

Working in partnership



**Barking &
Dagenham**

**London Borough of Barking and
Dagenham**

First Revised Draft Local Plan (Reg 19) Consultation Summary Report

Draft report

Prepared by Be First

August 2021

Contents

Chapter 1		Appendix F	
Introduction	1	Full Reg 19 (1) Consultation Response	F-1
<hr/>			
Chapter 2			
Consultation Methods	2		
a) Hard Copies			
b) Website			
c) Email Correspondence			
d) Press & Social Media			
e) Consultation Events and Meetings			
<hr/>			
Chapter 3			
Overview of Consultation Responses	5		
<hr/>			
Chapter 4			
Summary of Key Responses Themes	7		
<hr/>			
Appendix A			
List of Statutory and General Consultees	A-1		
Statutory Consultees:	A-1		
General Consultees:	A-1		
<hr/>			
Appendix B			
Example Emails Sent to Statutory Consultees	B-2		
<hr/>			
Appendix C			
Example Emails Sent to General Consultees	C-3		
<hr/>			
Appendix D			
Article in Planning Magazine	D-4		
<hr/>			
Appendix E			
Articles in Dagenham Post	E-1		

Chapter 1

Introduction

1.1 BeFirst, on behalf of the London Borough of Barking and Dagenham (LBBD), consulted on the first revised draft Regulation 19 (1) Local Plan from 5th October to 29th November 2020, receiving 63 individual responses containing 576 individual comments.

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

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

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

Chapter 2

Consultation Methods

Consultation Methods

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

- online resources;
- direct e-mail correspondence;
- press and social media; and
- stakeholder engagement meetings (online)

2.2 The details are set out below.

Online Resources

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

2.4 Link to the Council's website:

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

2.5 The webpage included a link to 'One Borough Voice' an online public consultation platform hosted by Engagement HQ, which is frequently used to host public consultations by both Be First and the Council. On the 'One Borough Voice' page, the public were able to provide structured feedback in the form of a questionnaire.

2.6 Link to the online consultation portal:

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

Direct Email Correspondence

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

Press and Social Media

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

- A featured article in ‘Planning Resource’ found in **Appendix D**;
- Two editorial articles in the Barking and Dagenham Post found in **Appendix E**; and
- Posts to Be First’s social media platforms (Facebook, Twitter, & Instagram).

Consultation Meetings

2.9 During and post the consultation, LBBD held eight Local Plan engagement meetings online with a number of key stakeholders to obtain feedback that related to the draft policies and proposed sites (see **Table 2.1**). Where appropriate, they have been fed into the development of policies in the next stage of the plan.

Table 2.1: Local Plan Engagement Meetings

Meeting with whom	Date
ELWA authorities Local Plan Engagement meeting	21/11/2021
Local Plan Engagement meeting with London Borough of Havering	19/11/2021
Local Plan Engagement meeting with London Borough of Redbridge	26/11/2021
London Plan Engagement meeting with the Greater London Authority	12/11/2021
London Plan Engagement meeting with Highways England	02/02/2021
Local Plan Engagement meeting with London Borough of Newham	16/03/2021
Local Plan Engagement meeting with Metropolitan Police Service	26/03/2021
Local Plan Engagement meeting with Natural England	09/04/2021
Local Plan Engagement meeting with Home Builders Federation	28/04/2021
London Plan Engagement meeting with the Greater London Authority	12/05/2021
London Plan Engagement meeting with Healthy Urban Development Unit	19/05/2021
Local Plan Engagement meeting with Barking Riverside Limited	01/07/2021

Chapter 3

Overview of Consultation Responses

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

3.2 In total, the Council received written representations from 63 individuals or organisations and businesses. Of these, 15 were statutory consultees. These representations generated 372 individual comments in relation to the Local Plan.

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

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

3.4 The large majority of comments are related to:

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

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

Chapter 4

Summary of Key Responses Themes

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

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

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

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

	Policy/Theme	Summary of Issue	Council/BeFirst Response
6	Housing	<p>Affordable housing</p> <ul style="list-style-type: none"> Clarity is required on the current affordable housing target of 50% Clarity is required to follow the Mayor's Threshold Approach to affordable housing as set out in Policy H5 of the London Plan. <p>Housing mix</p> <ul style="list-style-type: none"> The borough -wide unit mix should acknowledge the need for private rented sector housing and consideration to the differentiated housing mix demand for this different housing product. <p>Build to rent</p> <ul style="list-style-type: none"> More specific policy approach to affordable housing on build to rent schemes should be provided. <p>Gypsy, Traveller and Travelling Showpeople needs</p> <ul style="list-style-type: none"> The need has not been accounted for beyond 2034. Clarification required to explain how the additional 19 new pitches up until 2024 will be delivered. 	<ul style="list-style-type: none"> The policies contained in the Housing chapter have been reviewed and updated to provide clarity, and are in conformity with the London Plan 2021. The policy has been revised and updated to allow some flexibility where creation of a balanced community may require a different approach. LBBB takes a positive approach to build to rent in accordance with the London Plan 2021, policy H11. The need has been rolled forward to cover the whole plan period to 2037. We are preparing a topic paper which will provide detailed site related information to support the Local Plan submission. The policy has been revised and updated to explain the Council's approach to meet the identified need. The Council is producing a topic paper on recommended deliverable sites to support the Local Plan examination.
7	Transport	<ul style="list-style-type: none"> Lacking clarifications appear to be required in terms of: cycle facilities, car-lite development, on-street parking spaces and bulk goods shopping etc. 	<ul style="list-style-type: none"> The policies contained in the Transport chapter have been reviewed and updated to provide clarity, and are in conformity with the London Plan 2021. Borough Transport Strategy and Cycling and Walking Strategy will be published alongside the second revised draft Local Plan Reg 19 (2) consultation.

	Policy/Theme	Summary of Issue	Council/BeFirst Response
8	Social infrastructure	<ul style="list-style-type: none"> 24 months Marketing period is too restrictive. 	<ul style="list-style-type: none"> The relevant policies have been updated to allow flexibility in marketing period - not less than 12 months. This is except for public houses, which requires 24 months marketing period.
9	New planning Use Class Order	<ul style="list-style-type: none"> Unclear of how the policies reflect the changes to the Use Classes Order – which introduced greater flexibility (as well as protections) for certain town centre uses – primarily the new class E. 	<ul style="list-style-type: none"> LBBD recognise the changes to the Use Classes Order and the amendments to the GPDO. However, these are live challenges, which will be dealt with in the planning application process.

Appendix A

List of Statutory and General Consultees

Statutory Consultees:

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

Non-Statutory Consultees:

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

Appendix B

Example Emails Sent to Statutory Consultees

Example Email Sent to Statutory Consultees

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

Dear consultee,

Regulation 19 Consultation on the LBBB draft Local Plan 2037

We are writing to let you know that London Borough of Barking and Dagenham are launching a period of public consultation on the new draft Local Plan.

This period of consultation will run from **5th October 2020 till midnight 29th November 2020** for a total of eight weeks. You can view and download a copy of the draft Local Plan and its supporting documents, including the Sustainability Appraisal, via our website: <https://www.lbbd.gov.uk/local-plan-review>

You can submit your comments by using the attached Representation Form and the Accompanying Guidance, return a completed form to us by email: localplan@lbbd.gov.uk.

Please note that we will not accept any late representation beyond 29th November 2020 as this is statutory consultation.

In light of the current COVID-19 pandemic, we are complying with recent changes to the government regulations allow the Local Plan to be consulted on virtually until the end of 2020. Therefore, hard copies of this Local Plan will not be made available during the consultation.

We look forward to hearing from you.

Planning Policy Team

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

Planning Policy | Be First

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

www.befirst.london | @befirstLondon



working on behalf of Barking and Dagenham Council

Appendix C

Example Emails Sent to General Consultees

Example Email Sent to Non-Statutory Consultees

Subject: Subject: Public Consultation on the draft Local Plan 2037 for Barking & Dagenham

Dear Sir/ Madam,

Public Consultation on the draft Local Plan 2037 for Barking & Dagenham

I am writing to tell you that between now and **Midnight 29th November 2020**, we will consult on the new version of the Local Plan, which tells how our borough should develop and grow in the future.

About the Local Plan?

The Local Plan is an important planning document for Barking and Dagenham. It will provide a planning framework to guide growth and development within the borough up until 2037. It will set out how the borough will grow, where new homes will be built and jobs created, and decide what facilities are needed to support our changing population. It will also protect the features of the borough that our communities cherish, such as local parks, conservation areas and historic buildings.

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

How can I comment?

This will be your opportunity to comment on the new version of the Draft Local Plan and tell us whether you think the Local Plan is 'legally compliant' and 'Sound'.

You can submit your comments by using the attached Representation Form and the Accompanying Guidance (as attached), return a completed form to us by email: localplan@lbbd.gov.uk.

In light of the current COVID-19 pandemic, we are complying with recent changes to the government regulations allow the Local Plan to be consulted on virtually until the end of 2020. Therefore, hard copies of this Local Plan will not be made available during the consultation.

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

We look forward to hearing from you.

Planning Policy Team

Appendix D

Article in Planning Magazine

8/6/2021

Barking and Dagenham Local Plan – Strategy published | Planning Resource

From the publishers of ▾

Sign out



PLANNING

Planning Resource: independent intelligence for planning professionals

Barking and Dagenham Local Plan – Strategy published

5 October 2020

Barking and Dagenham Council published its Local Plan on 5 October 2020.

Barking and Dagenham Council has published a [draft version](#) of its Local Plan that is available for consultation between 5 October 2020 and 29 November 2020.


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Appendix E

Articles in Dagenham Post

Views sought on the future of Barking and Dagenham

 Jon King



Published: 2:00 PM October 5, 2020 Updated: 8:03 PM November 27, 2020



Views are being sought on the future of Barking and Dagenham. Picture: Mike Brooke - Credit: Archant

Views are being sought on the future of the borough.

Households, businesses and developers in Barking and Dagenham are being asked to share their opinions in a public consultation on an emerging local plan.

The plan sets out the vision for the borough until 2037 and covers areas, including homes, jobs, climate change, and communities.

Cllr Cameron Geddes, cabinet member for regeneration and social housing, said: "Our borough is leading the way in London's eastward expansion and this will bring huge amount of economic opportunities for people.

"However, there are also big challenges we all face, such as climate change and a post-Covid world, which will affect the borough's social, environmental and economic future.

"It's why it's so important that people get involved today to help shape a better tomorrow."

This is the last opportunity for the public to have their say on how the borough should grow and develop.

A draft of the local plan is available to view on the council website and through the One Borough Voice webpage.

The consultation ends on November 29.

Appendix F

Full Reg 19 (1) List of Representations

Appendix F: Index of Representations and List of Representations

	Respondent Type	Representations ID	Organisation or Individual
1	Community Group	LP049	B&D Heritage Conservation Group
2	Local Resident	LP058	Individual
3	Local Resident	LP005	Individual
4	Statutory Stakeholder	LP077	Marine Management Organisation
5	Statutory Stakeholder	LP078	Department of education
6	Developer	LP079	AEW UK
7	Statutory Stakeholder	LP062	Natural England
8	Cllr	LP054	Cllr
9	Local Resident	LP080	Traveller Community
10	Developer	LP064	Picton
11	Interest Group	LP007	Theatres Trust
12	Local Authority	LP081	Newham
13	Developer	LP051	Brakspear
14	Interest Group	LP082	PATH
15	Developer	LP044	Shell Pension Trust
16	Interest Group	LP098	London Garden Trust
17	Developer	LP048	Archway Group
18	Local Resident	LP0083	N/A
19	Statutory Stakeholder	LP069	LB Havering
20	Statutory Stakeholder	LP039	CPRE
21	Developer	LP071	Sabreleague Ltd
22	Developer	LP020	DB Cargo Ltd and Express Concrete
23	Developer	LP028	10 Thames road
24	Statutory Stakeholder	LP036	Port of London authority
25	Statutory Stakeholder	LP056	Home Builders Federation
26	Local Authority	LP085	LB Redbridge
27	Developer	LP029	Town Quay Wharf
28	Developer	LP027	Baymoor Investing Ltd
29	Business Group	LP037	UPS
30	Community Group	LP046	Chadwell Heath residents association
31	Developer	LP088	Hollybrook Homes Ltd

LBBB/BeFirst First Revised Draft Local Plan Consultation: List of Representations

	Respondent Type	Representations ID	Organisation or Individual
32	Local Resident	LP089	
33	Developer	LP031	Lagmar (Barking)Ltd
34	Infrastructure Provider	LP066	Thames Water
35	Statutory stakeholder	LP067	Sport England
36	Strategic Partner	LP073	NHS Property services
37	Statutory Stakeholder	LP045	Historic England
38	Business Group	LP090	Lidl Great Britain Limited
39	Interest Group	LP016	Chatsworth Settlement Trustees
40	Developer	LP046	Barking Riverside Ltd
41	Developer	LP074	TFL CD
42	Statutory Stakeholder	LP024	Environment agency
43	Developer	LP091	London & Quadrant Housing Trust
44	Developer	LP033	Peabody and Dagenham Dock
45	Infrastructure Provider	LP035	Essex and Suffolk Water
46	Developer	LP038	Countryside Properties PLC
47	Statutory Stakeholder	LP008	GLA
48	Developer	LP022	CoLC
49	Developer	LP092	Independent Fleet Care ltd
50	Business Group	LP011	SEGRO
51	Developer	LP026	Hapag Lloyd
52	Statutory Stakeholder	LP040	Metropolitan Police Service
53	Developer	LP013	Millennium Group
54	Developer	LP017	Inland Homes
55	Cllr	LP093	Cllr
56	Infrastructure Provider	LP061	National Grid
57	Statutory Stakeholder	LP094	Highways England
58	Developer	LP095	Westbury Group
59	Developer	LP010	Bloomingdale ltd
60	Developer	LP097	LBBB and HHL
61	Developer	LP096	Valor
62	Statutory Stakeholder	LP036	Port of London authority
63	Infrastructure Provider	LP087	NHS London Healthy Urban Development Unit

LBBD/BeFirst First Revised Draft Local Plan Consultation: List of Representations

Rep ID	Category: Housing, Industrial Land, Open Space, Waste, (Hong to Check at End)	Nature of Response (General/Support/Objection/Support but with suggestions)	Relevant Chapter number	Policy Number	Relevant Paragraph No.	Summarised Comment
LP005	Reference	Support, but with suggestions	Chapter 3	SPP5	2 e ii	Suggestion of change from "Reed Road" to "Reede Road".
LP005	Reference	Support, but with suggestions	Chapter 3	SPP1 and other areas	2 c	Suggestion of change from "Vicarage Fields" to "Vicarage Field".
LP005	Transport	Support, but with suggestions	Chapter 3	SPP1	5c	Suggestion of clarification n on what 'a minimum of one-way' means and clarification that 'vehicular' means 'motor vehicles. It is suggested that this ambiguity is addressed throughout the document
LP005	Transport, Vision	Support, but with suggestions	Chapter 10	SP8	6	In respect of a new cycle link CFR10 linking Barking Riverside to Ilford , it is suggested the cycle route from Barking Station needs improving. However, the extension of a formal cycling route further south and around Wakering Road is welcomed.
LP005	Place	Support, but with suggestions	Chapter 3	SPP5	3	Suggestion that the Local Plan be amended to reflect that Dagenham Village is not the historic heart of the borough, both Barking and Dagenham are ancient settlements, this should be addressed in the Local Plan.
LP005	Transport	Support, but with suggestions	Chapter 3	SPP3	6 e	Suggestion that the term 'cycle routes' be amended to 'cycle paths' or 'cycle tracks' due to a concern that a cycle route could be misunderstood as just a route taken when cycling.
LP005	Transport	Support, but with suggestions	Chapter 3	SPP3	4 b	Suggestion that the Local Plan should be amended to clarify that the C2C station at Dagenham East is not a 'new' station but a 'reopening' of the two National Rail platforms decommissioned in 1962.
LP005	Transport	Support, but with suggestions	Chapter 3	SPP7	2 b	Suggestion that wording the Local Plan should be amended to read as follows 'improvements to pedestrian and cycling routes through the area including strengthening east - west walking and cycle links'.
LP005	Reference	Support, but with suggestions	Chapter 3	SPP7	2 c	Suggestion that "Hainaut Country Park" should be amended in the Local Plan to " Hainault Country Park".
LP005	Place	Support, but with suggestions	Chapter 3	SPP7	2 e	Suggestion that the inclusion of "Rainham Road High" be removed from policy.
LP007	Social Infrastructure	Support	Chapter 6	SP4	N/A	Support is given for policy SP4 due to the current lack of cultural facilities.

LBBB/BeFirst First Revised Draft Local Plan Consultation: List of Representations

Rep ID	Category: Housing, Industrial Land, Open Space, Waste, (Hong to Check at End)	Nature of Response (General/Support/Objection/Support but with suggestions)	Relevant Chapter number	Policy Number	Relevant Paragraph No.	Summarised Comment
LP007	Social Infrastructure	Support	Chapter 6	DMS1	1, 2	Support is given for policy DMS 1, particularly wording regarding the protection and enhancements of the borough's existing cultural facilities.
LP007	Social Infrastructure	Support	Chapter 6	DMS3	N/A	Support is given for policy DMS 3, particularly the protection of pubs due to the social and cultural benefits that they provide to local areas.
LP008	Strategy	Objection	Chapter 2, 3, 5 and 9	N/A	N/A	Concern expressed that the Local Plan is not consistent with the London Plan. Issues such as the approach to affordable housing, relationship of the Plan to the London Riverside Opportunity Area, release of industrial land and status of evidence base for waste needs, should be addressed by the Local Plan.
LP008	Housing	Objection	Chapter 3	SPDG1	N/A	Concern expressed that the Plan's target housing figure of 50,000 is higher than the target identified in the London Plan. Advice is given that the Mayor supports authorities exceeding target but only if this does not impact on the delivery of wider policy objectives.
LP008	Housing	Support, but with suggestions	Chapter 3	SPDG1	N/A	Concern expressed that the provision of housing does not meet the small sites target as defined in the London Plan. Suggestion given that the small sites target should be treated as a minimum in order to promote this type of housing development.
LP008	Affordable Housing	Objection	Chapter 5	SP3	part C)	Concern expressed that Policy SP3, part c), fails to apply the Mayor's Threshold Approach to affordable housing in accordance with Policy H5 of the ItP London Plan and is not aligned with Policy DF1 which seeks to limit the use of viability to only those instances where there are genuinely clear circumstances creating barriers to delivery. Suggestion given that the wording of the policy, that sets out that LBBB will seek the maximum reasonable amount of affordable housing on all market housing proposals subject to viability, is amended.
LP008	Older peoples housing	Support, but with suggestions	Chapter 5	DMH3	Footnote 27	Support is given for policy DMH3. Suggestion given that the Policy is amended to clarify whether the figure of 180 units of Extra Care, as set out in footnote 27, has come from the Strategic Housing Market Assessment 2020.
LP008	Gypsy and Traveller needs	Support, but with suggestions	Chapter 5	DMH5	N/A	Support is given to Policy DMH5. Suggestion given that the policy is amended to cover delivery for the entire plan period including a gap in delivery that has been identified between 2035 and 2037. Will also need to be more specific about the locations identified for traveller pitches. Which sites will be able to meet the need of 19 pitches by 2024.
LP008	Gypsy and Traveller needs	Support, but with suggestions	Chapter 5	DMH5	N/A	Support is given to Policy DMH5. Suggestion given that the policy is amended to identify locations for traveller pitches, particularly regarding sites that will be able to meet the need of 19 pitches by 2024.
LP008	Industrial Land	Objection	Chapter 3 and 7	N/A	N/A	Concern expressed that the Local Plan proposes a significant loss of industrial land without a sufficient evidence base to justify this release or detail of how industrial land will be replaced.

LBBD/BeFirst First Revised Draft Local Plan Consultation: List of Representations

Rep ID	Category: Housing, Industrial Land, Open Space, Waste, (Hong to Check at End)	Nature of Response (General/Support/Objection/Support but with suggestions)	Relevant Chapter number	Policy Number	Relevant Paragraph No.	Summarised Comment
LP008	Industrial Land	Objection	Chapter 7	DME1	N/A	Concern expressed that the site allocations and policy approach in DME1 do not provide sufficient clarity on how LBBD will achieve the borough's aim of retaining or re-providing the existing industrial floorspace capacity. Therefore, concern is expressed that the draft Local Plan is not in conformity with Policy E4 of the ItP London Plan, which requires a sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions to be provided and maintained.
LP008	Industrial Land	Support, but with suggestions	Policies map	N/A	Page 164	Suggestion given that the key for the policies map, as set out from page 164 of the draft Local Plan, should be updated to refer to "Strategic Industrial Locations" rather than "Proposed Locally Significant Industrial Locations".
LP008	Industrial Land	Objection	Policies map	N/A	Page 164	Concern express that the policies map only identifies one LSIS, namely the extended area around Dagenham East. The map identifies all other industrial areas as SIL, including some that are currently LSIS.
LP008	Industrial Land	Objection	Policies map	N/A	Page 164	Concern expressed that the policies map appears to show that part of the Dagenham Dock SIL (between the A13 and the railway line) is proposed for de-designation.
LP008	Industrial Land	Objection	Policies map	N/A	Page 164	Concern expressed that the River Roding industrial area, as shown on the policies map, appears to cover a significant area to the east of the river which is currently residential.
LP008	Industrial Land	Objection	Chapter 7	N/A	N/A	Objection given that, without evidence and a robust strategy to manage development within the borough's industrial areas, the Local Plan's industrial land strategy is considered an issue of non-conformity with the ItP London Plan.
LP008	Industrial Land	Objection	Chapter 7	N/A	N/A	Concern expressed that the 10-year housing targets established in the ItP London Plan, including LBBD's, are not based on the extensive release of industrial land. Advice given that the strategic approach in the ItP London Plan is one which recognises the importance of protecting London's industrial capacity as set out in paragraph 6.4.1 as essential to the functioning of the capital's economy and for the servicing needs of the growing population. Suggestion given that housing delivery in LBBD must deliver good growth as set out strategically in the ItP London Plan.
LP008	Industrial Land	Objection	Policies map	N/A	Page 164	Concern expressed that the policies map identifies a new potential District Centre at Merriellands Crescent – however, the location of the star referencing this on the map appears to be located within the centre of a designated industrial site, whereas the existing retail sites are to the north of this, along Ripple Road.
LP008	Economic growth	Objection	Chapter 7	SP5	N/A	Concern expressed that the Local Plan sets out a target for creating 20,000 new jobs but does not provide any evidence for the figure, nor does it breakdown the figure by sector e.g. the quantity of jobs that would be office jobs.
LP008	Economic growth	Objection	Chapter 7	SP5	N/A	Concern expressed that the provision of office and commercial employment in Dagenham Dock would be contrary to the sequential test set out in para 85 of the NPPF.
LP008	Economic growth	Support, but with suggestions	Chapter 7	DME1	Part 4	Suggestion given that Policy DME1, Part 4, should be amended to clarify that industrial intensification is not about increasing employment and instead should be focused on increasing industrial capacity in accordance with Policy E7 of the ItP London Plan.
LP008	Economic growth	Support, but with suggestions	Town Centre Study Addendum 2020	N/A	N/A	Concern expressed that the Barking and Dagenham Retail and Town Centre Study Addendum 2020 establishes a need for 1,650 FTE retail jobs up to 2034, however this year is three years short of the plan period.
LP008	Safeguarded Wharves	Support, but with suggestions	Chapter 7	SP5	N/A	Concern expressed that if rationalisation of Wharves, as suggested in Policy SP5, implies a reduction in wharf capacity, then this would not be acceptable. Suggestion given that Policy SP5 is amended to clarify that where proposals come forward on sites adjacent to wharves, the agent of change policy is recognised so that future development is designed to ensure that there are no conflicts of use and that freight capacity is not reduced.

LBBB/BeFirst First Revised Draft Local Plan Consultation: List of Representations

Rep ID	Category: Housing, Industrial Land, Open Space, Waste, (Hong to Check at End)	Nature of Response (General/Support/Objection/Support but with suggestions)	Relevant Chapter number	Policy Number	Relevant Paragraph No.	Summarised Comment
LP008	Safeguarded Wharves	Support, but with suggestions	Chapter 3	SPDG 1	N/A	Suggestion given that the safeguarded wharves are identified and added to the Transformation Areas set out in Chapter 3.
LP008	Town Centre	Support, but with suggestions	Chapter 3	SPDG 1	N/A	Suggestion given that new district centres are supported by appropriate and up-to-date evidence of demand, ensuring that where LBBB intends to create them that they provide a range of goods and services, and social infrastructure for the local communities they will serve and that they are accessible by public transport, walking and cycling. Suggestion given that new district centres should typically contain between 5,000 and 50,000 sqm of retail, leisure and service floorspace.
LP008	Town Centre	Support, but with suggestions	Chapter 7	SP5	N/A	Concern expressed that Policy SP 5 refers to a new town centre hierarchy but this is not clearly set out as part of that policy. Suggestion given that the policy is amended to include this for clarity.
LP008	Site Allocation	Support, but with suggestions	Site allocations document	AC Marriellands Crescent Two	N/A	Concern expressed that site AC, in the site allocations document, sets out the location of Merriellands Crescent but it is not clear if the site boundary indicated on the location plan is the proposed town centre boundary.
LP008	Site Allocation	Support, but with suggestions	Site allocations document	AA Barking Riverside	N/A	Concern expressed that the site allocation for AA Barking Riverside sets out the development area boundary but does not set out the proposed town centre boundary.
LP008	Site Allocation	Support, but with suggestions	Site allocations document	N/A	N/A	Suggestion given that the site allocation are amended to provide more clarity regarding its plans for these new district centres and should include maps setting out clearly the proposed (or indicative at this stage) town centre boundaries for each.
LP008	Town Centre	Support, but with suggestions	Chapter 7	SP5	N/A	Suggestion given that Town centre strategies for the proposed new town centres would help to positively inform the draft Plan. Advice given that the 'High Streets – Adaptive Strategies guidance' could guide a strategic approach for the boroughs new and existing town centres.
LP008	Affordable workspace	Support, but with suggestions	Chapter 7	DME2	N/A	Support is given to the intention of LBBB to provide flexible affordable workspace but advice is given that the approach should be consistent with ItP London Plan Policies E2 and E3. Concern expressed that there is insufficient clarity regarding how the 1,000m2 threshold has been established. Suggestion given that this figure is clarified and based on up-to-date evidence.
LP008	Night time economy	Support, but with suggestions	Chapter 7	DME5	N/A	Support is given for Policy DME5 and the intention to support the night-time economy. Suggestion given that LBBB follow the guidance set out in Policy HC6 of the ItP London Plan, including through developing a vision for the night time economy in the area, and to make use of Policy D13 regarding the Mayor's agent of change principle to mitigate against any potential conflicts arising from a night-time economy.
LP008	Green Infrastructure	Support, but with suggestions	Chapter 8	DMNE1	N/A	Suggestion given that Policy DMNE 1 is amended to explicitly clarify that development proposals should not result in the loss of designated open space, in accordance with Policy G4 of the ItP London Plan.

