agree appropriate mitigation with Planning Officers.</p> <p>3. Major and strategic development proposals (including estate regeneration schemes) should:</p> <p>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</p> <p>b) 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 and amenity space (private, communal and child play space)</p> <p>c) provide a range and mix of publicly accessible open spaces that promote biodiversity, safety, health and well-being</p>	

⁴⁷ London Borough of Barking and Dagenham Archaeological Priority Areas Appraisal (July 2016), Historic England is available at: <https://historicengland.org.uk/content/docs/planning/apa-barking-and-dagenham-pdf/>

Policy	Description	Likely Significant Effects
	<p>d) seek to achieve the highest standards of construction (e.g. MMC), and adhere to the Local Plan policy DMSI 1: sustainable design and construction.</p>	
<p>POLICY DMD 2: Tall buildings</p>	<ol style="list-style-type: none"> 1. Unless otherwise specified in localised Masterplan SPDs, Tall Buildings in the borough are taller than six storeys (or 18 metres) measured from ground to the floor level of the uppermost storey. 2. Development of tall buildings will be directed towards appropriate Tall Building Locations (as shown on the Policies Map and Figure XX below) and must accord with latest relevant national guidance, London Plan policies and relevant policies within Chapter 3 of the Local Plan. 3. 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. 4. Developments that include Tall Buildings must demonstrate how they: <ol style="list-style-type: none"> 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. 5. Development proposals that include Tall Buildings should be supported by: <ol style="list-style-type: none"> i. an appropriate townscape analysis (including verified views to demonstrate how they positively contribute to the skyline) 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. 	<p>No Likely Significant Effects</p> <p>This policy relates to tall buildings. There are no linking impact pathways present and thus, no likely significant effects.</p>
<p>POLICY DMD 3: Development in town centres</p>	<ol style="list-style-type: none"> 1. Proposals for development within town centres (designated boundaries are as defined shown on the Policies Map) should, where relevant and appropriate: <ol style="list-style-type: none"> a) respect the building lines of the existing urban environment and, where appropriate, build up to the edge of the curtilage 	<p>No Likely Significant Effects</p> <p>This policy relates to development in town centres. It does not outline any type or quantum of development. There are no linking impact pathways</p>

Policy	Description	Likely Significant Effects
	<p>b) co-ordinate and consolidate elements of street furniture, such as seating, bins, bollards, cycle stands and lighting, to streamline the appearance of the public realm and avoid visual clutter</p> <p>c) avoid the creation of inactive frontages and contribute positively to the street scene and public realm to coordinate the design of development around town centres consider street widths, crossings locations; integration of bus stands along with other public realm elements (as mentioned in b) above) and focus on reducing vehicle dominance along with promoting safe walking and cycling environment</p> <p>d) provide clearly defined public and private space, placing servicing away from street frontages, for example at the rear of building</p> <p>e) provide level access and ensure new development is fully accessible.</p> <p>2. New or replacement shop fronts are required to be robust and well-designed. Proposals must ensure that:</p> <p>a) they retain or restore traditional shop fronts and existing architectural and heritage features</p> <p>b) active shop fronts are well maintained in order to contribute positively to the building, street-scene and public realm</p> <p>c) a sensitive relationship is maintained between the shop front and the upper floors, with neighbouring shop fronts and surrounding buildings</p> <p>d) the use of materials is appropriate to and enhances the local character and value of existing architectural and historic features</p> <p>e) the use of external mounted shutters or solid roller shutters are avoided</p>	<p>present and thus, no likely significant effects.</p>

Policy	Description	Likely Significant Effects
	<p>3. Development outside town centres is set out in the Local Plan policy DME 3: encouraging vibrant, resilient and characterful town centres.</p>	
<p>POLICY DMD 4: Heritage assets and archaeological remains</p>	<p>1. The borough’s designated and non-designated heritage assets⁴⁸, conservation areas and Archaeological Priority Area (APA) are identified on the Policies Map.</p> <p>2. Other heritage assets and the wider historic environment will be identified, celebrated and promoted where relevant through the Council’s heritage strategy (or its updated equivalent).</p> <p>The Council will ensure that new development takes into account the wider social, cultural, economic and environmental benefits that the historic environment can bring. Developments should make a positive contribution to local character and distinctiveness while recognising the role of the historic environment to the character of place.</p> <p>Heritage assets</p> <p>Development proposals affecting designated and non-designated heritage assets of local importance will be granted provided they:</p> <ul style="list-style-type: none"> a) set out how the application accords with the latest relevant national guidance and London Plan policies b) demonstrate that the proposed development is appropriate in terms of height, scale and massing, form, materiality and detailing and its relationship to the surrounding context c) preserve the setting of the asset/s and its historic significance, and include hard and soft landscape proposals, where appropriate, that respect the character and appearance of the heritage asset; and d) demonstrate that the proposed use is the optimum viable use, which causes the least harm to the significance of the asset and its setting and secures its long-term viability e) agree an appropriate strategy for conserving, and where appropriate, enhancing in a manner appropriate to their significance as key and distinctive elements of the areas’ character having regard to the relevant Conservation Area Appraisal and Management Plan, as well as the Townscape and Socioeconomic Study (2017) (or its updated equivalent) f) seek to remove heritage assets from the Heritage at Risk Register in collaboration with Historic England and other relevant stakeholders. <p>Development proposals that affect the significance of any heritage assets must be accompanied by a Built Heritage Statement. The Built Heritage Statement must provide:</p> <ul style="list-style-type: none"> g) a description of the significance of any affected heritage assets and their settings h) how the application accords with the latest relevant national guidance and London Plan policies i) how the application justifies any harm to the significance of designated heritage assets j) how the application positively responds to the relevant heritage themes (as set out in the Council’s latest heritage strategy) in their design. 	<p>No Likely Significant Effects</p> <p>This policy relates to heritage assets and archaeological remains. There are no linking impact pathways present and thus, no likely significant effects.</p>

⁴⁸ London Borough of Barking and Dagenham’s conservation areas and listed buildings are available at: <https://www.lbbd.gov.uk/conservation-areas-and-listed-buildings>

Policy	Description	Likely Significant Effects
	<p>Where a development proposal would lead to harm to designated or non-designated heritage assets, they will be assessed against the relevant criteria in the National Planning Policy Framework, taking into account the scale of harm and the impact on the significance of the heritage asset</p> <p>Other heritage assets</p> <p>k) development within or affecting any heritage feature should respect its local context and avoid materially detracting from its significance, including its archaeological, architectural, historic, landscape or biodiversity interest, or harming its setting.</p> <p>Conservation areas</p> <p>l) development proposals affecting conservation areas or their settings will be supported where they preserve or enhance the character and appearance of the area including, the established local character of individual buildings and groups of buildings in accordance with the relevant Conservation Area Appraisal and Management Plan, as well as the Townscape and Socioeconomic Study (2017) (or its updated equivalent) and subject to proposals adhering to other relevant Local Plan policies.</p> <p>m)demolition of buildings or structures that are considered to make a positive contribution to a conservation area will not generally be permitted. In exceptional circumstances, where this is permitted, replacement buildings or structures must demonstrably preserve or enhance the conservation area's distinct character.</p> <p>Archaeological heritage</p> <p>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 or their setting will be not supported.</p> <p>o) where development is proposed on sites of archaeological significance or potential significance, the Council will require appropriate assessments or appropriate level of investigation and recording within an Archaeology Impact Statement before development proposals are determined.</p> <p>Scheduled monuments (designated heritage assets)</p> <p>p) the site of Barking Abbey is Barking and Dagenham's only scheduled ancient monument. It includes the ruins of the Abbey and most of Abbey Green. Works affecting the scheduled ancient monument (including repair works) are subject to a statutory consent regime administered by Historic England on behalf of the Secretary of State.</p>	
<p>POLICY DMD 5: Local views</p>	<p>1. The Council will protect the borough's local views identified on the policies map and set out as follows:</p> <p>a) View 1: The main view of the Malthouse south from the Mill Pool</p> <p>b) View 2: 360-degree views from junction of Station Parade, London Road and Ripple Road, north along Station Parade, east along Ripple Road and west along Linton Road</p> <p>c) View 3: From Town Quay across Abbey Green towards St Margaret's Church and Barking Town Hall</p>	<p>No Likely Significant Effects</p> <p>This policy relates to local views. There are no linking impact pathways present and thus, no likely significant effects.</p>

Policy	Description	Likely Significant Effects
	<ul style="list-style-type: none"> d) View 4: From the front of the Curfew Tower along East Street e) View 5: From the Ripple Road entrance of Vicarage Field shopping centre, Ripple Road, to 2 Town Square f) View 6: From in front of 32 East Street (currently the National Westminster Bank) towards the Curfew Tower, this gives a glimpse of the Abbey Green area and a hint of the Abbey beyond g) View 7: From the A406 across Town Quay towards St Margaret's Church and Barking Town Hall h) View 8: From the Mill Pool west towards Canary Wharf and south east towards Shooters Hill i) View 9: From the bridge on the A13 which crosses the River Roding towards the town centre and the Clock Tower. <ul style="list-style-type: none"> 2. Development must seek to positively contribute to the characteristics and composition of identified local views of significant landmarks relevant to the development proposal within Barking and Dagenham. 1. Development that affects the borough's local views (its updated equivalent) should provide Accurate Visual Representations (AVRs) to demonstrate the impact of the proposal upon them. 	
<p>POLICY DMD 6: Householder extensions and alterations</p>	<ul style="list-style-type: none"> 1. Householder extensions and alterations will need to be designed in a sensitive and appropriate manner. 2. Proposals must not significantly impact on quality of life for neighbouring residents. Development proposals must respect and complement the character of the area in which they are located and the appearance of the original house and the group of buildings of which it forms a part. The Council will expect that: <ul style="list-style-type: none"> i. Any proposed extension or alteration to a property should be sympathetic and subordinate to the design of the original dwelling with regards to scale, form, materials and detailing ii. An extension should not cause harmful visual impact upon the street scene, for example, the space between properties should be considered and any loss of such spaces should be avoided 	<p>No Likely Significant Effects</p> <p>This policy relates to residential extensions and alterations. There are no linking impact pathways present and thus, no likely significant effects.</p>

Policy	Description	Likely Significant Effects
	<ul style="list-style-type: none"> iii. Extensions should be designed to be respectful of neighbouring privacy, considering the impact on the amenity of neighbouring properties iv. Extensions should take into account the positive aspects of the existing roofscape of the area and seek to apply the same style as the roof of the original property including the pitch, eaves treatment and materials used v. An extension should be well laid out, bright, spacious and accessible for all vi. Any proposed extension or alteration should promote and enhance biodiversity vii. where practicable, any extension or alteration should be energy efficient and incorporate renewable energy sources 	
<p>POLICY DMD 7: Advertisements and signage</p>	<ul style="list-style-type: none"> 1. The Town and Country Planning (Control of Advertisements) (England) Regulations 2017 (as amended) sets out the different classes of advertisements and groups according to whether they require consent. Advertisements that do not fall into one of the classes in Schedule 1 or Schedule 3 of the regulations will need to be subject to an application for consent from the Council. 2. An excessive amount of signage can lead to visual clutter in the street scene and negatively impact on visual, amenity and public safety. The amount of signage must therefore be appropriate to the character of the area and must consider proximity to conservation areas and listed buildings. 3. Proposals for advertisements and signage are required (individually and cumulatively) to: <ul style="list-style-type: none"> a) avoid adverse impacts on amenity, including its visual and aural impact and impact on trees or other aspects of the natural and historic environment 	<p>No Likely Significant Effects</p> <p>This policy relates to advertisements and signs. There are no linking impact pathways present and thus, no likely significant effects.</p>

Policy	Description	Likely Significant Effects
	<ul style="list-style-type: none"> b) design fascias and projecting signs of an appropriate size and depth in relation to the building and respect its architectural features and be designed for public safety relevant to the safe use and operation of any form of traffic or transport for all users. 4. For illuminated displays, the illumination levels of advertisements should be in accordance with the guidance set by the Institute of Lighting Engineers PLG05 The Brightness of Illuminated Advertisements or its updated equivalent. The Council will resist the illumination of hoardings where it is a nuisance or out of character with the area 5. All outdoor advertisements are expected to be of high quality, well suited to the building or street for which it is proposed and makes a positive contribution to the appearance and character of an area; and to comply with the standard conditions outlined in the DCLG's Outdoor Advertisements and Signs: A Guide of Advertisers (2007)⁴⁹, or its updated equivalent 6. Free-standing signs, such as 'A boards on the public highway (which includes the pavement) will require a separate consent under the Highways Act for any temporary or permanent obstruction on the highway. 7. Proposals for new or replacement shop fronts must ensure that: <ul style="list-style-type: none"> a) signage location and design are sensitive and not overly dominant to the shop fronts and the surrounding area b) out of hours lighting is incorporated to enhance a well-lit, safe and secure streetscape. 	
<p>STRATEGIC POLICY SP 3: Delivering homes that meet peoples' needs</p>	<ul style="list-style-type: none"> 1. The Council will support the delivery of at least 44,051 new homes across the Borough between 2019 and 2037. This will be achieved through: <ul style="list-style-type: none"> a) focusing the majority of new housing in the identified Transformation Areas and site allocations, as set out in the Place policies (see Chapter 3: Transforming Barking and Dagenham) b) building council homes by developing residential-led schemes on council-owned land, and ensuring that these council-led schemes can also deliver the highest design standards in accordance with the Council's design guidelines 	<p>Likely Significant Effects</p> <p>This policy relates to delivering a net increase in new residential dwellings over the plan period through supporting the delivery of the most up-to-date London Plan. The Council will support proposals that contribute to the increase of a minimum of 44,051 homes.</p>

⁴⁹ The guide is available at: <https://www.gov.uk/government/publications/outdoor-advertisements-and-signs-a-guide-for-advertisers>.

Policy	Description	Likely Significant Effects
	<ul style="list-style-type: none"> c) supporting planning applications for self-build and custom-build, as well as purpose built shared housing through innovative approaches, subject to proposals adhering to other relevant Local Plan policies d) continuing to actively promote development of Build to Rent in accordance with London Plan Policy H11: Build to Rent e) continuing to monitor housing delivery effectively to resolve any anticipated shortfalls with the Mayor of London, and publish an annual update on housing trajectories⁵⁰. <p>2. In order to address Borough's housing need, the Council will:</p> <ul style="list-style-type: none"> i. seek a 50% strategic target on affordable housing on all private sector housing schemes ii. ensure development does not undermine the supply of self-contained housing, in particular family housing iii. require provision of wheelchair accessible accommodation across all tenures iv. support the delivery of quality new homes that accord with policy DMD 1: securing high quality design, and the Mayoral supplementary planning guidance v. support planning applications that meet the needs of specific communities, including older people, disabled and vulnerable people, LGBT community, students, families and private rented sectors (PRS) and Gypsies and Travellers vi. encourage community groups and local organisations to take on leading roles in the delivery of new homes through the Council's programme of housing innovation⁵¹, taking the opportunity to test and trial innovations around sustainability and construction vii. work proactively with developers to ensure that, wherever possible, homes delivered are marketed to, and occupied by, people who live and work primarily in Barking and Dagenham. 	<p>New residential dwellings may cause an increase in some impact pathways which can cause a likely significant effect upon European sites including:</p> <ul style="list-style-type: none"> cc) Recreational pressure dd) Air pollution ee) Water resources ff) Water quality
<p>POLICY DMH 1: Affordable housing</p>	<p>1. All development with the capacity to provide 10 or more self-contained units, or which have a gross internal residential floorspace of more than 1,000 sqm will be required to provide affordable housing (measured in habitable rooms) in accordance with Part 2 a) of the Local Plan Policy SP3: delivering homes that meet people's needs as follows:</p> <ul style="list-style-type: none"> a) Applying the threshold approach to viability in accordance with the most up to date London Plan Policy H5: threshold approach to applications, and/or guidance 	<p>No Likely Significant Effects</p> <p>This policy relates to affordable housing. There are no linking impact pathways present and thus, no likely significant effects.</p>

⁵⁰ Appendix 4 sets out a summary of the expected housing supply over the plan period.

