

Barking and Dagenham's Local Plan

Habitats Regulations Assessment
Regulation 19 Consultation Version

Barking and Dagenham Borough Council

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Table of Contents

1. Introduction.....	5
Background to the Project.....	5
Legislative Context.....	5
Report Layout.....	6
2. Methodology	7
Introduction	7
A Proportionate Assessment	7
The Process of HRA	8
The Scope.....	10
The 'in Combination' Scope	11
3. Pathways of Impact	14
Recreational Pressure.....	14
Water Quality and Resources	16
Atmospheric Pollution (Atmospheric Nitrogen Deposition).....	17
4. Test of Likely Significance	19
Introduction	19
Recreational Pressure.....	19
Water Quality and Resources	19
Atmospheric Pollution (Atmospheric Nitrogen Deposition).....	20
Summary of Test of Likely Significance 'Alone'	21
Summary of Test of Likely Significance 'In Combination'	21
5. Appropriate Assessment.....	23
'Alone' Assessment.....	23
'In Combination' Assessment.....	23
6. Conclusions and Recommendations	27
Appendix A International Site Background Information and Locations	29
Epping Forest SAC	29
Lee Valley SPA/Ramsar	30
Thames Estuary and Marshes SPA/Ramsar	31
Appendix B Policy Screening: Likely Significant Effects.....	34
Appendix C Site Allocation Screening: Likely Significant Effect Table and Figure	85

Figures

Figure 1 – Internationally Designated Sites

Figure 2 – Site Allocations

Tables

Table 1: Physical Scope of the HRA.....	10
Table 2: 10-year targets for net housing completions (2019/20 – 2028/29).....	12
Table 3: Main sources and effects of air pollutants on habitats and species	17
Table 4: Proposed Residential Development fully within 6.2 km of Epping Forest SAC	24
Table 5: Proposed Residential Development partially within 6.2 km of Epping Forest SAC	24

1. Introduction

Background to the Project

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

Legislative Context

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

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

Box 1: The legislative basis for Appropriate Assessment

Conservation of Habitats and Species Regulations 2017 (as amended)

The Regulations state that:

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

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

Report Layout

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

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

2. Methodology

Introduction

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

A Proportionate Assessment

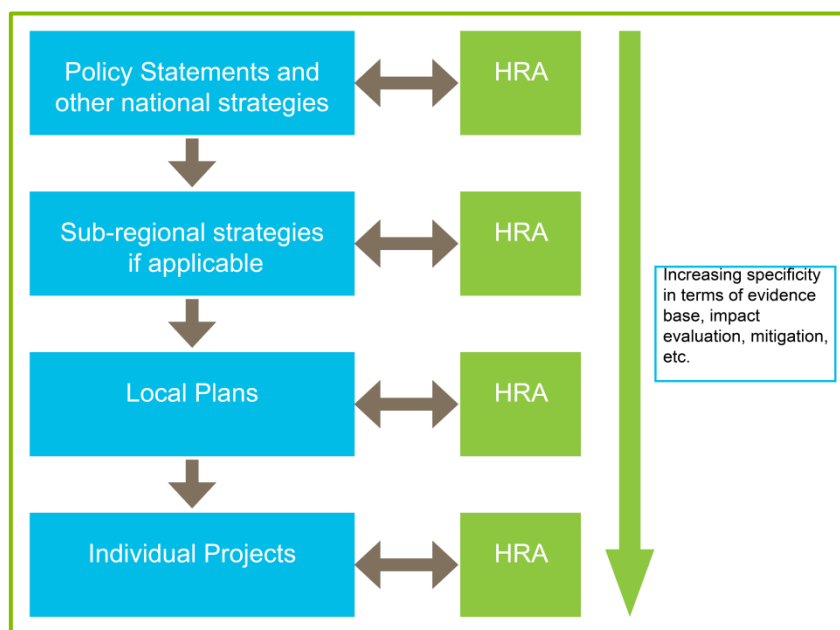
- 2.2 Project-related HRA often requires bespoke survey work and novel data generation in order to accurately determine the significance of effects. In other words, to look beyond the risk of an effect to a justified prediction of the actual likely effect and to the development of avoidance or mitigation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