LBBB/BeFirst First Revised Draft Local Plan Consultation: List of Representations

Rep ID	Category: Housing, Industrial Land, Open Space, Waste, (Hong to Check at End)	Nature of Response (General/Support/Objection/Support but with suggestions)	Relevant Chapter number	Policy Number	Relevant Paragraph No.	Summarised Comment
LP008	Air Quality	Support, but with suggestions	Chapter 9	DMSI 4	N/A	The draft Policy could reference Policy SI 1 of the ItP London Plan to ensure that the Mayors approach is followed correctly.
LP008	Air Quality	Support, but with suggestions	Policies map	N/A	N/A	Suggestion given that the policy map include clearly defined Air Quality Focus Areas on the policies map, it is considered that this would help to ensure that development proposals in those areas are carefully designed to mitigate against the impact of poor air quality.
LP008	Waste	Objection	Chapter 9	DMSI 8	N/A	Concern expressed that Policy DMSI 8 relies on the out of date ELWP and therefore it is not possible to establish whether LBBB is capable of meeting its waste apportionment targets for household, commercial and industrial waste.
LP008	Flood Risk	Support, but with suggestions	Chapter 8 and 9	DMSI 6 and DMNE 4	N/A	Support is given to LBBB's general approach to flood risk and references in draft Policies DMSI 6 and DMNE 4 to the Thames Estuary 2100 Plan which is in accordance with ItP London Plan Policy SI 12D. Suggestion given that flood risk is approached in an integrated way in line with the Thames Estuary 2100 Plan and more detail should be provided in relevant site allocations and other area-based strategies and emerging masterplans.
LP008	Tall buildings	Support, but with suggestions		DMD2	Part 2	Suggestion given that Policy DMD2, Part 2, stating 'significantly taller than the prevailing building height' should be amended and clarified in accordance with paragraph 3.9.3 and policy D9 of the ITP London Plan. Advice given that the London Plan sets out an approach in determining and identifying areas suitable for tall buildings and what building heights might be appropriate in those locations. Suggestion given that LBBB should follow this guidance.
LP008	Transport	Support, but with suggestions	Chapter 7	SP5	N/A	Concern expressed that the focus on redeveloping industrial land could lead to housing being delivered in inaccessible locations. Suggestion given that where industrial intensification or redevelopment will take place, the Local Plan should establish whether there is sufficient capacity on the road network and public transport to manage this.
LP008	Site allocation	Support, but with suggestions	Site Allocations document	HL Hapag Lloyd House, BB Tesco car park	N/A	Suggestion given that site allocations should contain more detail regarding local context, prevailing building heights, listed buildings, conservation areas, areas at risk of flooding, nature conservation and strategic and local views among other material planning considerations. Suggestion given that Proposed site allocations should indicate potential development capacities and define appropriate building heights in those locations among other criteria so that there is an indication of how much development can be delivered on these sites over the plan period. This suggestion is in the context of site allocations HL or BB lacking the details requested above.
LP008	Site allocation	Support, but with suggestions	Site Allocations document	AA Barking Riverside	N/A	Suggestion given that site AA identifies where proposed types of development would take place and identifies the proposed new district centre boundary as set out in draft Policy SPDG 1 of the draft Local Plan.
LP008	Site allocation	Support, but with suggestions	Site Allocations document	CF Castle Green	N/A	Suggestion given that site CF is amended with information setting out where the release of industrial land is proposed or where industrial land is to be protected and/or intensified, where the new station and where new residential development is proposed.

LBBB/BeFirst First Revised Draft Local Plan Consultation: List of Representations

Rep ID	Category: Housing, Industrial Land, Open Space, Waste, (Hong to Check at End)	Nature of Response (General/Support/Objection/Support but with suggestions)	Relevant Chapter number	Policy Number	Relevant Paragraph No.	Summarised Comment
LP008	Site allocation	Support, but with suggestions	Site Allocations document	CH Chadwell Heath Industrial Estate	N/A	Suggestion given that site CH is amended to clarify how the industrial and office floorspace in the site allocation relates to the LSIS designation and approach in the industrial strategy, and whether the entire site is envisaged to be redeveloped, whether there would be co-location across the area or whether there would be intensified industrial land with some released for other uses.
LP008	Site allocation	Support, but with suggestions	Site Allocations document	Wantz Road LSIS	N/A	Suggestion given that whether Wantz Road LSIS is a site allocation is clarified given that the policies map suggests half the area would be released from the LSIS designation but there does not appear to be a site allocation covering the released area.
LP008	Site allocation	Support, but with suggestions	Site Allocations document	XJ, XC, CI, CM	N/A	Suggestion given that site further detail is provided regarding Stamping Plant site (Site ID: XJ), the Harts Lane Estate (Site ID: XC), the Thames Road site (Site ID: CI) and the Gascoigne Business Area (Site ID: CM) – all of which are currently LSIS sites and where it is understood from the strategic evidence that there is the potential for these sites to reprovided some existing industrial capacity.
LP008	Site allocation	Support, but with suggestions	Site Allocations document	CI Thames Road	N/A	Suggestion given that site CI Thames Road is amended to clarify why the site overlaps with the retained area of SIL, as set out in the policies map, and to clarify the approach for that part of the site.
LP008	Site allocation	Support, but with suggestions	Site Allocations document	N/A	N/A	Concern expressed that the site allocations give little indication about when industrial intensification, residential development or other forms of development are likely to happen in specific areas and in the absence of that information it is considered difficult to plan for necessary transport infrastructure improvements.
LP008	Site allocation	Support, but with suggestions	Site Allocations document	N/A	N/A	Suggestion given that, where existing industrial areas are identified for residential uses which would result in the net loss of industrial floorspace capacity, it is made explicitly clear that the threshold for the Fast Track Route for affordable housing is set at 50%.
LP008	Site allocation	Support, but with suggestions	Site Allocations document	AC Marriellands Crescent Two	N/A	Suggestion given that site AC clarifies how the Asda supermarket, adjacent to the Merriellands Crescent site, could contribute to the creation of a vibrant town centre that supports sustainable modes of transport.
LP008	Site allocation	Support, but with suggestions	Site Allocations document	N/A	N/A	Concern expressed that it is not clear what capacity small sites have to deliver new homes because the allocations currently lack that sufficient level of detail. Suggestion given that LBBB seek more opportunities from small sites in order to deliver, or exceed, their small housing site target of 199 new homes a year as set out in Table 4.2 of the ItP London Plan.
LP010	Economy	Objection	Chapter 7	DME1	1c, 2	Concern expressed that Policy DME1, part 1c and part 2, does not align with NLP Policy E7. Suggestion given that the policy should be expanded from purely industrial uses to include allowance for office and light industrial uses. Concern expressed that Policy DME1 does not accommodate the new Use Class E. Suggestion is given that flexibility should be afforded to allow changes of use under Use Class E, e.g. the ability to provide office accommodation.
LP010	Area, vision	Objection	Chapter 3	SPP4	2a	Concern expressed that the wording of Policy SPP4 appears to delegate a level of responsibility to the Chadwell Heath Masterplan SPD in terms of policy detail. It is considered that this would exceed the weight that should be accorded to an SPD, given that it is not within the development plan. Concern expressed that Policy SPP4, part 2a, does not align with NLP Policy E7. Suggestion given that the policy should be expanded from purely industrial uses to include allowance for office and light industrial uses.

LBBD/BeFirst First Revised Draft Local Plan Consultation: List of Representations

Rep ID	Category: Housing, Industrial Land, Open Space, Waste, (Hong to Check at End)	Nature of Response (General/Support/Objection/Support but with suggestions)	Relevant Chapter number	Policy Number	Relevant Paragraph No.	Summarised Comment
LP010	Area, vision	Objection	Chapter 7	SP5	3	Concern expressed that Policy SP5 does not accommodate the new Use Class E. Suggestion is given that flexibility should be afforded to allow changes of use under Use Class E, e.g. the ability to provide office accommodation.
LP010	Area, vision	Support, but with suggestions	Policies map; Appendix 2	N/A	N/A	Concern expressed that not all land designated as SIL or LSIS reflects the current or future use of the site. Suggestion given that the map should be updated to reflect the proposed changes in land use of these areas.
LP010	Housing	Objection	Chapter 5	SP3	2f	Suggestion given that paragraph 2f of Policy SP3 is removed as it is considered to restrict the sale of open market housing, which is considered a disadvantage for the borough.
LP010	Housing	Objection	Chapter 5	DMH 2	1	Suggestion given that Policy DMH2, part 1, is amended to allow for more flexibility for privately built housing to meet market demand.
LP010	Design, Housing	Support, but with suggestions	Chapter 4	DMD2	3	Suggestion given that Policy DMH2, part 1, is amended to clarify that the requirements to adhere to the Historic England Advice note should only apply in cases where historic assets are impacted.
LP010	Area, vision	Support, but with suggestions	Chapter 3	SPP4	N/A	Suggestion given that Policy SPP4 is amended to allow small scale convenience retail provision, in line with Policy DME3.
LP010	transport evidence	General	Barking Town Centre Regeneration Strategy 2020 - 2030	N/A	N/A	Suggestion given that the Barking Town Centre Regeneration Strategy 2020 - 2030 is included within the evidence base for the new Local Plan. It is considered that the Strategy demonstrates that the delivery of MCP in the borough is supported by Members, and is in line with Be First's corporate ambition and strategy for the borough.
LP011	Vision, objectives	Support, but with suggestions	Chapter 3	SPP3	2a	Suggestion given that Policy SPP3, part 2a, is reworded to remove the description of "Sustainable Industrial Business Park".
LP011	Vision, objectives	Support, but with suggestions	Chapter 4	SPP3	2c	Support is given to Policy SPP3. Suggestion given that part 2c is amended to actively encourage developers to explore means of optimising and intensifying the delivery of new floorspace on vacant sites
LP011	Transport, Infrastructure	Support, but with suggestions	Chapter 10	SP8	N/A	Suggestion given that Policy SP8, Part 2d, is amended to clarify that while a Transport Study is being undertaken, development can still come forward.
LP011	Transport, Infrastructure	Support, but with suggestions	Chapter 10	DMT 1	N/A	Suggest given that the full contents of the Jacobs A13 Study should be incorporated into the draft Local Plan before submission as it provides a key evidence base for policy DMT1 which could be unsound if not fully supported.
LP011	Transport, Infrastructure	Support, but with suggestions	Chapter 10	DMT 2	N/A	Suggest given that the full contents of the Jacobs A13 Study should be incorporated into the draft Local Plan before submission as it provides a key evidence base for policy DMT2 which could be unsound if not fully supported.
LP011	Transport, Infrastructure	Support, but with suggestions	Chapter 10	DMT 3	N/A	Suggest given that the full contents of the Jacobs A13 Study should be incorporated into the draft Local Plan before submission as it provides a key evidence base for policy DMT3 which could be unsound if not fully supported.

LBBD/BeFirst First Revised Draft Local Plan Consultation: List of Representations

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LP011	Transport, Infrastructure	Support, but with suggestions	Chapter 10	DMT 4	N/A	Suggest given that the full contents of the Jacobs A13 Study should be incorporated into the draft Local Plan before submission as it provides a key evidence base for policy DMT4 which could be unsound if not fully supported.
LP011	Site allocation	Support, but with suggestions	Site allocations map	XS - Plot 62 Segro Park	N/A	Suggestion given that the proposed use of Site XS should include 'Opportunities for industrial intensification through strategic planning' in line with other nearby SEGRO sites and include reference to suitability for flexible Class E (light industrial), B2 and B8 uses. Submitted alongside these suggestions are site pro formas offering suggested guidance including approach to industrial uses, optimisation of development on site and design principles.
LP011	Site allocation	Support, but with suggestions	Site allocations map	XT - Plot 63 Segro Park	N/A	Suggestion given that site allocation XT should be amended to include reference to flexible Class E (light industrial), B2 and B8 uses.
LP011	Site allocation	Support, but with suggestions	Site allocations map	XU - Plot 64 Segro Park	N/A	Suggestion given that site allocation XU should be amended to include reference to flexible Class E (light industrial), B2 and B8 uses.
LP011	Site allocation	Support, but with suggestions	Site allocations map	XV - Plot 65 Segro Park;	N/A	Suggestion given that site allocation XV should be amended to include reference to flexible Class E (light industrial), B2 and B8 uses.
LP011	Site allocation	Support, but with suggestions	Site allocations map	XW - Plot 67 Segro Park	N/A	Suggestion given that site allocation XW should be amended to include reference to flexible Class E (light industrial), B2 and B8 uses.
LP011	Site allocation	Support, but with suggestions	Site allocations map	XX - Plot 70 Segro Park	N/A	Suggestion given that the proposed use of Site XX should include 'Opportunities for industrial intensification through strategic planning' in line with other nearby Serco sites and include reference to suitability for flexible Class E (light industrial), B2 and B8 uses. Submitted alongside these suggestions are site pro formas offering suggested guidance including approach to industrial uses, optimisation of development on site and design principles.
LP011	Vision, objectives	Support, but with suggestions	Chapter 3	SPDG1	Subheading 3	Support is given to Policy SPDG1. Suggestion is given that sub heading 3 be amended to "Intelligent use of our Transformation Areas."
LP011	Vision, objectives	Support, but with suggestions	Chapter 3	SPP3	4, 5	Support is given to Policy SPP3. Suggestion is given that paragraph 4 should be expanded to include reference to Dagenham Dock as a transformation area with scope for industrial intensification. Suggestion is also given that paragraph 5 should be expanded to outline that intensification ambitions

LBB/BeFirst First Revised Draft Local Plan Consultation: List of Representations

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						for the area should allow development in the area between the A1306 and the River Thames that is taller than prevailing heights, as long as it is of good design.
LP011	Economy, land use	Support, but with suggestions	Chapter 7	SP5	3, 7d	Support is given to Policy SP5. Suggestion given that the policy is expanded to list the types of 'suitable industrial activities' referenced in paragraph 3. Suggestion is also given that paragraph 7d is amended to clarify what is meant by the reference to future uses of intensified industrial units reflecting the needs of occupiers and guided by plot ratios.
LP011	Employment	Support, but with suggestions	Chapter 7	DME1	1	Support is given to Policy DME1. Suggestion is given that paragraph 1 is amended to include scope for delivery of employment floorspace within use classes B2/B8 and E, to ensure compliance with New London Plan Policies E4 and E5.
LP011	Employment	Support, but with suggestions	Chapter 7	DME2	2	Suggestion given that Policy DME2, part 2, is amended to offer greater flexibility. Suggestions for amendments include, that affordable workspace is not considered a requirement for industrial developments, that affordable workspace/payments in lieu will not be required where it cannot realistically be provided. Advice given that Enterprise Quarter, SEGRO Park and Rainham are examples of sites without such provision where start-ups have successfully established.
LP011	Economy	Support	Chapter 7	DME4	N/A	Full support is given to Policy DME4.
LP011	Design	Support, but with suggestions	Chapter 4	DMD2	N/A	Suggestion given that Policy DMD2 is amended to offer greater flexibility. Suggestions for amendments include allowing taller buildings in locations where they make the best use of land, and on allocated sites where scope for taller buildings is identified.
LP011	Infrastructure	Support, but with suggestions	Chapter 9	SP7	1b	Suggestion given that paragraph 1b of Policy SP7 should be expanded to require Carbon Offset Fund contributions or off-site provision where developments cannot achieve net zero carbon. It is considered that this would ensure SP7 and DMSI2 comply with each other.
LP011	Transport	Support, but with suggestions	Chapter 9	DMSI 2	2 (d)	Suggestion given that Policy DMSI2, part 2d, is amended to replace "Overheating Assessment "with "Energy Strategy including an Overheating Assessment where appropriate", in line with NLP Policy.
LP011	Environment	Support, but with suggestions	Chapter 8	DMNE 3	2 (b), 4 (e)	Support is given to Policy DMNE3. Suggestion given that Paragraph 2(b) should be expanded to grant more flexibility for offsite provision or financial contributions if 10% on site cannot realistically be provided. Suggestion given that Paragraph 4(e) should be expanded to allow a mixture of native and appropriate non-native species within 250m of SINCs, this is considered to be more realistic in London.
LP011	Environment	Support, but with suggestions	Chapter 8	DMNE 4	1	Support is given to Policy DMNE4. Suggestion given that the policy is amended to ensure that developments are only required to comply in a manner proportionate to the scale of the affected waterway, to not add what is considered unnecessary additional requirements to a development.
LP011	Environment	Support	Chapter 8	DMNE 5	N/A	Full support given to Policy DMNE5.

LBB/BeFirst First Revised Draft Local Plan Consultation: List of Representations

Rep ID	Category: Housing, Industrial Land, Open Space, Waste, (Hong to Check at End)	Nature of Response (General/Support/Objection/Support but with suggestions)	Relevant Chapter number	Policy Number	Relevant Paragraph No.	Summarised Comment
LP011	Sustainable infrastructure	Support, but with suggestions	Chapter 9	DMSI 3	1(d)	Support is given to policy DMSI3, an amendment to 1d) is suggested to ensure that 24 hour industrial uses are protected.
LP011	Sustainable infrastructure	Support	Chapter 9	DMSI 6	N/A	Full support given to Policy DMSI6.
LP011	Transport	Support, but with suggestions	Chapter 10	DMT1	1, 5	Suggestion given that Policy DMT1, Paragraph 1, is amended to clarify that the requirement to locate different uses within easy reach of each other should apply to mixed use developments, and not to SIL. Suggestion given that Paragraph 5 should reiterate that developments in industrial areas will not have to wait for delivery of strategic transport schemes.
LP011	Transport	Support, but with suggestions	Chapter 10	DMT2	2b	Suggestion given that Policy DMT2 is amended to allow for more flexibility to reflect specific requirements of sites and occupiers in terms of vehicular and cycle parking. Suggestion also given that part 2(b) is amended to cover application of this policy to B2/B8 industrial developments, contingent on different trip-generating characteristics.
LP011	Transport	Support, but with suggestions	Chapter 10	DMT3	N/A	Suggestion given that Policy DMT3 is amended to allow for more flexibility to reflect specific requirements of sites and occupiers in terms of vehicular and cycle parking.
LP011	Developer Contributions	Support, but with suggestions	Chapter 11	DMM 1	1	Suggestion given that Policy DMM1 is amended so that planning obligations will only be sought to offset harmful effects of a development which cannot be mitigated and where required by legislation.
LP011	Transport	Support, but with suggestions	Chapter 10	N/A	Table 10.3	Suggestion given that The 'A13 Strategic Study" in table 10.3 should be corrected to "Strategic Transport Study" with a revised date of December 2020.
LP013	Area vision	Support, but with suggestions	Appendix 2	DN Gascoigne South	N/A	Concern expressed that the number of residential units suggested for site allocation DN is not based on up to date evidence or planning context. Concern expressed that the allocation has changed from 'residential' to 'mixed use' between the Reg 18 and Reg 19 drafts of the Local Plan. Suggestion given to amend the allocation to increase indicative residential capacity - up to 920 is suggested. Suggestion given to amend the allocation with more scope for commercial, flexible Class E uses and to explicitly allow applications for different parcels of the site allocation to come forward independently. It is considered that these amendments would ensure that development is optimised.
LP013	Site allocation	Support, but with suggestions	Appendix 2	Proposed site not allocated	N/A	Concern expressed that the site situated North of the borough, at the junction of Whalebone Lane North and Collier Row Road, which was proposed for allocation has not been allocated. Suggestion given that this site is allocated for development.
LP013	Area vision	Support, but with suggestions	Chapter 3	DN Gascoigne South	3.9, Figure 4 and 5	Concern expressed that the transformation area is shown in Figure 4 but not in Figure 5. Suggestion given that Figure 5 is amended for continuity and accuracy, and to reflect that site DN, and the surrounding parcels of land, would comprise a Transformation Area in line with section 3.9 of Chapter 3.

LBBD/BeFirst First Revised Draft Local Plan Consultation: List of Representations

Rep ID	Category: Housing, Industrial Land, Open Space, Waste, (Hong to Check at End)	Nature of Response (General/Support/Objection/Support but with suggestions)	Relevant Chapter number	Policy Number	Relevant Paragraph No.	Summarised Comment
LP013	Site allocation	Support, but with suggestions	Appendix 2	Proposed site not allocated	N/A	Concern expressed that the site situated at City Pavilion and Elmstead Nurseries, Collier Row, Dagenham RM5 2BH, which was proposed for allocation has not been allocated. Suggestion given that this site is allocated for development. It is considered that there is scope for developing this site given that it was previously developed but is now designated as Metropolitan Green Belt. Suggestion given that development of the site could be achieved without removing the site from the Green Belt.
LP016	Site allocation	Support	N/A	SSA SC4	N/A	Support given for the removal of site allocation 'SSA SC4', as allocated in the previous draft plan. Support is given on the basis that the site should be allocated for a use considered more appropriate to the site.
LP016	Site allocation	Objection	N/A	SSA SC4	N/A	Concern expressed that site allocation 'SSA SC4', as allocated in the previous draft plan, has not been allocated for residential development in the latest draft plan on the basis that the site cannot deliver over 150 dwellings. Concern expressed that this approach to housing allocations could overlook a number of sites which could deliver a substantial amount of homes during the Plan Period. Suggestion given that site SSA SC4 is allocated for residential development on the basis that; it will deliver homes, the site is in close proximity to local shops and services, transport links, and the site is in close proximity to the Chadwell Heath Transformation Area.
LP016	Site allocation	Objection	N/A	SSA SC4	N/A	Concern expressed that site SSA SC4 is located in the Becontree Sub-Area when the site would better relate to the existing typology and urban fabric in Chadwell Heath & Mark's Gate Sub-Area. Suggestion given that site SSA SC4 is relocated in Chadwell Heath & Mark's Gate Sub-Area.
LP016	Site allocation	Support, but with suggestions	N/A	SSA SC4	N/A	Support is given to the growth vision of site SSA SC4. Suggestion given that the Council undertake negotiations with the owners of the site located immediately outside the BRL area, to ensure delivery in full on site
LP017	Area vision	Support, but with suggestions	Chapter 2	SPDG1	N/A	Ambitious housing/employment targets are supported along with proposals to accomplish this through more intelligent use of industrial land and the creation of "Transformation Areas" for more intensive development. Suggestion given that the Council consider a hierarchy of key areas to maximise development. Suggestion given that the policy is amended to reflect that the responsibility for improving infrastructure which guides development is the responsibility of stakeholder collaboration, not solely the developer.
LP017	Area vision	Support	Chapter 3	SPP3	N/A	Support is given to policy SPP3 and the strategic principles underpinning the transformation area, notably, the links to Dagenham Dock Station, the creation of a new coherent townscape and scope to build taller than prevailing height is supported.
LP017	Area vision	Support, but with suggestions	Appendix 2	ZZ: GSR and Gill sites	N/A	Support is given to residential-led mixed use development on both sites ZZ: GSR and Gill. It is noted that the two sites are under different ownership arrangements for both sites and suggestion is given that the site allocation allows flexibility for independent delivery, as the GSR site development is considered integral to regeneration in the area. Suggestion also given that the site allocation is amended with the following, the residential housing figure amended to 'minimum', reference to the new Use Class E to allow flexibility for initial developments and future changes of use between commercial/light industrial where appropriate, a benchmark 35% affordable housing target for Fast Track viability, considering that this should override NLP Policy H5 requirement for 50% affordable on industrial land.
LP017	Design	Support	Chapter 4	SP2	N/A	Full support is given to this policy setting a framework for high-quality design and developments.