⁵¹ The Council is undertaking a further review of wider potential sites for housing development and also considering approaches in which homes will be delivered within the programme.

Policy	Description	Likely Significant Effects
	<p>b) Providing early and advanced stage review mechanisms in line with Mayoral guidance, to maximise the delivery of affordable housing where development viability improves</p> <p>c) Maximising the delivery of affordable housing on-site and where appropriate, ensuring that all new dwellings contribute to the delivery of a range of housing tenures in accordance with the following tenure split as show in Figure 22 below, or in any subsequent updates on affordable housing products</p> <p>d) As set out in Table XX, below, affordable housing should be genuinely affordable for the people they are intended for. Applicants will be required to include homes that are affordable to households on a range of incomes, including the local average income levels in the Borough. Applicants will also be required to demonstrate, through their Affordable Housing Statement, how the affordability of the proposed tenure mix compares to average income levels in the borough⁵².</p> <p>1. Off-site affordable housing or payments in-lieu will only be acceptable in exceptional circumstances where:</p> <p>a) it can be robustly demonstrated that affordable housing cannot be delivered on-site and other sites may be more appropriate to provide affordable housing than the site of the proposed development to better deliver mixed and inclusive communities. If a suitable site cannot be found, a cash in lieu contribution towards the off-site provision of affordable housing may be accepted. The applicant will need to clearly demonstrate that:</p> <p>i. it is not practical to deliver affordable housing on-site , off-site options have been explored but are not acceptable</p> <p>ii. 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</p> <p>iii. agreements for off-site provision or in lieu contributions should provide no financial benefit to the applicant relative to on-site provision and should include review mechanisms in line with the Viability Tested Route; and</p> <p>iv. it will not result in an over-concentration of a particular size of unit in any one local area</p> <p>v. it can provide a greater yield of family sized affordable rent product subject to individual site characteristics, viability, location.</p>	
<p>POLICY DMH 2: Housing mix</p>	<p>1. 1. Development proposals will be required to provide a range of unit sizes (including family housing) in accordance with the Council's preferred housing size mix table below, or in any future subsequent affordable housing needs evidence.</p>	<p>No Likely Significant Effects</p>

⁵² The average income levels in the Borough is available on the government website:

<https://www.ons.gov.uk/peoplepopulationandcommunity/personalandhouseholdfinances/incomeandwealth/bulletins/smallareamodebasedincomeestimates/financialyearending2018#average-household-income-by-local-area>

Policy	Description	Likely Significant Effects																				
	<table border="1" data-bbox="481 316 1527 624"> <thead> <tr> <th>Bedrooms/Dwelling size</th> <th>Private</th> <th>Intermediate</th> <th>Social</th> </tr> </thead> <tbody> <tr> <td>1 bed</td> <td>39%</td> <td>17%</td> <td>10%</td> </tr> <tr> <td>2 bed</td> <td>26%</td> <td>44%</td> <td>40%</td> </tr> <tr> <td>3 bed</td> <td>25%</td> <td>19%</td> <td>40%</td> </tr> <tr> <td>4+ bed</td> <td>10%</td> <td>19%</td> <td>10%</td> </tr> </tbody> </table> <p data-bbox="481 632 1232 655">Source: LBBB SHMA March 2020 and information provided by Reside.</p> <p data-bbox="389 735 1688 943">2. The Council will consider a different housing mix, having regard to the following factors:</p> <ul style="list-style-type: none"> a) The proposal must meet the tenure split requirements outlined in the Local Plan Policy DMH 1: affordable housing. b) The applicant will be expected to provide up-to-date evidence of housing needs by taking account of the Council's latest local evidence identified by the LBBB Strategic Housing Market Assessment along with the local Housing Register. 	Bedrooms/Dwelling size	Private	Intermediate	Social	1 bed	39%	17%	10%	2 bed	26%	44%	40%	3 bed	25%	19%	40%	4+ bed	10%	19%	10%	<p data-bbox="1729 264 2105 379">This development management policy relates to housing mix. There are no linking impact pathways present and thus, no likely significant effects.</p>
Bedrooms/Dwelling size	Private	Intermediate	Social																			
1 bed	39%	17%	10%																			
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3 bed	25%	19%	40%																			
4+ bed	10%	19%	10%																			
<p>POLICY DMH 3: Specialist housing for older persons</p>	<p data-bbox="389 951 1666 1059">1. Existing specialist older persons housing will be protected. Loss of existing supported and specialist housing will be resisted unless re-provided elsewhere in the Borough with at least the equivalent number of bed spaces, and would result in improved standards and quality of accommodation, or where it can be demonstrated that there is no local need for its retention in current or refurbished format.</p> <p data-bbox="389 1110 1704 1369">2. Development proposals for specialist older person housing should:</p> <ul style="list-style-type: none"> a) meet the relevant London Plan policy requirements (Policy H13: specialist old persons housing) and criteria for new accessible or adapted housing (Policy D7), or its updated equivalent b) deliver affordable housing in accordance with the Local Plan policy DMH 1: affordable housing c) meet an identified need within the Borough based on up-to-date evidence base, through providing a diverse range of tenures to meet varying needs, including opportunities to rent and buy, as well as schemes with varying levels of support and care (e.g. specialist support for mental health needs in Extra Care provision) 	<p data-bbox="1729 951 1962 975">Likely Significant Effects</p> <p data-bbox="1729 1018 2105 1139">Although this policy does not allocate a quantum of housing it does support the provision of specialist older persons housing within the Borough.</p> <p data-bbox="1729 1214 2105 1390">New specialist housing may cause an increase in some impact pathways which can cause a likely significant effect upon European sites including:</p> <ul style="list-style-type: none"> vi. Recreational pressure vii. Air pollution 																				

Policy	Description	Likely Significant Effects
	<ul style="list-style-type: none"> d) be co-designed with service users and their families and other key stakeholders to satisfy user requirements e) is supported by a legal agreement for occupation by a relevant operator. 	<ul style="list-style-type: none"> viii. Water resources ix. Water quality
POLICY DMH 4: Purpose-built shared housing	<ol style="list-style-type: none"> 1. The Council will support new purpose-built shared housing schemes where they: <ul style="list-style-type: none"> a) meet the London Plan policy H16: large-scale purpose-built shared living, and planning guidance, including space standards, for this form of accommodation b) meet an identified need within the Borough based on up-to-date evidence base by taking account of the Council's latest local evidence identified by the LBBB Strategic Housing Market Assessment, and along with the local Housing Register c) are located within preferred areas in accordance with Place policies (see Chapter 3: Transforming Barking and Dagenham). 	<p>No Likely Significant Effects</p> <p>This development management policy relates to purpose built shared housing. There are no linking impact pathways present and thus, no likely significant effects.</p>
POLICY DMH 5: Houses in multiple occupations (HMOs)	<ol style="list-style-type: none"> 1. New houses in multiple occupation (HMOs) will only be supported where they: <ul style="list-style-type: none"> a. meet an identified need b. do not result in the loss of existing family housing, or dwelling houses capable of accommodating a small family with children c. do not result in the loss of character or amenity occurs to the area as a consequence of increased traffic, noise or general disturbance d. are located in the area of high transport accessibility e. comply with relevant standards and satisfy the housing space standards outlined in the London Plan policy D6: housing quality and standards, and/or its relevant guidance. 2. The number of houses that have been converted to flats or HMOs in any road (including unimplemented but still valid planning permissions) must not exceed 10 per cent of the total number of houses in the road; and no two adjacent properties apart from dwellings that are separated by a road should be converted 3. Proposals for conversions or loss of existing family housing, or dwelling houses capable of accommodating a small family with children, will be resisted. 	<p>No Likely Significant Effects</p> <p>This development management policy relates to HMOs. There are no linking impact pathways present and thus, no likely significant effects.</p>
POLICY DMH 6: Gypsy and Traveller Accommodation	<ol style="list-style-type: none"> 1. The Council will meet the identified current and future accommodation needs of Gypsies and Travellers and Travelling Showpeople in Barking and Dagenham by: <ul style="list-style-type: none"> a) retaining and protecting the existing Gypsy and Traveller sites at Eastbrookend Country Park b) delivering a maximum of 12 pitches by expanding the existing public site at Eastbrookend Country Park within the first five years of the plan period 	<p>Likely Significant Effects</p> <p>This policy provides a small quantum and three locations for Gypsy and Traveller accommodation within the Borough of Barking and Dagenham.</p>

Policy	Description	Likely Significant Effects								
	<p>c) delivering the remaining identified need by the end of the plan period at Collier Row Road and Choats Road</p> <p>2. The Council will consider granting temporary planning permission for proposals that come forward in advance of the allocated sites being developed and will be addressed against the criteria set out below.</p> <p>3. Development of a site to provide additional short-stay /or permanent Gypsy and Traveller accommodation to meet the long-term needs of these communities will be supported where:</p> <p>a) the site is able to accommodate the number of pitches identified in an up to date and robust needs assessment</p> <p>b) the site is accessible to public transport, safe, convenient walking and cycling environment, essential services and facilities (e.g. water, power, sewerage and waste disposal) and be capable of supporting by local social infrastructure and does not place undue pressure on local infrastructure and services (such as healthcare, schools and shops)</p> <p>c) it provides safe access to and from the public road network</p> <p>a) the site is a safe location (e.g. not located in an inappropriate area of high flood risk, including functional floodplains, given the particular vulnerability of caravans)</p> <p>b) the proposal would not result in significant adverse impacts on the amenity of other site occupants and the occupiers of neighbouring sites</p> <p>c) the proposal supports the health and wellbeing of the occupiers of the site by providing appropriate facilities, layout and design quality</p> <p>d) arrangements can be put in place at the planning application stage, to ensure the proper management of the site in line with the policy requirements above.</p> <p>Table 1 New pitches needed for Gypsy and Traveller households that meet the PPTS (2015) definition</p> <table border="1" data-bbox="383 1054 1590 1174"> <thead> <tr> <th>2020 – 2024</th> <th>2025 – 2029</th> <th>2030 - 2037</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>19</td> <td>2</td> <td>4</td> <td>25</td> </tr> </tbody> </table>	2020 – 2024	2025 – 2029	2030 - 2037	Total	19	2	4	25	<p>New development may cause an increase in some impact pathways which can cause a likely significant effect upon international sites in combination including:</p> <ul style="list-style-type: none"> x. Recreational pressure xi. Air pollution xii. Water resources xiii. Water quality <p>The two site allocations identified in this policy are assessed in Appendix C</p>
2020 – 2024	2025 – 2029	2030 - 2037	Total							
19	2	4	25							
<p>STRATEGIC POLICY SP 4: Delivering social and cultural</p>	<p>1. The Council will seek to ensure that a range of high-quality social and cultural infrastructure facilities for existing and new residents, visitors and workers are provided in appropriate locations throughout the borough by:</p>	<p>No Likely Significant Effects</p>								

Policy	Description	Likely Significant Effects
<p>infrastructure facilities in the right locations</p>	<ul style="list-style-type: none"> a) protecting existing social and cultural infrastructure facilities in accordance with policy DMS1 Protecting and Enhancing Existing Facilities b) securing the delivery of, or contributions towards enhanced or new social and cultural infrastructure facilities to meet the needs arising from development c) working with service providers and other stakeholders to identify funding sources for the long-term management and maintenance of both new and existing social and cultural infrastructure d) supporting proposals for new and enhanced social and cultural infrastructure facilities where they: <ul style="list-style-type: none"> I. meet an identified need in line with the Council's latest Infrastructure Delivery Plan, taking account of the needs of the future local community II. contribute to the capacity, quality, usability, sustainability and accessibility of existing and enhanced facilities and services, particularly where development will increase demand III. should be delivered in advance to support new development IV. promoting the growth and expansion of educational facilities (both mainstream and special needs) to meet an identified need and demand. V. increasing sustainable connectivity through walking, cycling and public transport VI. working in partnership with health authorities and other key stakeholders to improve healthcare access and support people's overall health and well-being VII. undertaking innovative approaches to the delivery and operation of social infrastructure; for example creating multi-functional spaces. 	<p>This policy relates the delivery of social and cultural infrastructure facilities. There are no linking impact pathways present and thus, no likely significant effects.</p>
<p>POLICY DMS 1: Protecting and enhancing existing facilities</p>	<ul style="list-style-type: none"> 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: <ul style="list-style-type: none"> a) The existing facility is being re-provided, whether on site or in a nearby location, that would continue and enhance the needs of existing local users. 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: <ul style="list-style-type: none"> I. Active marketing over a period of not less than 12 months for its continuous use and be based on a realistic price/rent which is supported by the Council. 	<p>No Likely Significant Effects</p> <p>This policy relates to protecting and enhancing existing facilities. There are no linking impact pathways present and thus, no likely significant effects.</p>

Policy	Description	Likely Significant Effects
	<p>II.If the facility can be refurbished or used by multi occupiers to prevent the loss</p> <p>III.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.</p> <p>2. The Council will expect applicants to submit competitive marketing evidence in accordance with Part 1 b), which should:</p> <ul style="list-style-type: none"> a) outline where and how marketing has been undertaken, with details also provided to demonstrate that the asking rent has been at a realistic rate for the type, size and condition of the property or unit⁵³ b) submit a report detailing the level of interest in the property over the agreed marketing period, details of any viewings and offers and details of why any interest had not been taken forward. <p>3. Notwithstanding the provisions of Part 1 of this policy, development proposals that would result in the net loss of sports and recreational buildings and land, including playing fields will not be considered acceptable, unless it meets the requirements set out in the NPPF (or its updated equivalent) and the loss is supported by Sports England.</p> <p>4. Extensions to existing schools should demonstrate there is an identified need to support the expansion and that it would not result in any shortfall of child play space overall.</p> <p>5. The Council will allow six months for bidding to buy a community or cultural facility that is listed on the Assets of Community Value (ACV) register⁵⁴. The marketing statement could be reduced to 6 months in accordance with part 1 and 2 above (from a continuous period of six months that the community has to prepare a bid to buy it).</p>	
<p>POLICY DMS 2: Planning for new facilities</p>	<p>1. Development that is within, or part of, a site allocation is expected to accommodate supporting infrastructure requirements alongside the identified land uses and other development principles, or where appropriate contribute to provision or expansion off site (as part of an agreed strategy).</p> <p>2. New facilities will be located across the borough, to support growth in each sub-area (see Chapter 3: Transforming Barking and Dagenham).</p> <p>3. Development proposals for residential and mixed-use development including provision of social, community and cultural facilities will need to submit a community needs strategy to accompany the planning application, demonstrating how the community space needs generated by the development have been met.</p>	<p>No Likely Significant Effects</p> <p>This policy provides development management policy for the planning of new facilities. There are no linking impact pathways present and thus, no likely significant effects.</p>

⁵³ The Council would be expected that the property or site has been actively marketed, including appearing on local and national commercial property websites and visible display boards being displayed at the site.