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

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

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

Box 2: Tiering in HRA of Land Use Plans



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

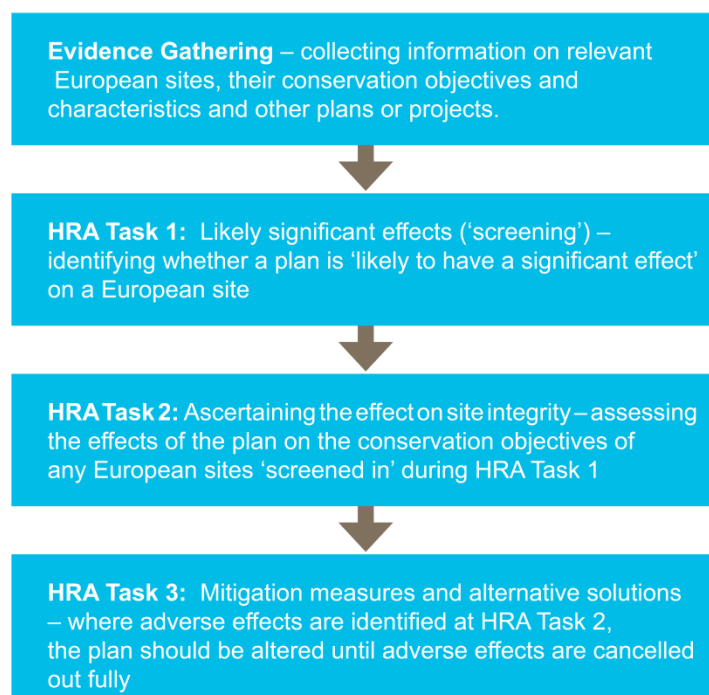
The Process of HRA

- 2.8 The HRA is being carried out in the continuing absence of formal central Government guidance. The former DCLG (now MHCLG) released a consultation paper on AA of Plans in 2006⁶. As yet, no further formal guidance has emerged from MHCLG on the assessment of plans. However, Natural England has produced its own informal internal guidance and central government have released general guidance on appropriate assessment⁷.
- 2.9 **Box 3** outlines the stages of HRA according to the draft MHCLG guidance (which, as government guidance applicable to English authorities is considered to take precedence over other sources of guidance). The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations and any relevant changes to the plan until no likely significant effects remain.