LBBB/BeFirst First Revised Draft Local Plan Consultation: List of Representations

Rep ID	Category: Housing, Industrial Land, Open Space, Waste, (Hong to Check at End)	Nature of Response (General/Support/Objection/Support but with suggestions)	Relevant Chapter number	Policy Number	Relevant Paragraph No.	Summarised Comment
LP017	Design	Support, but with suggestions	Chapter 4	DMD 1	2 (H)	Concerns raised about conflict between Policy DMD1, part 2(h), and the NLP Policy D13 regarding the Agent of Change Principle and impact upon new development near industrial sites. Suggestion given that the Policy is amended to account for this to ensure development is not stymied and these principles are applied sensibly.
LP017	Design	Support	Chapter 4	DMD 2	2	Strong support is given to this policy, in particular paragraph 2 which promotes a localised framework for identifying sites for tall buildings. It is considered that this will help meet ambitious housing targets.
LP017	Housing	Support	Chapter 5	SP3	1c	Strong support is given to the approach to housing delivery strategy and housing targets, in particular paragraph 1c which seeks to maximise affordable housing depending on the site context.
LP017	Housing	Support, but with suggestions	Chapter 5	DMH1	N/A	Suggestion given that Policy DMH1 is amended to clarify the role of SPDs, masterplans and site allocations in setting area-specific AH targets. Suggestion given that the policy should not necessarily follow Mayoral guidance requiring 50% AH on former industrial land where net loss of industrial land is justified e.g. Transformation Areas. Suggestion given that the developable area of a site, instead of the site boundary, should also be considered when applying AH thresholds.
LP017	Housing	Support	Chapter 5	DMH2	1	Policy DMH2 is supported, suggestion given that part 1 is amended to give greater weight to qualitative factors and requirements of the area to determine appropriate housing mix. An example is given of Dagenham Dock, where it is considered that higher density development needs may not align with the desired mix in the dwelling size/mix table.
LP017	Housing	Support, but with suggestions	Chapter 5	DMH3	N/A	Concern expressed that Policy DMH3 is missing reference to some specialist housing types such as build-to-rent and live-work spaces. Suggestion given that the policy is amended and updated to incorporate new and changing housing preferences over the LP period.
LP017	Economy	Support, but with suggestions	Chapter 7	SP5	N/A	Support is given to policy SP5 but it is suggested that reference is made to flexibility of new Use Class E, as a way of delivering economic growth.
LP017	Economy	Support, but with suggestions	Chapter 7	DME1	2	Suggestion given that Policy DME1 is robust enough to manage industrial land release / intensification, but further guidance should be issues through SPDs. Suggestion given that the role of Be First in delivering changes outlined in paragraph 2 should be clarified and amended to read 'best endeavours', to ensure readers understand delivery processes and to highlight Be First's role.
LP017	Economy	Support, but with suggestions	Chapter 7	DME1	5	Concerns raised that Policy DME1, paragraph 5, will not allow for the proportionate approach to site specific evidence required for approval of new floorspace. Suggestion given that some flexibility should be allowed to meet future trends, with scope for Class E reiterated.
LP017	Environment	Support, but with suggestions	Chapter 8	DMNE 1	5	Policy DMNE 1 is supported. Suggestion given that part 5 is amended so that areas identified for high density have the option to provide off-site.
LP017	Environment	Support, but with suggestions	Chapter 8	DMNE 2	2	Support is given to Policy DMNE2 regarding UGF, but it is suggested that the policy is amended with the flexibility to allow exemption on 'challenging' sites, where it can be justified.

LBBD/BeFirst First Revised Draft Local Plan Consultation: List of Representations

Rep ID	Category: Housing, Industrial Land, Open Space, Waste, (Hong to Check at End)	Nature of Response (General/Support/Objection/Support but with suggestions)	Relevant Chapter number	Policy Number	Relevant Paragraph No.	Summarised Comment
LP017	Environment	Support	Chapter 8	DMNE 4	N/A	Utilisation of water assets is supported in Policy DMNE4. Advice is given that a joined up approach will be required, with the Council coordinating interaction between stakeholders to maximise effectiveness of this, rather than leaving this to developers. Suggestion is given that S106 obligations are required to deliver this.
LP017	Infrastructure	Support, but with suggestions	Chapter 9	DMSI 1	2a; 3	Suggestion given that Policy DMSI1, part 2a, is amended to allow applicants to offer justification for not meeting the requirements set out where it isn't considered possible. Suggestion also given that part 3 should be amended to clarify whether the Home Quality Mark 3 Star rating is mandatory.
LP017	Infrastructure	Support, but with suggestions	Chapter 9	DMSI 3	1d	Concern expressed regarding co-existence of new developments and existing uses during phased regeneration. Suggestion given that planning decisions must be taken pragmatically to avoid over-designing technical mitigations. Suggestion given that the Council must take a proactive approach in managing this, noting the Agent of Change principle.
LP017	Transport	Support, but with suggestions	Chapter 10	SP8	Fig.22	Policy SP8 is supported, but it is suggested that Figure 22 should be updated to include upgrading of environment around Chequers Lane as a key transport objective.
LP017	Transport	Support, but with suggestions	Chapter 10	DMT2	1, 2	Policy DMT2 is supported, but it is suggested that the policy should be extended to encourage more sites, that are not located in high PTAL areas, to become car free or car lite.
LP017	Managing Development	Support, but with suggestions	Chapter 11	SP9	P344 (of the IDP)	Policy SP9 is strongly supported, particularly the role of BeFirst in enabling delivery of critical infrastructure in the short term to catalyse growth. Suggestion given that page 344 of the IDP should be reviewed regularly.
LP017	Planning obligations	Support	Chapter 11	DMM1	N/A	Policy DMM1 is supported and its role in meeting future objectives is acknowledged and emphasised.
LP020	Industrial land	Objection	Policies map Chapter 3	N/A	3(a)	Objection given to the Ripple Road Logistics Centre allocation for residential development. Suggestion given that the site should be amended on the Policies Map as retained SIL, and identified in the Local Plan as a 'safeguarded rail site' and, thus, supported as an existing rail infrastructure. An amendment is suggested to paragraph 3a (Castle Green Transformation Area), to confirm the safeguarding and support of existing rail served sites and transport infrastructure at this site.
LP020	Industrial land	Objection	Policies map Chapter 3	N/A	3(a)	Objection given to the Box Lane Euro Hub Site allocations for residential development. Suggestion given that the site should be amended on the Policies Map as retained SIL, and identified in the Local Plan as a 'safeguarded rail site' and, thus, supported as an existing rail infrastructure. An amendment is suggested to paragraph 3a (Castle Green Transformation Area), to confirm the safeguarding and support of existing rail served sites and transport infrastructure at this site.
LP020	Growth/Area Strategy	Objection	Chapter 3	SPP2	Fig 7; Fig 8	Objection given to the Box Lane Euro Hub Ripple Road and Logistics Centre site allocations for residential development. Suggestion given that Figure 7 and Figure 8 in the Local Plan are amended to recognise the two sites as safeguarded rail sites.
LP020	Land use	Objection	Chapter 7	SP5	2(D)	Objection given to policy SP5 part 2(d). Suggestion given that the policy is amended to remove allocation of Ripple Road Logistics Centre and/or the Box Lane, Eurohub site for residential development. Suggestion given that a policy to protect safeguarded rail sites is included as a new paragraph between paragraphs 4 & 5.
LP020	Land use	Objection	Chapter 7	DME 1	2; 3	Objection given to policy DME 1; concern is voiced that the policy is not clear regarding whether it is compliant with Policy E7 of the ITP London Plan. Suggestion given to amend paragraph 2 to clarify that the policy is compliant with the London Plan. Suggestion given to amend paragraph 3 so that the policy includes the safeguarding of employment sites in the context of the 'Agent of Change' principle requirements.

LBBB/BeFirst First Revised Draft Local Plan Consultation: List of Representations

Rep ID	Category: Housing, Industrial Land, Open Space, Waste, (Hong to Check at End)	Nature of Response (General/Support/Objection/Support but with suggestions)	Relevant Chapter number	Policy Number	Relevant Paragraph No.	Summarised Comment
LP020	Environment	Objection	Chapter 6	DMSI 3	1 (D)	Suggestion that policy DMSI3 is amended to include protections of safeguarded sites in the context of 'Agent of Change' principle requirements.
LP020	Environment	Objection	Chapter 10	SP8	2 (B); 8	Suggestion given that policy SP8 paragraph 2(b) should be amended to include reference to existing sites, it is considered that this would allow for modal shift of freight and would be in line with policy contained in the NPPF and London Plan. Suggestion given that paragraph 8 should be updated to include reference to rail sites as well as wharf sites, due to the rail sites safeguarded status.
LP020	Site allocation	Objection	Appendix 2	CF Castle Green	N/A	Objection given to site allocation CF due to the lack of reference to the two safeguarded rail served freight sites at Ripple Road and Box Lane, Euro Hub.
LP022	vision, objectives	support	Chapter 1	Vision and objectives	N/A	Support is given to the reference to MCP in the Vision and Objectives section of the draft Local Plan, and the reference to LBBB working with CoLC and other stakeholders to create a major new logistics hotspot. It is noted that the consultee is committed to continuing to work collaboratively with Be First to deliver MCP and wider infrastructure.
LP022	vision, objectives	Support, but with suggestions	Chapter 3	SPDG1	Part 6	Support is given to Policy SPDG 1. Suggestion given that part 6 is amended to state "key transport improvements, which support strategic links into London, regionally and internationally, such as the A13."
LP022	vision, objectives	Support, but with suggestions	Chapter 3	SPDG1	Subheading 3	Suggestion given that subheading 3 is amended to read "Intelligent use of our Transformation Areas."
LP022	vision, objectives	Support, but with suggestions	Chapter 3	SPP2	Part 3b	Support is given to Policy SPP2. Suggestion given that part 3B is amended to state "Suitable improvements to the A13, based on the results of the Strategic Transport Study, viability and impact on existing and future developments."
LP022	Employment Space	Support, but with suggestions	Chapter 7	DME1	Part 1d	Support is given to Policy DME1. Suggestion given that part 1d is amended to state "provides a mix of unit sizes to meet the needs of small and medium enterprises (SMEs) where appropriate."
LP022	Employment Space	Support, but with suggestions	Chapter 7	DME1	Part 5	Support is given to Policy DME 1. Suggestion given that part 5 is amended to state "applicants must demonstrate that new employment floor space within the redevelopment is designed to respond to market demand and occupier requirements to secure viable occupation where appropriate."
LP022	Employment Space	Support, but with suggestions	Chapter 7	DME2	N/A	Support is given to Policy DME2. Suggestion given that an additional sentence is included that states "Affordable workspace and a payment in lieu will not be required where justified by the specific use of a development, or where identified in a site allocation."
LP022	Environment	Support, but with suggestions	Chapter 8	DMNE2	Part 2	Support is given to Policy DMNE2. Suggestion given that part 2 is amended to state "target score of 0.3 should be achieved for commercial development (excluding B2 and B8 uses and similar industrial uses that are defined as Sui Generis)."
LP022	Environment	Support, but with suggestions	Chapter 8	DMNE3	Part 4e	Support is given to Policy DMNE3. Suggestion given that part 4e is amended to state "use a suitable mixture of native and non-native species in soft landscaping schemes within 250m of Sites of Importance for Nature Conservation, waterways and wildlife corridors, and on green/brown roofs and roof gardens."
LP022	Environment	Support, but with suggestions	Chapter 8	DMNE3	Part 2b	Support is given to Policy DMNE3. Suggestion given that part 2b is amended to state "demonstrate a minimum of 10% biodiversity net gain using the DEFRA metric (or agreed equivalent). Where this is not possible on site, off-site provision or an offsetting contribution will be appropriate."

LBBD/BeFirst First Revised Draft Local Plan Consultation: List of Representations

Rep ID	Category: Housing, Industrial Land, Open Space, Waste, (Hong to Check at End)	Nature of Response (General/Support/Objection/Support but with suggestions)	Relevant Chapter number	Policy Number	Relevant Paragraph No.	Summarised Comment
LP022	Design	Support, but with suggestions	Chapter 4	DMD1	N/A	Support is given to Policy DMD1.
LP022	Design	Support, but with suggestions	Chapter 4	DMD2	N/A	Support is given to Policy DMD2. Suggestion given that the Council prepares a localised planning framework for Dagenham Dock which identifies the area as suitable for tall buildings in line with draft Policy DMD 2 'Tall buildings'.
LP022	Environment	Support, but with suggestions	Chapter 9	SP7	Part 1b	Support is given to Policy SP7. Suggestion given that part 1b is amended to state "Where it is not possible for developments to achieve net zero carbon on site, off-site provision or a cash in lieu contribution to a Carbon Offset Fund will be appropriate."
LP022	Environment	Support, but with suggestions	Chapter 9	DMSI2	N/A	Suggestion given that Policy DMSI 2 is amended to replace "Overheating Assessment" with "Energy Strategy including an Overheating Assessment where appropriate."
LP022	Environment	Support, but with suggestions	Chapter 9	DMSI8	Part 2	Support is given to Policy DMSI8. Suggestion given that part 2 is amended to state "proposals for non-waste uses on safeguarded sites will be acceptable where the proposed use does not conflict with the vision for the area or where the waste capacity for the area has already been surpassed."
LP022	Transport	Support, but with suggestions	Chapter 10	SP8	N/A	Support is given to Policy SP8. Suggestion given that the policy is amended with an additional sentence that states: "Strategic transport plans for the Borough will be informed by the Strategic Transport Study."
LP022	Transport	Support, but with suggestions	Chapter 10	SP8	N/A	Suggestion given that policy SP8 is amended to indicate that it should be applied flexibly to reflect the specific nature of development proposals, where the need for such flexibility is identified in site allocations. Suggestion given that Policy SP8 is also amended to support practical and economically viable alternatives or strategies for local businesses and recognise coordination requirements at a regional level.
LP022	Transport	Support, but with suggestions	Chapter 10	SP8	Part 2d	Suggestion given that Policy SP8, part 2d, is amended to state "seeking to further explore the feasibility and business case of wider strategic schemes to improve the A13, improve public transport access across the borough and into the town centres and establish funding for delivering these improvements. The feasibility and business case should be informed by the Strategic Transport Study but the delivery of strategic transport improvements should not delay the delivery of development in Transformation Areas."
LP022	Transport	Support, but with suggestions	Chapter 10	DMT1	Part 1	Support is given to Policy DMT1. Suggestion given that part 1 is amended to recognise that the policies should be applied and considered relative to the specific nature of individual development proposals.
LP022	Transport	Support, but with suggestions	Chapter 10	DMT1	Part 5	Support is given to Policy DMT1. Suggestion given that part 5 is amended to state "Any development which is likely to have a significant impact on the borough's transport network will be required to submit a robust transport assessment and a travel plan, in accordance with Policy T4 of the draft New London Plan Intend to Publish version. However, the delivery of strategic transport improvements should not delay the delivery of development in Transformation Areas."
LP022	Transport	Support, but with suggestions	Chapter 10	DMT1	Part 6	Support is given to Policy DMT1. Suggestion given that part 6 is amended to reference contributions to mitigating transport measures being led by a strategic coordinated plan.

LBBD/BeFirst First Revised Draft Local Plan Consultation: List of Representations

Rep ID	Category: Housing, Industrial Land, Open Space, Waste, (Hong to Check at End)	Nature of Response (General/Support/Objection/Support but with suggestions)	Relevant Chapter number	Policy Number	Relevant Paragraph No.	Summarised Comment
LP022	Transport	Support, but with suggestions	Chapter 10	DMT2	N/A	Support is given to Policy DMT2. Suggestion given that the policy is amended to indicate that the policy can be applied flexibly to reflect the specific nature of development proposals, where the need for such flexibility is identified in site allocations.
LP022	Transport	Support, but with suggestions	Chapter 10	DMT2	Part 2b	Support is given to Policy DMT2. Suggestion given that part 2b is amended to state "New office development should comply with the parking standards as set out in Table 10.4 (Maximum office parking standards) and policy T6.2 of the New London Plan Intend to Publish version. Policy T6.2 should also apply to industrial, storage and logistics and distribution development, but trip generating characteristics of such development should be reflected in the quantum of vehicle parking provided."
LP022	Transport	Support, but with suggestions	Chapter 10	DMT2	Part 2d	Support is given to Policy DMT2. Suggestion given that part 2d is amended to state "some flexibility may be applied where retail, industrial, storage and logistics and distribution uses are redeveloped outside of town centres in areas which are not well served by public transport."
LP022	Transport	Support, but with suggestions	Chapter 10	DMT3	N/A	Support is given to Policy DMT3. Suggestion given that the policy is amended to indicate that the policy can be applied flexibly to reflect the specific nature of development proposals and evolution of the area's cycle facilities.
LP022	Transport	Support, but with suggestions	N/A	Table 10.3	Page 130	Suggestion given that part 6 is amended to that "A13 Strategic Study" is corrected to "Strategic Transport Study" and the date produced box is updated to state "December 2020" in line with the amended timescales for the study.
LP024	General	Objection	Chapter 3	N/A	N/A	Concern expressed regarding the lack of consideration given to the environment in the seven sub-areas. Suggestion given that the environment is integrated as a key consideration in future masterplans.
LP024	Housing	Objection	Chapter 5	DMH5	Part D	Concern expressed that the site at Choats Road/Lane is partially within flood zone 3 (high risk). Suggestion given to amend paragraph D to refer to sites not being located in an inappropriate area of high flood risk.
LP024	Open space	Support, but with suggestions	Chapter 8	DMNE 3	Parts 2 a & b	Suggestion given to amend paragraph 2 (a) to include the word "Demonstrate" to strengthen the requirement, and to amend 2 (b) to clarify that the types of small applications which are excluded from the requirement.
LP024	Environment	Support, but with suggestions	Chapter 8	DMNE 4	N/A	Concern expressed that previous suggested changes may have been misinterpreted. Suggestion given that underground structures, such as anchors and tie rods, are considered part of a flood defence structure and it is expected that any buffer zone will start from the landward extent of the flood defence, which would include any underground structures.
LP024	Environment	Support, but with suggestions	Chapter 9	DMSI 6	Part 6	Support is given to the flood defences section of this policy. Suggestion given that Point (6) is amended to include the River Roding which is a tributary of the River Thames and tidally influenced with the same requirements for TE2100 flood defence raisings. Suggestion given that Point 6 is amended to read, 'Development proposals along the Thames and tidal River Roding will be expected to...'.'
LP026	HL	Support, but with suggestions	Appendix 2	HL Hapag Lloyd House	N/A	Site Allocation HL is supported. Suggestion given that the Site Allocations Pro Forma Documents are updated to include omitted information from previous consultation, to ensure it is comprehensive and accurate.

LBBB/BeFirst First Revised Draft Local Plan Consultation: List of Representations

Rep ID	Category: Housing, Industrial Land, Open Space, Waste, (Hong to Check at End)	Nature of Response (General/Support/Objection/Support but with suggestions)	Relevant Chapter number	Policy Number	Relevant Paragraph No.	Summarised Comment
LP027	Industrial Land/Site Allocation	Support, but with suggestions	Policies map; Appendix 2	HA - Wickes (Hertford Road)	N/A	Suggestion given that the Site Allocations housing capacity is amended so that the value is a minimum number of dwelling rather than a maximum so that maximum development can be achieved on each site.
LP027	Industrial Land/Site Allocation	Support, but with suggestions	Policies map; Appendix 2	HA - Wickes (Hertford Road)	N/A	Concern expressed that part of site HA has been designated LSIS in error as it is not referenced in the ILS. Suggestion given that this is amended to reflect the correct designation.
LP027	Industrial Land/Site Allocation	Objection	Policies map; Appendix 2	XC - Harts Lane Estate	N/A	Concern expressed that site XC has been allocated as intelligent SIL in the proposals map which contradicts the proposal for residential development on the site. Suggestion is given that this allocation is amended so that the site is not constrained for future residential development.
LP028	Site allocation	Support	Appendix 2	CI Thames Road	N/A	Support is given to site allocation CI, notably the reference to 'approximate' instead of 'maximum' dwellings, is supported.
LP028	Growth/area strategy	Support, but with suggestions	Chapter 3	SPP2	N/A	Support is given for the proposed residential development on Thames Road. However, suggestion is given that residential development should be achieved through intensification and release of industrial land rather than co-location. Suggestion given for a residential/neighbourhood core in the centre of Thames Road.
LP028	Design	Support, but with suggestions	Chapter 4	DMD 1	Part 2	Suggestion given that policy DMD1 is amended to reference the 'effective use of land and optimisation density using a design led approach', it is considered that this would make the policy better in line with the NPPF and would better support policy SP2.
LP028	Design	Support	Chapter 4	SP2	N/A	Support given to policy SP2.
LP028	Housing	Support	Chapter 5	DMH1	N/A	Support given to policy DMH1.
LP029	Industrial Land/Site Allocation	Support, but with suggestions	Appendix 2	DO: Town Quay Wharf	N/A	Support is given for the inclusion of Town Quay Wharf as part of a site allocation for residential development. Suggestion given that the existing site description is amended to reflect the 22 existing residential units on the site.
LP029	Industrial Land/Site Allocation	Support, but with suggestions	Appendix 2	DO: Town Quay Wharf	N/A	Concern expressed that site DO has capacity for more than the proposed 160 residential units which is evidenced by a recent pre application enquiry for 204 residential units on the site. Suggestion given that the allocation description should be revised to reflect this.
LP031	Area vision	Support, but with suggestions	Chapter 3	SPDG1	Part 4	Support is given to Barking Town Centre as a focal point for new development. Suggestion is given that the planning weight of 'Transformation Areas' is clarified, particularly whether higher density development will be acceptable in these areas if they align with the broader Council Objectives.
LP031	Area vision	Support, but with suggestions	Chapter 3	SPP1;	Part 2 (b), (c), (g) and (h)	Suggestion given that the town centre housing capacity is amended so that the value is a minimum number of dwellings rather than a maximum, so that maximum development can be achieved on each site. Concern expressed that area has capacity for more new homes than the 1500 that is proposed.

LBBD/BeFirst First Revised Draft Local Plan Consultation: List of Representations

Rep ID	Category: Housing, Industrial Land, Open Space, Waste, (Hong to Check at End)	Nature of Response (General/Support/Objection/Support but with suggestions)	Relevant Chapter number	Policy Number	Relevant Paragraph No.	Summarised Comment
LP031	Site allocation	Support, but with suggestions	Appendix 2	AK: Vicarage Field	N/A	Suggestion given that the site allocation description should be expanded to include development which has planning consent.
LP031	Design	Support, but with suggestions	Chapter 4	SP2	Part 1(a)	Suggestion given that further guidance is added to policy SP2, Part 1(a), to clarify how a design-led approach will be taken.
LP031	Design	Support, but with suggestions	Chapter 4	DMD1	N/A	Suggestion given that further guidance is added to policy DMD1 to clarify how a design-led approach will be taken.
LP031	Housing	Support, but with suggestions	Chapter 5	SP3	N/A	Suggestion given that Policy SP3 should be amended to offer greater planning weight to proposals for new homes on accessible brownfield sites.
LP031	Housing	Support, but with suggestions	Chapter 5	DMH1	Part b	Suggestion given that 'Affordable Rent' should be renamed to avoid confusion and that Policy DMH1, Part B, is amended so that the wording of the policy corresponds with Policy SP31, Part C, to allow greater flexibility.
LP031	Housing	Support, but with suggestions	Chapter 5	DMH2;	N/A	Suggestion given that Policy DMH2 is amended to allow more flexibility for the unit mix in Transformation Areas compared to the preferred unit mix for the Borough.
LP031	Economic Growth	Support	Chapter 7	SP5	N/A	Support given for Policy SP5.
LP031	Economic Growth	Support, but with suggestions	Chapter 7	DME2	N/A	Support is given for Policy DME2. Suggestion given that further guidance should follow regarding the quantum of floorspace that should be provided as affordable, and the rental discount expected.
LP031	Economic Growth	Support, but with suggestions	Chapter 7	DME3	N/A	Suggestion given that Policy DME3 is updated to acknowledge the revised Use Classes Order and resulting flexibility in town centres.
LP031	Transport	Support	Chapter 10	SP8	Part 9	Support is given to Policy SP8, Part 9, particularly in so far as it applies to the development of the Town Centre and Vicarage Field site.
LP033	Growth strategy	Support	Chapter 3	SPDG1	N/A	Support is given for site XJ being brought forward within the context of SPDG 1, which outlines the future growth ambitions for the borough and the deallocation of the site for development in order to meet these targets, as part of the Dagenham Dock Transformation Area
LP033	Site Allocation	Support	Appendix 2	XJ – Stamping Plant;	N/A	Support is given for the allocation of site XJ for release of industrial land for a residential-led mixed use development.
LP033	Growth strategy/transport/Housing	Support, but with suggestions	Chapter 3	SPP3	Figure 9	Suggestion given that Fig. 9 is amended so that the cycle path, running west-east along the southern boundary, also extends north to connect to approved green route in Beam Park to improve green infrastructure, cycling and walking paths and promote good placemaking.

LBBB/BeFirst First Revised Draft Local Plan Consultation: List of Representations

Rep ID	Category: Housing, Industrial Land, Open Space, Waste, (Hong to Check at End)	Nature of Response (General/Support/Objection/Support but with suggestions)	Relevant Chapter number	Policy Number	Relevant Paragraph No.	Summarised Comment
LP033	Growth strategy/transport/Housing	Support, but with suggestions	Chapter 3	SPP3	Figure 10	Suggestion given that Fig.10, Site XJ (Stamping Pant) is omitted and should be listed as a Housing Site Allocation within the key.
LP033	Growth strategy/transport/Housing	Support, but with suggestions	Chapter 3	SPP3	paragraph 2	Suggestion given that a new section (i) should be added to paragraph 2 to clarify the position of the Stamping Plant. It is considered that the Stamping Plant could expand the commercial offer being developed at Merriellands (Site AC).
LP033	Growth strategy/transport/Housing	Support, but with suggestions	Chapter 3	SPP3	paragraph 3	Suggestion given that paragraph 3 is reworded to emphasise that provision of cultural facilities should be informed by local need, instead of being implemented to generate interest.
LP033	Growth strategy/transport/Housing	Support, but with suggestions	Chapter 3	SPP3	page 45	Concern is expressed that the supporting CGI on Page 45 focuses on the Stamping Plant site including indicative massing. Suggestion given that this is replaced with an image of Beam Park.
LP033	Site designations	Support, but with suggestions	Chapter 7	DME3	Part 5	Concern expressed that Policy DME3 Part 5 conflicts with Part 2 (c) of policy SPP3 as it requires impact assessments for retail and leisure development proposals outside of town centres over 500sqm. Suggestion given that this requirement is removed for Transformation areas so as not to stymie development, and in line with the NPPF.
LP033	Site allocation	Support, but with suggestions	Policies map; Appendix 2	XJ – Stamping Plant	N/A	Suggestion given that the small plot fronting New Road should be given a separate site allocation to reflect the separate ownership, and to reflect that development on the wider site XJ is not reliant upon this plot.
LP033	Site allocation	Support, but with suggestions	Policies map; Appendix 2	XJ – Stamping Plant	N/A	Concern expressed that there is scope to exceed the figure of 3,000 new homes proposed for the site allocation. Suggestion given that the site allocation should be amended to allow for more flexibility in the quantum of development, and in the types of future industrial uses permitted to ensure optimisation of the site, e.g. the addition of 'industrial workspace' to the site allocation.
LP033	Tall buildings	Support, but with suggestions	Chapter 3	SPP3	2	Suggestion given that Policy SPP3 is amended to allow for greater flexibility in height of buildings than has been approved at Beam Park (9-10 storeys) in order to optimise density on the development site. Advice given that The London Housing SPG (2016) allows for greater flexibility for large sites to define their own setting and densities. In line with Policy DMD2, it is requested that engagement take place when the framework for this area is drawn up.
LP033	Design	Support, but with suggestions	Chapter 4	DMD 2	N/A	Suggestion given that there is further engagement on a framework for tall buildings in the Dagenham Dock Transformation Area.
LP033	Site allocation	Support, but with suggestions	Policies map, Chapter 6 , IDP		IDP, Section 9.4	Concern expressed that Policy which relates to Cultural Assets lacks clarity. Suggestion given that more detail is included regarding Cultural assets to the north of the site. For example, Brewers Fayre is identified as a Public House in the Policies Map, but identified as an Arts and Cultural Facility at Section 9.4 of the Infrastructure Delivery Plan (IDP).
LP033	Design	Support, but with suggestions	Chapter 4	DMD 1	2a	Suggestion given that the application of Policy DMD1, part 2(a), is clarified in respect of the delivery of larger, phased schemes. Advice given mechanisms are already built into the planning process (such as Design Codes) to remove the need for Section 106.
LP033	Housing	Support, but with suggestions	Chapter 5	DMH1	1a	Concern expressed that Policy DMH1, Part 1a, is unclear whether 50% affordable housing is being sought on every site, or whether there is a strategic target of 50%. Suggestion given that the Policy is amended for clarity.