Policy	Description	Likely Significant Effects
	<p>4. Development proposals should deliver high-quality design that:</p> <ul style="list-style-type: none"> a) is accessible and inclusive to all sections of the community b) adheres to the latest national, regional and local design guidelines c) provides opportunities to make space multipurpose and open to different sections of the community. <p>5. Development proposals for faith facilities in employment and industrial areas will only be permitted if they are in accordance with other policies of the Local Plan, and where conflicts between employment and industrial use and faith use can be avoided (i.e. meeting the other policies of the Local Plan, with regards to increased traffic and parking issues, congregations of people, and noise; and the safety of users or workers will not be compromised). Applicants will be expected to engage in pre application discussions with the Council before making a formal planning application.</p> <p>6. To support the endeavours of the sports organisations, development proposals for improved leisure and sports facilities (including any essential ancillary facilities⁵⁵) to use these facilities will be acceptable subject to discussions with Sport England.</p>	
<p>POLICY DMS 3: Public houses</p>	<p>1. The Council will protect public houses within the Borough in accordance with the London Plan policy HC 7: protecting public houses.</p> <p>2. Where a public house is replaced or re-provided, the new development:</p> <ul style="list-style-type: none"> a) should make an equal or greater contribution to preserve or enhance local character b) where appropriate, incorporates a community use in the redevelopment or contribute towards enhancing community facilities in the local area c) Would be subject to a sequential site assessment where applicable d) must provide adequate floorspace to ensure the continued viability of the public house, demonstrate that all reasonable efforts have been taken to preserve the facility as a public house, including evidence of appropriate maintenance and upkeep and efforts to diversify the business. A full detailed marketing report demonstrating that the public house has been continuously marketed for at least 24 months as a public house at a reasonable market rent and free of tie and restrictive covenant. <p>3. Where the public house is considered to be a heritage asset (see policy DMD4 'Heritage Assets and Archaeology Remains') or to make a valued contribution to the borough's history and its loss is considered justified, the applicant will be required to send significant architectural and historic components relating to the building's use for archiving or public display to the Council, in line with the Historic England's guidance.</p>	<p>No Likely Significant Effects</p> <p>This is a development management policy relating to public houses. There are no linking impact pathways present and thus, no likely significant effects.</p>

⁵⁵ These facilities could include uses such as changing rooms, clubhouses, public toilets and nature education facilities.

Policy	Description	Likely Significant Effects
<p>STRATEGIC POLICY SP 5: Promoting inclusive economic growth</p>	<ol style="list-style-type: none"> 1. The Council will focus on growing a thriving and productive enterprise and small business economy, alongside new business investment, and ensuring the delivery of at least 20,000 new jobs and a wider employment base. 2. The Council will protect office floorspace in accordance with Policy E1: Offices of the London Plan. 3. The Council will protect, strengthen and intensify land within the designated Strategic Industrial Location (SIL) and Locally Significant Industrial Sites (LSIS) boundaries through: <ol style="list-style-type: none"> a) Retention of suitable locations (see Table XX and Figure XX) to accommodate future employment growth b) Promoting efficient use of employment land to support economic growth sectors through managed renewal and intensification of industrial sites, alongside plan-led managed release, and co-location of existing industrial land with other sympathetic and appropriate uses c) promoting efficient use of industrial land to support strategic sectors, including: Transport & Logistics, Advanced Manufacturing, Green Technology and Digital Cultural Creative Industries etc. 4. All safeguarded wharves and maritime infrastructure will be protected and retained in line with Mayoral policy and the marine management Organisation. The locations are defined in the Policies Map and in Figure XX below. Opportunities for intensification of wharf use, or rationalisation of wharves and infrastructure, will require discussions with the Port of London Authority and the Marine Management Organisation at an early stage. Where proposals come forward on sites adjacent to wharves, that the importance of the agent of change policy (London Plan Policy D13) is recognised so that future development is designed to ensure that there are no conflicts of use and freight capacity is not reduced. 5. The Council will support a new town centre hierarchy for the Borough with major office development will be directed to Barking town centre with secondary provision directed to District Centres as set out in the town centre hierarchy as show on the Policies Map. 6. The Council will encourage the provision of affordable workspace within developments for new employment in accordance with Policy DME 2: providing flexible, affordable workspace, alongside the London Plan policy E3: affordable workspace. 7. The Council will support businesses who seek to evolve, diversify, and contribute to a more thriving and more inclusive local economy through: <ol style="list-style-type: none"> a) supporting a range of appropriate town centre uses, not limited to traditional retail, which could include residential uses above existing commercial, social infrastructure and transport infrastructure uses, temporary or 'meanwhile' uses⁵⁶ of vacant properties, affordable workspace and educational facilities 	<p>No Likely Significant Effects</p> <p>This policy promotes a strategy to improve the economic growth of the borough to ensure a thriving economy, strong communities and a distinctive place. The policy does not allocate a quantum of development merely advocates the Council's realignment of focus on developing businesses and jobs within borough.</p> <p>No likely significant effects are expected from this Policy.</p>

⁵⁶ In London, meanwhile use sector ranges from property guardianship, housing (e.g. manufactured homes) small community gardens to large workspaces (Centre for London, 2018).

Policy	Description	Likely Significant Effects
	<ul style="list-style-type: none"> b) supporting new development and redevelopment that stimulates the evening economy, contributing to the vitality of district centres and supporting a balanced and socially inclusive evening and night-time economy c) supporting the provision of flexible, affordable, modern employment spaces in suitable locations; ensuring the design of employment space is flexible and adaptable to the changing needs of different types of potential user d) avoiding vacant or under-utilised buildings and spaces by encouraging better utilisation of industrial sites, and where appropriate supporting the re-use of surplus industrial land and floorspace for other uses e) providing new high-quality employment and training opportunities for local people, and procurement opportunities for local businesses, focusing on investment in physical improvement, but also in the long-term social infrastructure and education required for producing talented, entrepreneurial individuals locally. 	
<p>POLICY DME1: Utilising the borough's employment land more efficiently</p>	<ol style="list-style-type: none"> 1. SIL/LSIS Land release will only be considered in accordance with the London Plan policy E7: industrial intensification, co-location and substitution. 2. Development proposals must ensure neighbourly development is achieved, in line with the Local Plan policy DMSI 2: Energy, Heat and Carbon Emissions and must not jeopardise the functioning of any remaining or re-provided employment uses, including those incorporated within the redevelopment. 3. Any development on-site or surrounding SIL, LSIS or Non-Designated Industrial Sites must not compromise their continued efficient function, access, service arrangements and days/hours of operation, in line with Policies E5 and E7 of the London Plan. Particular regard should be made to the design of residential development adjacent to SILs to ensure that existing or potential industrial activities within these locations are not compromised or curtailed. 4. The Council may prepare masterplan supplementary planning documents (SPDs) to guide development. Where adopted, development must be in accordance with an SPD. <p>Strategic Industrial Locations (SIL)</p> <ol style="list-style-type: none"> 5. SIL provides strategic protection and intensification for warehousing and logistics uses, which often require larger spaces. 6. 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. 7. Proposals for residential elements will be refused. Planning conditions or legal agreements may be required to prevent subsequent conversion of SIL sites to residential use. 	<p>Potential Likely Significant Effects</p> <p>The policy is a design management policy and does not specifically promote an increase in industrial space in the Borough. However, the supporting text provides a table (see policy description) which states the indicative future capacity of several industrial land parcels.</p> <p>Therefore, dependent on where these industrial land parcels are situated there could potentially be likely significant effects arising from and increase in industrial capacity if within the zone of influence of the Epping Forest SAC.</p>

Policy	Description	Likely Significant Effects
	<p>8. Applicants should clearly demonstrate how their proposal contributes to meeting the future industrial floorspace capacity targets (as set out in Table XX) on site, through setting out all options explored for intensification as part of the Planning Application.</p> <p>Locally Significant Industrial Sites (LSIS)</p> <p>9. The Council will protect local business' needs, and support development that is in accordance with this Local Plan or an adopted localised planning framework.</p> <p>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.</p> <p>11. In Locally Significant Industrial Sites the following uses for industrial type activities and relation functions, including ancillary facilities, will be permitted and safeguarded:</p> <ul style="list-style-type: none"> a) Class B2 and B8 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. <p>E(G) covers all uses that can be carried out in a residential area without detriment to its amenity so E(g)(i) offices, E(g)(ii) research and development and E(g)(iii) industrial processes.</p> <p>12. Applicants must clearly demonstrate that the proposal:</p> <ul style="list-style-type: none"> a) contributes to meeting the future industrial capacity targets (as set out in Table XX 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 b) can deliver at least 50 percent affordable housing where the scheme includes residential uses and would result in a net loss of industrial capacity (as required by London Plan policy H4 and H5) c) can provide a mix of unit sizes and adequate servicing and delivery space in accordance with Policy DMT4: deliveries, servicing and construction d) are well designed for their intended purpose in accordance with DMD1: securing high quality design, having regard to providing flexibility for incorporating innovative typologies, such as smaller scale, cleaner type industrial uses that are more compatible with residential uses. 	

Policy		Description	Likely Significant Effects				
		<p>Outside designated SIL or LSIS</p> <p>13. The Council will direct Industrial or Warehousing uses towards areas of the borough that are designated for SIL or LSIS. 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.</p>					
Industrial Land	Function	Indicative Future Capacity (sqm)				Potential for Industrial Use	
1	Kingsbridge	LSIS				107,867	Accommodating relocation from Gascoigne South and accommodate demand of logistics industry serving the Greater London market.
2	Lyon Business Park	LSIS				10,800	Cleaner industrial uses, supported by lighter, van-based servicing with smaller service yards.
3	River Road	SIL				538,757	Advanced manufacturing, transport & logistics, green technology.
4	Thames Road Central	LSIS				62,202	Cleaner industrial uses, supported by lighter, van-based servicing with smaller service yards.
5	Castle Green and Box Lane	SIL				375,949	Larger logistics and distribution (possibility for multistorey/ramp access warehouse) and heavier industrial activities with advantage of rail connection (freight of heavy goods).
6	Chadwell Heath	LSIS				136,732	Digital/cultural creative industries such as small makers space, craft industry etc.

Policy		Description				Likely Significant Effects
7	Dagenham Dock	SIL	1,346,520	Logistics activities, consolidated wholesale market (and supporting uses), business park, advanced manufacturing, green technology.		
8	Dagenham West (west to the Stamping Plant)	LSIS	99,053	Large distribution units with operational yard space with opportunity for co-location to accommodate the vision for regeneration around the station area.		
9	Dagenham East	LSIS	92,800	Digital/cultural creative industries such as small makers space, craft industry etc. Industrial and other employment (office) to deliver ancillary space for the film studio.		
10	Wantz Road	LSIS	114,861	Light industrial estate and trade counter activities.		
11	Hertford Road	LSIS	30,244	Industrial space for last mile delivery activities and trade counters servicing the North East of London, with opportunity for co-location to accommodate the vision for regeneration of the nearby transformation areas.		
12	Gascoigne South	LSIS	47,674	Multi-storey industrial buildings with lift servicing for lighter distribution activities or warehousing with vertical storage solutions, with opportunity for co-location to accommodate the vision for regeneration of the nearby transformation areas.		
	Total		2,915,785			

Policy	Description	Likely Significant Effects
<p>POLICY DME 2: Providing flexible, affordable workspace</p>	<p>1. Development of 1,000 sqm employment floorspace⁵⁷ or greater will be required to incorporate an appropriate provision of affordable workspace⁵⁸ on-site, offered at below market rate, for shared workspace or small business units through Section 106 agreements, subject to development viability. This must meet the needs of local start-ups, small-to-medium enterprises and creative industries. The applicant should establish robust management links with registered workspace providers agreed by the Council and be able to:</p> <ul style="list-style-type: none"> a) demonstrate that there is sufficient critical mass to ensure the sustainability of any provision b) provide units in turnkey form which are accepted by the Council or the registered workspace provider following completion. To be considered as acceptable turnkey spaces, the Council will expect the workspace units to be secure, vacant, and fully glazed, with smooth sealed concrete finishes to ceiling and walls, functional lighting, running water, sanitary facilities, and having capped essential services such as electricity and gas, as well as access provision of wired and wireless broadband technologies delivering the highest speeds to provide a wide range of services. These works will avoid substantial fit out costs for potential occupiers and enable the workspace to be more affordable for smaller businesses. <p>2. In circumstances where it is not feasible to meet Part 1 of the policy, a payment in lieu may be accepted to support delivery of affordable workspace in other parts of the borough, focusing primarily in identified Transformation Areas (see Chapter 3: Transforming Barking and Dagenham).</p>	<p>No Likely Significant Effects</p> <p>This is a development management policy relating to the provision of flexible and affordable workspace. There are no linking impact pathways present and thus, no likely significant effects.</p>
<p>POLICY DME 3: Encouraging vibrant, resilient, and characterful town centres</p>	<p>1. The location of town, district and neighbourhood centres are defined on the Policies Map. The boundaries clearly relate to the application of the sequential and impact tests, which seek to direct main town centre uses to town centres, and proposals for large retail development in edge, or out of town centre locations to be considered against the sequential approach in accordance with the most up to date NPPF.</p> <p>2. Development proposals should seek to deliver and maintain active ground floor frontages. This includes, but is not limited to, shops, markets, community, cultural and civic uses⁵⁹.</p> <p>3. When considering applications for town centre uses the applicants are expected to take account of the flexibility which may be required to meet changing needs in terms of what contribution the new development will make to the success of our town centres. This could include the potential need for temporary or 'meanwhile or interim' space to support the creative industries or serve needs in the early phases of a business.</p> <p>4. 'Meanwhile' uses of buildings in designated town centres must not have an unacceptable impact on residential amenity or prevent development sites from being brought forward for development in a timely fashion. Meanwhile use of sites for housing uses should be consistent with other Local Plan policies in relation to the residential amenity.</p>	<p>No Likely Significant Effects</p> <p>This is a development management policy relating to vibrant, resilient and characterful town centres. There are no linking impact pathways present and thus, no likely significant effects.</p>

⁵⁷ This policy applies to applications for Planning Use Class E: Commercial, Business and Service.