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

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

Box 3: Four-Stage Approach to Habitats Regulations Assessment



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

Task One: Test of Likely Significant Effect

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

Task Two: Appropriate Assessment

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

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

The Scope

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

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

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

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

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

Table 1: Physical Scope of the HRA

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

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

The 'in Combination' Scope

- 2.20 It is a requirement of the Regulations that the impacts and effects of any land use plan being assessed are not considered in isolation but in combination with other plans and projects that may also be affecting the international designated site(s) in question.
- 2.21 When undertaking this part of the assessment it is essential to bear in mind the principal intention behind the legislation i.e. to ensure that those projects or plans which in themselves have minor impacts are not simply dismissed on that basis but are evaluated for any cumulative contribution they may make to an overall significant effect. In practice, in combination assessment is therefore of greatest relevance when the plan would otherwise be screened out because its individual contribution is inconsequential. The overall approach is to exclude the risk of there being unassessed likely significant effects in accordance with the precautionary principle. This was first established in the seminal Waddenzee⁹ case.
- 2.22 For the purposes of this HRA, we have determined that the key other documents with a potential for in-combination effects is the Draft London Plan 2019. This plan sets out the broad spatial development targets for the Greater London over the next 20 – 25 years, which covers 32 boroughs. In addition to this, other key documents include the Local Plans of those districts within 6.2 km of Epping Forest SAC. The distance 6.2km relates to the core recreational catchment area within which 75% of people that visit Epping Forest SAC reside that has been calculated from visitor surveys by Footprint Ecology in 2018¹⁰. The housing numbers within each of these districts will be relevant to assessing the 'in-combination' recreational pressure impact on Epping Forest.
- 2.23 The relevant Local Plan Documents within this 6.5 km zone are listed below:
- Epping Forest District Local Plan 2011 – 2033 (Regulation 19 Version)
 - Adopted London Borough of Redbridge Local Plan (2015 – 2030)
 - London Borough of Waltham Draft Local Plan 2020 – 2035 (Consultation Version)
 - London Borough of Enfield Draft Local Plan 2036 (Regulation 18 Version – Issues and Options)
 - Adopted London Borough of Newham Local Plan (2018 – 2033)
 - London Borough of Tower Hamlets Local Plan 2031 (adopted January 2020)
 - London Borough of Hackney Local Plan 2033 (adopted July 2020)
 - Adopted London Borough of Haringey Strategic Policies 2013 (with alterations 2017)
 - Adopted London Borough of Haringey Site Allocations DPD (2017)
 - Harlow Draft Local Development Plan 2033 (Pre-Submission Publication)
 - Broxbourne Local Plan 2018 2033 (adopted June 2020)
 - Brentwood Draft Local Plan (Pre-Submission, Regulation 19 Version)
- 2.24 The Draft London Plan (currently completing its Examination) originally set out the need for approximately 66,000 new homes per year across Greater London. It stated that *'there is capacity across London for approximately 40,000 new homes a year on large sites... [and] also shows that there is capacity for development on small sites for 24,500 new homes a year'*. The plan outlines the 10-year housing targets for each Planning Authority as contained in the London Plan going through Examination is presented in Table 2 below.
- 2.25 As shown in the table, residential growth in the Barking and Dagenham Borough (at the top of the table) is only targeted to account for 3.48% of the growth in Greater London over the next 10-year period. Nevertheless, the potential for Barking and Dagenham's contribution – however small – to an in-combination effect arising from increased development throughout Greater London, must be considered.

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

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

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

Planning Authority	Residential Growth (dwellings)
Barking & Dagenham	22,640
Barnet	31,340
Bexley	12,450
Brent	29,150
Bromley	14,240
Camden	10,860
City of London	1,460
Croydon	29,490
Ealing	28,070
Enfield	18,760
Greenwich	32,040
Hackney	13,300
Hammersmith & Fulham	16,480
Haringey	19,580
Harrow	13,920
Havering	18,750
Hillingdon	15,530
Hounslow	21,820
Islington	7,750
Kensington & Chelsea	4,880
Kingstone	13,640
Lambeth	15,890
Lewisham	21,170
London Legacy Development Corporation	21,610
Merton	13,280
Newham	38,500
Old Oak Park Royal Development Corporation	13,670
Redbridge	19,790
Richmond	8,110
Southwark	25,540
Sutton	9,390
Tower Hamlets	35,110
Waltham Forest	17,940
Wandsworth	23,100
Westminster	10,100
Total	649,350

2.26 Following the Examination in Public of the Draft New London Plan, the Inspectors recommended that the total housing target for London be reduced from 649,350 to 'just under 523,000'. Reflecting this reduction

within the borough could lead to the delivery of around 18,235 houses between 2019 and 2029 (equivalent to 1,824 new homes per annum), which is lower than the current emerging London Plan policy requirement.

- 2.27 It should be noted that, while the broad potential impacts of the London Plan will be considered, this document does not carry out a full HRA of this Plan. Instead it draws upon existing HRAs that have been carried out on the Plan.

3. Pathways of Impact

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

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

Recreational Pressure

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

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

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

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

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

Activities causing disturbance

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

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

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

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

¹¹ The RTP1 report 'Planning for an Ageing Population' (2004) which states that 'From being a marginalised group in society, the elderly are now a force to be reckoned with and increasingly seen as a market to be wooed by the leisure and tourist industries. There are more of them and generally they have more time and more money.' It also states that 'Participation in most physical activities shows a significant decline after the age of 50. The exceptions to this are walking, golf, bowls and sailing, where participation rates hold up well into the 70s'.

