

# **ONE BOROUGH ONE PLAN**

**Draft Sustainability Appraisal  
Scoping Report  
Consultation Statement**

**Barking and Dagenham  
Local Plan**

July 2015

**One borough; one community;  
London's growth opportunity**



## **Draft Sustainability Appraisal Scoping Report Consultation Statement**

Consultation was undertaken on the Draft Sustainability Appraisal Scoping Report for the Local Plan for a period of six weeks from 23 March 2015 to 4 May 2015 in accordance with Article 5(4) of the SEA Directive and the Town and Country Planning (Local Planning) (England) Regulations 2012.

Representations were received from 3 organisations within this period:

- Environment Agency
- English Heritage
- Natural England

There were 2 respondents that made no comment:

- Office of Rail Regulation
- Marine Management Organisation

A summary of the main issues raised in those representations and the Council's response are provided in Table 1:

- The first column identifies who made the representation.
- The second column details the method and date of the response.
- The third column summarises the representation made.
- The fourth column details the Council's response to the representation

The final Sustainability Appraisal Scoping Report is available on the council's web site.

**Table 1**

Consultee	Method/ Date of Response	Summary of comments	LBBD Response
Environment Agency	Email 01/05/2015	Overall, we are satisfied that the Draft Scoping Report represents a solid base on which to build the Sustainability Appraisal (SA). We are particularly pleased to see the focus on flood risk, climate change and water quality together with the inclusion of the Water Framework Directive and the Thames Estuary 2100 plan.	Comment acknowledged.
		<p><b>Page 13, Table 2, Sustainability Issue – Water:</b> The Thames River Basin Management Plan 2009 should be included into the list of relevant plans and policies.</p>	Agreed. Amendment made to Table 2.
		<p><b>Page 14, Table 2, Sustainability Issue – Flooding</b> Paragraph 2 Surface Water: London Plan, Policy 5.13 and the Supplementary Planning Guidance: Sustainable Design &amp; Construction should be included in plans and policies. These documents provide strong recommendations on the management of surface water and the use of sustainable drainage techniques.</p>	Agreed. Amendment made to Table 2.
		<p><b>Page 26, Table 3, Objective 12 Flood Risk:</b></p> <ul style="list-style-type: none"> <li>• Add sub objective: ‘Will it avoid locating new homes in areas of flood risk’ which would match the indicator on ‘Number of new homes approved/completed in flood risk areas 2 and 3.’</li> <li>• For sub-objective ‘Will it increase flood risk in new homes’ use data EA supply to DCLG on ‘Developments approved in flood zones 2 and 3 against the advice of the Environment Agency’.</li> </ul>	<ul style="list-style-type: none"> <li>• This objective already has four sub-objectives. Sub-objective 12.3 has been changed from “Will it increase flood risk for new homes” to: Will it avoid locating new homes in areas of flood risk”</li> <li>• Agreed. Amendment made to include “Developments approved in flood zones 2 and 3 against the advice of the Environment Agency” for amended sub-objective 12.3.</li> </ul>
		<ul style="list-style-type: none"> <li>• Page 27, Table 3, Objective 13 Improve chemical and biological water quality: The next version of the Thames River Basin Management Plan will include location specific actions e.g. removal of a weir, installation of a fish pass or river restoration. We can share the draft actions now on request.</li> </ul>	Draft actions requested from EA for inclusion in development of Local Plan

		<ul style="list-style-type: none"> <li>Page 28, Table 3, Objective 17 Water consumption An additional indicator could be; the number of new developments reduced to 110 litres per head (lph) conditioned through the planning process. This is a requirement set out in the new Housing Standards and London Plan Policy 5.15: Water Use and Supplies (which is due to be amended in line with new Housing Standards).</li> </ul>	Agreed. Indicator added for Objective 17.
		<p>Page 31, Appendix A Policies, Plans and Programmes: The Thames River Basin Management Plan 2009 should be included into this list. The GLA's Supplementary Planning Guidance: Sustainable Design &amp; Construction (2014) should be included.</p>	Agreed. The Thames River Basin Management Plan 2009 and the Sustainable Design & Construction SPG 2014 have been added to Appendix A under the Regional heading.
Historic England	Email 01/05/2015	It is essential that the Scoping Report is tailored to the type and purpose of the Local plan being considered. In line with the National Planning policy Framework (NPPF) the Local Plan should be based on adequate, up to date and relevant evidence. This includes the Borough's heritage assets and wider historic environment, and their contribution to the economic, social and environmental characteristics and prospects of Barking & Dagenham.	Acknowledged.
		<p>Page 13, Table 2 Cultural Heritage: The current issues identified are limited and should include the conditions and potential threats to all types of heritage assets and not just listed buildings. For example there are according to the Historic England Register of Heritage Assets at Risk (2014) there are five listed buildings, Barking Abbey a scheduled monument and one conservation area at Chadwell Heath Anti-aircraft Gun Site, which are at risk.</p>	<p>Agreed. The heritage asserts at risk have been listed in Table 2. The details of their condition have been added to section 13. Cultural Heritage in Appendix B Environmental Baseline.</p>
		It is important to include Barking and Dagenham Heritage Strategy as a relevant document to be considered as part of identifying and addressing heritage issues in the Borough.	<p>Agreed. Celebrating our past, looking forward with pride: A Heritage Strategy for Barking and Dagenham 2013 – 2016 has been added to Table 2 and to Appendix A.</p>