⁵⁸ Workspace are: E(g) Uses which can be carried out in a residential area without detriment to its amenity.

⁵⁹ Uses which offer a service to the general public.

Policy	Description	Likely Significant Effects
	<p>5. Outside the designated town centres, development proposals for retail and leisure development exceeding 500sq.m⁶⁰ gross (or its updated equivalent) will be required to submit an impact assessment in accordance with the NPPF and NPPG.</p> <p>6. Development proposals for a new local shopping centre outside designated town centres must seek to meet the needs of local residents based on up to date documental evidence⁶¹. The applicant should submit information which considers factors including:</p> <ul style="list-style-type: none"> a) the relative size of a local parade and the range of shops and services each centre can offer b) the proximity of other town centres, local centres and 'standalone' shops, which may mean that local need may be met at an alternative location within walking distance and local needs are therefore still being met c) the quality of the shopping centre or parade, in terms of its environment, type and range of retailers, affecting how it is perceived and used by local residents d) the relative accessibility of each centre since this is an important factor in how local people use the local shops and services. The reasonable and maximum walking distances as prescribed in GLA's Town Centre SPG and its equivalent update should be considered in the statement or assessment. <p>7. Development proposals for new hot food takeaways (sui generis), new betting shops 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:</p> <ul style="list-style-type: none"> 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). 	
<p>POLICY DME 4: Visitor accommodation</p>	<p>1. Proposals for new visitor accommodation must be in accordance with Policy DME3 of the Local Plan, and they should:</p>	Likely Significant Effects

⁶⁰ The Council will apply a 500 sqm gross threshold for impact assessments, which is consistent with the retail floorspace projections within the borough. The Town Centre Topic Paper sets out the rationale behind this policy approach. The revised floorspace capacity projections in this Addendum are lower than the 2019 Update and the need for a lower impact threshold (500 sqm gross) is reinforced. The Council will keep the retail impact analysis threshold under review in light of future circumstances.

⁶¹ The local needs index provides a useful indicator of whether a local centre or important local parade is meeting some or all the needs of local residents.

Policy	Description	Likely Significant Effects
	<p>a) accord with principal land uses and not compromise regeneration visions (see the Local Plan Place Policies in Chapter 3)</p> <p>b) the size, scale and nature of the proposal is proportionate to its location</p> <p>c) it does not create an over-concentration of such accommodation, taking account of other proposals and unimplemented consents in the local area</p> <p>d) it does not have significant adverse impact on surrounding amenity or local character.</p> <p>e) Would be subject to a sequential assessment and impact assessment where applicable</p> <p>2. Applications for serviced apartments must demonstrate that they meet the criteria stated in Part (1) of this policy and will be managed appropriately as short-term accommodation (i.e. accommodation for up to 90 days in any 365 day period).</p>	<p>This proposal supports the development of visitor accommodation within the borough. Visitor accommodation includes hotels and serviced apartments.</p> <p>Although the policy does not allocate a quantum of this development within the borough, the policy has been included on a precautionary basis as dependent on location the developments brought forward under this policy may cause an increase in some impact pathways which can cause a likely significant effect upon European sites including:</p> <ul style="list-style-type: none"> xiv. Recreational pressure xv. air quality xvi. water resources xvii. water quality
<p>POLICY DME 5: Evening Economy</p>	<p>1. The Council will support development that contributes to the vitality of Barking town centre, and supports a balanced and socially inclusive evening and night-time economy, subject to the following considerations:</p> <p>a) cumulative impact – in areas where a concentration of night-time uses may be detrimental to the character or vitality and viability of the centre, there will be a presumption against further facilities. For example, the existing number of similar establishments in the immediate area and their proximity to each other; and the potential impacts of the proposal on the wider community</p> <p>b) residential amenity – the proposed use should not create an unacceptable impact on neighbouring uses in terms of noise, traffic and disturbance. For example, the type and characteristics of other uses, such as housing, shops and public houses; any known unresolved amenity, traffic or safety issues arising from existing uses in the area</p> <p>c) balance – new uses in centres should support both the day-time and evening and night-time economies whilst not undermining the role and function of the designated town centres in accordance with DME3 Encouraging Vibrant, Resilient, and Characterful Town Centres.</p>	<p>No Likely Significant Effects</p> <p>This is a development management policy relating to the Evening Economy. There are no linking impact pathways present and thus, no likely significant effects.</p>

Policy	Description	Likely Significant Effects
POLICY SP6: Green and blue infrastructure	<p>1. The Council will protect and enhance the quality of the natural environment (including the borough's parks, public open spaces and playing pitches) and will work with a range of stakeholders to maximise the creation of new and improved green and blue infrastructure and address deficiencies⁶² in quantity, quality and access. This will be achieved through:</p> <ul style="list-style-type: none"> a) protecting and enhancing the borough's Green Belt and Metropolitan Open Land (MOL) to maintain its function, quality and openness b) ensuring development protects and enhances significant ecological features, achieves biodiversity net gain, and maximises opportunities for urban greening through appropriate landscaping schemes, green roofs and the planting of street trees c) working with local partners, the Environment Agency, Natural England and other key stakeholders including the Wildlife Sites Board officers to resurvey and review SINC's, ecological corridors and areas of biodiversity (as shown on the Policies Map) every 5 to 10 years, to ensure development contributes as appropriate to the borough's overall biodiversity and environmental quality d) improving the quality, character, value and accessibility of existing publicly accessible open space across the borough, in line with the Council's Parks and Open Spaces Strategy, Green Infrastructure and Biodiversity Strategy and Sport England's Active Design Guidance (or updated equivalent) e) maximising the opportunity to deliver an improved network of green grid links to enhance access through walking, cycling and public transport to key destination points such as town centres, community facilities and publicly accessible open spaces, and along rivers and waterways f) protecting, improving and enhancing blue spaces, to create a coherent blue network, improving walking and cycling accessibility to the water environment and improving the relationship with the river⁶³ (including public realm, habitats and waste heat energy sources). Where possible, opportunities should be sought to 'naturalise' riverbanks and water features by removing hard engineered walls and introducing new habitats and sustainable flood management g) protecting and enhancing the existing residential moorings located on the River Roding and explore opportunities for part of the River Roding in the borough, north of the existing safeguarded wharves as a potential residential mooring opportunity zone in line with local and regional planning policies h) maximising opportunities to create and increase publicly accessible open space (including playing pitches and ancillary sporting facilities) with a range of sizes and for a range of users, particularly in locations 	<p>No Likely Significant Effects</p> <p>This is policy provides for the management of green and blue infrastructure. There are no linking impact pathways present and thus, no likely significant effects.</p>

⁶² The borough's open space provision requirement is 2.4 hectares per 1,000 head of population. The Council will keep this standard under review.

⁶³ River Thames, River Roding, Gores Brook and the Beam.

Policy	Description	Likely Significant Effects
	<p>which experience the highest level of open space deficiency within the borough (as shown on the Policies Map)</p> <ul style="list-style-type: none"> i) protecting and enhancing the borough's habitat and wildlife, including linking green spaces with coherent ecological corridors, protecting species and habitats identified in the London Biodiversity Action Plan or updated equivalent, and creating new nesting and roosting sites j) supporting community food growing through protection of existing allotments, provision of space for urban agriculture in new developments and as a meanwhile use, and building partnerships with social enterprise and voluntary organisations that have already started working in the borough; and supporting communities that aspire to designate important local open spaces as local green spaces k) working with strategic partners, developers and the community to position the natural environment at the heart of estate regeneration and development, having regard to the Council's latest park masterplans⁶⁴. 	
<p>POLICY DMNE 1: Parks, open spaces and play space</p>	<ol style="list-style-type: none"> 1. The Council will protect and enhance the borough's parks, public open spaces and playing pitches, working closely with a range of stakeholders to address deficiencies in quantity, quality and access. Public open spaces should be safe and easily accessible through walking, cycling, and public transport for all users, and supportive infrastructure such as crossings, cycle parking, bus stops and clear signage should be provided appropriately near the entrance of open spaces. To reduce car dominance, these should be provided in proximity to residential, commercial and social infrastructure. 2. The Council will prevent inappropriate development within the designated sites, areas and green space (Green Belt) and on Metropolitan Open Land (MOL), except in very special circumstances, in line with the NPPF and Policy G3 of the London Plan. 3. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: <ul style="list-style-type: none"> a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirement b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and in a suitable location c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use. 	<p>No Likely Significant Effects</p> <p>This is policy provides for the management, protection and enhancement of parks, open spaces and play spaces. There are no linking impact pathways present and thus, no likely significant effects.</p>

⁶⁴ The Council has been working on 10 masterplans for the borough's most important parks. These masterplans will give us a framework for the future development of these sites that we can bring into effects as resource become available. Chapter 7 of the Borough's Parks and Open Space Strategy provides information on these masterplans: <https://modgov.lbbd.gov.uk/Internet/documents/s114608/Parks%20Strategy%20-%20App.%201b.pdf>

Policy	Description	Likely Significant Effects
	<p>4. Development of 100 dwellings or greater which falls within the 3 km to 6.2 km Recreational Pressure 'Zone of Influence' (Zol) around the Epping Forest SAC (as shown on the Policies Map) will be required to mitigate the impacts of recreational pressure upon the SAC in compliance with Natural England's Interim Mitigation Advice⁶⁵ and any subsequent Full Mitigation Strategy release. Applicants should provide mitigation in the form of Suitable Alternative Natural Greenspace (SANG) within the footprint of the development site. If this is not possible due to space constraints, contributions will be required for Strategic Access Management and Monitoring (SAMM) of the SAC. Any development which would cause an adverse impact upon the integrity of Epping Forest SAC will not be supported.</p> <p>5. Development on non-designated open space, including amenity greens and amenity spaces with limited public access, will be resisted, except where proposals accord with an agreed Council regeneration strategy, and include replacement space of higher quality to the open space that would be lost to mitigating this loss as part of any future works.</p> <p>6. Development should not rely upon existing publicly accessible open space to contribute towards on-site communal amenity space and child play space. All major and strategic development should contribute to the delivery of sufficient new publicly accessible open space on-site which should:</p> <ul style="list-style-type: none"> a) meet the needs of current and any future residents b) be of a high-quality that is accessible to all c) provide multiple benefits, including recreation, food growing, SuDS, improvements to biodiversity and links to green infrastructure, as well as any blue infrastructure, on and adjacent to the development site d) consider taking the form of new parks (including pocket parks), allotments or play space in accordance with the Council's guidance as set out in the Parks and Open Spaces Strategy, the Green Infrastructure and Biodiversity Strategy and park masterplans and their updated equivalents e) comply with Policy G4 of the London Plan and the Council's guidance in the design of new open space. In exceptional circumstances, where on-site provision cannot be adequately accommodated, the Council may agree a financial contribution towards improvements to existing or new open spaces within the borough via planning obligations. <p>7. Large major development proposals for schemes that are likely to be used by children and young people should increase opportunities for play and informal recreation in line with Policy S4 of the London Plan.</p>	

⁶⁵ Natural England 2019. Emerging strategic approach relating to the Epping Forest Special Area of Conservation (SAC) Mitigation Strategy. Interim advice following feedback from London Borough's and Greater London Authority.

Policy	Description	Likely Significant Effects
	8. Proposals for new playing pitches should be developed in accordance with Policy DMS1, the Council's Playing Pitch Strategy (or updated equivalent) and in consultation with Sport England	
POLICY DMNE 2: Urban greening	<p>1. Development proposals will be supported where they:</p> <ul style="list-style-type: none"> a) maximise opportunities for urban greening, including landscaping, street trees, green and brown roofs, green walls, food growing, rain gardens and nature-based sustainable drainage. b) contribute to the All London Green Grid, the Council's Green Infrastructure and Biodiversity Strategy and the Council's Parks and Open Spaces Strategy. <p>2. The applicant is expected to calculate the site's Urban Greening Factor (UGF). In line with Policy G5 of the London Plan, a target score of 0.4 should be achieved for developments that are predominately residential, and a target score of 0.3 should be achieved for commercial development (excluding B2 and B8 uses, which have no target but are required to quantify the UGF score and demonstrate measures to achieve urban greening on site).</p>	<p>No Likely Significant Effects</p> <p>This is policy relates to urban greening. There are no linking impact pathways present and thus, no likely significant effects.</p>
POLICY DMNE 3: Nature conservation and biodiversity	<p>1. 1. Development should not lead to adverse effects on the integrity of Epping Forest Special Area of Conservation (SAC), or loss or degradation of Sites of Importance for Nature Conservation (SINCs), including local nature reserves. All existing SINC boundaries and Areas of Deficiency in access to nature are shown on the Policies Map.</p> <p>2. All development proposals are required to:</p> <ul style="list-style-type: none"> a) minimise the impacts of development on biodiversity and nature in accordance with the mitigation hierarchy set out in Policy G6 of the London Plan b) 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 c) prepare a long-term monitoring and management plan of biodiversity net gain sites for a period of 30 years, preferably within the development area d) provide wider environmental net gain where possible. <p>3. The Council's Green Infrastructure and Biodiversity Strategy identifies opportunities for habitat creation, wildlife corridors and Green Design Codes for different parts of the borough, which should be used to inform net gain proposals.</p> <p>4. Major development proposals are required to:</p>	<p>No Likely Significant Effects</p> <p>This is a positive policy that relates to nature conservancy and biodiversity. There are no linking impact pathways present and thus, no likely significant effects.</p>

Policy	Description	Likely Significant Effects
	<ul style="list-style-type: none"> a) contribute to the strategic network of green and blue spaces, as identified in the Council's Green Infrastructure and Biodiversity Strategy (or updated equivalent) and in accordance with Policy G1 of the London Plan b) contribute to improving local access to nature, in accordance with national and London Plan requirements and taking account of Natural England's latest Accessible Natural Greenspace Standards c) submit an ecology assessment demonstrating biodiversity enhancements that contribute to the objectives of the latest Council's strategies, as well as guidance and best practice for habitat creation d) submit a habitat management plan setting out the long-term maintenance and monitoring of all biodiversity protection and enhancement measures e) use only native species of local provenance in soft landscaping schemes within 250m of Sites of Importance for Nature Conservation, waterways, and wildlife corridors, and on green and brown roofs and roof gardens. On all other sites, the use of native plants of local provenance should be at least 75% by area of the soft landscaping scheme f) incorporate soft landscaping that minimises the risk of new plant diseases and avoids introducing invasive species by sourcing plants from stock grown in the UK and avoiding the use of plants listed in Schedule 9 of the Wildlife and Countryside Act (1981). Landscaping and planting around developments must control potentially invasive non-native species and eradicate these where possible as part of redevelopment g) 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). 	
<p>POLICY DMNE 4: Rivers, waterways and watercourses Water environment</p>	<p>1. Development proposals within and adjacent to rivers and waterways will be required to:</p> <ul style="list-style-type: none"> a. contribute to achieving the objectives of the Thames River Basin Management Plan, Water Framework Directive or updated equivalent and catchment partnership local measures b. protect and enhance biodiversity and geomorphology in and along watercourses, banks and waterways, adjacent terrestrial habitats, the foreshore and the floodplain c. improve water quality, including reducing or minimising pollution from adjacent land and roads (e.g. by using oil interceptors in car parks) and improve the ecological status of waterbodies (e.g. by investigating and rectifying misconnections, retrofitting sustainable urban drainage systems, fitting hydrocarbon interceptors and creating and restoring wetlands) 	<p>No Likely Significant Effects</p> <p>This is a positive policy that relates to the water environment. There are no linking impact pathways present and thus, no likely significant effects.</p>