LBBB/BeFirst First Revised Draft Local Plan Consultation: List of Representations

Rep ID	Category: Housing, Industrial Land, Open Space, Waste, (Hong to Check at End)	Nature of Response (General/Support/Objection/Support but with suggestions)	Relevant Chapter number	Policy Number	Relevant Paragraph No.	Summarised Comment
LP033	Housing	Support, but with suggestions	Chapter 5	DMH2	N/A	Support is given to Policy DMH2.
LP033	Economy	Support, but with suggestions	Chapter 7	DME1	Part 6	Suggestion given that, where sites are allocated for alternative uses, the Council expressly allows for the loss of existing employment floorspace and land in the wording of Policy DME1 to avoid confusion.
LP033	Economy	Support, but with suggestions	Chapter 7	DME4	N/A	Support is given to policy DME4.
LP033	Environment	Support, but with suggestions	Chapter 8	DMNE6	Part 2	Suggestion that Policy DME6, Part 2, is amended for flexibility to read, 'exploring opportunities' to create new food growing opportunities, as opposed to an expectation to do so. It is considered that an opportunity should only be pursued where stakeholder engagement reveals an emerging need.
LP033	Transport	Support, but with suggestions	Chapter 10	DMT1;	DMT1(7);	Suggestion given that Policy DMIT1, Part 7, is amended to remove the requirement for bus access and standing in strategic sites, rather, it is considered this requirement should be on a case by case basis.
LP033	Transport	Support, but with suggestions	Chapter 10	DMT2	N/A	Suggestion given that Policy DMT2 is amended with a more flexible, site specific approach to implementation, particularly as new transport links emerge and PTAL ratings develop.
LP033	Developer Contributions	Support, but with suggestions	Chapter 11	DMM1	N/A	Suggestion given that flexibility in the application of S106 requirements is allowed, with S106 only being collected in line with legal tests and line with ITP London Plan policy DF1, which prioritises "affordable housing and necessary public transport" ahead of other considerations e.g. health and education infrastructure; affordable workspace, culture and leisure facilities.
LP034	Infrastructure	Support	Chapter 9	DMSI 7	N/A	Support what the Plan is aiming to achieve. Understand Thames Water pre-application service is referred to in DMSI 7 and want us to know that they also provide services to Barking and Dagenham and provide a similar paid pre-application service
LP036	Safeguarded Wharves	Support, but with suggestions	Chapter 7	DME1	1.5	Noted that the council intends to create supplementary planning documents to provide strategic guidance on intensification and more intelligent use of the borough's designated industrial land within the identified Transformation Areas and include details on industrial intensification and redistribution including the relocation of existing businesses that cannot be incorporated within a redevelopment. A request is registered to be consulted on these documents when available, particularly in the context of the existing Safeguarded Wharves located in these areas and the 2020 Industrial Strategy which, it notes, states in paragraph 1.51 with regard to the River Road SIL area that: "The new residential-led neighbourhood coming forward within proximity to the area at Barking Riverside, which is expected to extend into Creekmouth to make the most of the River Roding and Thames, is likely to put increasing pressure on the employment development within this area".
LP036	Safeguarded Wharves	Support, but with suggestions	Glossary	N/A	N/A	Support given to the reference to the Agent of Change principle in the glossary, however, suggestion is given to amend the glossary to include a description of Safeguarded Wharves, it is suggested that the definition would sit alongside the definition for safeguarded waste sites. It is proposed that the description for Safeguarded Wharves within the glossary should be: "A network of sites that have been safeguarded for cargo handling uses such as intraport or transshipment movements and freight-related purposes by Safeguarding Directions. A site remains safeguarded unless and until the relevant Safeguarding Direction is formally removed or amended."

LBBB/BeFirst First Revised Draft Local Plan Consultation: List of Representations

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LP036	Safeguarded Wharves	Support, but with suggestions	Chapter 4	SP5	N/A	Support given for policy SP5, part 4 of the policy. However, suggestion given that the policy is amended to reference the fact that Safeguarded Wharves are protected by Ministerial Direction and should be amended to the following: "All safeguarded wharves and maritime infrastructure will be protected and retained in line Ministerial Safeguarding Directions, supported by with Mayoral policy and the Marine Management Organisation."
LP036	Safeguarded Wharves	Support, but with suggestions	Chapter 4	SP5, Polices map, Table 2	N/A	Support is given that the locations of the boroughs Safeguarded Wharves are defined in the policies map and in table 2. However, suggestion given to amend that part 4 of the policy wording describes this as table 3 rather than table 2.
LP036	Safeguarded Wharves	Support, but with suggestions	Chapter 4	SP5, Polices map, Table 2	N/A	Support is given to SP5 and that the locations of the boroughs Safeguarded Wharves are defined in the policies map and in table 2. However, suggestion given to amend the reference in table 2 so that is states De Pass Wharf is 'located in Barking' rather than 'located in Dagenham'.
LP036	Safeguarded Wharves	Support, but with suggestions	Chapter 3	SPP2, Figure 7	N/A	Suggestion given that Figure 7 should be updated to the highlight the 'freight services' location of the seven Safeguarded Wharves located in this Transformation Area. Namely: Alexander Wharf, Pinns Wharf, Steel Wharf, Rippleway Wharf, Docklands Wharf, Victoria Stone Wharf and DePass Wharf.
LP036	Safeguarded Wharves	Support, but with suggestions	Chapter 3	SPP2	N/A	Suggestion given to add the following wording to policy SPP2 under the Thames Road and River Road Transformation Area section part 5 to state under a new sub heading: "5: The Council will support development that contributes positively to the delivery of: h) existing rail, maritime and river transport infrastructure to be utilised within the wider area and the Thames Estuary as a whole"
LP036	Safeguarded Wharves	Support, but with suggestions	Chapter 3	SPP3	Figure 9	Suggestion given to amend Figure 9 to show the location of the Transformation Areas other Safeguarded Wharves, including Dagenham Wharf, Pinnacle Terminal, No 1 Western Extension, East Jetty, No 4 Jetty and Ford Dagenham Terminal.
LP036	Safeguarded Wharves	Support, but with suggestions	Chapter 3	SPP2	N/A	Suggestion given to add the following to policy SPP2 with regard to the Agent of Change principle under the Barking Riverside Transformation Area section part 2 "2: The Council will support development that contributes to a) strengthening the relationship with the adjacent Transformation Areas. Robust consideration of the long-term relationship with Creekmouth site in line with the agent of change principle"
LP036	General	Support, but with suggestions	Chapter 3	N/A	N/A	In support of the ambitions of the Local Plan.

LBBD/BeFirst First Revised Draft Local Plan Consultation: List of Representations

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LP037	Industrial Land/Site Allocation	Objection	Chapter 3	Sub-Area 2: Thames Road, Barking Riverside and Castle Green	N/A	Concern expressed regarding the proposed relocation of existing businesses in sub area 2 in favour of residential led development. Issues of being relocated further from the centre of London such as increased journey time, may also increase congestion and air pollution and would make the introduction of electric vehicles more challenging for the consultee's business due to electric cars' limited range. Suggestion that the Council focus on underutilised and vacant commercial properties rather than relocate existing properties.
LP037	Industrial Land/Site Allocation	Objection	Chapter 3	Sub-Area 2: Thames Road, Barking Riverside and Castle Green	N/A	Concern expressed that the consultee's business generates significant amounts of noise which would impact proposed future residential developments and generate noise complaints. Reiterated the 'Agent of Change' principle in relation to proposed residential developments near to the Thames road site.
LP037	Industrial Land/Site Allocation	Support	Chapter 10	DM33	N/A	Request for more information and further discussion regarding the Council's aspirations for the proposed freight consolidation. Noted that the comment is given on behalf of a business that carries out a high degree of consolidation work.
LP037	Industrial Land/Site Allocation	Support	Chapter 7	DM6	N/A	Support given for an increase in Industrial Land.
LP037	Industrial Land/Site Allocation	Support	Chapter 10	SP8	N/A	Support is given for reducing businesses' environmental footprint via minimising miles travelled, monitoring its carbon footprint and investing in low and zero carbon technologies.
LP038	Infrastructure	Support	Chapter 9	DMSI 7	N/A	Suggestion given that the 'indicative capacity' of 6,300 residential units instead be referenced as a 'minimum figure', as it is considered the site has scope for higher levels of residential development and there should be no hindrance to this in policy if it is appropriate
LP038	Growth/Area strategy	Support, but with suggestions	Chapter 3	SPP3	5, 6 & 6a	Concern expressed that Policy SPP3, Paragraph 5, (Dagenham Dock) proposes future developments of increased heights subject to design quality, but the adjacent Beam Park site (paragraph 6) does not make such suggestion despite similar characteristics. Suggestion given that the policy is amended for continuity regarding tall buildings. More info should also be provided on improved visual connections, including cycling and walking paths and green infrastructure, especially between new key housing sites and Dagenham Dock/urban centres
LP038	Growth/Area strategy	Support, but with suggestions	Chapter 3	SPP3	N/A	Support is given to Beam Park proposals but a suggestion is given that reference is made to cross boundary issues such as parking, healthcare provision and education.
LP038	Growth/Area strategy	Support, but with suggestions	Chapter 3	SPP3	N/A	Suggestion given that reference should be made to provision of 50% affordable housing including appropriate family accommodation.

LBBD/BeFirst First Revised Draft Local Plan Consultation: List of Representations

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LP038	Growth/Area strategy	Support, but with suggestions	Chapter 3	SPP3	N/A	Support is given to Beam Park proposals but suggestion is given that the Policy is worded so that references to density and tenure of affordable housing do not hinder residential development, particularly where the context and proximity to transport nodes encourage higher densities.
LP038	Growth/Area strategy	Support, but with suggestions	Chapter 4	SP2	Part 1 a), b), d)	Support given to Policy SP2, suggestion given that development may need to create its own context sense of place where one does not exist, e.g. Beam Park, or where there is need for improvement to the sense of place.
LP038	Design	Support, but with suggestions	Chapter 4	DMD 1	Part 3 c)	Suggestion given that Policy DMD 1, Part 3 (c), is amended to clarify what is meant by 'different options' to be considered, i.e. those expected to be reflected on within a Design and Access document, or those that may be looked at within an Environmental Assessment.
LP038	Design	Support, but with suggestions	Chapter 4	DMD 1	Part 3 g)	Suggestion given that Policy DMD 1, Part 3 (g), is amended to include a requirement for applicants to agree to, and implement, a consultation strategy with the Council.
LP038	Design	Support, but with suggestions	Chapter 4	DMD2	N/A	Suggestion is given to clarify DMD2 regarding the suitability of sites for tall buildings, especially where sites may be brought forward in the absence of any Masterplan or LDO to offer localised guidance. This suggestion is in the context of Beam Park and Dagenham Dock, as currently flat undeveloped sites.
LP038	Housing	Support, but with suggestions	Chapter 5	SP3	Part 2a	Suggestion given that 'self-contained' be removed from this paragraph as it reduces the scope for providing flats, which have the advantage of delivering higher densities in an area with close proximity to transport nodes.
LP038	Housing	Support, but with suggestions	Chapter 5	DMH1	Part 1a	Concern expressed that the requirement for 50% affordable housing is not achievable in sites such as Beam Park where 50% affordable housing is offered on public land. Suggestion that Policy DMH1 Part 1a is amended to better reflect London Plan policy, where the requirement for a review mechanism remains in place for sites which do not reach substantial implementation within a specified timeframe.
LP038	Housing	Support, but with suggestions	Chapter 5	DMH1	Part 1b	Suggestion given that the reference in Policy DMH1, Part 1b, to 'genuinely affordable' should be deleted.
LP038	Housing	Support, but with suggestions	Chapter 5	DMH2	Part 1	Suggestion given that Policy DMH2, Part 1, is amended so that proposed tenure mix is more flexible depending on requirement, site constraints and planning context.
LP038	Social Infrastructure	Support, but with suggestions	Chapter 6	DMS2	Part 4	Suggestion given that Policy DMS2, Part 4, is amended to require that any community needs are identified at pre-application stages, it is considered that this would ensure that community needs are met.
LP038	Environment	Support, but with suggestions	Chapter 8	DMNE1	Part 5c	Suggestion given that Policy DMNE1, Part 5c, is amended to remove the requirement to deliver, in recognition that this is not considered possible on all sites, and instead 'maximise provision as appropriate'.

LBBB/BeFirst First Revised Draft Local Plan Consultation: List of Representations

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LP038	Environment	Support, but with suggestions	Chapter 8	DMNE2	Part 2	Suggestion given that Policy DMNE2, Part 2, is amended to remove the requirement for UGF, in recognition that this is not considered viable on all sites, and instead suggested that the UGF be a target.
LP038	Environment	Support, but with suggestions	Chapter 8	DMNE6	Part 2	Suggestion given that Policy DMNE6, Part 2, is amended to remove the requirement for community food growing initiatives, in recognition that it is considered unfeasible that all developments will be able to include community food growing initiatives. Suggestion given that proposals should be viewed in the context of site constraints and balancing assessed community.
LP038	Environment	Support, but with suggestions	Chapter 8	DMNE6	Part 2	Suggestion given that Policy DMNE6, Part 2, is amended so that sites with pre-existing masterplans are exempt from the requirement to incorporate community food growing initiatives. It is considered that post the masterplan stage, the broad development principles and layout have been established such that it will be difficult to accommodate this requirement.
LP038	Transport	Support, but with suggestions	Chapter 10	DMT2	Part 3	Suggestion given that Policy DMT2, Part 3, is amended to clarify the requirements for parking spaces where developments are on adopted highways. Suggestion given that Policy DMT2 should clarify the status and ongoing maintenance of parklets.
LP038	Planning Obligations	Support, but with suggestions	Chapter 11	SP9	Part 1	Suggestion given that Policy SP9, Part 1, should be amended to ensure that scheme viability will not be significantly affected by The Council's strategy to 'front load' infrastructure provision.
LP038	Planning Obligations	Support, but with suggestions	Chapter 11	DMM1	Part 1(e) & 3	Suggestion given that Policy DMM1 is amended to clarify what Part 1e will require from developers and how this will differ from usual developer contributions. Suggestion given that Part 3 is amended to clarify how the policy will affect cashflow.
LP039	General	Support, but with suggestions	Chapter 8	DME3	N/A	Support given to the ambitions identified in the Local Plan. However, suggestion given that policy DME 3 is amended to remove the allocation of Castle Green Sports Field and Padnall Lake due to a perceived impact on public open space the allocation may result in.
LP040	Infrastructure	Support, but with suggestions	Infrastructure Delivery Plan	N/A	N/A	Support is given to the plan as a whole. It is noted that the consultee has expressed an interest in delivering the new car pound as set out in the infrastructure delivery plan.
LP044	Site allocation	Support	Draft Policies Document	WF - Sainsburys, 97-131 High Road,	N/A	Support is given for site allocation WF, and support is given for the level of development, density and scale included in the allocation, it is noted that the Council have reflected the discussions previously held about development on site WF.
LP044	Area vision	Support	Chapter 5	SPDG1	N/A	Support is given for growth ambitions for development in Chadwell Heath, particularly for high density, strategic scale development.

LBBB/BeFirst First Revised Draft Local Plan Consultation: List of Representations

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LP044	Housing	Support, but with suggestions	Chapter 5	SP3	Figure 19	Concern is expressed that there is a discrepancy between the indicative housing targets given in fig.19 and the housing target given in policy SPDG1. Suggestion is given that a single strategic housing target, or clarification on which figure relates to the Plan period, is addressed in the Local Plan to avoid ambiguity.
LP044	Housing	Support, but with suggestions	Chapter 3	SPP4	Figure 12	Concern is expressed that there is a discrepancy between the indicative capacity for homes in the policy's key housing allocations and the cumulative total of each of the site allocations in Appendix 2. Suggestion is given that this discrepancy is because the Local Plan does not contain an explicit timescale for housing delivery. Suggestion is given that the Local Plan should make it clear which allocations are deliverable, it advised that this solve the issue of discrepancy and ensure that the Plan is effective.
LP044	Site allocation	Support, but with suggestions	Draft Policies Document	WF - Sainsburys, 97-131 High Road,	N/A	Support is given for site allocation WF with the following suggestions given: To rename site allocation to '97-131 High Street'; To offer greater flexibility on the quantum of housing by amending description to 'at least 365 net homes'; To offer greater flexibility on the quantum of non-residential floorspace so that the site can be developed in the context of an unpredictable post-COVID market; to broaden the range of acceptable uses for the Site in line with the new Class E and to diversify the town centre offer.
LP044	Housing	Objection	Chapter 5	DMH2	Part 1	Concern expressed that the proposed quantum of 3+ bed houses at the tenures offered in town centre locations may make development unviable, and that this would be contrary to of NPPF Para.16.Suggestion made that policy DHM2 is amended to allow for deviation more easily from the preferred tenure mix if it is proven that delivering the desired mix would be unviable.
LP044	Growth strategy	Support, but with suggestions	Chapter 7	SP5 (stated as SP3 in submission)	N/A	Support is given for the Local Plan's strategy to create a diverse, mixed economy; however, suggestion is given that policies in the Local Plan are worded so as not to 'overprotect' assets where it may lead to vacant or underused units.
LP044	Employment	Objection	Chapter 7	DME2 (listed as DME1 on submission)	Part 1 (a) - (b)	Objection is raised regarding the purpose of, and evidence supporting, the inclusion of policy DME2, advice is given that the London Plan requires policies are supported by evidence. Concern is expressed on the following points: That the policy contradicts the Industrial Land Strategy's 'Economy' Chapter; That the demand for affordable workspace in LBBB is not demonstrated; and that this policy could result in problems of viability which constrain economic development. Suggestion is given that this policy is contrary to E3 in the ITP London Plan and should be removed.
LP045	Heritage	Support, but with suggestions	Chapter 4	SP2	N/A	Support given for Policy SP2. Suggestion given that the reference to addressing the challenges of assets on the Heritage at Risk register, that was included in the previous draft, is reinserted.
LP045	Heritage	Support, but with suggestions	Chapter 3	SPP1	Para 4.3	Suggestion given that Policy SPP1 include further references to the historic environment. Advice is given that this area includes the key concentration of heritage assets in the Borough. Suggestion is given that paragraph 4.3 is amended to include explicit references to the historic environment and the Barking Town Centre Conservation Appraisal and Management Plan.
LP045	Heritage	Support, but with suggestions	Chapter 4	DMD4	N/A	Support is given to Policy DMD4.

LBBD/BeFirst First Revised Draft Local Plan Consultation: List of Representations

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LP045	Heritage	Support, but with suggestions	Chapter 5	DMD2	Para 3 a i)	Support is given to Policy DMD2. Suggestion given that the wording of the policy is amended from 'contemplate', which is considered passive, to instead read 'reflect all relevant', so that successful tall building proposals will have to actively demonstrate that they have applied the relevant design guidance.
LP046	Site allocation	Support, but with suggestions	Appendix 2	AA - Barking Riverside	N/A	Suggestion given that the 'proposed use' of site AA is updated to reflect existing planning consents, including an increase in quantum of residential units and commercial floorspace. The following wording is suggested: "Residential led mixed use development including retail, employment, education, open space, community and leisure uses. Potential to deliver a further 11300 new homes (over and above the 1534 delivered to date and representing an increase of 2000 homes over and above the 10800 permitted), with 65,600 sq.m of commercial space, additional schools to meet the needs arising from the development, supported by the extension of London Overground and Thames Clipper services."
LP046	Site allocation	Support, but with suggestions	Appendix 2	AA - Barking Riverside	N/A	Suggestion given that the site boundary and area size are slightly inaccurate and should be reviewed.
LP046	Site allocation	Support, but with suggestions	Appendix 2	AA - Barking Riverside	N/A	Suggestion given that the site allocation is amended to clarify that the site owner is 'Barking Riverside' and not 'LBBD'.
LP046	Site allocation	Support, but with suggestions	Appendix 2	AA - Barking Riverside	N/A	Suggestion given that a Statement of Common Ground be setup to address the various issues raised in this submission
LP046	Area/Growth vision	Support	Chapter 3	SPP2	N/A	Support is given to SPP2 on the basis that the Local Plan ensures that site owners in the Transformation Area engage with Barking Riverside.
LP046	Infrastructure	Support, but with suggestions	Appendix 2	AA Barking Riverside	N/A	Support is given for the allocation of the AA Barking Riverside for residential-led redevelopment. Suggestion given that the site allocation is amended to reflect the 1563 homes that have already been delivered on the site and the 5 schools have already been provided including the Barking Riverside Academy.
LP046	Area/Growth vision	Support, but with suggestions	Chapter 3	SPDG1	Figure 4 & 7	Support is given for the allocation of the AA Barking Riverside for residential-led redevelopment. Suggestion given that SPDG1, Figure 4 and 7, are amended to reflect the 1563 homes that have already been delivered on the site and the 5 schools have already been provided including the Barking Riverside Academy.
LP046	Infrastructure	Objection	Chapter 11	SP9	N/A	Concern expressed that Policy SP9 places significant weight on the IDP which is not part of the development plan and is not considered, by the consultee, to be accurate or up to date.
LP046	Area/Growth vision	Objection	Infrastructure Delivery Plan	AA - Barking Riverside	N/A	Concern expressed that The IDP does not accurately identify the infrastructure that will be delivered by BRL to support the planning permission for Site AA Barking Riverside.
LP046	Area/Growth vision	Objection	Infrastructure Delivery Plan	AA - Barking Riverside	N/A	Concern expressed that the IDP does not reflect that stakeholders and developers involved in the Barking Riverside Transformation Area must 'front load' infrastructure development .

LBBB/BeFirst First Revised Draft Local Plan Consultation: List of Representations

Rep ID	Category: Housing, Industrial Land, Open Space, Waste, (Hong to Check at End)	Nature of Response (General/Support/Objection/Support but with suggestions)	Relevant Chapter number	Policy Number	Relevant Paragraph No.	Summarised Comment
LP046	Area/Growth vision	Objection	Infrastructure Delivery Plan	AA - Barking Riverside	N/A	Concern expressed that the IDP inaccurately references the infrastructure BRL pays for.
LP046	Area/Growth vision	Objection	Infrastructure Delivery Plan	AA - Barking Riverside	Paragraph 82	Concern expressed that the boundaries used for Site AA Barking Riverside are incorrect and the map on page 82 omits part of the Thames View.
LP046	Area/Growth vision	Objection	Infrastructure Delivery Plan	N/A	N/A	Concern expressed that the Local Plan does not contain a detailed plan for housing delivery. Advice given that this would provide a useful baseline to guide developers and a measure for the Council to determine whether annual housing delivery is on target. Suggestion given that a housing delivery plan which contains delivery timescales and yearly housing targets is included as an appendix.
LP046	Housing	Support	Chapter 5	DMH1, AA - Barking Riverside	N/A	Support is given to the approach to affordable housing and no modifications are suggested. It is noted that the consultee wishes to attend hearing sessions in relation to the site allocation, housing matters, viability and infrastructure delivery.
LP046	Planning Obligations	Support, but with suggestions	Chapter 11	N/A	N/A	Concern expressed that the Council's viability review does not reflect Mayoral guidance. Suggestion given that the Council reduces CIL to 0 on major development to offer more flexibility for bespoke approaches to developer contributions.
LP046	Design	Support	Chapter 10	SP9	N/A	Support is given to design policy in the Local Plan on the basis that requirements for 'design codes' can be led by the developer and will not slow down project delivery.
LP048	Growth/Area Strategy	Support, but with suggestions	Chapter 3	SPP4	N/A	Support is given to the proposed housing delivery in Chadwell Heath Transformation Area. However, the omission of a northern section of the site from the proposed residential development is objected to. A suggestion is given that housing is delivered on this section to increase the delivery of houses on the site.
LP048	Industrial land	Support	Chapter 7	DME1	Part 6	Support is given to policy DME 1, part 6, which identifies the site and wider estate for mixed-use and smaller workspaces, it is noted that this strategy is in accordance with the ILS and agreement is expressed that the policy will facilitate local regeneration and help meet the Plan's emerging housing target.
LP048	Masterplan	Support, but with suggestions	Chapter 3	SPP4	N/A	Suggestion is given that LBBB expedite the Chadwell Heath Masterplan, it is suggested that this will facilitate landowners and developers to submit planning applications and develop their sites.
LP049	Site Allocation	Objection	Appendix 2	AK - Vicarage Field	N/A	Concerns voiced regarding the proposed plans for the Vicarage Field site. Issues that may result from any significant increase to the density or height of the site, and whether the proposed affordability level meets GLA affordability requirements which are cited as 35% to 50%, should be considered in the Local Plan.
LP049	Design, Housing	Objection	Chapter 3	SPDG1	Part 4	Concerns voiced regarding any additional high density housing, and in particular high-rise tower blocks, at Ripple Road, East street, Clockhouse Avenue and the Station Parade. Issues that may result from this form of housing, particularly social, environmental, public health and safety including cladding issues, should be addressed in the Local Plan.
LP049	Public consultation, housing	Objection	Chapter 3	SPDG1	N/A	Concern voiced that there has not been a full consultation on residential development proposals in the Local Plan with local residents and action groups.