		<p>Appendix A Policies, Plans and Programmes. The following additional documents should be reviewed as part of the SA process:</p> <ul style="list-style-type: none"> <li>• International: European Landscape Convention (Florence Convention)</li> <li>• National: Historic Environment Good Practice Advice in Planning (GPA) - GPA 1 Local Plan Making is the most relevant to the production of the Local Plan.</li> <li>• Local: Borough Conservation Area appraisals and management plans; Heritage Cultural Strategy 2012 - 2014; Heritage SPD and any other relevant SPDs</li> </ul>	<ul style="list-style-type: none"> <li>• The European Landscape Convention (Florence Convention) is already listed in Appendix A.</li> <li>• Agreed. Historic Environment Good Practice Advice In Planning Note 1 – The Historic Environment in Local Plans (2015) has been added to Appendix A.</li> <li>• The Conservation Area Appraisals are already listed in Appendix A. Unable to locate a document entitled “Heritage Cultural Strategy 2012 - 2014; The Local Plan does not have a Heritage SPD. All Local Plan SPDs are already listed in Appendix A.</li> </ul>
		<p>Baseline information: improve by providing more qualitative and analytical information on the status and condition of the historic environment. For example, identify relevant trends and targets, plus identify any potential cross boundary heritage issues and characteristics.</p>	<p>Agreed. Further information has been added regarding Heritage at Risk assets. Potential cross boundary issues have not been identified.</p>
		<p>Baseline information: ensure all aspects of the historic environment are understood, beyond those designated and highlighted in the current draft Scoping Report. For example, include other non-designated heritage assets, locally listed buildings and other features that are valued for the heritage interest. This could include any characterisation studies the Council may have undertaken.</p>	<p>Agreed. Further information has been added regarding locally listed buildings, historic parks and trees.</p>
		<p>Advise that the Borough’s own conservation staff are closely involved throughout the preparation of the emerging new Local Plan and associated Sustainability Appraisal</p>	<p>Agreed.</p>

Natural England	Email 05/05/2015	Section 1 -5 give a very clear introduction and describe the background and processes for the SA.	Comment acknowledged.
		We consider Appendix A includes a comprehensive list of relevant plans, policies and programmes. You may wish to include reference to:  Nature Nearby, Accessible Natural Greenspace Guidance' (March 2010)	Agreed. Nature Nearby, Accessible Natural Greenspace Guidance' has been added to Appendix A.
		Reference should be made to the National Character Areas (NCAs) which divide England into 159 natural areas. The new NCA profiles provide an integrated, locally specific evidence base that highlight significant environmental opportunities and therefore can be used for making decisions about the natural environment	Agreed. National Character Areas have been added to Appendix A. Information has also been added to Appendix B Baseline Evidence under 11. Biodiversity, flora and fauna geodiversity and landscape. Sub objective 16.2 has been amended to include reference to NCA 81 and NCA 111.
		Include National pollinator strategy: for bees and other pollinators in England (2014) a strategy to protect pollinating insects which support our food production and the diversity of our environment in Appendix A.	Agreed. National pollinator strategy: for bees and other pollinators in England (2014) had been added to Appendix A.
		We are pleased the baseline information refers to important environmental assets, including nature conservation sites, parks and green spaces. Priority Habitat is also included - <i>Magic</i> , ( <a href="http://www.natureonthemap.naturalengland.org.uk">www.natureonthemap.naturalengland.org.uk</a> ) Defra's GIS package for environmental assets could be referred to as a data source.	Priority habitats are referred to in the context of London plan targets. Information about the MAGIC web site has been added to Appendix B.

		<p>The structures and processes that make up healthy functioning ecosystems provide us with ecosystem services, all of which contribute to our health, wealth and wellbeing: there could be opportunities to add cross references to open space/Green Grid in sections on health and in climate change.</p>	<p>Agreed. Reference to deficiencies in access to nature and to local parks added to Appendix B under 4.Human Health. Reference to the All London Grid Grid added to Appendix B under 14. Climatic factor including flooding.</p>
		<p><b>Objectives within the Proposed SA Framework:</b> We welcome the recognition that SUDs can bring benefits for flood resilience and water quality. Add that retro fitting small scale SUDs into existing developments can also provide these functions and the SUDs can be incorporated into open space to contribute to the network of green infrastructure.</p>	<p>Agreed. Two indicators added to sub-objective 12.4 Will it promote the use of SUDS? Retrofitted SUDs into existing developments and Creation of ecological SUDs in open spaces.</p>
		<p><b>Objectives within the Proposed SA Framework:</b> Parks &amp; open spaces can also contribute to the health issues, a theme picked up in <i>The Natural Choice - securing the value of nature</i>: 'Greener neighbourhoods and improved access to nature will improve public health and quality of life and reduce environmental inequalities. Urban green spaces will provide varied ecosystem services and will contribute to coherent and resilient ecological networks.'</p>	<p>Agreed. Sub-objective 4.2 Will it improve overall wellbeing: “% of homes deficient in access to nature and parks” added as an indicator.</p> <p>Additional sub-objective and indicators created: 11.4 Will it increase the quantity of green cover?</p> <p>Indicators: Provision of green grid, priority habitat, vegetated open space, or tree-lined streets</p>