Policy	Description	Likely Significant Effects
	<ul style="list-style-type: none"> d. conserve the waterways and make them as part of a cohesive place-making strategy tailored to local context e. avoid harm or negative impacts on navigation and use of existing waterways f. conserve and enhance the existing character of the waterway and its setting g. provide open space for recreation, habitat provision and increasing the blue space network, which can also be used to store excess floodwater, where appropriate h. provide a naturalised buffer zone between the proposed development and the top of bank of any nearby watercourse or body of water as follows: <ul style="list-style-type: none"> 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, hard standing, paths or lighting, underground structures (including tie rods and anchors), 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 vi. improve safe, public access to waterways and provide opportunities for enjoyment and understanding of the waterways; development will be expected to provide appropriate riparian lifesaving equipment (e.g. grab chains, access ladders and life buoys) alongside the riverside areas to a standard recommended in the 1991 Hayes Report on the Inquiry into River Safety vii. encourage active travel (walking and cycling) through the provision of cycle and foot paths adjacent to the waterway (but outside of the buffer zone) viii. have regard to the HM Government's UK Marine Policy Statement (2011) or updated equivalent and the emerging South East Marine Plan, which applies to the River Thames and the River Roding 	

Policy	Description	Likely Significant Effects
	<p>ix. identify and deliver natural flood management opportunities to help alleviate fluvial and surface water flooding, as well as measures to prevent litter entering waterways. On sites with culverted watercourses, proposals for new development will be expected to investigate and secure the implementation of measures to restore sections of the watercourse, with clear and robust justification provided, if considered unachievable</p> <p>x. maximise the use of the river for freight, including for the transportation of construction materials to, and waste from a development site either directly to and from the site or through the supply chain.</p> <p>Thames Policy Area</p> <p>2. The Thames Policy Area, including the River Roding, is designated on the Policies Map. Within this area, development will be supported where it meets the requirements above and it:</p> <ul style="list-style-type: none"> a) improves public access to and along the River Thames b) protects and enhances views towards and along the River Thames c) facilitates and acts on the recommendations of the Thames Estuary 2100 Plan (or updated equivalent) for Action Zone 4, within which the borough lies d) protects safeguarded wharves and jetties from any development that would prejudice their future use for river transport in accordance with policy SP5. 	
<p>POLICY DMNE 5: Trees</p>	<p>1. Development proposals should retain existing trees, shrubs and 'vegetation of value' where possible unless it can be demonstrated that their removal would provide substantial public benefit or if they are considerably damaged or deceased. This value should be assessed by an appropriate valuation system, as agreed with the Council.</p> <p>2. Trees, shrubs or vegetation must be retained where one or more of the criteria below are met:</p> <ul style="list-style-type: none"> a) it is considered to be of significant value, including ecological value, as per an agreed appropriate arboriculture valuation system (such as i-tree or CAVAT) and subject to consultation with the Council b) it makes a significant contribution to amenity or local character c) it is of special character, age, or has scope for screening other properties or features. <p>3. If existing trees and vegetation of value cannot be retained, a robust justification must be provided and they should be replaced by species of at least equivalent value with a preference for on-site planting.</p>	<p>No Likely Significant Effects</p> <p>This policy relates to trees. There are no linking impact pathways present and thus, no likely significant effects.</p>

Policy	Description	Likely Significant Effects
	<ol style="list-style-type: none"> 4. Where it is agreed with the Council that it is not possible to provide adequate replacement trees as part of a development, the applicant will be required to make a financial contribution to the Council's tree planting and maintenance programme dependent on the specific development and the value of the trees. 5. Major development is expected to incorporate planting including trees, shrubs and vegetation over and above any existing provision. Planting should use trees, shrubs and vegetation that are appropriate to the context and location of the development site and provide complementary habitat. 6. Applicants will be expected to demonstrate how a development has been designed to allow trees and other vegetation to grow and thrive, including during construction. This includes ensuring that urban planting allows tree roots to grow sufficiently, allows water filtration and avoids soil compaction around street planting. 7. When identifying locations for new trees, it is vital that eventual root and branch growth of a tree are taken into account when determining how much space will be needed in the future. This is to ensure the tree survives and thrives, and to prevent damage to existing properties and structures. 8. All trees and vegetation planted in close proximity to flood defences and within the 'buffer zone' must have appropriate root containment systems installed, to prevent future tree root growth negatively affecting flood defence structures. 	
<p>POLICY DMNE 6: Existing allotments</p> <p>Local food growing, including allotments</p>	<p>Redevelopment of existing allotments will only be permitted in exceptional circumstances where it can be demonstrated that they are no longer needed by the community or existing allotment users are relocated to an alternative allotment that is within reasonable proximity to their homes.</p> <p>Creation of new food growing opportunities</p> <ol style="list-style-type: none"> 1. Proposals for community food growing and gardening will be encouraged in line with Policy G8 of the London Plan, particularly where this forms part of the overall landscaping and open space strategy for residential development or as part of a school, playground or recreational area. Innovative food growing solutions, such as edible landscaping, rooftop growing, vertical and hydroponic growing and indoor growing will be strongly encouraged. 2. Major residential-led developments are expected to provide community food growing opportunities and to provide a strategy for the ongoing management of this. 3. Proposals for new allotments will be supported where there is a demonstrable local need through appropriate engagement with key stakeholders and the local community, and where this does not prejudice alternative land uses from coming forward, including residential use. 	<p>No Likely Significant Effects</p> <p>This policy relates to local food growing including allotments. There are no linking impact pathways present and thus, no likely significant effects.</p>
<p>STRATEGIC POLICY SP7: Securing a</p>	<ol style="list-style-type: none"> 1. The Council will: 	<p>No Likely Significant Effects</p>

Policy	Description	Likely Significant Effects
<p>clean, green and sustainable borough</p>	<ul style="list-style-type: none"> a) encourage innovative approaches to tackling climate change, reducing air pollution, managing flood risk, heat risk and nuisance, and promoting sustainable infrastructure b) expect major development to be net zero carbon and employ low carbon technologies in line with the London Plan Policy SI 2: minimising greenhouse gas emissions, and work with developers, landowners and other key stakeholders to ensure, where appropriate, development supports and connects into the borough's strategic District Energy Networks and associated infrastructure, utilising low or zero carbon energy sources and heat recovery c) expect all development to minimise the risk of internal overheating in line with the London Plan policy SI 4: managing heat risk d) ensure all development manages nuisance (such as noise, vibration, artificial light, odour, fumes and dust pollution) during both construction and operation through appropriate design, planning and mitigation e) improve the borough's air quality in line with the Council's Air Quality Action Plan; requiring new development to accord with policy SI 1 of the London Plan; and promoting sustainable transport and green infrastructure f) expect development and large-scale regeneration to facilitate the remediation of land affected by contamination g) work with developers and key stakeholders to reduce flood risk (including through the use of Sustainable Drainage Systems), improve wastewater infrastructure in line with the Council's Infrastructure Delivery Plan, and reduce mains water consumption h) co-operate with other boroughs to jointly address cross-boundary flood risk issues i) Seek to maintain an appropriate landbank as per the apportionment for the Borough set out in the London Plan 2021 and review the approach until the new Joint Waste Plan⁶⁶ is adopted j) Meet the borough-level apportionment target of household, commercial and industrial waste set out in the London Plan 2021 within an updated joint waste plan k) Reduce waste and promote the circular economy principles as set out in policy SI 7 of the London Plan 2021 	<p>This policy relates to securing a clean, green and sustainable Borough. There are no linking impact pathways present and thus, no likely significant effects.</p>

⁶⁶ The constituent East London Waste Authority (ELWA) boroughs are currently developing a new Joint Waste Plan, alongside their respective Local Plan work. The programme for this is still to be finalised, however waste sites will need to be protected until the joint strategy is completed, at which point it will form part of LBBD's development plan and will set out the strategic approach for the sustainable management of waste over the Local Plan period in accordance with London Plan.

Policy	Description	Likely Significant Effects
	<ul style="list-style-type: none"> l) Meet the municipal waste recycling target by 65 per cent by 2050 m) Ensure that zero biodegradable or recyclable waste goes to landfill by 2026 n) seek to deliver secure, affordable and low carbon utilities and physical infrastructure. 	
<p>POLICY DMSI 1: Sustainable design and construction</p>	<ol style="list-style-type: none"> 1. All development will be required to incorporate sustainable design and construction, relating to the scale, nature, orientation, layout and form of the proposal. 2. Major development proposals must demonstrate, in a supporting sustainability statement, how sustainable principles, standards, and materials and low carbon technologies are integral to the design, construction and operation of the development; and be accompanied by a pre-assessment, demonstrating how the following standards, or any future replacement standards, will be met. <ul style="list-style-type: none"> a) all new non-residential development over 500 sqm floorspace (gross) must be designed and built to meet or exceed a BREEAM 'Excellent' rating (or updated equivalent) b) all non-residential refurbishment of existing buildings and conversions (including change of use) over 500sqm floorspace (gross) must be designed and built to meet or exceed a BREEAM non-domestic refurbishment 'Excellent' rating (or updated equivalent) c) all residential refurbishment development of 10 dwellings or more must be designed and built to meet or exceed a BREEAM Domestic Refurbishment 'Excellent' rating (or updated equivalent). 3. All new residential development should meet a Home Quality Mark 3 star rating (or updated equivalent). 	<p>No Likely Significant Effects</p> <p>This policy relates to sustainable building design. There are no linking impact pathways present and thus, no likely significant effects.</p>
<p>POLICY DMSI 2: Energy, heat and carbon emissions</p>	<p>Carbon dioxide emissions</p> <ol style="list-style-type: none"> 1. The Council will expect major development to contribute to, and where possible exceed, the borough's target of becoming carbon neutral by 2050 by maximising energy efficiency and carbon reduction on-site and demonstrating the achievement of net zero carbon buildings and neighbourhoods, in line with the Council's latest guidance. 2. Major development proposals are required to submit a detailed Energy Assessment, which provides information on predicted energy demand and carbon savings, following the most recent guidance from the GLA, demonstrating how the development has been designed in accordance with the energy hierarchy and relevant policies set out in Policy SI 2 of the London Plan. Minor development proposals are also encouraged to submit an Energy Strategy. 3. Where it is clearly demonstrated that the zero-carbon target cannot be achieved on-site and there is a well-justified shortfall, applicants will be expected to make a financial contribution in agreement with the Council, either through a cash in lieu contribution to the Council's Carbon Offset Fund, or agreement of sufficient alternative offsetting arrangements within the borough via planning obligations. 	<p>No Likely Significant Effects</p> <p>This policy relates to energy, heat and carbon emissions. There are no linking impact pathways present and thus, no likely significant effects.</p>

Policy	Description	Likely Significant Effects
	<p>Connection to district energy networks</p> <p>4. All development proposals will be expected to:</p> <ul style="list-style-type: none"> a) address an area's energy infrastructure requirements, as identified in the Council's latest Infrastructure Delivery Plan; and b) prioritise decentralised energy; and c) adhere to the London Plan's heating hierarchy (Policy SI 3). <p>5. All new large-scale development (over 500 dwellings) should liaise with the Council about the creation of a new District Energy Network (DEN).</p> <p>Low carbon and renewable energy technologies</p> <p>6. Development proposals will be expected to incorporate as much low carbon and renewable energy technologies as possible with minimal impact on the environment, amenity, affordability/operational costs and human health and wellbeing. They must demonstrate that the most appropriate and well-performing technologies are incorporated into new development and that any adverse effects on human health or the environment are avoided, or otherwise appropriately mitigated, including in respect of managing overheating risk and end user affordability.</p> <p>Overheating risk</p> <p>7. All development proposals should minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure.</p> <p>8. All major development proposals will be expected to mitigate overheating risk (for example through orientation, shading, insulation, solar-controlled glazing, natural ventilation and efficient mechanical ventilation with heat recovery) and submit an Overheating Assessment in accordance with the requirements of policy SI 4 the London Plan and the cooling hierarchy. This assessment must have regard to the Noise and Vibration Assessment in terms of managing both overheating risk and acoustics.</p>	
<p>POLICY DMSI 3: Nuisance</p>	<p>1. Development proposals are required to:</p> <ul style="list-style-type: none"> a) submit a noise and vibration assessment for all major applications to reduce any adverse impacts to an acceptable level using the most appropriate layout, orientation, design and use of buildings. This assessment must have regard to the overheating assessment in terms of managing both overheating risk and acoustics b) have regard to the Agent of Change principle (Policy D13 of the London Plan) 	<p>No Likely Significant Effects</p> <p>This policy relates to nuisance. There are no linking impact pathways present and thus, no likely significant effects.</p>

Policy	Description	Likely Significant Effects
	<ul style="list-style-type: none"> c) submit and implement a construction management plan in order to avoid, minimise and mitigate significant adverse demolition, construction and operational impacts (such as noise, vibration, artificial light, odour, fumes and dust pollution) on people and the built and natural environment through the development d) 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 e) ensure noise-sensitive and air quality-sensitive development is directed to appropriate locations, and protect these against any existing and proposed sources of noise and air pollution through careful design, layout and use of materials and adequate insulation f) where appropriate, work with the Council to manage noise by identifying and protecting areas of tranquillity that have remained relatively undisturbed by noise and are valued for their recreational and amenity value for this reason. <p>2. Development proposals which generate unacceptable levels of nuisance, either individually or cumulatively, will generally be resisted.</p>	
<p>POLICY DMSI 4: Air quality</p>	<ul style="list-style-type: none"> 1. The whole borough is designated as an Air Quality Management Area (AQMA) for both nitrogen dioxide (NO₂) and particulate matter (PM₁₀). LBBDD also have three designated Air Quality Focus Areas (see Policies map) – A13 Ripple Road, Barking town centre and Whalebone Lane North) where the EU annual mean limit value for NO₂ has been exceeded. 2. Major development proposals must achieve or improve upon the ‘air quality neutral’ benchmark (in line with Policy SI 1 of the London Plan and LBBDD’s latest Air Quality Action Plan) by avoiding people’s exposure to poor air quality. This should be achieved through: <ul style="list-style-type: none"> a) effective design solutions b) appropriate plant, machinery and technology c) facilitating the use of low or zero emission transport and reducing the reliance on private motor vehicles, while promoting walking and cycling d) improving traffic management 	<p>No Likely Significant Effects</p> <p>This policy relates to air quality. There are no linking impact pathways present and thus, no likely significant effects.</p> <p>Whilst this is a positive policy that aims to improve air quality overall in the Borough, it does not provide any specific mechanisms relating to international sites.</p>