- Tuite et al¹² found that during periods of high recreational activity, bird numbers at Llangorse Lake decreased by 30% as the morning progressed, matching the increase in recreational activity towards midday. During periods of low recreational activity, however, no change in numbers was observed as the morning progressed. In addition, all species were found to spend less time in their 'preferred zones' (the areas of the lake used most in the absence of recreational activity) as recreational intensity increased;
 - Underhill et al¹³ counted waterfowl and all disturbance events on 54 water bodies within the South West London Water Bodies Special Protection Area and clearly correlated disturbance with a decrease in bird numbers at weekends in smaller sites and with the movement of birds within larger sites from disturbed to less disturbed areas.
- 3.1 Human activity can affect birds either directly (e.g. through causing them to flee) or indirectly (e.g. through damaging their habitat). The most obvious direct effect is that of immediate mortality such as death by shooting, but human activity can also lead to behavioural changes (e.g. alterations in feeding behaviour, avoidance of certain areas *etc.*) and physiological changes (e.g. an increase in heart rate) that, although less noticeable, may ultimately result in major population-level effects by altering the balance between immigration/birth and emigration/death¹⁴. The impact of disturbance on birds changes during the seasons in relation to a number of very specific factors, for example the winter below freezing temperature, the birds fat resource levels and the need to remain watchful for predators rather than feeding. These considerations lead to birds apparently showing different behavioural responses at different times of the year.
- 3.2 The degree of impact that varying levels of noise will have on different species of bird is poorly understood except that a number of studies have found that an increase in traffic levels on roads does lead to a reduction in the bird abundance within adjacent hedgerows - Reijnen et al (1995) examined the distribution of 43 passerine species (i.e. 'songbirds'), of which 60% had a lower density closer to the roadside than further away. By controlling vehicle usage, they also found that the density generally was lower along busier roads than quieter roads¹⁵.

Mechanical/abrasive damage and nutrient enrichment

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

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

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

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

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

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

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

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

considered least resistant. Cover of hemicryptophytes and geophytes (plants with buds below the soil surface) was heavily reduced after two weeks but had recovered well after one year and as such these were considered most resilient to trampling. Chamaephytes (plants with buds above the soil surface) were least resilient to trampling. It was concluded that these would be the least tolerant of a regular cycle of disturbance.

- Cole (1995c)¹⁸ conducted a follow-up study (in 4 vegetation types) in which shoe type (trainers or walking boots) and trampler weight were varied. Although immediate damage was greater with walking boots, there was no significant difference after one year. Heavier trampers caused a greater reduction in vegetation height than lighter trampers, but there was no difference in effect on cover.
 - Cole & Spildie (1998)¹⁹ experimentally compared the effects of off-track trampling by hiker and horse (at two intensities – 25 and 150 passes) in two woodland vegetation types (one with an erect forb understorey and one with a low shrub understorey). Horse traffic was found to cause the largest reduction in vegetation cover. The forb-dominated vegetation suffered greatest disturbance but recovered rapidly. Higher trampling intensities caused more disturbance.
- 3.4 Walkers with dogs contribute to pressure on sites through nutrient enrichment via dog fouling and also cause greater disturbance to fauna as dogs are less likely to keep to marked footpaths and also tend to move in a more erratic manner. Sites being managed by nature conservation bodies and local authorities frequently resort to hardening eroded paths to restrict erosion but at the same time they are losing the habitats formerly used by sand lizards and burrowing invertebrates. Motorcycle scrambling and off-road vehicle use can cause more serious erosion, as well as disturbance to sensitive species. Boats can also cause some mechanical damage to intertidal habitats through grounding as well as anchor and anchor line damage.