LBBD/BeFirst First Revised Draft Local Plan Consultation: List of Representations

Rep ID	Category: Housing, Industrial Land, Open Space, Waste, (Hong to Check at End)	Nature of Response (General/Support/Objection/Support but with suggestions)	Relevant Chapter number	Policy Number	Relevant Paragraph No.	Summarised Comment
LP049	Protected buildings	Objection	Chapter 4	DMD4	N/A	Concern voiced regarding protection status of all public and religious buildings in Barking Town Centre. Specific concerns are raised regarding the protection of Barking Methodist Church, Barking Baptist Church and The Barking Hotel. The protection of these buildings from inappropriate development should be addressed in the Local Plan, and should be in line with other local and national planning policy.
LP049	Housing, Design	Objection	Chapter 3	SPP2	Part 3	Concerns voiced regarding the height, density and mix of the proposed plans for new dwellings in the Castle Green Transformation Area and other Transformation Areas that are south of the A13. Issues that may result from any significant increase to the density or height in the area, whether affordable housing will be provided, and whether communities would benefit from a lower density housing form, should be considered in the Local Plan.
LP049	Green Space	Objection	Chapter 3	SPP2	Part 3	It has been recommended that any existing green spaces in the Castle Green area are protected and that green spaces in the Castle Green area should be increased, accessible to residents, and have a greater canopy cover to mitigate air pollution levels.
LP049	Infrastructure	Objection	Chapter 3	SPP2	Part 3b	Objection is raised regarding the plans to construct a tunnel over the A13 on the basis that it would be disruptive for residents and people who work in the Castle Green area and that the construction may result in social, environmental, public health and safety issues.
LP049	Housing, landuse, services, public health	Objection	Chapter 3	SPDG1	N/A	Concern voiced that the proposed number of dwellings, 50,000 units over the plan period, and proposed number of sites, 52 sites, would result in overdevelopment of the area. Concern that proposed residential sites would be better used for commercial, leisure use or open space. The proposed residential use of the sites and the issues caused by overdevelopment of the sites, including environmental, air pollution, public health, transport, strain on local services and infrastructure, need to be addressed in the plan.
LP049	Green space	Objection	Chapter 8	SP6	N/A	Concern raised that all green belt sites, including Padnall Lake, playing fields, allotments, trees and other open spaces, should be protected in the Local Plan for the protection of the environment and for public health.
LP049	Site allocation	Objection	Appendix 2	YM	Proposed use	Objection raised that Barking Job Centre should be used as office space rather than residential due to concerns for public health and safety.
LP049	Site allocation	Objection	Appendix 2	HA	Proposed use	Objection raised that Wickes in Hertford Road Barking should be used as commercial space rather than residential due to concerns for social and environmental issues.
LP049	Site allocation	Objection	Appendix 2	DM	Proposed use	Objection raised that Dagenham Heathway Shopping Centre and its surrounding commercial properties should be used as retail and leisure space rather than residential due to concerns for public health, safety, social and environmental issues.
LP049	Site allocation	Objection	Appendix 2	AK	Proposed use	Objection raised that Vicarage Field Shopping Centre and its surrounding commercial properties should be used as retail and leisure space rather than residential due to concerns for public health, safety, social and environmental issues.
LP049	Site allocation	Objection	Appendix 2	HL	Proposed use	Objection raised that Hapag Lloyd House should be used as office space rather than residential due to concerns for public health and safety.

LBBD/BeFirst First Revised Draft Local Plan Consultation: List of Representations

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LP049	Heritage	Support, but with suggestions	Chapter 4	DMD 4	N/A	Suggestion raised that more protection from over development is afforded to the Barking Town Centre Heritage and Conservation Areas, area around Ripple Road, London Road, Station Parade, Axe Street, East Street, Waking Road, North Street and the town quay area in order to continue to attract visitors who have an interest in historical locations.
LP049	Tall building	Support, but with suggestions	Chapter 4	SP 2, DMD 1, DMD 2	Proposed use	Suggestion raised that the design of future affordable family housing should be of low rise design and have a private garden per dwelling on the basis that this design has been successful in areas of Becontree, Faircross, Leftley, Thames View, Eastbury, Gascoigne, Castle Green and Chadwell Heath.
LP049	Listed building	Objection	Policies map	Listed building	N/A	Concern voiced regarding the protection status of Barking Elim Church.
LP049	Site allocation	Objection	Appendix 2	WD	Proposed use	Concern voiced regarding the protection status of The Victoria Public House.
LP049	Site allocation	Objection	Appendix 2	RC	Proposed use	Concern raised that Barking Rugby Club and playing field should be protected from development. Issues surrounding relocation of the club, including the lease and availability of land to relocate the club, should be addressed in the local plan.
LP049	Infrastructure, services	Objection	Chapter 6	SP 4, DMS 2	N/A	Concern raised that local services would need to be sufficient to serve existing and future residents in the area, the provision of future services such as transport, crime, waste and healthcare needs to be addressed in the Local Plan.
LP051	Site allocation	Support, but with suggestions	Draft Policies Document	WD - Former Victoria Pub	N/A	Support is given for site allocation WD Former Victoria Pub but amendments are suggested regarding the following: The ownership, 'W D Brakspear Ltd' not 'LBBD'; The description, to read 'Land at the corner of Axe Street and St Anne's Road' and correction of a discrepancy between housing numbers on the site allocation '26' and unit numbers on the Call for Sites '30'.
LP054	Gypsy and Traveller	Support	Chapter 5	DMH5	N/A	Support is given to the Local Plan's approach to address the accommodation needs of the gypsy and traveller community.
LP056	Housing	Objection	Chapter 4	SP2	Parts D and F	Concern voiced that policy SP2, parts D and F, lack clarity. Suggestion is given that the policy is amended, or parts D and F are removed and the requirements that they set out are instead dealt with via Building Regulations.
LP056	Housing	Objection	Chapter 4	DMD1	N/A	Concern voiced about the requirement for major developments to be considered by an independent Quality Review Panel. The issue of whether this could result in significant delays should be addressed. Suggestion is given that the Council publish a design guide for major development in place of this requirement.
LP056	Housing	Objection	Chapter 5	SP3	Part 1 a)	Concern voiced that the Borough's 10 year housing land supply lacks sufficient clarity to determine whether it is deliverable.
LP056	Housing	Objection	Chapter 5	SP3	Part 1 a)	Objection is given that the Council's housing strategy does not include enough provision of housing on small sites.
LP056	Housing	Objection	Chapter 5	SP3	Part 1 a)	Suggestion is given that the reference in Part 1 (a), which states it will support applications in general accordance with delivery phases, should be omitted from the policy.

LBBB/BeFirst First Revised Draft Local Plan Consultation: List of Representations

Rep ID	Category: Housing, Industrial Land, Open Space, Waste, (Hong to Check at End)	Nature of Response (General/Support/Objection/Support but with suggestions)	Relevant Chapter number	Policy Number	Relevant Paragraph No.	Summarised Comment
LP056	Housing	Objection	Chapter 5	SP3	Part 1 a)	Suggestion is given that the policy is amended to remove the requirement to sell homes to residents in Barking and Dagenham first as developers. Advice given that there is already a requirement to do so within the GLA boundary.
LP056	Housing	Objection	Chapter 5	Policy DMH1	N/A	Concern voiced that the policy requirement, for developments to demonstrate whether the local authority's housing objectives are effective, will delay developments and thus should be omitted from the policy.
LP056	Housing	Objection	Chapter 5	Policy DMH1	N/A	Suggestion given that the policy refers to 'First Homes'.
LP056	Housing	Objection	Chapter 5	Policy DMH2	N/A	Concern voiced that the level of detail required to achieve the desired dwelling mix is a barrier to small and medium sized developers. Suggestion given that the policy is simplified so that developers only have to achieve the appropriate mix of affordable housing.
LP056	Housing	Objection	Chapter 5	Policy DM3	N/A	Suggestion that the policy should refer specifically to the GLA target of 70 new dwellings for older residents per year.
LP056	Infrastructure	Objection	Chapter 6	Policy DMS1: Protecting and enhancing existing facilities	N/A	Concern voiced that the requirement to advertise sites for a 24-month period may result in an increase in costs and timescales to deliver sites.
LP056	Infrastructure	Objection	Chapter 6	Policy DMS1: Protecting and enhancing existing facilities	N/A	Concern voiced that the requirement to advertise sites for a 24-month period may result in an additional marketing cost which may have to factored into Council viability assessments.
LP056	Infrastructure	Objection	Chapter 6	Policy DMS2: Planning for new facilities	N/A	Concern voiced that the policy would require the applicant to accommodate a lot of planning requirements and considerations for any given new facility. Suggestion that the policy is amended to allow for more flexibility to negotiate the requirements with the Council, where the requirements are not considered proportionate, or relevant, to the facility that is proposed.
LP056	Infrastructure	Objection	Chapter 7	Policy DME1: Utilising the boroughs employment land more efficiently	N/A	Concern voiced that the Council's industrial land strategy is not in accordance with the Secretary of State's industrial land strategy as set out in the 'Intend to Publish' version of the London Plan.
LP056	Open Space	Support, but with suggestions	Chapter 8	Policy DMNE 1: Protect open spaces and play spaces	Part 5 d)	Suggestion is given that the policy is amended to specify how much open space will be required per dwelling, or, where there are existing requirements in the Parks and Open Spaces Strategy, suggestion is given that a reference is added to clarify the requirements.
LP056	Green Space	Objection	Chapter 8	Policy DMNE 3: Nature conservation and biodiversity	Part C	Concern voiced regarding the costs involved for the requirement for applicants to prepare a long-term management and monitoring plan for biodiversity net gain sites. Suggestion is given that the Council the quantifies the cost of the management and monitoring plans as part of its viability assessment.

LBBB/BeFirst First Revised Draft Local Plan Consultation: List of Representations

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LP056	Sustainability	Objection	Chapter 9	Strategic Policy SP7: Securing a clean, green and sustainable borough	Part 1 b)	Concern voiced regarding the requirement for major developments to be net carbon zero prior to 2025. Advice is given that HBF is working with the Government on a strategy to achieve net zero carbon homes by 2025. Issues that may arise for the housebuilder to deliver net zero carbon prior to this date should be considered by the Council, and the policy amended accordingly.
LP056	Sustainability	Objection	Chapter 9	Policy DMSI 2: Energy, heat and carbon emissions	N/A	Concern voiced regarding the requirement for major developments to be net carbon zero prior to 2025. Issues of cost, and the availability of a skilled workforce to install new technologies, should be addressed in the Local Plan.
LP056	Parking	Objection	Chapter 10	Policy DMT 2: Car parking	N/A	Suggestion to amend the policy to clarify the definition of a "car-lite" development.
LP056	Parking	Objection	Chapter 10	Policy DMT 2: Car parking	N/A	Concern voiced that the car parking requirements are not in accordance with the Secretary of State car parking strategy as outlined in the 'Intend to Publish' version of the London Plan.
LP056	Parking	Objection	Chapter 10	Policy DMT 2: Car parking	N/A	Concern voiced regarding the cost of car club membership. Suggestion given that any additional cost be factored into viability assessments.
LP056	Planning Obligations	Objection	Chapter 11	Policy DMM 1: Planning obligations	N/A	Concern expressed regarding the validity of the viability assessment in providing an accurate assessment of the costs associated with development in Barking and Dagenham.
LP056	Vacant Building Credit	Objection	Chapter 11	Policy DMM 1: Planning obligations	N/A	Concern expressed that the Council's requirements to qualify for Vacant Building Credit are not in accordance with national planning policy. Advice is given that the following requirements: no part of the building to have been in continuous use for any six months during the last five years up to the date of a planning application; evidence that the building has been marketed for at least 24 months prior to point of occupation, are more restrictive than national planning policy.
LP058	Public Consultation	Objection	Appendix 2	AK Vicarage Field; CD - Land at the Corner of London Road and North Street, Barking Town Centre; CF Castle Green	N/A	It is considered that there has been insufficient public consultation to inform the development of the draft Local Plan.
LP058	Tall buildings	Objection	Appendix 2	AK Vicarage Field; CD - Land at the Corner of London Road and North Street, Barking Town Centre; CF Castle Green	N/A	Objections are raised in respect of the scale of new development, in terms of height and massing, issues that tall buildings would cause such as 'canyoning' should be addressed in the Local Plan.

LBBB/BeFirst First Revised Draft Local Plan Consultation: List of Representations

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LP058	Vision	Objection	Appendix 2	AK Vicarage Field; CD - Land at the Corner of London Road and North Street, Barking Town Centre; CF Castle Green; HN - Ripple Road Shops;	N/A	Objections are raised regarding the prospective loss of The Victoria pub, HN Ripple Road shops, the Methodist Church in Axe Street, DJ Row of shops between East Street and Clockhouse Avenue, HO. London Road row of shops, HL. Hapag Lloyd House, and that to do so would contradict the Town Centre Conservation Area and policy to protect pubs.
LP061	Infrastructure	Support, but with suggestions	Entire Plan	N/A	N/A	Support is given to the proposals in the Local Plan. It is noted that further information has been provided to LBBB regarding where National Grid assets cross, or are in close proximity, to the proposed development sites. Suggestion is given that this information is included in the consultation database for future reference when developing sites.
LP062	Natural England	General	N/A	N/A	N/A	No comments were considered necessary for this application.
LP064	Industrial land	Support, but with suggestions	Draft Policies document; Industrial Land Strategy	XK - Barking Riverside Gateway Zone	N/A	Support is given to the Local Plan's approach to diversifying the use of industrial land where it is of poor quality, ageing industrial stock. Support is given for the redevelopment of site XK - Barking Riverside Gateway Zone. However, suggestion is given that the site allocation should be amended to increase flexibility of use to include a full residential development instead of modernised or intensified industrial provision in accordance with London Plan policy E7.
LP064	Industrial Land, Growth Strategy	Support	Chapter 3	SPDG1	Part 2, 3, 4	Support is given to intensification and redistribution of industrial floor space as a way of releasing land for development and the designation of River Road/Thames Road as a 'transformation area', support is given for the inclusion of site XK in this designation.
LP064	Growth Strategy	Support, but with suggestions	Chapter 3	SPP2	Part 5a, b	Support is given for Policy SPP2, however. concerns are voiced that the policy may restrict development of site XK. Suggestions are given to amend the policy so that it allows more flexibility in the uses of future developments, and, to amend to policy so that industrial uses are prioritised to the west of the River Road/Thames Road transformation area.
LP064	Housing	Support, but with suggestions	Chapter 5	SP3	Part 1b	Support is given for the Local Plan's housing targets. In order to meet this target, a suggestion is given that policy SP3 should be amended to explicitly encourage allocated sites within Transformation Areas to optimise housing potential, in line with Para117 of the NPPF.
LP064	Housing evidence	General	Appendix 2	XK - Barking Riverside Gateway Zone	Para 33	Support is given for intensified redevelopment on brownfield sites to meet the need for 1 and 2 bed housing and affordable housing, in line with the SHMA and Housing Needs Survey. A suggestion is given that XK - Lyons Business Park would be a good site for residential development and that the Local Plan should be amended to support residential development on this site.
LP064	Housing	Support	Chapter 5	SP3	Part 1c	Support is given for proposals to optimise affordable housing provision but 'subject to viability and site context', it is considered that this will ensure viable developments come forward.

LBBB/BeFirst First Revised Draft Local Plan Consultation: List of Representations

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LP064	Housing	Support	Chapter 5	DMH1	Part 1	Support is given for proposals to optimise affordable housing provision but 'subject to viability and site context', it is considered that this will ensure viable developments come forward.
LP064	Area vision	General	Draft Policies document	XK - Barking Riverside Gateway Zone	N/A	Suggestion that site XK could act as a 'landmark site', on the basis that corner plot location of site XK is positioned as a 'gateway' to the Barking Riverside complex.
LP064	Growth Strategy	Support, but with suggestions	Chapter 7	SP5, DME2	Part 2, 6	Support is given for a flexible approach to developing site XK and it is acknowledged that scope is required for employment/industrial workspace. Concern is expressed regarding the provision of affordable workspace as it is suggested that this will impact the viability of the site, although it is acknowledged that policy DME2 addresses this issue.
LP064	Industrial Land	Support, but with suggestions	Chapter 7	DME1	N/A	Suggestion to amend the wording of policy DME1 to reflect that a solely residential scheme should only be permitted on a site if it is identified as an option within the Local Plans relevant site allocation.
LP064	Industrial Land	Support, but with suggestions	Chapter 7	DME1	Part 1 (b), (d)	Support is given for policy DME1, however, with the suggestion that Part 1 (b) and (d) are amended to allow flexibility in the use and intensification of any future development, subject to site context and viability for sites such as site XK: Barking Riverside Gateway Zone.
LP064	Design	Support	Chapter 4	SP2	N/A	Support is given for the key aims and design ambitions set out within policy SP2.
LP064	Design	Support, but with suggestions	Chapter 4	DMD2	2	Support is given for policy DMD2, however, with the suggestion that site XK could accommodate large scale higher density development and that the Local Plan should address this. There is acknowledgement that the site has a low 'PTAL' rating but there is a suggestion that the site could nonetheless accommodate a scale of development that was proposed in a previous application, namely the Barking Riverside outline permission.
LP064	Site Allocation; growth strategy	Support, but with suggestions	Appendix 2	XK - Barking Riverside Gateway Zone	N/A	Support is given for site allocation XK, however, with the suggestion that that site XK could accommodate large scale higher density development and that the Local Plan should address this. There is acknowledgement that the site has a low 'PTAL' rating but there is a suggestion that the site could nonetheless accommodate a scale of development that was proposed in a previous application, namely the Barking Riverside outline permission.
LP064	Growth Strategy	Support, but with suggestions	Draft Policies Document	XK - Barking Riverside Gateway Zone	Proposed use	Support is given for site allocation XK, however with the suggestion that the allocation should be amended to reflect one of four options. Either, firstly, redevelopment of the site to provide more intensive employment use; or secondly, redevelopment of the site to provide more intensive employment and residential use; or thirdly, redevelopment of the site to provide wholly residential use; or fourthly, the site allocation description provide more details to clarify the preferred developable options.
LP066	Water management	Support	Chapter 9	DMSI 7	N/A	Support is given to Policy DMSI7.
LP066	Water management	Support, but with suggestions	Appendix 2	HO 14-34 London Road	N/A	Suggestion is given that the scale of development for site HO is likely to require upgrades to the wastewater network. Therefore, a suggestion is given that the Plan determines the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan and to avoid planning conditions being sought at the application stage to control the phasing of development in order

LBBD/BeFirst First Revised Draft Local Plan Consultation: List of Representations

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						to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development.
LP066	Water management	Support, but with suggestions	Appendix 2	ZZ GSR and Gill Sites – Land on the West side Thames of Chequers Lane, Dagenham	N/A	Concern expressed that the wastewater network capacity in this area may be unable to support the demand anticipated from the development of site ZZ. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Advice given that, where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application.
LP066	Water management	Support, but with suggestions	Appendix 2	ZZ GSR and Gill Sites – Land on the West side Thames of Chequers Lane, Dagenham	N/A	Advice given that there are Thames Water assets crossing site ZZ that will need to be protected.
LP066	Water management	Support, but with suggestions	Appendix 2	ZT 58 to 68 Church Street	N/A	Advice given that no infrastructure concerns have been identified regarding wastewater networks in relation to the development of site ZT. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing.
LP066	Water management	Support, but with suggestions	Appendix 2	AU Abbey Retail Park (South)	N/A	Suggestion is given that the scale of development for site AU is likely to require upgrades to the wastewater network. Therefore, a suggestion is given that the Plan determines the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan and to avoid planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development.
LP066	Water management	Support, but with suggestions	Appendix 2	AU Abbey Retail Park (South)	N/A	Advice given that Thames Water would expect surface water to discharge to the nearby watercourse.
LP066	Water management	Support, but with suggestions	Appendix 2	XR Barking Power Station	N/A	Concern expressed that the wastewater network capacity in this area may be unable to support the demand anticipated from the development of site XR. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Advice given that, where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application.
LP066	Water management	Support, but with suggestions	Appendix 2	XR Barking Power Station	N/A	Advice given that Thames Water would not expect surface water to be discharged to the Thames Water network.
LP066	Water management	Support, but with suggestions	Appendix 2	AA Barking Riverside	N/A	Suggestion is given that the scale of development for site AA is likely to require upgrades to the wastewater network. Therefore, a suggestion is given that the Plan determines the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan and to avoid planning conditions being sought at the application stage to control the phasing of development in order

LBBB/BeFirst First Revised Draft Local Plan Consultation: List of Representations

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						to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development.
LP066	Water management	Support, but with suggestions	Appendix 2	XK Riverside Gateway	N/A	Concern expressed that the wastewater network capacity in this area may be unable to support the demand anticipated from the development of site XK. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Advice given that, where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application.
LP066	Water management	Support, but with suggestions	Appendix 2	XK Riverside Gateway	N/A	Advice given that Thames Water would expect surface water to discharge to the nearby watercourse.
LP066	Water management	Support, but with suggestions	Appendix 2	EA Barking Station	N/A	Suggestion is given that the scale of development for site EA is likely to require upgrades to the wastewater network. Therefore, a suggestion is given that the Plan determines the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan and to avoid planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development.
LP066	Water management	Support, but with suggestions	Appendix 2	CF Castle Green	N/A	Suggestion is given that the scale of development for site CF is likely to require upgrades to the wastewater network. Therefore, a suggestion is given that the Plan determines the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan and to avoid planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development.
LP066	Water management	Support, but with suggestions	Appendix 2	CH Chadwell Heath Industrial Estate	N/A	Suggestion is given that the scale of development for site CH is likely to require upgrades to the wastewater network. Therefore, a suggestion is given that the Plan determines the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan and to avoid planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development.
LP066	Water management	Support, but with suggestions	Appendix 2	DJ Clockhouse Avenue	N/A	Suggestion is given that the scale of development for site DJ is likely to require upgrades to the wastewater network. Therefore, a suggestion is given that the Plan determines the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan and to avoid planning conditions being sought at the application stage to control the phasing of development in order

LBBB/BeFirst First Revised Draft Local Plan Consultation: List of Representations

Rep ID	Category: Housing, Industrial Land, Open Space, Waste, (Hong to Check at End)	Nature of Response (General/Support/Objection/Support but with suggestions)	Relevant Chapter number	Policy Number	Relevant Paragraph No.	Summarised Comment
						to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development.
LP066	Water management	Support, but with suggestions	Appendix 2	AM Crown House & Linton Road car park	N/A	Suggestion is given that the scale of development for site AM is likely to require upgrades to the wastewater network. Therefore, a suggestion is given that the Plan determines the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan and to avoid planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development.
LP066	Water management	Support, but with suggestions	Appendix 2	DM Dagenham Heathway Mall	N/A	Advice given that no infrastructure concerns have been identified regarding wastewater networks in relation to the development of site DM. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing.
LP066	Water management	Support, but with suggestions	Appendix 2	DZ Dagenham Labour Hall	N/A	Advice given that no infrastructure concerns have been identified regarding wastewater networks in relation to the development of site DZ. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing.
LP066	Water management	Support, but with suggestions	Appendix 2	AD Dagenham Leisure Park	N/A	Advice given that no infrastructure concerns have been identified regarding wastewater networks in relation to the development of site AD. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing.
LP066	Water management	Support, but with suggestions	Appendix 2	XJ Former Ford Stamping Plant	N/A	Advice given that no infrastructure concerns have been identified regarding wastewater networks in relation to the development of site XJ. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing.
LP066	Water management	Support, but with suggestions	Appendix 2	YG Garages at Keir Hardie Way	N/A	Advice given that no infrastructure concerns have been identified regarding wastewater networks in relation to the development of site YG. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing.
LP066	Water management	Support, but with suggestions	Appendix 2	CM Gascoigne Industrial Area	N/A	Suggestion is given that the scale of development for site CM is likely to require upgrades to the wastewater network. Therefore, a suggestion is given that the Plan determines the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan and to avoid planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development.
LP066	Water management	Support, but with suggestions	Appendix 2	CM Gascoigne Industrial Area	N/A	Advice given that Thames Water would expect surface water to discharge to the nearby watercourse.