Policy	Description	Likely Significant Effects
	<p>e) providing new green infrastructure in line with the Council's Infrastructure Delivery Plan and Green Infrastructure & Biodiversity Strategy (or updated equivalents).</p> <p>3. All major development will be required to provide an Air Quality Impact Assessment as part of the planning application in accordance with Policy SI1 of the London Plan: improving air quality.</p> <p>4. Development located within the borough's designated Air Quality Focus areas will be closely scrutinised as to the approach to air quality and will be expected to help reduce air pollution in the area.</p> <p>5. Where proposals do not achieve the air quality neutral benchmark, applicants will be expected to make a financial contribution in agreement with the Council through off-site measures, in line with the London Plan policy SI 1: improving air quality. During demolition and construction, all developments must adhere to the requirements of the GLA's Control of Dust and Emissions during Construction and Demolition SPG 2014 (or updated equivalent) including the emissions standards set for all Non-Road Mobile Machinery (NRMM) used on-site.</p>	
<p>POLICY DMSI 5: Land contamination</p>	<p>1. Development proposals on, or adjacent to land potentially affected by previous contaminative land use will be required to apply the latest government guidance on land contamination⁶⁷.</p> <p>2. Remediation proposals to deal with contamination must be agreed with the Council prior to the commencement of any works.</p> <p>3. Development proposals will:</p> <ul style="list-style-type: none"> a) ensure safe transportation, storage, and use of hazardous substances b) protect neighbouring occupiers and the natural environment from remediation impacts c) consult the Health and Safety Executive (HSE) and the Environment Agency (EA) on proposals involving hazardous substances where required. <p>4. Hazardous substances are to be located where they would not cause potential health and safety risks to neighbouring uses or to the environment. Other uses should be prevented from being located near potentially polluting substances where future users could be at risk.</p>	<p>No Likely Significant Effects</p> <p>This policy relates to land contamination. There are no linking impact pathways present and thus, no likely significant effects.</p>
<p>POLICY DMSI 6: Flood risk and defences</p>	<p>1. Development should seek to deliver a neutral impact or reduction in flood risk, on and off-site, by demonstrably giving sufficient consideration from the outset of the design, and during pre-application discussions with the Environment Agency (EA) and Thames Water and the Council.</p>	<p>No Likely Significant Effects</p> <p>This policy relates to flood risk and defences. There are no linking impact</p>

⁶⁷ The government guidance on land contamination is available at: <https://www.gov.uk/government/publications/land-contamination-risk-management-lcrm>

Policy	Description	Likely Significant Effects
	<p>2. Development is required to undertake Flood Risk Assessments for schemes meeting the thresholds set out in DEFRA and EA guidance:</p> <ul style="list-style-type: none"> a) adapt to climate change by planning for future flood risk. If a site is not currently shown to be within Flood Zone 2 or 3, but detailed modelling shows it is expected to be impacted when climate change is assessed, then the same design considerations should be applied as if it was within the present-day Flood Zone. b) consult the Environment Agency to obtain these models and any other updates to modelling that contribute to the Strategic Flood Risk Assessment (SFRA)⁶⁸. <p>3. Development proposals for vulnerable uses and sleeping accommodation must be located away from areas of high flood risk, and above the tidal breach level or fluvial 1 in 100 plus climate change flood level.</p> <p>4. All development within sites at risk of flooding should be guided towards areas of lowest risk within the site and development should be designed in strict accordance with the Development Control recommendations set out in Section 7 of the Strategic Flood Risk Assessment (SFRA) Level 1 Report.</p> <p>5. Basements, and any development not classified as water compatible, are not considered appropriate in Flood Zone 3b, and there are restrictions on their use and design within Flood Zones 2 and 3a with the Development Control recommendations set out in Section 7 of the SFRA Level 1 Report.</p> <p>Flood defences</p> <p>6. Development proposals along the Thames will be expected to:</p> <ul style="list-style-type: none"> a) maintain, repair, enhance or replace flood defence walls, banks and flood control structures to provide adequate protection for the lifetime of the development b) protect land adjacent to, and set buildings back from, flood defences to allow future replacement of defences and provision of public amenity and biodiversity, in accordance with the Thames Estuary 2100 Plan c) seek opportunities to raise existing tidal flood defences to the required levels in line with the Thames Estuary 2100 Plan (or updated equivalent) in preparation for future climate change impacts, or demonstrate how defences can be raised to the required levels in the future through submission of plans and cross-sections of the proposed raising 	<p>pathways present and thus, no likely significant effects.</p>

⁶⁸ Since the Council's SFRA was completed, the Environment Agency has updated the hydraulic model of the Lower Roding and Loxford Water and intends to carry out further breach modelling downstream of the Thames Barrier.

Policy	Description	Likely Significant Effects
	<p>d) demonstrate the provision of improved access to existing defences, or where opportunities exist to realign or set back defences</p> <p>e) provide landscape, amenity and habitat improvements, where appropriate, in line with the riverside strategy approach</p> <p>f) safeguard land for future defence raising</p> <p>g) secure financial contributions from partners in order to enable flood defence works.</p> <p>7. Where appropriate the Council will require proposals to include a condition survey of existing flood defences and watercourse infrastructure to demonstrate that it will adequately function for the lifetime of the development, and if necessary, make provision for repairs or improvements or replacement.</p>	
<p>POLICY DMSI 7: Water management</p>	<p>7: Surface water management</p> <p>1. As a minimum all development must:</p> <p>a) utilise permeable surfaces (including on areas of public realm and on small surfaces such as front gardens and driveways) unless they can be shown to be unavoidable</p> <p>b) seek advice from the Council as the Lead Local Flood Authority (LLFA) as to their preference and guidance on Sustainable Drainage Systems (SuDS).</p> <p>2. Development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible in line with Policy SI 13 of the London Plan and the drainage hierarchy. All major development must incorporate SuDS into proposals, where appropriate, having regard to the government's latest Non-Statutory Technical Standards for Sustainable Drainage Systems and the Council's latest Strategic Flood Risk Assessment (SFRA).</p> <p>3. Minor developments are also expected to incorporate SuDS, where feasible. SuDS should be green, provide multiple benefits and integrate with the Council's green infrastructure network.</p> <p>4. Proposals for SuDS will also need to include a long-term SuDS Management and Maintenance Plan, including details of who is responsible for maintenance.</p> <p>Wastewater</p> <p>5. Major development is required to demonstrate that the local water supply and public sewerage networks have adequate capacity, both on and off-site, to serve the development, taking into consideration the cumulative impacts of current and proposed development.</p>	<p>No Likely Significant Effects</p> <p>This policy relates to water management. There are no linking impact pathways present and thus, no likely significant effects.</p>

Policy	Description	Likely Significant Effects
	<p>Reducing water consumption</p> <p>6. All new development is required to reduce water consumption. New residential development must achieve a maximum internal water use target of 105 litres per person, per day, and non-residential development must achieve at least the BREEAM 'Excellent' standard for the Wat 01 water category (or updated equivalent) in line with Policy SI 5 of the London Plan: water infrastructure. The use of rainwater and grey water to minimise the use of mains water will be encouraged.</p> <p>7. The Council will support development proposals where they:</p> <p>a) consider the net increase in water and wastewater demand to serve their developments and also any impact the development may have off-site further down the network, in order to avoid no or low water pressure and internal or external sewage flooding of property</p> <p>b) engage with Thames Water and use their free pre-planning service at an early stage to determine if there will be capacity in the Thames water or wastewater networks to serve the development, or what they will do if there is not. The outputs of the communication can be included as evidence to support a planning application.</p>	
<p>POLICY DMSI 8: Demolition, construction and operational waste</p>	<p>Demolition and construction waste</p> <p>1. Prior to demolition and construction, all development proposals will be expected to:</p> <p>a) develop an appropriate construction waste management plan in order to reduce, reuse, recycle and recover waste and to mitigate environmental impact in accordance with DMSI1 of the Local Plan</p> <p>b) where appropriate, consider the use of the river for freight, including for the transportation of waste, from a development site either directly to and from the site or through the supply chain in line with the Local Plan Policy DMNE 4: Water Environment.</p> <p>2. The Council supports sustainable waste management, however there are instances where it is not appropriate to re-use materials on site and the principles defined in CL:AIRE: The Definition of Waste: Development Industry Code of Practice (DoWCoP) should be applied. If a proposed material reuse scenario cannot meet these principles, it is likely that material is waste, and its reuse will need to be managed in line with the requirements of the Environmental Permitting (England and Wales) Regulations 2010, or its updated equivalent.</p> <p>Operational waste</p> <p>3. All new and refurbishment development proposals must submit a strategy for the minimisation and collection of waste and recycling and include sufficient and accessible space in their design and layout for waste storage and collection</p>	<p>No Likely Significant Effects</p> <p>This policy relates to demolition, construction and operational waste. There are no linking impact pathways present and thus, no likely significant effects.</p>

Policy	Description	Likely Significant Effects
	<p>within developments, in accordance with the London Waste Recycling Board's (LWARB) latest guidance on recycling and storage. As a minimum, appropriate facilities must be provided, both within individual units and for the building as a whole, in order to separate and store dry recyclables (card, paper, mixed plastics, metals, glass), organic and residual waste.</p> <p>4. Major residential developments are required to incorporate high-quality, on-site waste collection systems that are based on current best practice and do not include traditional methods of storage and collection, such as kerbside collections and wheeled bin methods. The type of systems could include compactors, underground storage containers, vacuum systems and automated or pneumatic waste collection systems. These systems require land to be set aside to store bulky waste materials, with the size and footprint of the space varying from system to system. Applicants should discuss options with the Council regarding waste collection prior to the submission of an application.</p> <p>5. Non-residential proposals involving the use or disposal of hazardous substances must demonstrate that the risks to public safety and the environment are appropriately managed in line with Policy DMSI 3 Nuisance.</p>	
<p>POLICY DMSI 9: Smart utilities</p>	<p>1. Development proposals should accord with the London Plan Policy SI 6: digital connectivity infrastructure, and will be supported where they directly provide, and demonstrate in their design the flexibility and adaptability to:</p> <ul style="list-style-type: none"> a) incorporate smart technologies and approaches that enable resources, space, systems and materials to be monitored and managed efficiently, as well as support the balancing of the grid b) adopt protocols and systems that are compatible with others used in the borough and London, such as the local planning authorities, statutory undertakers, independent distribution network operators, social infrastructure providers and other organisations that are responsible for managing the public realm and supply vital services to the area, in order to allow for the safe sharing of information and efficient service provision c) ensure open access provision of wired and wireless broadband technologies delivering the highest speeds to provide a wide range of services d) work proactively with the Council to plan, deliver and manage development e) give data access to the Council and service providers at no cost to provide joined-up and efficient services that respond to customer needs. <p>2. Development should prioritise connecting to strategic area wide telecommunications networks when and where they are available.</p> <p>3. Telecommunications development should be sited and designed in such a way that it does not adversely affect the appearance of the surrounding area. The Council will only support such development where:</p>	<p>No Likely Significant Effects</p> <p>This policy relates to smart utilities. There are no linking impact pathways present and thus, no likely significant effects.</p>

Policy	Description	Likely Significant Effects
	<ul style="list-style-type: none"> a) the siting is not intrusive in the street scene b) the design is of a scale, height and appearance which does not disrupt the character of an area c) the equipment has been designed to keep the size of the installation to the technical minimum and sited, so far as practicable, to minimise the impact on the environment d) screening of equipment housing and other visually intrusive development associated with the proposal is provided e) applicants have considered the need to include additional structural capacity to take account of the growing demands for network development, including that of other operators f) the applicant has certified that the development will operate within the latest (ICNIRP) guidelines for public exposure. 	
<p>STRATEGIC POLICY SP8: Planning for integrated and sustainable transport</p>	<p>1. In line with the Borough-wide Transport Strategy Topic Paper the Council will seek to create a cohesive transport network for the whole borough that prioritises sustainable transport modes.</p> <p>1. The Council will work proactively with the GLA, TfL, C2C, Network Rail and other network operators/stakeholders to develop strategic transport plans which enhance growth by improving local connectivity across the borough and the wider London area. The Council will promote sustainable active travel by extending current schemes including Low Emission Neighbourhoods & School Streets Programme. The Borough's overall transport vision is outlined in Figure 25 below.</p> <p>2. The Council will continue to follow the Mayor's Transport Strategy through delivery of its Local Implementation Plan (LIP) and supporting programmes. This will be achieved by:</p> <ul style="list-style-type: none"> a) Seeking improvements to and, where necessary, safeguarding existing land and buildings used for active travel (walking and cycling), public transport or related support functions critical for delivering the borough's strategy for improving the transport network and services, as set out in the Local Implementation Plan and borough-wide Transport Strategy Topic paper 	<p>No Likely Significant Effects</p> <p>This policy relates to planning integrated and sustainable transport. There are no linking impact pathways present and thus, no likely significant effects.</p> <p>Whilst this is a positive policy that aims to improve air quality overall in the Borough, it does not provide any specific mechanisms relating to international sites.</p>

Policy	Description	Likely Significant Effects
	<p>b) Identifying and safeguarding new sites, space and route alignments, as well as supporting infrastructure which allow for modal shift of freight from road to rail or river such as the proposed Dagenham Free Port and the City Markets relocation at Dagenham Dock</p> <p>c) Seeking to adopt a multifaceted approach to sustainable transport which recognises the inter-relationship between successful placemaking, health and wellbeing, and the environment. We will develop an integrated, joined-up system that allows people to travel easily both within the borough and between other inner and outer London boroughs, prioritising active travel on key desire lines connected to new and existing public transport hubs</p> <p>d) Exploring the feasibility and business case of wider strategic schemes to improve the A13 and a future link across the River Roding that aim to reduce severance and improve environmental conditions</p> <p>e) 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</p> <p>f) Supporting for consolidation of deliveries in town centres, logistics hubs and in new masterplans, with low or zero emission last-mile deliveries</p> <p>g) Working with rail operators, river freight operators, TfL and other partners to improve the operation and capacity of all stations, and maximising the use of rail sites, as well as safeguarded wharves in respect of Policy SP5: Promoting Inclusive Economic Growth</p> <p>h) Expand the borough's network of 'School Streets' where all motor vehicles, except those belonging to residents and school staff, are restricted from the immediate area during school drop-off and pick-up.</p> <p>3. The Council will work to support the delivery of the Mayor's two strategic targets in by 2041:</p>	