Water Quality and Resources

- 3.5 Increased amounts of housing or business development can lead to reduced water quality of rivers and estuarine environments. Sewage and industrial effluent discharges can contribute to increased nutrients on international sites leading to unfavourable conditions. In addition, diffuse pollution, partly from urban run-off has international identified during an Environment Agency Review of Consents process and a joint Environment Agency and Natural England evidence review, as being a major factor in causing unfavourable condition of international sites.
- 3.6 The quality of the water that feeds international sites is an important determinant of the nature of their habitats and the species they support. Poor water quality can have a range of environmental impacts:
- At high levels, toxic chemicals and metals can result in immediate death of aquatic life, and can have detrimental effects even at lower levels, including increased vulnerability to disease and changes in wildlife behaviour. Eutrophication, the enrichment of plant nutrients in water, increases plant growth and consequently results in oxygen depletion. Algal blooms, which commonly result from eutrophication, increase turbidity and decrease light penetration. The decomposition of organic wastes that often accompanies eutrophication deoxygenates water further, augmenting the oxygen depleting effects of eutrophication. In the marine environment, nitrogen is the limiting plant nutrient and so eutrophication is associated with discharges containing available nitrogen;
 - Some pesticides, industrial chemicals, and components of sewage effluent are suspected to interfere with the functioning of the endocrine system, possibly having negative effects on the reproduction and development of aquatic life; and
 - Increased discharge of treated sewage effluent can result both in high levels of macroalgal growth, which can smother the mudflats of value to SPA birds and in greater scour (as a result of greater flow volumes).
- 3.7 At sewage treatment works, additional residential development increases the risk of effluent escape into aquatic environments in addition to consented discharges to the catchment. In many urban areas, sewage

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

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

treatment and surface water drainage systems are combined, and therefore a predicted increase in flood and storm events could increase pollution risk.

Atmospheric Pollution (Atmospheric Nitrogen Deposition)

3.8 The main pollutants of concern for international sites are oxides of nitrogen (NO_x), ammonia (NH_3) and sulphur dioxide (SO_2). NO_x can have a directly toxic effect upon vegetation. In addition, greater NO_x or ammonia concentrations within the atmosphere will lead to greater rates of nitrogen deposition to soils. An increase in the deposition of nitrogen from the atmosphere to soils is generally regarded to lead to an increase in soil fertility, which can have a serious deleterious effect on the quality of semi-natural, nitrogen-limited terrestrial habitats.

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

Pollutant	Source	Effects on habitats and species
Acid deposition	SO_2 , NO_x and ammonia all contribute to acid deposition. Although future trends in S emissions and subsequent deposition to terrestrial and aquatic ecosystems will continue to decline, it is likely that increased nitrogen emissions may cancel out any gains produced by reduced sulphur levels.	Can affect habitats and species through both wet (acid rain) and dry deposition. Some sites will be more at risk than others depending on soil type, bed rock geology, weathering rate and buffering capacity.
Ammonia (NH_3)	Ammonia is released following decomposition and volatilisation of animal wastes. It is a naturally occurring trace gas, but levels have increased considerably with expansion in numbers of agricultural livestock. Ammonia reacts with acid pollutants such as the products of SO_2 and NO_x emissions to produce fine ammonium (NH_4^+) containing aerosol which may be transferred much longer distances (can therefore be a significant trans-boundary issue.)	Adverse effects are as a result of nitrogen deposition leading to eutrophication. As emissions mostly occur at ground level in the rural environment and NH_3 is rapidly deposited, some of the most acute problems of NH_3 deposition are for small relict nature reserves located in intensive agricultural landscapes.
Nitrogen oxides NO_x	Nitrogen oxides are mostly produced in combustion processes. About one quarter of the UK's emissions are from power stations.	Deposition of nitrogen compounds (nitrates (NO_3), nitrogen dioxide (NO_2) and nitric acid (HNO_3)) can lead to both soil and freshwater acidification. In addition, NO_x can cause eutrophication of soils and water. This alters the species composition of plant communities and can eliminate sensitive species.
Nitrogen deposition	(N) The pollutants that contribute to nitrogen deposition derive mainly from NO_x and NH_3 emissions. These pollutants cause acidification (see also acid deposition) as well as eutrophication.	Species-rich plant communities with relatively high proportions of slow-growing perennial species and bryophytes are most at risk from N eutrophication, due to its promotion of competitive and invasive species which can respond readily to elevated levels of N. N deposition can also increase the risk of damage from abiotic factors, e.g. drought and frost.
Ozone (O_3)	A secondary pollutant generated by photochemical reactions from NO_x and volatile organic compounds (VOCs). These are mainly released by the combustion of fossil fuels. The increase in combustion of fossil fuels in the UK has led to a large increase in background ozone concentration, leading to an increased number of days when levels across the region are above 40ppb. Reducing ozone pollution is believed to require action at international	Concentrations of O_3 above 40 ppb can be toxic to humans and wildlife, and can affect buildings. Increased ozone concentrations may lead to a reduction in growth of agricultural crops, decreased forest production and altered species composition in semi-natural plant communities.