LBBB/BeFirst First Revised Draft Local Plan Consultation: List of Representations

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LP066	Water management	Support, but with suggestions	Appendix 2	AL Gascoigne Estate West	N/A	Suggestion is given that the scale of development for site AL is likely to require upgrades to the wastewater network. Therefore, a suggestion is given that the Plan determines the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan and to avoid planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development.
LP066	Water management	Support, but with suggestions	Appendix 2	DO Town Quay	N/A	Suggestion is given that the scale of development for site DO is likely to require upgrades to the wastewater network. Therefore, a suggestion is given that the Plan determines the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan and to avoid planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development.
LP066	Water management	Support, but with suggestions	Appendix 2	DO Town Quay	N/A	Advice given that Thames Water would expect surface water to discharge to the nearby watercourse.
LP066	Water management	Support, but with suggestions	Appendix 2	DN Gascoigne South	N/A	Advice given that no infrastructure concerns have been identified regarding wastewater networks in relation to the development of site DN. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing.
LP066	Water management	Support, but with suggestions	Appendix 2	XC Harts Lane Estate	N/A	Suggestion is given that the scale of development for site XC is likely to require upgrades to the wastewater network. Therefore, a suggestion is given that the Plan determines the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan and to avoid planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development.
LP066	Water management	Support, but with suggestions	Appendix 2	XC Harts Lane Estate	N/A	Advice given that Thames Water would expect surface water to discharge to the nearby watercourse and that there may be wayleaves and easements as there is Thames Water owned land on this site.
LP066	Water management	Support, but with suggestions	Appendix 2	XD 41-59 (Odd) Hepworth Gardens 38-64 (Even) Southwold Drive 1-32 Hepworth Court Hepworth Gardens	N/A	Advice given that no infrastructure concerns have been identified regarding wastewater networks in relation to the development of site XD. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing.

LBBB/BeFirst First Revised Draft Local Plan Consultation: List of Representations

Rep ID	Category: Housing, Industrial Land, Open Space, Waste, (Hong to Check at End)	Nature of Response (General/Support/Objection/Support but with suggestions)	Relevant Chapter number	Policy Number	Relevant Paragraph No.	Summarised Comment
LP066	Water management	Support, but with suggestions	Appendix 2	XD 41-59 (Odd) Hepworth Gardens 38-64 (Even) Southwold Drive 1-32 Hepworth Court Hepworth Gardens	N/A	Advice given that Thames Water would expect surface water to discharge to the nearby watercourse.
LP066	Water management	Support, but with suggestions	Appendix 2	XE Ibscott Close Estate and highways land at Rainham Road South and Ballards Road	N/A	Suggestion is given that the scale of development for site XE is likely to require upgrades to the wastewater network. Therefore, a suggestion is given that the Plan determines the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan and to avoid planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development.
LP066	Water management	Support, but with suggestions	Appendix 2	CD Land at the Corner of London Road and North Abbey Street (Former Site of White Horse PH and Omnibus Park)	N/A	Suggestion is given that the scale of development for site CD is likely to require upgrades to the wastewater network. Therefore, a suggestion is given that the Plan determines the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan and to avoid planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development.
LP066	Water management	Support, but with suggestions	Appendix 2	AC Marriellands Crescent Two	N/A	Advice given that no infrastructure concerns have been identified regarding wastewater networks in relation to the development of site AC. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing.
LP066	Water management	Support, but with suggestions	Appendix 2	CO Padnall Lake	N/A	Advice given that no infrastructure concerns have been identified regarding wastewater networks in relation to the development of site CO. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing.
LP066	Water management	Support, but with suggestions	Appendix 2	AJ Gascoigne East Estate	N/A	Suggestion is given that the scale of development for site AJ is likely to require upgrades to the wastewater network. Therefore, a suggestion is given that the Plan determines the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan and to avoid planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development.
LP066	Water management	Support, but with suggestions	Appendix 2	YM Phoenix House, 12-14 Wakering Road, Barking	N/A	Suggestion is given that the scale of development for site YM is likely to require upgrades to the wastewater network. Therefore, a suggestion is given that the Plan determines the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development. It is recommended that the Developer and the Local Planning Authority liaise with Thames

LBBB/BeFirst First Revised Draft Local Plan Consultation: List of Representations

Rep ID	Category: Housing, Industrial Land, Open Space, Waste, (Hong to Check at End)	Nature of Response (General/Support/Objection/Support but with suggestions)	Relevant Chapter number	Policy Number	Relevant Paragraph No.	Summarised Comment
						Water at the earliest opportunity to agree a housing and infrastructure phasing plan and to avoid planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development.
LP066	Water management	Support, but with suggestions	Appendix 2	HN Ripple Road and Methodist Church	N/A	Suggestion is given that the scale of development for site HN is likely to require upgrades to the wastewater network. Therefore, a suggestion is given that the Plan determines the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan and to avoid planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development.
LP066	Water management	Support, but with suggestions	Appendix 2	WF Sainsburys 97-131 High Road	N/A	Advice given that no infrastructure concerns have been identified regarding wastewater networks in relation to the development of site WF. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing.
LP066	Water management	Support, but with suggestions	Appendix 2	CV Salisbury Road car park	N/A	Advice given that no infrastructure concerns have been identified regarding wastewater networks in relation to the development of site CV. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing.
LP066	Water management	Support, but with suggestions	Appendix 2	RC Barking Rugby Club	N/A	Advice given that no infrastructure concerns have been identified regarding wastewater networks in relation to the development of site RC. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing.
LP066	Water management	Support, but with suggestions	Appendix 2	CW 90 Stour Road	N/A	Advice given that no infrastructure concerns have been identified regarding wastewater networks in relation to the development of site CW. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing.
LP066	Water management	Support, but with suggestions	Appendix 2	CI Thames Road	N/A	Concern expressed that the wastewater network capacity in this area may be unable to support the demand anticipated from the development of site CI. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Advice given that, where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application.
LP066	Water management	Support, but with suggestions	Appendix 2	AK Vicarage Field	N/A	Suggestion is given that the scale of development for site AK is likely to require upgrades to the wastewater network. Therefore, a suggestion is given that the Plan determines the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan and to avoid planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development.

LBBD/BeFirst First Revised Draft Local Plan Consultation: List of Representations

Rep ID	Category: Housing, Industrial Land, Open Space, Waste, (Hong to Check at End)	Nature of Response (General/Support/Objection/Support but with suggestions)	Relevant Chapter number	Policy Number	Relevant Paragraph No.	Summarised Comment
LP066	Water management	Support, but with suggestions	Appendix 2	WD Former Victoria Public House	N/A	Suggestion is given that the scale of development for site WD is likely to require upgrades to the wastewater network. Therefore, a suggestion is given that the Plan determines the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan and to avoid planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development.
LP066	Water management	Support, but with suggestions	Appendix 2	HA Wickes (Hertford Road)	N/A	Concern expressed that the wastewater network capacity in this area may be unable to support the demand anticipated from the development of site CI. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Advice given that, where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application.
LP066	Water management	Support, but with suggestions	Appendix 2	HA Wickes (Hertford Road)	N/A	Advice given that Thames Water would expect surface water to discharge to the nearby watercourse.
LP067	Sport Facilities	General	Evidence Base	N/A	N/A	Concern was expressed about the robustness of the sport facility evidence base as part of the Regulation 18 consultation. Acknowledgement given that the Council/Be First have been liaising with Sport England to address the issue.
LP067	Sport Facilities	Support, but with suggestions	Evidence Base	N/A	N/A	Concern expressed that the Playing Pitch Strategy (PPS) and Strategic Assessments of Artificial Grass Pitch, Swimming Pool and Sport Hall Provision are outdated given that they are based on 2015/2016 data and Sports England requires the evidence base to be reviewed annually. Concern also expressed that the Strategic Assessments were not prepared according to Sport England guidance and so are not considered robust. Suggestion given that the Council's evidence for indoor and outdoor sport facilities is reviewed and updated so that it is sufficiently up-to-date to support the Local Plan. Suggestion that the Council develop a Sports Built Facility Strategy to support the Local Plan.
LP067	Sport Facilities	Support, but with suggestions	Evidence Base	N/A	N/A	Acknowledgment given that some flexibility in preparing a new evidence base is required due to the pandemic and to allow the 'Parklife' project at Parsloes Park to be delivered. Support is given for the delivery of this project, thus an extension to reviewing and updating the Playing Pitch Strategy is agreed until this project is operating which is anticipated for late 2021.
LP067	Sport Facilities	Support, but with suggestions	Evidence Base	N/A	N/A	Support is given to the provision of sports facilities in the Local Plan if the Local Plan is supported by an evidence based that has recently been reviewed and updated. Suggestion given that the evidence base should be reviewed and updated in co-operation with the relevant competent steering groups including Sport National Governing Bodies.
LP067	Active Design	Support, but with suggestions	Chapter 4	SP2	N/A	Support is given for the incorporation of active design in Policy SP2. Suggestion given that the Council elaborate on Active Design and/or provide links to the Sport England guidance to assist applicants/developers. A link to the guidance is included: https://www.sportengland.org/how-we-canhelp/facilities-and-planning/design-and-cost-guidance/active-design
LP067	Social Infrastructure	Support, but with suggestions	Chapter 6	SP4	N/A	Support is given for Policy SP4, particularly where it seeks to protect existing social infrastructure provision and secure delivery of enhanced/new social infrastructure facilities to meet needs arising from development and what is identified in the Infrastructure Delivery Plan. Suggestion given that Policy SP4 is updated to correspond with the updated PPS and other strategic sport facilities documentation.

LBBB/BeFirst First Revised Draft Local Plan Consultation: List of Representations

Rep ID	Category: Housing, Industrial Land, Open Space, Waste, (Hong to Check at End)	Nature of Response (General/Support/Objection/Support but with suggestions)	Relevant Chapter number	Policy Number	Relevant Paragraph No.	Summarised Comment
LP067	Social Infrastructure	Support, but with suggestions	Chapter 6	SP4	Part iv	Concern expressed regarding the wording of Strategic Policy SP4, Part iv, that seeks to encourage the growth and expansion of educational facilities which often is on the playing field. It is noted that the protection of playingfields is referenced in Policy DMS 1 but a suggestion is given that Strategic Policy SP4 is amended to clarify that the expansion of the playing field would have to meet requirements of Sport England's' Playing Field Policy, the NPPF (paragraph 97) and Policy DMS 1.
LP067	Social Infrastructure	Support	Chapter 6	DMS1	N/A	Support is given for DMS1 as it is considered that the policy aligns with Sport England's Planning Policy, its Playing Field Policy and the NPPF, paragraph 74.
LP067	Social Infrastructure	Support	Chapter 6	DMS2	N/A	Support is given for DMS2 as it is considered that the policy aligns with Sport England's Planning Policy, its Playing Field Policy and the NPPF, paragraph 74.
LP067	Social Infrastructure	Support, but with suggestions	Chapter 6	N/A	N/A	Support given for the multi-use of spaces in the delivery of social infrastructure. Advice given that Education facilities do have extensive sports facilities that are often not utilised outside of core education hours. Support is given for the community use of such facilities, which it is advised can be secured through a Community Use Agreement. Suggestion given that the Local Plan directs educational providers to further guidance, which is available at the following: https://www.sportengland.org/campaigns-and-our-work/use-our-school
LP067	Sport Facilities	Support	Chapter 7	SP5	N/A	Support is given to Policy SP5 on the basis that it would allow community uses in town centres and potentially in vacant and under-used 'employment' buildings.
LP067	Sport Facilities	Support, but with suggestions	Chapter 7	N/A	N/A	Suggestion given that the Local Plan supports sports uses such as fitness clubs, gyms, climbing centres and five aside centres, to be acceptable on all employment sites. Advice given that sports uses create sustainable employment opportunities, work experience and qualifications. Evidence is cited that there are usually more employment opportunities generated through a commercial gym or a gymnastics club than a 500,000m2 B8 use.
LP067	Sport Facilities	Support, but with suggestions	Chapter 8	SP6	N/A	Concern voiced that policies in the Local Plan refer to the protection of playing fields and not playing pitches. Advice given that playing pitches form part of the playing field but the playing field does include areas that are not marked as pitches that are important for recreational/informal play off the pitches. Suggestion given that the references to playing pitches in Policy SP6 is amended to playing field to avoid confusion.
LP067	Sport Facilities	Support	Chapter 10	N/A	N/A	Support is given to the policies within chapter 10 which include the promotion of waking and cycling, the expansion of local cycling infrastructure, and connecting neighbourhoods.
LP069	Housing	Support, but with suggestions	Chapter 5, Chapter 2	SP3, Vision	N/A	Suggestion given that the Local Plan provides a clarification on its housing target through a Statement of Common Ground. Suggestion given that the SCG would include: LBBB's commitment to meeting the draft London Plan housing target; and that the site allocations for Barking Riverside and Beam Park will be built out in accordance with existing planning permissions, unless subsequent S73 or S96 applications are submitted and approved.
LP069	Green Belt	Support, but with suggestions	Chapter 8	N/A	N/A	Suggestion given that the Local Plan provides clarification through a Statement of Common Ground on whether there are any changes proposed to the Green Belt boundary and that there is confirmation that any changes do not affect LB Havering.

LBBB/BeFirst First Revised Draft Local Plan Consultation: List of Representations

Rep ID	Category: Housing, Industrial Land, Open Space, Waste, (Hong to Check at End)	Nature of Response (General/Support/Objection/Support but with suggestions)	Relevant Chapter number	Policy Number	Relevant Paragraph No.	Summarised Comment
LP069	SINC	General	Chapter 7	SP6	N/A	Suggestion given that the Local Plan provides clarification through a Statement of Common Ground on how LBBB will amend the Local Plan to ensure that Beam Valley South SINC is upgraded to Metropolitan status, it is noted that this status is being implemented in LB Havering.
LP069	Waste	General	Chapter 8	DMS18	N/A	Suggestion given that the Local Plan provides clarification through a Statement of Common Ground on cooperation on the evidence base for waste.
LP069	Transport	Support, but with suggestions	Chapter 10	N/A	N/A	Suggestion given that the Local Plan provides clarification through a Statement of Common Ground on LBBB's ongoing engagement with Havering on the A13 tunnel scheme and to address the capacity constraints on the strategic road network.
LP069	Housing	Support, but with suggestions	Chapter 5, Appendix 2, Policies Map	DMH5	N/A	Concern voiced that there is insufficient detail in the draft Local Plan on site provision for Gypsies and Travellers in Barking and Dagenham to assess the impact of proposed sites on Havering. Suggestion given that the location, size and number of pitches for each Gypsy and Traveller site (including any extension of the existing site at Eastbrookend Country Park) are identified.
LP069	Housing	Support, but with suggestions	Chapter 5	DMH5	N/A	Suggestion given that policy DMH5 is amended in order to correct errors and to clarify whether LBBB will meet the need identified in the 'accommodation needs assessment for Gypsies and Travellers for Barking and Dagenham'.
LP069	Housing	Support, but with suggestions	Chapter 5	DMH5	N/A	Suggestion given that a Statement of Common Ground is provided by LBBB with a commitment to meeting the accommodation needs identified for Gypsies and Travellers within Barking and Dagenham.
LP071	Growth/area strategy	Support	Chapter 3	SPP2	Part 3	Support is given for the Local Plan's strategy of intensifying land use as a way to optimise site potential, particularly the co-location of uses is supported in Castle Green, as is improvement to the A13 tunnel.
LP071	Site allocation	Support, but with suggestions	Appendix 2	CF - Castle Green	N/A	Support is given for site allocation CF, particularly the scope for high density residential development. Suggestions are given to amend the site allocation with the following: Taller buildings and higher densities in some locations. The indicative quantum of residential units to be amended to a minimum number as opposed to a target; and to allow an 'uplift' at the site once public transport access to the site improves. A request is also registered for the consultee to have involvement and engagement in the masterplanning process.
LP071	Site allocation	Support, but with suggestions	Appendix 2	CF - Castle Green	N/A	Suggestion given that land in the CF site allocation should no longer be designated as SIL in order to reflect the new ambitions for the site.
LP073	Infrastructure	Objection	Chapter 6	DMS1	N/A	Concern expressed that Policy DMS1 is too restrictive regarding the removal of existing facilities, which the NHS Property Services relies on for their extension or relocation of facilities. It is considered that, without this flexibility, the policy is unsound. Suggestion given that the Policy is amended to read the following: "1. In accordance with policy SP4, development proposals involving the net loss of existing facilities (excluding sports facilities, playing fields, and recreational buildings and land) or viable cultural facilities will be resisted, unless: a) the existing facility is being re-provided on-site and of a similar nature that would better meet (in quantum and quality) the needs of existing users or forms part of a strategy agreed by the Council or as

LBBB/BeFirst First Revised Draft Local Plan Consultation: List of Representations

Rep ID	Category: Housing, Industrial Land, Open Space, Waste, (Hong to Check at End)	Nature of Response (General/Support/Objection/Support but with suggestions)	Relevant Chapter number	Policy Number	Relevant Paragraph No.	Summarised Comment
						<p>confirmed by the relevant service provider to serve local needs; or</p> <p>b) there is no longer an identified need or demand for the existing use of the facility. In such circumstances, the applicant must provide robust evidence to demonstrate:</p> <p>i. active marketing over a continuous 24-month period of time for alternative forms of social and cultural infrastructure on the site, taking into account the needs of the future local community, including if the facility was refurbished and/or multi-functional;</p> <p>ii. demonstrate that the loss of the facility would not lead to a shortfall in provision for the specified use for the population that it serves.</p> <p>2. Unless otherwise stated as per Part 2c, the Council will expect applicants to submit competitive marketing evidence in accordance with Part 1 b), which should:</p> <p>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 unit;</p> <p>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> <p>c) in the case of proposals where the loss of the use would form part of a wider public estate rationalisation program, evidence of such a program would be sufficient as a form of evidence that the site is surplus to requirements and as such would not be required to submit marketing information.</p> <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. This is unless they can meet one of the criteria set out in the paragraph 97 of the NPPF and the exceptions in Sport England Playing Field Policy, or their updated equivalent."</p>
LP074	Area/Growth vision	Support, but with suggestions	Chapter 3	SPP5	N/A	Concern expressed that the Transformation Areas in SPP5 is not identified on the relevant maps. Suggestion given that this should be rectified as it is currently not clear exactly what the area relates to.
LP074	Site Allocation	Objection	Appendix 2	N/A	N/A	Concern expressed that Dagenham Heathway Station was not allocated as a site. It is considered that this would enable a more comprehensive consideration of development in the area, particularly given the site allocation of Dagenham Heathway The Mall (DM), located to the South-East of Dagenham Heathway Station, for residential-led mixed use development.
LP074	Site allocation	Objection	SHLAA	N/A	N/A	Concern expressed that the Council has stated that the Dagenham Heathway Station site had been assessed in the Strategic Land Availability Assessment but the consultee could not access appendices providing the site assessment, despite a request from the policy team.
LP074	Housing	Support, but with suggestions	Chapter 3	SPP5	N/A	Concern expressed that there is less reference to development around Dagenham Heathway station in the most recent draft of the Local Plan than in the Regulation 18 version. Suggestion given that the potential to develop new homes above the station should be specifically referenced, and further details embedded into SPP5, to recognise the development potential around Dagenham Heathway station as well as above the station.
LP074	Infrastructure, Housing	Support, but with suggestions	Chapter 3	SPP5	N/A	Concern expressed that there is no longer a reference to a supplementary planning document being prepared for Dagenham Heathway and it is requested that reference to this is reinserted to ensure the comprehensive assessment of potential development options.
LP074	Housing	Support, but with suggestions	Chapter 3	SPDG1	N/A	Suggestion given that Policy SPDG1 is amended to recognise that, in order to make the most efficient use of land, growth should be directed towards all suitable and available brownfield sites, especially those with existing or planned PTALs 3-6, in line with the Intend to publish London Plan policy H1 Increasing housing supply.

LBBD/BeFirst First Revised Draft Local Plan Consultation: List of Representations

Rep ID	Category: Housing, Industrial Land, Open Space, Waste, (Hong to Check at End)	Nature of Response (General/Support/Objection/Support but with suggestions)	Relevant Chapter number	Policy Number	Relevant Paragraph No.	Summarised Comment
LP074	Housing	Support, but with suggestions	Chapter 5	DMH2	Part 2 d)	Concern expressed that Policy DMH2 now omits all reference to Build to Rent. Advice given that Policy H11 of the Intend to Publish London Plan requires boroughs to adopt a positive approach to Build to Rent residential schemes and recognises that there are particular economic challenges and characteristics associated with it that should be addressed through planning policies. Suggestion given that Point 2d of the policy is amended to directly reference Build to Rent and provide clear support for this housing type.
LP074	Housing	Support, but with suggestions	Chapter 4	DMD2	N/A	Suggestion given that Policy DMD2 should support the development of tall buildings located in sustainable locations, including those with high levels of public transport accessibility in line with the Intend to publish London Plan and the NPPF.
LP074	Site allocation	Support, but with suggestions	Appendix 2	CD Land at the Corner of London Road and North Street, Barking Town Centre	N/A	Support is given to site allocation CD, subject to the satisfactory relocation of TfL's existing bus standing area.
LP074	Site allocation	Support, but with suggestions	Appendix 2	CV Land North of Becontree Station	N/A	Support is given to the allocation of site CV. Concern is expressed that there is information missing in the site allocation document including existing use, planning consideration, how site was identified, delivery timescales and proposed use.
LP074	Site allocation	Support, but with suggestions	Appendix 2	CV Land North of Becontree Station	N/A	Suggestion that the site allocation CV is amended to reflect that it is wholly owned by Transport for London, rather than referring to 'private' ownership as it currently does.
LP074	Site allocation	Support, but with suggestions	Appendix 2	CV Land North of Becontree Station	N/A	Suggestion given for an opportunity to combine redevelopment of the site CV with Council owned land to the north. It is considered that this site has the potential to deliver a significant number of new homes and to so is in line with Policy H1 of the Intend to publish London Plan policy, which states that boroughs should seek to optimise the potential for residential development on brownfield sites with a PTAL score of 3-6 and/or within 800m of a transport station.
LP074	Site allocation	Support, but with suggestions	Appendix 2	CV Land North of Becontree Station	N/A	Concern expressed that the sustainability appraisal indicates 22 dwellings as the site capacity for site CV. Suggestion given that this is increased in line with feasibility studies that have indicated that a housing figure of 40 – 50 would deliver a viable scheme.
LP074	Site allocation	Support, but with suggestions	Appendix 2	Former 'The Volunteer' Public House and Land at Alfred's Way	N/A	Concern expressed that the Former 'The Volunteer' Public House and Land at Alfred's Way remain unallocated within the Local Plan Site Allocation. It is considered that this site is an underutilised, brownfield site with a medium PTAL rating which presents an opportunity for optimisation through residential-led development, in line with the Draft London Plan and the National Planning Policy Framework. Suggestion given that this site is recognised as a development site.
LP076	Canals and Rivers	General	N/A	N/A	N/A	Advice given that the Canal & River Trust has no interests within this area and therefore no comment is given.
LP077	Heritage	Support, but with suggestions	Chapter 4	DMD 4	N/A	Suggestion is given to review the Local Plan policies to ensure that Local Plan policies will accord with the following South East Marine Plan policy 'SE-HER-1: Proposals that demonstrate they will conserve and enhance elements contributing to the significance of heritage assets will be supported. Proposals unable to conserve and enhance elements contributing to the significance of heritage assets will only be supported if they demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate harm to those elements contributing to the significance of heritage assets d) if it is not possible to

LBBD/BeFirst First Revised Draft Local Plan Consultation: List of Representations

Rep ID	Category: Housing, Industrial Land, Open Space, Waste, (Hong to Check at End)	Nature of Response (General/Support/Objection/Support but with suggestions)	Relevant Chapter number	Policy Number	Relevant Paragraph No.	Summarised Comment
						mitigate, then public benefits for proceeding with the proposal must outweigh the harm to the significance of heritage assets.'
LP077	Seascapes, landscapes	Support, but with suggestions	Chapter 8	N/A	N/A	Suggestion is given to review the Local Plan policies to ensure that Local Plan policies will accord with the following South East Marine Plan policy 'SE-SCP-1: Proposals that may have a significant adverse impact upon the seascapes and landscapes of an area should only be supported if they demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate d) if it is not possible to mitigate, the public benefits for proceeding with the proposal must outweigh significant adverse impacts to the seascapes and landscapes of an area. Where possible, proposals should demonstrate that they have considered how highly the seascapes and landscapes of an area is valued, its quality, and the areas potential for change. In addition, the scale and design of the proposal should be compatible with its surroundings, and not have a significant adverse impact on the seascapes and landscapes of an area.'
LP077	Flood defence, carbon sequestrations, habitats	Support, but with suggestions	Chapter 8	N/A	N/A	Suggestion is given to review the Local Plan policies to ensure that Local Plan policies will accord with the following South East Marine Plan policy 'SE-CC-1: Proposals which enhance habitats that provide flood defence or carbon sequestration will be supported. Proposals that may have significant adverse impacts on habitats that provide a flood defence or carbon sequestration ecosystem service must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate significant adverse impacts, or, as a last resort, d) compensate and deliver environmental net gains in line with and where required in current legislation.'
LP077	Climate resilience	Support, but with suggestions	N/A	N/A	N/A	Suggestion is given to review the Local Plan policies to ensure that Local Plan policies will accord with the following South East Marine Plan policy 'SE-CC-2: Proposals in the south east marine plan area should demonstrate for the lifetime of the project that they are resilient to the impacts of climate change and coastal change.'
LP077	Coastal change	Support, but with suggestions	Chapter 8	N/A	N/A	Suggestion is given to review the Local Plan policies to ensure that Local Plan policies will accord with the following South East Marine Plan policy 'SE-CC-3: Proposals in the south east marine plan area and adjacent marine plan areas that are likely to have significant adverse impacts on coastal change should not be supported. Proposals that may have significant adverse impacts on climate change adaptation measures outside of the proposed project area must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate the significant adverse impacts upon these climate change adaptation measures.'
LP077	Air quality	Support, but with suggestions	Chapter 8	N/A	N/A	Suggestion is given to review the Local Plan policies to ensure that Local Plan policies will accord with the following South East Marine Plan policy 'SE-AIR-1: Proposals must assess their direct and indirect impacts upon air quality and emissions of greenhouse gases and air pollutants. Where proposals are likely to result in air pollution or increased greenhouse gas emissions, they must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate air pollution and or greenhouse gas emissions in line with current national and local air quality objectives and legal requirements.'
LP077	Waste	Support, but with suggestions	Chapter 8	N/A	N/A	Suggestion is given to review the Local Plan policies to ensure that Local Plan policies will accord with the following South East Marine Plan policy 'SE-ML-1: Public authorities must make adequate provision for the prevention, re-use, recycling and disposal of waste to reduce and prevent marine litter. Public authorities should aspire to undertake measures to remove marine litter within their jurisdiction.'
LP077	Marine litter	Support, but with suggestions	Chapter 8	N/A	N/A	Suggestion is given to review the Local Plan policies to ensure that Local Plan policies will accord with the following South East Marine Plan policy 'SE-ML-2: Proposals that facilitate waste re-use or recycling to reduce or remove marine litter will be supported. Proposals that could potentially increase the amount of marine litter in the marine plan area, must include measures to: a) avoid b) minimise c) mitigate waste entering the marine environment.'