Policy	Description	Likely Significant Effects
	<p>a) 75% of all trips (based on the citywide target of 80%) in Outer London to be made by walking, cycling or public transport</p> <p>b) the Mayor's Vision Zero ambition to eliminate all deaths and serious injuries on the roads.</p> <p>4. In order to support the borough's growth, the Council will seek where appropriate, schemes which are car-free or offer a low level of parking provision in line with the London Plan 2021 parking standards. This will be supported by further development of local public transport networks and sustainable modes of travel such as wider footpaths, good cycling infrastructure and well-designed public realm walking and cycling routes.</p> <p>5. We will also support developments to include the installation of electric vehicle charging points and supporting infrastructure, in line with London Plan 2021 targets. This will be further supported by the borough's emerging EV vision.</p> <p>6. In line with the Borough's Walking and Cycling Strategy the Council will support new and planned schemes such as Cycle Route CFR10, and the Barking to Chadwell Heath cycle route, which will reduce severance and improve connectivity across the borough. The Walking and Cycling Strategy also identifies existing routes to be upgraded, ensuring routes follow the Healthy Streets approach and are along key desire lines, which feed other transport modes.</p> <p>7. The Council will seek a sustainable approach to freight by working with developers, local businesses, river and rail freight operators, and other partners to reduce highway congestion and environmental impacts. This will include the development of a Freeport on the River Thames to support planned industrial intensification.</p>	
<p>POLICY DMT 1: Making better connected neighbourhoods</p>	<p>1. Strategic and major development proposals should be located where employment, housing and supporting facilities and services are within easy reach of each other by sustainable modes, reducing the need to travel and ensuring people are connected to places by, and with, high-quality, safe and attractive cycling and walking routes, both new and existing.</p> <p>2. Active travel routes, which support walking and cycling, should connect to areas of Green and Blue Infrastructure as well as transport hubs around the borough, where possible. Walking routes must be suitable for wheelchairs,</p>	<p>No Likely Significant Effects</p> <p>This policy relates to better connected neighbourhoods. There are no linking impact pathways present and thus, no likely significant effects.</p>

Policy	Description	Likely Significant Effects
	<p>pushchairs and other users with limited mobility and must include places to stop and rest, with suitable and sufficient safe crossing points, where required, to reduce severance.</p> <p>3. All proposals for new walking and cycling measures should be developed with an explicit understanding of how they promote use by women, children, elderly people, families, people from different ethnic backgrounds, and other people with protected characteristics as set out in the Equality Act.</p> <p>4. Cycle routes should, where possible, be fully protected from road transport and walkways, following the best current design guidance (currently LTN 1/20 and LCDS). Routes should be attractive for users of all ages, and be designed for both leisure and commuter travel.</p> <p>5. Active travel infrastructure proposals should demonstrate how they meet the Mayor's Healthy Streets approach in line with TfL's guidance⁶⁹. Emerging schemes in the borough include: the Heathway Regeneration and Vallance Avenue Healthy Streets, High Road Proposals, and Thames Road Regeneration.</p> <p>6. Expanding the school streets scheme will be considered in areas with low active travel method of travel to school mode shares.</p> <p>Assessing Development Proposals</p> <p>7. Development proposals should seek reduce the dominance of vehicles on London's streets whether stationary or moving, in line with the Mayor's Transport Strategy.</p> <p>8. 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 Plan⁷⁰, in accordance with Policy T4 of the London Plan: assessing and mitigating transport impacts.</p>	<p>Whilst this is a positive policy that has the potential to increase -sustainable modes of transport that have the potential to improve air quality, it does not provide any specific mechanisms relating to international sites.</p>

⁶⁹ TfL has developed cycle route quality criteria to improve the standard of London's cycle network. These criteria are designed to be consistent with recommendations in the London Cycling Design Standards and - working alongside other guidance and tools - should be used to shape the design of new cycling infrastructure. The criteria and tools are provided at <https://tfl.gov.uk/corporate/publications-and-reports/cycling>.

⁶⁹ Please refer to guidance available on TfL's website: <https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guide/transport-assessments>.

⁷⁰ Please refer to guidance available on TfL's website: <https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guide/transport-assessments>.

Policy	Description	Likely Significant Effects
	<p>9. TA / TSs should be submitted with the development proposals outlined and ensure that any potential capacity effects on the transport network (including the walking and cycling network, public transport and road network) are fully assessed, in line with available best practice guidance for London. TAs / TSs should demonstrate how they accord with the Mayor's 'Healthy Streets' approach.</p> <p>10. Developments likely to generate significant amounts of movement should be supported by a Travel Plan (TP)⁷¹ as part of a planning application so that it can be considered in parallel to development proposals and readily integrated into the design and occupation of the new site, rather than retrofitted after occupation. TPs should include clear, measurable targets with a key focus on ongoing monitoring and evaluation of its effectiveness</p> <p>11. Applicants should also ensure they engage early with relevant stakeholders, including the borough, in order to establish the likely transport impacts and agree the assessment parameters and appropriate mitigation measures.</p> <p>12. All developments will be required to demonstrate how they contribute to promoting sustainable modes of travel and limiting car use, particularly for short, local journeys.</p> <p>13. Any development that will have an adverse impact on the highway and transportation network (for example, demonstrable disbenefits on congestion, safety, air quality and noise), as well as the operation of public transport (including crowding levels and journey times) will be required to contribute and deliver appropriate transport infrastructure or effective mitigation measures, including a reduction in vehicular parking spaces (in line with the London Plan).</p> <p>14. Where appropriate, conditions will be imposed or planning obligations secured through a Section 106 or S278 agreement. CIL contributions will also be expected, where appropriate, to fund larger schemes of a wider benefit such as improving the A13.</p> <p>15. Developments in transformation areas as denoted by the Local Plan will be expected to contribute towards delivering the spatial strategies developed for that specific area, for instance the Barking Town Centre Movement Strategy.</p> <p>16. Strategic developments should provide bus access and safeguard the land required for bus standing, which is vital for ensuring new services are operable. Developments should also design and implement new junctions and road connections to allow buses to travel through the site. The borough will also 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 Borough</p>	

Policy	Description	Likely Significant Effects
	<p>and National Cycle Network (NCN). This will improve the borough's permeability, removing severance by connecting people with places and helping to create one cohesive transport network through sustainable movement.</p> <p>17. Development proposals will be required to include the installation of electric vehicle charging points and supporting infrastructure, in line with the London Plan Policy T6: car parking, Policy T6.1: residential parking, T6.2: office parking, T6.3: retail parking and T6.4 hotel and leisure parking.</p>	
<p>POLICY DMT 2: Car parking</p>	<ol style="list-style-type: none"> 1. All developments will be required to demonstrate how they contribute to promoting sustainable modes of travel and reducing car use by adopting the maximum London Plan car parking standards (see Policy T6: car parking of the London Plan). 2. Car-free developments should be the starting point for all development proposals on sites that are (or are planned to be) well-connected by public transport (designated by an appropriate PTAL 5 or 6 rating). Car-free development will have no general parking but should still provide disabled persons parking in line with London Plan. Developments in areas of poor/moderate transport accessibility will be required to be Car-lite, providing low-level car parking spaces on-site and a high-quality public realm that encourages walking, cycling and public transport use. Early engagement with the Council to discuss appropriate car parking levels that reflect policy and based on the "LBBD Parking Guidance" is recommended. 3. Residential developments in the borough will be expected to adhere to the London Plan's maximum car parking standards. In areas of poor public transport accessibility, car parking can help facilitate the building of family housing so developments may be required to provide a car parking provision nearer the London Plan maximum. Developers would be required to provide clear justification of the higher parking provision. On larger strategic schemes early engagement with the Council and TFL is encouraged. 4. Where parking is provided in a development it will be expected to: <ol style="list-style-type: none"> a. Provide a parking design and management plan, which follows the guidance provided by TfL's best practice guidance on parking design and management, detailing mechanisms for leasing spaces, providing disabled parking to meet future demand and activating passive electric charge points. b. All parking provided by developments will be expected to be utilised by the development users with strategies to convert car parking spaces to appropriate non-car parking uses, including pocket gardens, parklets, public realm spaces or cycling parking. Over time developments will be encouraged to actively convert their parking spaces into these uses, provided this does not have significant detrimental impacts on street parking, traffic and highways c. Include a car-free agreement within s106 agreements, restricting new residents from accessing parking permits within existing and proposed controlled parking zones 	<p>No Likely Significant Effects</p> <p>This policy relates car parking. There are no linking impact pathways present and thus, no likely significant effects.</p>

Policy	Description	Likely Significant Effects
	<p>d. Contribute to a Controlled Parking Zone (CPZ) Programme where existing residents' parking would be significantly impacted by the additional cars from a development, and this cannot be appropriately mitigated.</p> <p>e. Car Clubs should be proposed for all developments which are 'car-free' or 'car-lite' and considered for all other developments. In these cases, or if an existing Car Club is located within a reasonable distance of the development, free membership for residents will be required for at least the first two years after first occupation.</p> <p>5. All developments are required to ensure that provision of on-street parking does not obstruct walking and cycling desire lines; all car parking spaces should be allocated with no potential for providing more spaces than planned for. Car parking, if required, should be designed in accordance with the London Plan and local masterplan SPDs, in line with the available best practice guidance.</p>	
<p>POLICY DMT 3: Cycle parking</p>	<p>2. All developments must adopt the maximum London Plan cycle parking standards (see Policy T5: cycling of the London Plan). Any developments proposing a more generous provision of cycle parking and supporting infrastructure (e.g. changing rooms, maintenance facilities, lockers and shower facilities) will be supported, and this is actively encouraged.</p> <p>3. The design and layout of cycle parking should be in accordance with the guidance contained in the London Cycling Design Standards, supported by appropriate on-site security measures. Accessible cycles should also be considered and designed for meeting minimum requirements as set out in the London Plan.</p> <p>3. Where it is considered that proposed developments cannot accommodate sufficient cycle parking provision, developers will be obligated to work with borough officers to propose alternative solutions which meet the standards. These may include options such as providing spaces in secure on-street parking facilities such as cycle hangers or providing contributions to accessible Cycle Hubs in key areas identified in the Cycling and Walking Strategy. Developers in this situation should engage with the Council early in the planning process to discuss appropriate levels of provision and potential solutions.</p>	<p>No Likely Significant Effects</p> <p>This policy relates cycle parking. There are no linking impact pathways present and thus, no likely significant effects.</p>
<p>POLICY DMT 4: Deliveries, servicing and construction</p>	<p>1. Development proposals must explore the use of alternative delivery and servicing practices and emerging technologies, including: freight consolidation and re-timing of deliveries; freight movements by water (see Local Plan Policy DMNE 4 Water Environment), the use of carbo bikes, cycle freight, electric and low or zero-emission vehicles; and the use of delivery lockers in residential developments.</p> <p>2. Where appropriate, all developments should maximise the use of the river for freight including the proposed free port at Dagenham Dock. This includes operational needs as well as for the transportation of construction materials and waste to/from a development site, either directly via the site or through the supply chain.</p>	<p>No Likely Significant Effects</p> <p>This policy relates deliveries, servicing and construction. There are no linking impact pathways present and thus, no likely significant effects.</p>

Policy	Description	Likely Significant Effects
	<p>3. All developments which may have construction impact will have to submit a Construction Logistics Plan (CLP) and Delivery and Servicing plan (DSP) as part of the planning process in accordance with relevant TfL guidance.</p> <p>All construction, demolition and major logistic activities within the borough will be required to work with the council in developing the scope and impact of their operations. In order to mitigate the impact of any additional traffic or potential disruption to the network, careful planning and co-ordination with the council is required to ensure the smooth operation of the highway network.</p>	
<p>STRATEGIC POLICY SP 9: Managing development</p>	<p>1. The Council encourages development proposals to come forward as early as possible to support the regeneration of the borough and will secure:</p> <ul style="list-style-type: none"> a) ensure coordinated and comprehensive development b) delivery of key infrastructure to ensure development is sustainable and encourages active travel and public transport usage. <p>2. The Council will work with private sector and public sector partners including Homes England, registered providers and, on cross boundary issues, neighbouring authorities, to front-load infrastructure investment and delivery and unlock development especially in the Transformation Areas identified in Chapter 3 of this Local Plan 'Transforming Barking and Dagenham'.</p> <p>3. The Council's Infrastructure Delivery Plan (IDP), which will be periodically reviewed, identifies the infrastructure necessary to support development and to connect it to its surroundings and integrate new and existing communities.</p> <p>4. The Council and developers will be expected to proactively engage with residents and local businesses, using communications that best suit the communities, to ensure continued opportunity for local communities to inform and shape development in their area.</p> <p>5. The Council will use planning tools, including preparation of masterplans and design codes, to support the delivery of the Local Plan and secure delivery of key community priorities, highlighted in the Barking Town Centre Transport Strategy and the Borough-wide Transport Strategy</p> <p>6. The Council may also use compulsory purchase powers to facilitate land assembly and the acquisition of all necessary rights to carry out development to enable delivery, including key infrastructure, as set out in this Local Plan and detailed in the latest IDP.</p>	<p>No Likely Significant Effects</p> <p>A delivery management policy that provides for the management of development. There are no linking impact pathways present and thus, no likely significant effects.</p>

Policy	Description	Likely Significant Effects
	<p>7. The Council will monitor implementation of this Local Plan to assess whether growth targets and development outcomes are aligned and promote sustainability. A framework identifying the key indicators that will be monitored is included in Appendix 4.</p> <p>8. The Council will undertake a full or partial update of this Local Plan if our assessment indicates that changes to policy would better support delivery or if our monitoring indicates an amended development strategy would be more effective.</p>	
<p>POLICY DMM 1: Indicative planning obligations Planning obligations (Section 106)</p>	<p>1. The Council may use planning obligations to address a development's impacts and to ensure it aligns with the Development Plan for the borough. This may include Planning Obligations applied in line with the requirements set out in the rest of this Local Plan and the Planning Obligations SPD:</p> <ul style="list-style-type: none"> a) affordable housing on-site or, if acceptable, an off-site financial contribution in place of this b) carbon offset payment, where policy requirements are not met on-site c) air quality measures off-site or a financial contribution if development does not meet the 'air quality neutral' benchmark. d) measures or payment to increase biodiversity where net gain is not feasible on-site e) contributions to new green infrastructure and ecological resilience f) highways works or payments towards addressing any impacts as a result of the development g) other transport (including public transport, walking and cycling infrastructure) requirements arising from transport assessments, travel plans and growth projections. This will also include use of the waterways. h) construction-phase employment and procurement targets i) occupation-stage employment and procurement targets j) delivery of on-site social or physical infrastructure or payments necessary to mitigate the specific impacts of the development k) affordable workspace, where required, or a payment in lieu 	<p>No Likely Significant Effects</p> <p>A delivery management policy that outlines the use of planning obligations (Section 106). There are no linking impact pathways present and thus, no likely significant effects.</p>

Policy	Description	Likely Significant Effects
	<p>l) fees associated with the monitoring of any planning obligation secured which are separate and additional to any legal fees required to be paid to the Council for the preparation of the legal agreement or undertaking.</p> <p>2. Other planning obligations may also be sought, where necessary, to mitigate the specific impacts of the development and where these cannot be secured by planning condition. Requirements for planning obligations will be assessed on a case-by-case basis and used where they meet the legal tests set out in Community Infrastructure Levy Regulations (2010) as amended.</p> <p>3. Payments secured as Planning Obligations will normally be required prior to commencement of the development (or phase of development in the case of outline permissions) unless a financial appraisal demonstrates that later payment is acceptable. Where delivery of specific infrastructure or other works are required to enable development, the Council will use Planning Obligations to define the timing of development in relation to delivery of this.</p> <p>Financial appraisals and viability review mechanisms</p> <p>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, sustainability, public transport and active travel improvements and employment.</p> <p>5. The Council may include a Planning Obligation requiring a viability review of a development including up-to-date values and costs. Payments up to the level required by policy will be necessary if the viability review indicates these can be supported when the review is undertaken</p> <p>6. Viability reviews will be required to comply with the GLA's Homes for Londoners, Affordable Housing and Viability Supplementary Planning Guidance 2017 ⁷²(or its updated equivalent) and will typically be undertaken when:</p> <ul style="list-style-type: none"> a) substantial implementation, as agreed and defined in the legal agreement, of the scheme has not occurred within 24 months of grant of planning permission b) 75 per cent of units are have been sold or rented c) prior to implementation of the second or defined phase of the development or on an annual basis for phased development. 	