level to reduce levels of the precursors that form ozone.

Sulphur Dioxide SO ₂	Main sources of SO ₂ emissions are electricity generation, industry and domestic fuel combustion. May also arise from shipping and increased atmospheric concentrations in busy ports. Total SO ₂ emissions have decreased substantially in the UK since the 1980s.	Wet and dry deposition of SO ₂ acidifies soils and freshwater, and alters the species composition of plant and associated animal communities. The significance of impacts depends on levels of deposition and the buffering capacity of soils.
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- 3.9 Sulphur dioxide emissions are overwhelmingly influenced by the output of power stations and industrial processes that require the combustion of coal and oil. Ammonia emissions are dominated by agriculture, with some chemical processes also making notable contributions. As such, it is unlikely that material increases in SO₂ or NH₃ emissions will be associated with Local Plans. NO_x emissions, however, are dominated by the output of vehicle exhausts. Within a 'typical' housing development, by far the largest contribution to NO_x (92%) will be made by the associated road traffic. Other sources, although relevant, are of minor importance (8%) in comparison²⁰. Emissions of NO_x could therefore be reasonably expected to increase as a result of greater vehicle use as an indirect effect of the Local Plan.
- 3.10 According to the World Health Organisation, the critical NO_x concentration (critical threshold) for the protection of vegetation is 30 µgm⁻³; the threshold for sulphur dioxide is 20 µgm⁻³. In addition, ecological studies have determined 'Critical Loads'²¹ of atmospheric nitrogen deposition (that is, NO_x combined with ammonia NH₃) for key habitats within international sites.

Local Air Pollution

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

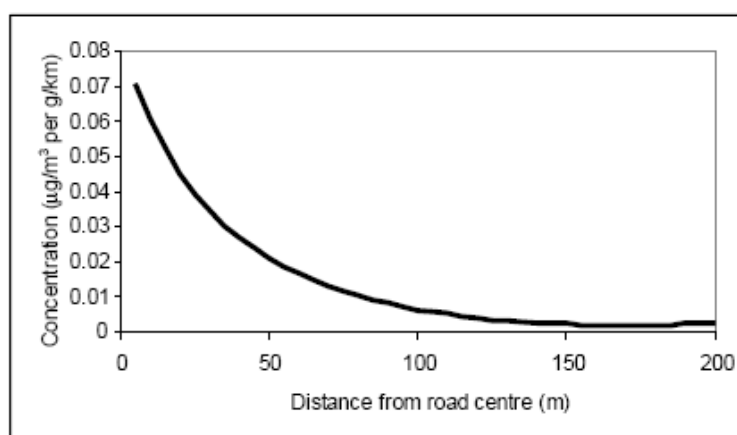


Plate 1. Traffic contribution to concentrations of pollutants at different distances from a road (Source: DfT)

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

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

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

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

4. Test of Likely Significance

Introduction

- 4.1 The initial scoping of international designated sites illustrated in Table 1 identifies that some sites are potentially vulnerable to:
- Recreational pressure
 - Water resources and water quality
 - Air pollution
- 4.2 The full test of Likely Significant Effects for the Barking and Dagenham Local Plan policies and site allocations are presented in **Appendix B and C**. The assessment took into consideration the above potential vulnerabilities of the international sites included in Table 1.
- 4.3 The following sections focus on Epping Forest SAC, Lee Valley SPA/Ramsar and Thames Estuary and Marshes SPA/Ramsar.