LBBD/BeFirst First Revised Draft Local Plan Consultation: List of Representations

Rep ID	Category: Housing, Industrial Land, Open Space, Waste, (Hong to Check at End)	Nature of Response (General/Support/Objection/Support but with suggestions)	Relevant Chapter number	Policy Number	Relevant Paragraph No.	Summarised Comment
LP077	Habitats, species	Support, but with suggestions	Chapter 8	N/A	N/A	Suggestion is given to review the Local Plan policies to ensure that Local Plan policies will accord with the following South East Marine Plan policy 'SE-BIO-1: Proposals that enhance the distribution of priority habitats and priority species will be supported. Proposals that may have significant adverse impacts on
LP077	Habitats, species	Support, but with suggestions	Chapter 8	N/A	N/A	Suggestion is given to review the Local Plan policies to ensure that Local Plan policies will accord with the following South East Marine Plan policy 'the distribution of priority habitats and priority species must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate d) compensate for significant adverse impacts.'
LP077	Habitats, species	Support, but with suggestions	Chapter 8	N/A	N/A	Suggestion is given to review the Local Plan policies to ensure that Local Plan policies will accord with the following South East Marine Plan policy 'SE-BIO-2: Proposals that enhance or facilitate native species or habitat adaptation or connectivity, or native species migration will be supported. Proposals that may cause significant adverse impacts on native species or habitat adaptation or connectivity, or native species migration must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate significant adverse impacts d) compensate for significant adverse impacts.'
LP077	Ecosystem services	Support, but with suggestions	Chapter 8	N/A	N/A	Suggestion is given to review the Local Plan policies to ensure that Local Plan policies will accord with the following South East Marine Plan policy 'SE-BIO-3: Proposals that deliver environmental net gain for coastal habitats where important in their own right and/or for ecosystem functioning and provision of ecosystem services will be supported. Proposals must take account of the space required for coastal habitats where important in their own right and/or for ecosystem functioning and provision of ecosystem services, and demonstrate that they will in order of preference: a) avoid b) minimise c) mitigate d) compensate for net habitat loss and deliver environmental net gain.'
LP077	Inshore and offshore waters	Support, but with suggestions	N/A	N/A	N/A	Suggestion is given to review the Local Plan to ensure that it refers to the correct South East Marine Plan policy, namely, the East Inshore and East Offshore Marine Plans, which were adopted in 2014, and the South Inshore and Offshore Marine Plan, which was adopted in 2018, and which cover the adjacent areas.
LP077	Inshore and offshore waters	General	N/A	N/A	N/A	Suggestion is given to review the Local Plan policies to ensure that Local Plan policies will accord with the South East Marine Plan Implementation Training session. This session was held in March 2020 and provided an introduction to marine planning, it is not believed that the Council or BeFirst were able to attend and, therefore, suggested that the Council can re-visit the material in the recorded webinar which supported the Consultation of the draft South East Marine Plan.
LP077	Inshore and offshore waters	General	N/A	N/A	N/A	Suggestion is given to review the Local Plan policies to ensure that Local Plan policies will accord with the adopted MMO policy. Advise given that public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act 2009 and any relevant adopted Marine Plan, in this case the draft South East Marine Plan, or the UK Marine Policy Statement (MPS).
LP078	Infrastructure	Support, but with suggestions	Chapter 6	DMS1	N/A	Support is given for policy DMS1 but concern expressed that the policy wording is not flexible enough to deliver new schools , or to do so easily. Suggestion that policy removes the requirements of '24 months of marketing'.
LP079	Site allocation	Support, but with suggestions	Draft policies map	AD - Dagenham Leisure Park	N/A	Support is given for the proposed mixed use development on site AD - Dagenham Leisure Park. However, the support is conditional on a suggested retention of the existing retail usage. Suggestion is offered that the site allocation wording should be amended to allow flexibility, specifically it is suggested that the allocation should allow retail uses where they meet the existing and projected retail demand on the site.

LBBB/BeFirst First Revised Draft Local Plan Consultation: List of Representations

Rep ID	Category: Housing, Industrial Land, Open Space, Waste, (Hong to Check at End)	Nature of Response (General/Support/Objection/Support but with suggestions)	Relevant Chapter number	Policy Number	Relevant Paragraph No.	Summarised Comment
LP079	Area, vision	Support, but with suggestions	Chapter 3	SPP6	N/A	Support is given for the vision the Local Plan sets for the area, the support is conditional on the effective management of the current established retail and leisure floorspace. Suggestion is made that the Local Plan should ensure that retail and leisure uses are not impacted by other development.
LP079	Social Infrastructure	Objection	Chapter 6	DMS1	N/A	The re-provision of cultural facilities should not be required in development on allocated sites. Reference is made to the 'culture location' Vue Cinema site at Dagenham Leisure Park, where the importance of the cinema as a cultural asset is not significant enough to require re-provision in the regeneration of the site.
LP079	Social Infrastructure	Objection	Draft policies map	AD - Dagenham Leisure Park	N/A	Objection that Unit 3, located at site AD - Dagenham Leisure Park, is no longer a public house and so the Local Plan should be amended to remove the unit's description as a 'Culture Location'.
LP080	Gypsy and Traveller	Support, but with suggestions	Chapter 5	DMH5	N/A	Support is given for the Local Plan's inclusion of new gypsy and traveller sites, particularly the Collier Row Plot. Concern is expressed on behalf of a number of travellers who wish to be accommodated within the borough and have been on waiting lists for the existing site for up to 25 years and have yet to be accommodated on a permanent site. The Local Plan should address the current demand for gypsy and traveller sites within the borough.
LP081	Infrastructure, transport, services	Support, but with suggestions	Chapter 3, Chapter 5, Chapter 7	SPDG1, SP3, SP5	N/A	Support given for new housing and job creation targets in the Local Plan. housing target to deliver 42,737 new homes along with the creation of 20,000 jobs by the end of its new plan period. However, support is conditional on the delivery of housing and job growth being sustainable and not increasing pressure on the existing services, land and infrastructure in neighbouring districts. The Local Plan needs to address how infrastructure, transport and waste capacity will to meet the demands of existing and future residents.
LP081	Industrial Land	Support, but with suggestions	Chapter 7	DME1	N/A	Support is given to the Local Plan's strategy to intensify the use of industrial land on the condition that existing and future employment land is protected, planned for and able to meet demand. Concern is expressed that there has been a demand for industrial space, and so, suggestion is given that any loss of employment land (as set out in the LBBB's Industrial Land Strategy) must be accompanied by an intensification of existing industrial floorspace.
LP081	Industrial Land	Support, but with suggestions	Chapter 7	DME1	N/A	Support is given to the Local Plan's strategy to intensify the use of industrial land on the condition that existing and future employment land is protected, planned for and able to meet demand. Suggestion is offered that the Local Plan should address the following in relation to industrial land: set clear parameters for limited managed release along with managed transition and intensification to ensure remaining industrial stock continues to be utilised to best effect; prior to the preparation of 'localised planning frameworks' to guide industrial intensification, the council should outline a baseline position in relation to industrial land release to ensure the protection of employment land in advance of detailed frameworks; 'localised planning frameworks' should acknowledge the need for industrial land to cater to a mix of industrial uses, both heavy industry and those that are suitable for residential co-location; the location of existing heavier industrial uses and their ability to adapt to intensified floorspace within smaller land area footprints.
LP081	Industrial Land	Support, but with suggestions	Chapter 7	DME1	N/A	Support is given to the Local Plan's strategy to intensify the use of industrial land on the condition that existing and future employment land is protected, planned for and able to meet demand. Suggestion is given that policy DME1 should clarify relocation strategies and prioritise the relocation of industrial land within Barking and Dagenham's boundaries to avoid placing pressure on other authorities services or infrastructure.

LBBB/BeFirst First Revised Draft Local Plan Consultation: List of Representations

Rep ID	Category: Housing, Industrial Land, Open Space, Waste, (Hong to Check at End)	Nature of Response (General/Support/Objection/Support but with suggestions)	Relevant Chapter number	Policy Number	Relevant Paragraph No.	Summarised Comment
LP081	Waste	Support, but with suggestions	Chapter 9	DMS18	N/A	Support is given for the Local Plan waste strategy with the suggestion that policy DMS18 is amended to: reflect the status of the Joint Waste Plan until the adoption of any updates; contain flexibility to adapt to future circumstances; and include a commitment that the capacity of existing waste management facilities will continue to be safeguarded or only released if alternative site in borough is found. Advice is given that a Waste Development Plan for the East London Waste Authority (ELWA) is being drafted and will include the commissioning of a new evidence base to inform decisions around any potential release of sites or capacity. Advice is given that new evidence may result in recommendations to retain existing capacity or safeguard of new land within the ELWA Boroughs for Schedule 2 sites. By incorporating the amendments, it is considered that options that will be evaluated through a review of the Joint Waste Plan will not be constrained by LBBB'S Local Plan requirements.
LP081	Transport	Support, but with suggestions	Chapter 10	N/A	N/A	Suggestion that the Local Plan is amended to reference a new bus service that has been proposed as part of the Silvertown Tunnel development and would travel through Barking and Dagenham.
LP081	Transport	Support, but with suggestions	Chapter 10	N/A	N/A	Support is given for the Local Plan's transport strategy for sustainable travel. Concern is expressed concerning whether proposed growth would increase pressure on transport infrastructure in LBBB and Newham, issues are identified in the LBBB Transport Impact Assessment (2020) that the road network would be close to full capacity by 2031. Suggestion is made that connections from Newham across the Barking Creek must remain for use by public transport only.
LP081	Transport	Support, but with suggestions	Chapter 10	N/A	N/A	Support is given for the Local Plan's transport strategy for sustainable travel. Suggestion given that the Local Plan addresses what alternative transport interventions LBBB are considering to ensure housing growth in the area will be supported by sustainable travel and not increase car use in the event that the Crossrail 2 eastern branch does not go ahead.
LP081	Transport	Support, but with suggestions	Chapter 10	N/A	N/A	Support is given for the Local Plan's options for A13 improvements, including the potential for tunnelling or innovatively covering the road. However, concern is expressed that the scope of improvements proposed will not fully address congestion issues on this key transport artery, LBBB evidence is referenced which suggests that even if the A13 improvements resulted in a high modal shift there may still be increased journey times on the A13. Recommendation is given that the Local Plan should adhere to the (currently delayed) A13 Strategic Study, along with junction improvements outlined in the evidence base, to ensure that the road can accommodate impacts of new housing.
LP081	Transport	Support, but with suggestions	Chapter 10	N/A	N/A	Suggestion is given that any strategy for the A13 improvements should provide an approach for reducing road commuting and freight transit, it is noted that it remains a significant air quality contributor for the wider sub-region. Advice is given that A13 work would also need to involve wider collaboration with relevant authorities across the A13, it is noted that many trips start and finish outside individual Borough boundaries.
LP081	Transport	Support, but with suggestions	Chapter 10	N/A	N/A	Suggestion that LBBB should consider transport recommendations listed under the 'Next Steps' of the local evidence base in order to determine the appropriate scale of transport interventions that will accommodate the planned growth proposed for the plan period.
LP082	Industrial Land, growth strategy	Objection	Chapter 3	SPP2	N/A	Concern expressed that the Local Plan does not provide enough information on engagement with landowners and the delivery of mixed industrial and residential uses. Suggestion that the Local Plan should address how this will practically be brought forward in light of 'agent of change' considerations.

LBBB/BeFirst First Revised Draft Local Plan Consultation: List of Representations

Rep ID	Category: Housing, Industrial Land, Open Space, Waste, (Hong to Check at End)	Nature of Response (General/Support/Objection/Support but with suggestions)	Relevant Chapter number	Policy Number	Relevant Paragraph No.	Summarised Comment
LP082	Industrial Land, growth strategy	Objection	Appendix 2	CI - Thames Road	Proposed use	Concern expressed that there is insufficient information contained in the Local Plan regarding plans for the Thames Road area. The Local Plan should have a strong evidence base that addresses how residential development would come forward alongside retained SIL.
LP082	Site allocation	Support, but with suggestions	Chapter 3	CI - Thames Road	Site allocations map	Support if given for allocation CI - Thames Road, but it is suggested that the Local Plan addresses how landowner engagement on delivery will ensure the allocation is delivered effectively
LP083	Tall building, design	Objection	Chapter 4	DMD2	N/A	Objection raised regarding the development of high rise accommodation that may result from policy DMD 2. The issues of safety and desirability of high rise accommodation should be addressed in the local plan.
LP083	Housing	Objection	Chapter 5	N/A	N/A	Concern voiced regarding the affordability, accessibility and mix of private rented and social housing tenures for new residential development. The issue of how LBBB will ensure that new residential development is accessible to local residents, should be addressed in the local plan.
LP083	Infrastructure	Objection	Chapter 3	SPDG1	N/A	Concern voiced regarding the proposed level of development and whether it will place pressure on infrastructure such as schools, healthcare and transport.
LP083	Other	Objection	N/A	N/A	N/A	Concern voiced regarding Be First's involvement in the Local Plan process. Issues that could result from Be First's and the Council's process and business model should be addressed and the two bodies financial involvement should be clarified.
LP085	General	Support	N/A	N/A	N/A	Support is given for the ambitions of the Local Plan. It is noted that the consultee wishes to be informed of options and policies relating to development at Padnall Lake and at Chadwell Heath Industrial Estate, and of any resulting impact this may have on the borough.
LP087	Community Consultation	Objection	N/A	N/A	N/A	Concern expressed that the Local Plan does not comply with the Statement of Community Involvement Refresh (June 19), Section 5: Channels of Communication, which states that the council "must make sure we engage with as many people and organisations when required in both plan making and assessing planning applications". Suggestion given that the Council engage further with the local community and improve access to digitally-produced information by issuing drafts of the plan in a non-digital format.
LP087	Community Consultation	Objection	Appendix 2	WF Sainsburys	N/A	Concern expressed that local residents have not received site consultation letters, invitations to public consultation or been made aware through public advertising, for the development of the Sainsburys site. Advice given that the Statement of Community Involvement specifies that this degree of consultation should be undertaken for major development schemes.
LP087	Community Consultation	Objection	N/A	N/A	N/A	Concern expressed that the closure of the local library, which is currently being used as a Covid testing centre, has meant that residents do not have access to any information on the draft Local Plan that may have been provided there. Concern that the Council have therefore not fully engaged with the community – especially "hard-to reach groups".
LP087	Housing	Support, but with suggestions	Chapter 2	SPP4	Part 2C	Suggestion given that SPP4, Part 2C is reworded to clarify unclear phrases such as "Urban Grain focusing".
LP087	Housing	Support, but with suggestions	Chapter 2	SPP4	Part 2 A - E	Suggestion given that the numbering of this policy is not consistent with the numbering of other policies and should therefore be amended for clarity.

LBBD/BeFirst First Revised Draft Local Plan Consultation: List of Representations

Rep ID	Category: Housing, Industrial Land, Open Space, Waste, (Hong to Check at End)	Nature of Response (General/Support/Objection/Support but with suggestions)	Relevant Chapter number	Policy Number	Relevant Paragraph No.	Summarised Comment
LP087	Housing	Objection	Chapter 2	SPP4	Part 2C	Concern expressed regarding the reference to tall building in Policy SPP4, Part 2C, specifically the proposal for buildings which are “significantly taller than prevailing heights in the heart of the area”. Issues associated with high rise living such as, mental health issues, fire, claustrophobia, safety for children, neglect and violence, should be addressed in the Local Plan.
LP087	Housing	Support, but with suggestions	Chapter 2	SPP4	Part 2C	Concern expressed that there are already a large amount of flats in the area, although it is noted that these flats are not affordable to local residents. Suggestion given that encouraging low-rise properties, for a mix of tenures, would meet the needs of the local community and be appropriate in the context of the area.
LP087	Heritage assets	General	Chapter 2	SPP4	Part 2E	Concern expressed that three sites in Chadwell Heath, The Warren Stone, Gun site and Warren Farm Barn, that are identified ‘for retention of heritage and character’, are not valued by, or known to, local residents due to the sites being located on private land. Suggestion given that The White Horse in Chadwell Heath should instead be considered for restoration due to its historical value to the community.
LP087	Heritage assets	Support, but with suggestions	Chapter 2	SPP4	Part 2E	Suggestion that more detail is provided in Policy SPP3, Part 2E, regarding the “enhancement and refurbishment of buildings with local heritage value.”
LP087	Heritage assets	Support, but with suggestions	Chapter 2	SPP4	Part 2E	Concern expressed that a building of historical value, The White Horse in Chadwell Heath, was derelict for several years before being damaged by a fire. Suggestion that this site should be considered for restoration due to its historical value to the community - evidence is given of a petition to save the building and restore it.
LP087	Place	Support, but with suggestions	Chapter 2	SPP4	Part 2E	Concern expressed regarding the high vacancy, lack of sense of place and limited range of shops in Chadwell Heath. Concern is particularly expressed about the high streets ability to provide for local residents and increased footfall with the planned expansion of Crossrail. Suggestion given that sites existing vacant sites such as, The White Horse, Bairstow Eves and the site next to the Baptist Church, should be utilised before the demolition of properties for new development, such as the WF Sainsbury allocation.
LP087	Local services	Objection	Appendix 2	WF Sainsburys	N/A	Objection to the allocation of the existing Sainsbury’s site on the basis that the store provides car parking and a necessary service for locals, particular concern is expressed for the loss of this car parking and shopping service for elderly and disabled residents that are less mobile, or able, to go elsewhere.
LP087	Social Infrastructure	Support, but with suggestions	Chapter 2	SPP4	Part 2B	Concern expressed regarding the current and future capacity of school and health services in Chadwell Heath, particularly in the context of proposed residential development in the area. Acknowledgment is given of the plans to provide these services as part of the proposed redevelopment of Chadwell Heath Industrial Estate but concern is expressed that this will not deliver services soon enough to meet current demand. Suggestion given that the timescale for Policy SPP4, Part 2B, is amended so that “ necessary social infrastructure”, including schools and health services, is delivered as a priority.
LP087	Community Consultation	Support, but with suggestions	N/A	N/A	N/A	Suggestion given that the Local Plan is made more easily accessible to residents of Chadwell Heath via letters/leaflets with proposed dates for meetings and information on how to voice opinion, and via sites such as 'Nextdoor.com'.
LP087	Community Consultation	Support, but with suggestions	N/A	N/A	N/A	Suggestion given that there is an extension of the consultation process to take into account that some communication has been prevented due to the Covid crisis.

LBBD/BeFirst First Revised Draft Local Plan Consultation: List of Representations

Rep ID	Category: Housing, Industrial Land, Open Space, Waste, (Hong to Check at End)	Nature of Response (General/Support/Objection/Support but with suggestions)	Relevant Chapter number	Policy Number	Relevant Paragraph No.	Summarised Comment
LP087	Housing	Support, but with suggestions	Chapter 2	SPP4	Part 2C	Suggestion given that Policy SPP4, Part 2C is amended for greater clarity. Particularly that that each subsection is clearly explained, an example is given that subsection (a) clarify what "distinctive character areas" could do to ensure their own "sense of place".
LP088	Site designations	Support, but with suggestions	LBBD Policies Map	N/A	N/A	Suggestion that the location of Brewers Fayre (Pub, Culture Locations) is amended to the correct location.
LP088	Site designations	Support, but with suggestions	LBBD Proposals Map 2020	N/A	N/A	Suggestion that the description of Chadwell Heath LSIS is amended from 'Intelligent SIL' to 'LSIS' as an LSIS is subject to different London Plan policies in respect of employment land protection and colocation.
LP088	growth/area strategy	Support, but with suggestions	Appendix 2	HA - Wickes site	N/A	Suggestion given that the Site Allocation's housing capacity is amended so that the value is a minimum number of dwellings rather than a maximum, so that maximum development can be achieved on each site. Concern expressed that site HA has capacity for more new homes than is proposed. Suggestion given that Council share the data and the method that has informed the given capacity for more clarity.
LP088	growth/area strategy	Support, but with suggestions	Appendix 2	XJ Ford Stamping Plant	N/A	Suggestion given that the Site Allocation's housing capacity is amended so that the value is a minimum number of dwellings rather than a maximum, so that maximum development can be achieved on each site. Concern expressed that site XJ has capacity for more new homes than is proposed.
LP088	Housing	Support, but with suggestions	Chapter 5	DMH1	1a	Suggestion given that Policy DMH1, Part 1a, is amended to provide more flexibility regarding the target of 50% affordable housing where the viability of sites will be significantly effected in order to reach this target. Suggestion given that alternative mechanisms for delivering affordable housing could be included in the policy where the 50% target is not considered deliverable.
LP088	Housing	Support, but with suggestions	Chapter 5	DMH1	1b	Suggestion given that Policy DMH1, Part 1b, is amended to clarify whether the 50/50 tenure split applies to all of the on-site affordable housing provision, or whether it applies to at least 40%, more to be determined at LBBD's discretion, as per London Plan.
LP088	Housing	Support, but with suggestions	Chapter 5	DMH1	1b	Suggestion given that Policy DMH1, Part 1b, is amended to clarify how updates to affordable housing products would be controlled and how affordability would be evidenced.
LP088	Housing	Support, but with suggestions	Chapter 5	DMH1	2a, iii) and iv)	Suggestion given that Policy DMH1, Part 2a, subsection iii) and iv), are amended to provide greater flexibility in the cascade mechanism to maximise affordable housing delivery.
LP088	Housing	Support, but with suggestions	Chapter 5	DMH2	1	Suggestion given to amend Policy DMH2, Part 1, with the following wording: "Development proposals will be required to provide a range of unit sizes (including larger family homes) to reflect the Council's preferred dwelling size mix table below, or in any subsequent housing needs evidence in light of future circumstances."
LP088	Industrial Land	Support, but with suggestions	Chapter 7	DME1	N/A	Suggestion to amend policy DME1 to clarify the definition of a "employment uses" or to provide a definition elsewhere in the Local Plan.

LBBB/BeFirst First Revised Draft Local Plan Consultation: List of Representations

Rep ID	Category: Housing, Industrial Land, Open Space, Waste, (Hong to Check at End)	Nature of Response (General/Support/Objection/Support but with suggestions)	Relevant Chapter number	Policy Number	Relevant Paragraph No.	Summarised Comment
LP088	Industrial Land	Support, but with suggestions	Chapter 7	DME1	N/A	Suggestion to amend policy DME1 to distinguish between policies to be applied to SIL, and policies to be applied to LSIS. Advice is given that this is necessary due to the different policies that apply to each designation in the ITP London Plan, Policies E5 and E6.
LP088	Industrial Land	Support, but with suggestions	Chapter 7	DME1	Paragraph 4	Suggestion to amend policy DME1, paragraph 4, to clarify the criteria to determine suitability for intensification and whether a proportionate approach will be taken as per the SoS directive in the London Plan (DR4).
LP088	Transport	Objection	Chapter 9	DMT2	Part 2	Concern expressed that Policy DMT2, Part 2, is not consistent with the NPPF regarding the reference to any increase in parking and congestion being a grounds for refusal. Suggestion given that the policy is modified so that only a severe adverse impact is considered grounds for refusal.
LP088	Developer contributions	Objection	Chapter 9	DMM1	Part 3	Concern voiced that this policy does not accommodate the complexity of a phased development and resulting need for staggered S106 triggers. Suggestion given that this requirement detailed in part 3 of Policy DMM1 is omitted from the policy.
LP089	Site designations	Objection	Appendix 2	WF Sainsburys	N/A	Concern is expressed that the estate manager for Sainsburys has stated that they will not be vacating the premises, that the current store is a community hub for residents and its loss would have adverse impacts on the mental health of many residents.
LP089	Site designations	Objection	Appendix 2	WF Sainsburys	N/A	Concern expressed that the closure of the Sainsburys store would put pressure on the highways network's capacity and exacerbate environment issues if residents would need to drive and/or use public transport to reach other larger supermarkets.
LP089	Site designations	Objection	Appendix 2	WF Sainsburys	N/A	Concern expressed that permitting the development of 52 homes on the White Horse pub site and 417 homes on the Sainsbury's site, would place pressure on the capacity of social infrastructure in the local area. Issues including GP waiting times, school spaces, the highways network capacity and parking, should be addressed in the Local Plan.
LP089	Site designations	Objection	Appendix 2	WF Sainsburys	N/A	Concern expressed that the Sainsburys scheme would have an adverse social and economic impact on the borough. Issues including the loss of jobs, and necessity for resident to visit shops in other boroughs and potentially spread COVID 19, are all reasons given for the removal of this site allocation.
LP089	Site designations	Objection	Appendix 2	WF Sainsburys	N/A	Concern expressed that the removal of the Sainsbury's car park would inhibit residents from being able to visit Chadwell Heath Stores.
LP090	Employment	Support, but with suggestions	Chapter 7	SP5	N/A	Suggestion given that Policy SP5 is amended to provide more flexibility on land designated for employment uses. Suggestion given that the policy supports retail development as a way of providing employment opportunities in the absence of 'traditional' employment development due to the Covid-19 pandemic.
LP090	Employment	Support, but with suggestions	Chapter 7	DME1	N/A	Suggestion given that the policy is amended to provide more flexibility to the controlled release of underutilised land on a case by case basis. Concern expressed that changes to the patterns of employment land use may result in SIL and LSIS sites that are surplus to requirements. Suggestion given that non-traditional employment uses, such as retail, should be considered for designated employment sites.
LP090	Employment	Support	Chapter 7	DME3	N/A	Support is given to Policy DME3.