⁷² This is available at: <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/planning-guidance/affordable-housing-and-viability-supplementary-planning-guidance-spg>

Policy	Description	Likely Significant Effects
	<p>Vacant Building Credit</p> <p>7. Where a Vacant Building Credit is sought to reduce the affordable housing contribution, a Vacant Building Credit Statement must be submitted alongside a planning application and such schemes are not eligible for a Fast Track assessment. The statement should demonstrate that:</p> <ul style="list-style-type: none"> a) No part of the building has been in continuous use for any six months during the last five years up to the date of the planning application is submitted b) the building has not been vacated solely for the purpose of redevelopment; or c) the building has been marketed for at least 24 months prior to the point of application. <p>8. The Vacant Building Credit must define the existing gross internal floor area and the proposed gross internal floor area. Where the total proposed floorspace is unclear at the time of application, such as may be the case for outline applications, the final calculation of any Vacant Building Credit will be deferred to a later phase of the development when details are available. This approach will be secured through a Section 106 agreement.</p>	

Appendix C Site Allocation Screening: Likely Significant Effect Table and Figure

Site reference	Site name	Distance to closest international site (Epping Forest SAC)	Within Epping 6.2km Zol?	Is it committed development, has planning permission?	Likely Significant Effect
AU	Bamford Road	5.7 km	Yes	No	Likely Significant Effect. This site is located within the 6.2km Zol for Epping Forest SAC. This site is subject to in-combination assessment
AA	Barking Riverside	Over 6.2 km	No	Yes	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. In addition, it is already committed development, so does not require further consideration within this HRA.
AC	Marrieland's Crescent Two	Over 6.2 km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
AD	Dagenham Leisure Park	Over 6.2 km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.

AE	Beam Park (South Dagenham East)	Over 6.2 km	No	Yes	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. In addition, it is already committed development, so does not require further consideration within this HRA.
AJ	Gascoigne East Estate (3 phases)	Over 6.2 km	No	Yes	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. In addition, it is already committed development, so does not require further consideration within this HRA.
AK	Vicarage Field	6.0 km	Yes (mostly within)	Yes	Likely Significant Effect. A portion of this site is located within the 6.2km Zol for Epping Forest SAC. However, it is already committed development, so does not require further consideration within this HRA.
AL	Gascoigne Estate West (phased development)	6.1 km	Yes but only a small proportion	Yes	Likely Significant Effect. A portion of this site is located within the 6.2km Zol for Epping Forest SAC. However, it is already committed development, so does not require further consideration within this HRA.

AM	Crown House & Linton Road car park	5.8 km	Yes	Yes	Likely Significant Effect. This site is located within the 6.2km Zol for Epping Forest SAC. However, it is already committed development, so does not require further consideration within this HRA.
DP	Abbey Retail Park (North)	5.6 km	Yes	Yes	Likely Significant Effect. This site is located within the 6.2km Zol for Epping Forest SAC. However, it is already committed development, so does not require further consideration within this HRA.
BB	Tesco car park	5.6 km	Yes	Yes	Likely Significant Effect. This site is located within the 6.2km Zol for Epping Forest SAC. However, it is already committed development, so does not require further consideration within this HRA.
CD	Land at the Corner of London Road and North Street (Former Site of White Horse PH and Omnibus Park)	5.8 km	Yes	Yes	Likely Significant Effect. This site is located within the 6.2km Zol for Epping Forest SAC. However, it is already committed development, so does not require further consideration within this HRA.
CF	Castle Green	Over 6.2 km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.

CH	Chadwell Heath Industrial Estate	Over 6.2 km	No	Yes	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
CI	Thames Road	Over 6.2 km	No	Yes	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
CM	Gascoigne Industrial Area (phased development)	Over 6.2 km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
CO	Padnall Lake	Over 6.2 km	No	Yes	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
CW	90 Stour Road	Over 6.2 km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.

DJ	Clockhouse Avenue	6.0 km	Yes	No	Likely Significant Effect. This site is located within the 6.2km Zol for Epping Forest SAC. This site is subject to in-combination assessment
DM	Dagenham Heathway Mall	Over 6.2 km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
DO	Town Quay	6.0 km	Yes	No	Likely Significant Effect. This site is located within the 6.2km Zol for Epping Forest SAC. This site is subject to in-combination assessment
EA	Barking Station	5.7 km	Yes	Yes	Likely Significant Effect. This site is located within the 6.2km Zol for Epping Forest SAC. However, it is already committed development, so does not require further consideration within this HRA.
HA	Wickes (Hertford Road)	5.5 km	Yes	No	Likely Significant Effect. This site is located within the 6.2km Zol for Epping Forest SAC. This site is subject to in-combination assessment
HN	Ripple Road and Methodist Church	6.1 km	Yes	No	Likely Significant Effect. This site is located within the 6.2km Zol for Epping Forest SAC. This site is subject to in-combination assessment

WF	Sainsburys 97-131 High Road	Over 6.2 km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
XC	Harts Lane Estate	5.0 km	Yes	Yes	Likely Significant Effect. This site is located within the 6.2km Zol for Epping Forest SAC. However, it is already committed development, so does not require further consideration within this HRA.
XD	41-59 (Odd) Hepworth Gardens 38-64 (Even) Southwold Drive 1-32 Hepworth Court Hepworth Gardens	Over 6.2 km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
XE	Ibscott Close Estate and highways land at Rainham Road South and Ballards Road	Over 6.2 km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
XJ	Former Ford Stamping Plant	Over 6.2 km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.

XK	Riverside Gateway	Over 6.2 km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
YM	Phoenix House, 12-14 Wakering Road, Barking	5.9 km	Yes	No	Likely Significant Effect. This site is located within the 6.2km Zol for Epping Forest SAC. This site is subject to in-combination assessment
ZZ	GSR and Gill Sites Land on the West side of Chequers Lane, Dagenham	Over 6.2 km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
AS	Padnall Court and Reynolds Court	Over 6.2 km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
DS	Rainham Road South	Over 6.2 km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.

DY	Chelmer Estate	Over 6.2 km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
HT	Dagenham Heathway Station	Over 6.2 km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
SR	2-20 Seabrook Road 1-27 Shipton Close	Over 6.2 km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
WB	30-58 Durham Road, Dagenham, 475, 477 and 477A Rainham Road South, Dagenham	Over 6.2 km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
WC	Selinas Lane	Over 6.2 km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.

XO	Lodge Avenue	Over 6.2 km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
XQ	Former Volunteer Public House, Alfred's Way	Over 6.2 km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
YA	IBIS Barking, Highbridge Road, Barking	5.9km	Yes	No	Likely Significant Effect. This site is located within the 6.2km Zol for Epping Forest SAC. This site is subject to in-combination assessment
YO	Barking Foyer land lying to the SW, NE & SW of Glenny Road. land on the NE side of Wakering Road, land on the SW side of Fanshawe Avenue and part of the roadways known as Queens Road and Church Road				
ZB	497-515 Gale Street, Dagenham	Over 6.2 km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
ZO	Cambridge House	5.9km	Yes	No	Likely Significant Effect. This site is located within the 6.2km Zol for Epping Forest SAC. This site is subject to in-combination assessment

HZ	Hertford Road Industrial Estate	5.0 km	Yes	No	Likely Significant Effect. This site is located within the 6.2km Zol for Epping Forest SAC. This site is subject to in-combination assessment
ZN	Brocklebank Lodge, Becontree Avenue	Over 6.2 km	No	Yes	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
AV	Abbey Sport Centre	6.2 km	Yes but only a small proportion	Yes	Likely Significant Effect. This site is located within the 6.2km Zol for Epping Forest SAC. However, it is already committed development, so does not require further consideration within this HRA.
BA	Collier Row EcoGrove (Wellgate Farm)	Over 6.2 km	No	Yes	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
DB	Former Sacred Heart Convent	Over 6.2 km	No	Yes	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.

DH	Oxlow Lane (previously 265-285 Rainham Road North)	Over 6.2 km	No	Yes	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
DI	Roxwell Road (53-135)	Over 6.2 km	No	Yes	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
HS	Former White Horse Pub, Chadwell Heath	Over 6.2 km	No	Yes	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
HQ	Town Quay Wharf	6.0 km	Yes	Yes	Likely Significant Effect. This site is located within the 6.2km Zol for Epping Forest SAC. However, it is already committed development, so does not require further consideration within this HRA.
YC	Royal British Legion	Over 6.2 km	No	Yes	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.

YS	2 Stamford Road and Woodward Road	Over 6.2 km	No	Yes	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
HM – Small Housing Site Allocations	Old Granary	6.0 km	Yes	No	Likely Significant Effect. This site is located within the 6.2km Zol for Epping Forest SAC. This site is subject to in-combination assessment
CV – Small Housing Site Allocations	North Becontree Station	Over 6.2 km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
CX – Small Housing Site Allocations	Salisbury Road Car Park	Over 6.2 km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
DZ – Small Housing Site Allocations	Dagenham Labour Hall	Over 6.2 km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.

HL– Small Housing Site Allocations	Hapag Lloyd House	5.8 km	Yes	No	Likely Significant Effect. This site is located within the 6.2km Zol for Epping Forest SAC. This site is subject to in-combination assessment
HO– Small Housing Site Allocations	14-34 London Road	5.9 km	Yes	No	Likely Significant Effect. This site is located within the 6.2km Zol for Epping Forest SAC. This site is subject to in-combination assessment
WD– Small Housing Site Allocations	Former Victoria Public House	6.2 km	Yes but only a small proportion	No	Likely Significant Effect. This site is located within the 6.2km Zol for Epping Forest SAC. This site is subject to in-combination assessment
YG– Small Housing Site Allocations	Garages at Keir Hardie Way	Over 6.2 km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
ZT– Small Housing Site Allocations	58-62 Church Street	Over 6.2 km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
AO	Melish Close Garages	Over 6.2 km	No	Yes	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.

BG	26 and 28 Land to the Rear of High Road	Over 6.2 km	No	Yes	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
BO	Elim Pentecostal Church 194	Over 6.2 km	No	Yes	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
BR	3 Station Road	Over 6.2 km	No	Yes	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
BS	St Marys Parish Church, Grafton Road	Over 6.2 km	No	Yes	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
BY	Rear of 5-7 Reede Road	Over 6.2 km	No	Yes	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.

CE	Site of Old Thames View Clinic, Bastable Avenue	Over 6.2 km	No	Yes	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
CP	Sebastian Court	Over 6.2 km	No	Yes	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
CS	Sugden Way	Over 6.2 km	No	Yes	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
CT	Former Wivenhoe Garages, Wivenhoe Rd, Barking	Over 6.2 km	No	Yes	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
CY	Artist Housing, Linton Road	5.6 km	Yes	Yes	Likely Significant Effect. This site is located within the 6.2km Zol for Epping Forest SAC. However, it is already committed development, so does not require further consideration within this HRA.

DF	Wantz Road	Over 6.2 km	No	Yes	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
DQ	Dagenham Working Men's Club	Over 6.2 km	No	Yes	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
HU	Land to Rear of 127 – 133 Becontree Avenue	Over 6.2 km	No	Yes	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
HW	31 – 35 Mill Lane	Over 6.2 km	No	Yes	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
HY	Street Record Margaret Bondfield Avenue	Over 6.2 km	No	Yes	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.

WA	Former Dagenham Job Centre Chequers Lane	Over 6.2 km	No	Yes	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
WE	Fels Farm, Dagenham Road, Rush Green Romford	Over 6.2 km	No	Yes	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
BZ	174 – 176 Ripple Road	Over 6.2 km	No	Yes	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
HV	7 Apollo Housing	Over 6.2 km	No	Yes	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
RA – School Allocation	New Pondfield School (special school)	9.915km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.

RB – School Allocation	Ford Polar (special school)		No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
E081 – Employment Allocations	Hertford Road	5.0 km	Yes	?	No Likely Significant Effects. This site is located within the Epping Forest SAC Zol but is solely for employment and does not require further consideration within this HRA.
E027 – Employment Allocations	Welbeck Wharf	Over 6.2km	No	?	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
E029 – Employment Allocations	Thames Road Economic Use	Over 6.2km	No	?	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
E058 – Employment Allocations	River Road	Over 6.2km	No	?	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.

E075 — Employment Allocations	Creekmouth	Over 6.2km	No	?	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
E088 — Employment Allocations	?	Over 6.2km	No	?	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
E089 — Employment Allocations	?	Over 6.2 km	No	?	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
E090 – Employment Allocations	?	Over 6.2 km	No	?	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
E014 – Employment Allocations	Barking Power Station	Over 6.2 km	No	?	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.

E015 – Employment Allocations	Plot 62 SEGRO Park	Over 6.2 km	No	?	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
E016 – Employment Allocations	Plot 63 SEGRO Park	Over 6.2 km	No	?	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
E017 – Employment Allocations	Plot 64 SEGRO Park	Over 6.2 km	No	?	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
E018 – Employment Allocations	Plot 65 SEGRO Park	Over 6.2 km	No	?	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
E019 – Employment Allocations	Plot 67 SEGRO Park	Over 6.2 km	No	?	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.

E020 – Employment Allocations	Plot 70 SEGRO Park	Over 6.2 km	No	?	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
E052 – Employment Allocations	Dagenham Dock	Over 6.2 km	No	?	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
E051 – Employment Allocations	Coopers Arms	Over 6.2 km	No	?	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
E079 – Employment Allocations	Former White Horse Pub, Chadwell Heath	Over 6.2 km	No	?	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
E038 – Employment Allocations	Here and East Film Studios	Over 6.2 km	No	?	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.

E055 – Employment Allocations	Dagenham East	Over 6.2 km	No	?	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
E059 – Employment Allocations	Wantz Road Estate	Over 6.2 km	No	?	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
E005 – Employment Allocations	79 Whalebone Lane South	Over 6.2 km	No	?	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
Proposed Traveller Broad Location 1	Choats Road	Over 6.2 km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
Proposed Traveller Broad Location 2	Collier Row Road	Over 6.2 km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.

Proposed Traveller Broad Location 3	Eastbrookend Country Park	Over 6.2 km	No	?	No Likely Significant Effects. This site is located outside of the Epping Forest SAC ZoI. It does not require further consideration within this HRA
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