LBBB/BeFirst First Revised Draft Local Plan Consultation: List of Representations

Rep ID	Category: Housing, Industrial Land, Open Space, Waste, (Hong to Check at End)	Nature of Response (General/Support/Objection/Support but with suggestions)	Relevant Chapter number	Policy Number	Relevant Paragraph No.	Summarised Comment
LP090	Parking	Objection	Evidence Base	N/A	N/A	Concern expressed that the purchase of bulk goods, such as a food shop, is problematic for walking, cycling and public transport modes of travel. Suggestion that policy planning should allow flexibility for such uses going forward.
LP090	Parking	Objection	Evidence Base	N/A	N/A	Concern expressed that key evidence documents noted as 'due' in Paragraph 10.3 are not provided at this stage.
LP090	Parking	Objection	Evidence Base	N/A	N/A	Concern expressed that the Borough does not have particularly good PTAL rating overall, except for in the centre of Barking, Dagenham and Chadwell Heath. Concern expressed that transport infrastructure required to improve this in the IDP focuses on improvements in the south of the Borough. Suggestion given that there should be more improvements around core residential areas.
LP090	Parking	Objection	Evidence Base	N/A	N/A	Concern expressed that, for food store operations, the PTAL score of the site does not alter the need to offer car parking for the bulk shopping trip and that the quantity of car parking for food retail cannot meet current demand.
LP090	Parking	Support, but with suggestions	Evidence Base	N/A	N/A	Suggestion given that the Local Plan supports food store car parking as a means to provide for electric vehicle charging.
LP090	Parking	Support, but with suggestions	Evidence Base	N/A	N/A	Suggestion given that the Local Plan should address the implications of the change in Use Class Order and how this is to be dealt with in terms of car parking.
LP090	Parking	Support, but with suggestions	Chapter 10	SP8	Para 3	Suggestion that the sustainable transport target Policy SP8, Para 3, is amended to recognise the necessity of car travel for some purposes. Concern is expressed that a typical weekly shop is bulky and heavy to transport and therefore it cannot be assumed that removing parking will change this type of trips to a more sustainable mode of transport.
LP090	Parking	Support, but with suggestions	Chapter 10	SP8	Para 4	Suggestion that the sustainable transport target Policy SP8, Para 4, is amended to recognise the necessity of car travel for some purposes. Concern is expressed that a typical weekly shop is bulky and heavy to transport and therefore it cannot be assumed that removing parking will change this type of trips to a more sustainable mode of transport. Suggestion that the paragraph is amended with the following wording: "In order to support the borough's growth, the parking requirement for non-residential development will be determined in the light of a submitted Transport Statement or Assessment. The presumption will be that vehicular parking is kept to the minimum necessary to ensure the successful functioning of the development. 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."
LP090	Parking	Support, but with suggestions	Chapter 10	DMT 1	N/A	Suggestion that Policy DMT1 should refer to best practice guidance provided by Transport for London and should note that guidance is likely to adapt over the Plan period.

LBB/BeFirst First Revised Draft Local Plan Consultation: List of Representations

Rep ID	Category: Housing, Industrial Land, Open Space, Waste, (Hong to Check at End)	Nature of Response (General/Support/Objection/Support but with suggestions)	Relevant Chapter number	Policy Number	Relevant Paragraph No.	Summarised Comment
LP090	Parking	Support, but with suggestions	Chapter 10	DMT 2	N/A	<p>Concern is expressed that the draft parking standards would restrict operational activity for a food store and increase demand for parking around any new food stores that are proposed. Concern expressed this could result in road safety implication on surrounding highway networks if vehicles park inappropriately to access local retail offers. Concern expressed that food stores with higher levels of parking could become a destination in order to facilitate the bulky shopping trip, which is considered to have implications on draft Policy SP 8 and DM 1 if the distance travelled increases. It is noted that these concerns are informed by a transport assessment and study that were carried out on behalf of the consultee.</p> <p>Suggestion is made that Policy DMT2 is amended to allow a more flexible approach to parking provision for retail operators, the following wording is suggested:</p> <p>"The parking requirement for all non-residential development, whether expansions of floorspace on existing sites, the redevelopment of existing or cleared sites, or new non-residential development on new sites, will be determined in the light of the submitted Transport Assessment or Travel Plan, which must take into account the objectives of this Plan to promote and achieve a shift towards sustainable modes of travel. The presumption will be that vehicle parking will be kept to the minimum necessary to ensure the successful functioning of the development."</p>
LP091	CIL	Objection	Chapter 10	DMM1	Part 3	<p>Objection raised against the requirement in Policy DMM1 for developer contributions prior to commencement of a project, particularly if the only means to change this is through a financial appraisal. Advice is given that the Planning for the Future White Paper (August 2020) is considering the removal of S106 payments and CIL and replacing them with a single 'Infrastructure Levy' which would be levied at the point of occupation. Suggestion given that Policy DMM 1 is amended as follows:</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). Where delivery of specific infrastructure or other works are required to enable development,. In this instance, the Council will use planning obligations to define the timing of development in relation to delivery of this. Timing for payment of other payments secured as planning obligations will be negotiated with the developer on a case by case basis."</p>
LP091	Barking Riverside Waste	Support, but with suggestions	Chapter 9	DMS19	Part 4	<p>Suggestion given that Policy DMS19 is amended, so as not to impact the Barking Riverside scheme viability, as follows:</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 seek to avoid traditional methods of storage and collection, such as kerbside collections and wheeled bin methods, where scheme viability and site-specific circumstances permit. Alternative 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>
LP092	vision, objectives	Support, but with suggestions	Proposals Map	CI - Thames Road	N/A	<p>Support is given for industrial intensification and residential development in the Thames Road area as per the site allocation, CI. Suggestion given that 1 Thames Road and the adjacent site, 1 River Road, should also be developed as such.</p>
LP092	vision, objectives	Support, but with suggestions	Chapter 3	SPP2	Part 5, 5a	<p>Suggestion given that 1 Thames Road and the adjacent site, 1 River Road, should be included within the Transformation Area and the proposal of mixed use developments on Thames Road.</p>

LBBD/BeFirst First Revised Draft Local Plan Consultation: List of Representations

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LP092	vision, objectives	Support, but with suggestions	Chapter 3	SPP2	Part 5, 5a	Support is given to the location of heavy industrial uses along the River Roding and a 'defensible boundary' between these sites and residential development. Suggestion given that more information be included on appropriate heights and densities of new developments in this site.
LP092	vision, objectives, housing	Support, but with suggestions	Chapter 5	SP3	Part 1b	Support is given to the housing target in Policy SP3. Suggestion given that part 1b is amended to indicate that flexibility must be adopted into the level of affordable housing that is provided on or off site. It is considered that this will ensure enough viable, deliverable schemes come forward to meet the housing target.
LP092	Economy	Support, but with suggestions	Chapter 7	SP5; DME1	Part 2	Support is given to the references in Policy SP5 and DME1 to intensification of sites. Suggestion is given that the policies are amended with further comments in respect of intensification and stacking.
LP093	Call for sites	General	Appendix 2	Proposed sites not allocated	N/A	Concern expressed that sites are missing that are located in Thames Ward that were proposed in the Call for sites exercise.
LP093	Green Space	Support, but with suggestions	Chapter 8	DMNE1	LBBD Green Grid map	Concerned raised regarding the lack of local green spaces in Thames Ward. Concern also expressed that the LBBD Green Grid map has omitted sites in Thames Ward including, Thames View Playing Fields, the Council owned field next to Hockley Mews/Curzon, the amenity greens on Thames View estate and the green area adjacent to the A13 next to Waverley Gardens. Concern raised that green spaces at Scrattons Eco park and Ripple Reserve are only identified in 'block green colour' in part, with the rest as lines. Suggestion that the reasoning for this is clarified.
LP094	Transport	Support, but with suggestions	Transport Evidence Base Final Draft Report	N/A	N/A	Concern raised that the consultee needs clarity on the full volume and routeing of trips, as demonstrated by the highway modelling using the ELHAM strategic assignment tool. Suggestion given that the model ought to be able to provide details of additional flows, queues and delays on the M11 within London and the M25 and A13 just outside of London at a strategic level. It is considered that this will allow the consultee to decide whether further detailed assessment work is required to ascertain potential impacts upon these parts of the Highways England SRN. Suggestion also given that LBBD provide information on peak PM trips.
LP095	Area, vision	Support, but with suggestions	Chapter 3	SPP1	N/A	Suggestion given then Policy SPP1 is amended so that all site allocations have 'minimum' housing numbers and a breakdown of site the capacity.
LP095	Area, vision	Support, but with suggestions	Appendix 2	HO 14 –34 London Road	N/A	Suggestion given that Site HO is amended to indicate capacity for at least 250 units, subject to feasibility (as per HLAA), instead of 29. Suggestion also given that the uses permitted on the allocation is expanded to reflect the sites proximity to the town centre, and to accommodate new use class E.
LP095	Area, vision	Support, but with suggestions	Appendix 2	CD London Road, Barking Town Centre	N/A	Suggestion given that Site CD is amended to indicate that the site has more capacity than the suggested 196 units. Suggestion also given that the uses permitted on the allocation is expanded to accommodate new use class E. It is also suggested that the there is potential for educational use on site which should be addressed in the local plan.
LP095	Public Houses	Objection	Chapter 6	DMS3	N/A	Concern expressed that the requirements of Policy DMS3, to protect all pubs, conflicts with the London Plan. Suggestion given that the policy is amended to protect only assets of value.

LBBB/BeFirst First Revised Draft Local Plan Consultation: List of Representations

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LP095	Design	Objection	Chapter 4	DMD2, HO 14 –34 London Road	N/A	Suggestion given that Policy DMD2 should be amended with an additional paragraph, as there was in Reg 18 draft policy DM12, to allow tall buildings on sites with high PTAL ratings, in line with draft London Plan policy and associated Sec of State comments. It is considered that not doing so could constrain such developments on sites such as site HO.
LP095	Housing	General	Chapter 5	DMH 2	Part 1	Suggestion is given that Policy DMH2, part 1, is amended to allow for greater flexibility when developments propose a housing mix not achieving the desired mix but where it is considered most appropriate for the site, it is considered that this is in line with the SHMA.
LP095	Housing	General	Chapter 5	DMH1	N/A	Concern expressed that policy DMH1 is not consistent with the London Plan Policy on Affordable Housing contributions with respect to Build to Rent. Suggestion given that a new paragraph is added to this chapter referring back to London Plan policy (paragraph 4.1.1.2), which requires a bespoke approach.
LP095	Design	Objection	Chapter 4	DMD1	Part 3d	Suggestion given that Policy DMD1, part 3d, is amended to reflect that public realm and amenity space provision is affected by site specific circumstances. Concern expressed that the context of site of different users, which will influence type of space required. Applicants should also be able to evidence any limitations to this provision
LP095	Housing	Objection	Chapter 5	SP3	Part 1 e & 2	Concern expressed that Policy SP3 does not include Build to Rent which is promoted by the London Plan and LBBB SHMA. Suggestion given that paragraph 1e and 2 are amended to make reference to this.
LP095	Environment	Objection	Chapter 8	DMNE6	N/A	Concern expressed that the requirement in Policy DMNE6, to provide food growing opportunities and an ongoing management strategy, is considered unrealistic and too onerous for all developments. Suggestion is given to amend the policy to allow flexibility subject to context and viability.
LP095	Environment	Objection	Chapter 8	DMNE3	Part 1B; 2	Concern expressed that the requirement in Policy DMNE3 to deliver 10% biodiversity net gain is unrealistic for all development. Suggestion given that the policy is amended to reflect Policy DMM1, which considers off-site provision for some development.
LP095	Transport	Objection	Chapter 10	DMT1	Part 7	Concern expressed that the requirement in Policy DMT1, to provide bus access and land for bus standing, is not a deliverable requirement for all development. Suggestion is given that paragraph 7 is amended to allow flexibility subject to feasibility and site context.
LP095	Area, vision	Objection	Appendix 2	HO: 14 –34 London Road	N/A	Concern raised that site HO should not have a designation of a cultural asset. It is not considered that the pub which warrants this designation is a cultural asset and suggestion is given that this designation is removed.
LP095	Social infrastructure	Objection	Chapter 6	DMS1	Part B (i)	Suggestion given that the '24 months marketing time', specified in Policy DMS1, is reduced to 6 months and that the policy is amended with more flexibility to allow applicants to justify why a location would no longer be suitable for such a facility. It is considered that this will encourage development and reduce vacancy.
LP095	Social infrastructure	Objection	Chapter 6	DMS3	N/A	Suggestion given that the '24 months marketing time', specified in Policy DMS3, is reduced to 6 months and that the policy is amended with more flexibility to allow applicants to justify why a location would no longer be suitable for such a facility. It is considered that this will encourage development and reduce vacancy.

LBBB/BeFirst First Revised Draft Local Plan Consultation: List of Representations

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LP095	Economy	Objection	Chapter 7	DME1	Part 2	Concern expressed that the wording of Policy DME1 appears to delegate a level of responsibility to the Chadwell Heath Masterplan SPD in terms of policy detail. It is considered that this would exceed the weight that should be accorded to an SPD, given that it is not within the development plan.
LP096	Site allocation	Objection	Appendix 2	CM: Gascoigne Business Area	N/A	Objection raised to the allocation of site CM for residential development. Suggestion given that a lack of market need for industrial uses should be evidenced prior to the allocation of SIL sites for other uses. It is not considered there is such evidence regarding site CM.
LP096	Site allocation	Objection	Appendix 2	CI: Thames Road	N/A	Objection raised to the allocation of site CI for residential development. Suggestion given that a lack of market need for industrial uses should be evidenced prior to the allocation of SIL sites for other uses. It is not considered there is such evidence regarding site CI.
LP096	Area, vision	Support, but with suggestions	Chapter 3	SPP1	N/A	Support is given to the principle of industrial intensification in Policy SPP1. Suggestion given that a lack of market need for industrial uses should be evidenced prior to the allocation of SIL sites for other uses.
LP096	Industrial land	Support, but with suggestions	Chapter 3	SPP2	N/A	Support is given to the principle of industrial intensification in Policy SPP2. Suggestion given that a lack of market need for industrial uses should be evidenced prior to the allocation of SIL sites for other uses.
LP096	Transport	Support, but with suggestions	Chapter 3	SPP3	N/A	Suggestion are given that the following details should be included in the Key Diagram illustrating Policy SPP3: Inclusion of road improvements other than those identified on Chequers Lane. Inclusion of rail sidings - it is considered that this is a key piece of infrastructure supported by the strategic infrastructure ambition of the Local Plan. Suggestion is also given that the supporting text is updated to explain the proposed allocation of a new district centre at the northern end of Chequers Lane.
LP096	Masterplan SPD	Support, but with suggestions	Chapter 3	SPP3	Key diagram	Suggestion is given that the brief for the Masterplan SPD should expand upon the topics detailed in Policy SPP3, and the key diagram, in order to address the following additional topics: Connections to the surrounding area; Opportunities for development in the area, and how to maximise development through intensified/consolidated uses of sites; Proposals for Local Plan allocated sites, including supported land uses (e.g. market-related development); Engagement with landowners and occupiers, to ensure a joined up approach and that individual development plans are coordinated; An area wide approach to energy and environmental issues with appropriate infrastructure to meet usage and storage demands; A Strategic review and plan to support the digital infrastructure necessary for modern commercial and residential demands; Description of the strategic transport infrastructure for passengers and freight (rail, river (including the potential Thames Freeport) and road), access to the Dagenham Dock area and opportunities for enhancement of passenger and logistics hubs with consideration of the need to move to greener transport technologies including electric and autonomous vehicles; An area-wide approach to funding for highway and public realm works; Description of local cycle lane works, highway works, public realm improvement works that would be considered for contributions from developments coming forward in the area; and, A delivery and programme strategy.
LP096	Transport	Support, but with suggestions	Chapter 3	SPP3	Part 2	Support is given to Policy SPP3, Part 2, particularly regarding the identification of the A13 as a key route. Support is conditional on the understanding that the LBBB Infrastructure Delivery Plan is a live document that will be continually updated to reflect the ongoing infrastructure needs in LBBB, including those for the A13.

LBBB/BeFirst First Revised Draft Local Plan Consultation: List of Representations

Rep ID	Category: Housing, Industrial Land, Open Space, Waste, (Hong to Check at End)	Nature of Response (General/Support/Objection/Support but with suggestions)	Relevant Chapter number	Policy Number	Relevant Paragraph No.	Summarised Comment
						Support is also given to the proposed rail and river connections in Dagenham Dock. Suggestion given that any strategic improvements to transport infrastructure in the area should be informed by the Strategic Transport Study that was carried out by Jacobs, and that these recommendations are incorporated into the draft Local Plan.
LP096	transport evidence, IDP	Support, but with suggestions	N/A	SP8, DMT1, DMT3 and DMT4	N/A	Concern expressed that policies SP8, DMT1, DMT3 and DMT4 are supported by six pieces of key evidence, including the Jacob study. If the recommendations of the study are not fully incorporated into the draft Local Plan before submission then these policies could be found unsound d by a planning inspector as it forms a key piece of evidence for the policies.
LP096	transport	Support, but with suggestions	Chapter 10	SP8	Table 10.3	Concern expressed regarding the conclusions of the Strategic Transport Study which indicates that once the overall direction of travel for the study area has been taken, more detailed analysis and testing will be required. Concern expressed that development in the study area could be prevented from coming forward whilst the feasibly and business case for strategic transport improvements is being considered. It is considered that this would slow down the regeneration of the area and conflict with paragraph 119 of the NPPF which states 'local planning authorities, and other plan-making bodies, should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs'.
LP097	Industrial land	Support, but with suggestions	Appendix 2	CH Chadwell Heath Industrial Estate	N/A	Full support given to Site CH, particularly the proposals for industrial intensification.
LP097	site allocation	Support, but with suggestions	Appendix 2	CH Chadwell Heath Industrial Estate	N/A	Concern expressed that Figure 6: Housing Character Areas, of the SHMA identifies part of site CH as suburban rather than urban and, thus, indicates a lower GLA typology density range on this part of the site. It is considered that this fails to optimise the development potential in accordance with NPPF and Draft London Plan policies. Advice given that the consultees' evidence indicates the allocation has the potential to deliver a higher density of units. Suggestion given that the draft allocation is amended so that 3,685 (net) units is a minimum figure. It is considered that the number of units can then be determined at application stage, at which time robust testing can be carried out having due regard to Development Plan policies and relevant material considerations, including the emerging Chadwell Heath Masterplan Supplementary Planning Document 'SPD'.
LP097	Industrial Land	Support, but with suggestions	Chapter 11	DMM1	3	Concern expressed that Policy DMM1, Part 3, will negatively affect project cashflow and scheme viability and does not accommodate the requirements of phased development, for example, it is considered that phased development benefits from staggered S106 triggers. Suggestion given that this requirement is omitted from the policy.

LBBB/BeFirst First Revised Draft Local Plan Consultation: List of Representations

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LP097	Industrial Land	Support, but with suggestions	Chapter 7	DME1	Part 4	<p>Support given for the principle of utilising the borough's industrial land more intelligently as advocated for in Draft Policy DME1. Concern expressed that criteria 1 to 5, of the policy, do not distinguish between approaches to the effective management of SIL and LSIS. Suggestion given to amend the policy to clarify how each criteria relates to SIL and LSIS, and, to ensure the policy is consistent with Intend to Publish London Plan policies E5 and E6, including policy support for colocation on LSIS sites.</p> <p>Suggestion is also given to clarify Policy DME1, Part 4, regarding the criteria to determine a site's suitability for intensification and whether a proportionate approach will be applied when assessing planning applications in accordance with the Secretary of State's Directions on the Intend to Publish Draft London Plan (13 March 2020, Direction DR4).</p>
LP097	Affordable Housing	Support, but with suggestions	Chapter 5	DMH1	Part 1a	<p>Suggestion given that Policy DMH 1, Part 1A, is amended to ensure the policy is compliant with national policy. The following wording is suggested:</p> <p>"i. The strategic target is for 50% of all new homes to be affordable. Developments which trigger affordable housing requirements are required to provide the maximum reasonable amount of affordable housing, having regard to site viability based on the 50% strategic target.</p> <p>ii. Developments which trigger affordable housing requirements will provide affordable housing through the threshold approach set out in the Intend to Publish London Plan policy H5.</p> <p>iii. Developments which trigger affordable housing requirements will provide early and advance stage review mechanisms in-line with Policy DMM1 'Planning Obligations'."</p>
LP097	Affordable Housing	Support, but with suggestions	Chapter 5	DMH1	Part 2	<p>Suggestion given that Policy DMH 1, Part 2, is amended to accord with the following suggestions:</p> <p>Regarding Criterion 2 (iii), which requires a minimum of 50% affordable housing overall, it is suggested that the requirement is modified to the maximum reasonable level of affordable housing that should be delivered, which secures a net uplift in affordable housing.</p> <p>Regarding Criterion 2 (iv), which requires 'a better outcome for all of the sites', it is suggested that the requirements is omitted from the policy as it is not considered to be objective or measurable.</p> <p>Regarding Criterion 2 (iv), which requires a greater yield of family sized affordable rent, it is suggested that the policy is amended to allow more flexibility against individual site characteristics, viability and location, in line with Draft Policy DMH 2: Housing Mix.</p>
LP097	Housing	Support, but with suggestions	Chapter 5	DMH2	Part 1	<p>Suggestion given that Draft Policy DMH2, Part 1, is amended with the following wording:</p> <p>"Development proposals will be required to provide a range of unit sizes (including larger family homes) to reflect the Council's preferred dwelling size mix table below, or to reflect any subsequent housing needs evidence in light of future circumstances."</p>
LP097	car parking	Support, but with suggestions	Chapter 10	DMT2	Part 2	<p>Concern expressed that Policy DMT2, Part 2, is inconsistent with the NPPF, which states that development should only be prevented on highways grounds if the impacts on the road network are severe. It is not considered that negligible increases in congestion and parking is a just grounds for refusal and may be in some cases unavoidable. Suggestion given that Policy DMT2 is amended with the following wording:</p> <p>"Development will be resisted where anticipated car parking and vehicle use will adversely impact on the delivery and design of liveable neighbourhoods or result in significant adverse increases in congestion and parking stress."</p>

LBBB/BeFirst First Revised Draft Local Plan Consultation: List of Representations

Rep ID	Category: Housing, Industrial Land, Open Space, Waste, (Hong to Check at End)	Nature of Response (General/Support/Objection/Support but with suggestions)	Relevant Chapter number	Policy Number	Relevant Paragraph No.	Summarised Comment
LP097	open space	Support, but with suggestions	Chapter 8	DMNE1	Part 5	<p>Suggestion given that Policy DMNE1 is amended to clarify that open space provision will be reviewed on a case by case basis, recognising the site's location and any local deficiency or surplus in open space as well as proximity to existing open space provision based on London Plan typologies.</p> <p>Concern also expressed that Policy DMNE1, Part 5, is inconsistent with the ITP London Plan in respect of children's play space, which allows for improvements to existing children's play facilities to be offset from play space calculations.</p> <p>Suggestion given that part 5 of the policy is amended with the following wording:</p> <p>" All major and strategic development should contribute to the delivery of sufficient new publicly accessible open space on-site which should:"</p>
LP097	S106	Support, but with suggestions	Chapter 5	DMH1	Part 5	<p>Suggestion given that Policy DMH1, part 5, is amended to clarify whether the 50% affordable housing provision must be delivered wholly onsite, or, whether it applies to at least 40% at the Local Planning Authority's discretion, in accordance with Intend to Publish London Plan Policy H6.</p> <p>Suggestion also given that LBBB clarify how 'any subsequent updates on affordable housing products' would be controlled and how affordability would be evidenced. Suggestion given that the policy is amended to allow applicants to offer alternative affordable housing products where affordability is sufficiently evidencing and GLA genuine affordable housing definitions are met.</p>
LP098	Heritage, Design, Housing	Objection	Chapter 4	DMD 4	N/A	<p>Suggestion is given that LBBB's register of local heritage assets is updated for the Local Plan, there is concern expressed that the list is currently incomplete and omits parks and gardens of heritage, cultural and landscape value.</p>
LP098	Heritage, Design, Housing	Objection	Chapter 4	DMD 4	Part 5	<p>Objection is given to that policy DMD 4 refers only to buildings when discussing heritage assets, whereas heritage assets on the local list include structures such as pillar boxes, lamp posts, stench posts, boundary stones and one open space, the Quaker Burial Ground. Suggestion is given that the policy is amended to reference to these heritage assets.</p>
LP098	Heritage, Design, Housing	Objection	Chapter 4	DMD 4	Part 5	<p>Objection is given that policy DMD 4 does not meet the 'Local Designations' criteria set out by Historic England. Suggestion is given that the policy wording is amended to the following:</p> <p>'POLICY DMD 4: Heritage assets and archaeological remains - Non-designated heritage assets</p> <p>5. When assessing the impact of a proposal (individually and cumulatively) on a non-designated heritage asset, applicants must: a) demonstrate that the proposed use is the optimum viable use, which causes the least harm to the significance of the heritage asset and its setting and secures its long-term viability c) submit detailed plans to an appropriate level as part of design and access statements and heritage impact assessments to clearly demonstrate how heritage assets, including their setting, will be impacted and to ensure that significance is protected and enhanced. Development proposals should demonstrate that there will be no adverse impacts to the settings, visual appearance and views into and from historic parks, gardens and other designed landscapes.</p> <p>To date, the borough has formally identified few heritage assets of parks, gardens and other designed landscapes. Protection of these assets should therefore be given significant consideration when assessing proposed development.'</p>