Recreational Pressure

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

Water Quality and Resources

- 4.9 With regards to water quality (water pollution) Barking and Dagenham sewerage is treated by Beckton Sewerage Treatment Plant which is the largest sewerage treatment plant in Europe. The plant is located on the banks of the River Thames to the south west of the London Borough of Barking and Dagenham. The outflow of treated water goes straight into the River Thames and thereafter flows south west to the Thames

²³ Footprint Ecology, 2018. Epping Forest Visitor Survey 2017. Footprint Ecology, Dorset.

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

Estuary. As both Epping Forest and Lee Valley are at least 4.9 km north west of the borough and the outflow of treated sewerage goes into the River Thames there is no link between development within the borough and either surface runoff or water pollution to either international site.

- 4.10 The Thames Estuary and Marshes SPA and Ramsar site is located 19.7km south east of the London Borough of Barking and Dagenham. This was given preliminary consideration with regards to wastewater impacts from London population growth, but Thames Water have invested extensively in infrastructure (such as expansions to Beckton, Mogden and Crossness Sewage Treatment Works, the Lee Tunnel and the Thames Tunnel) to ensure that water quality in the River Thames (and thus the SPA/Ramsar site downstream) improves notwithstanding the expected increase in the population of the catchment of WWTW that discharge to the tidal river. In addition, the Site Improvement Plan (SIP) for the Greater Thames Complex²⁵ which includes the Thames Estuary and Marshes SPA does not list water pollution as a threat to or pressure on the SPA. Therefore, the water quality impact pathway can be scoped out from further discussion within this HRA as the impact pathways is not considered to cause a likely significant effect upon any European sites.
- 4.11 Parts of the Lee Valley SPA/Ramsar are used to supply water to areas of north London within Thames Water supply areas. An increase in residential development within the supply area will increase the demand for water resourced and therefore potentially increase the level of abstraction at the SPA/Ramsar reservoirs. This could potentially have a likely significant effect upon the SPA/Ramsar. However, Thames Valley have produced a Water Resource Management Plan (WRMP) and a HRA of this WRMP. Within the HRA of the WRMP the Environment Agency have completed a 'Review of Consents' upon the existing abstraction consent limits at the competent authority for the regulation of the impact of abstraction on the natural environment. The Review of Consents considered all international sites within the Thames Valley supply area. The HRA details the proves of the review *"The European sites were initially screened to identify all sites with water dependent habitat within the Thames Water's supply area. Those sites that contained water dependent habitat were then reviewed to assess whether Thames Water abstractions were located within the same groundwater or surface water catchment and therefore could have potential to affect the hydrogeological or hydrological regime of the sites. Any sites that were in the same catchment as a Thames Water licensed abstraction source were assessed in more detail to determine whether the abstraction would be likely to have a significant effect."* Within this process a number of Thames Water licenced sources within the SPA/Ramsar were assessed to determine if there was an adverse effect.
- 4.12 The Appropriate Assessment of the Review of Consents process concluded that there would be no adverse impact upon the integrity of the Lee Valley SPA/Ramsar with regards to abstraction. Therefore, water resources can be screened out of this HRA as the impact pathways are not considered to cause a likely significant effect upon any international sites.

Atmospheric Pollution (Atmospheric Nitrogen Deposition)

- 4.13 The only parts of the Lee Valley SPA/Ramsar within London are the Walthamstow Reservoirs. These are sealed reservoirs that are internationally designated for their populations of wintering gadwall and shoveler ducks. The Air Pollution Information System (APIS) website provides details of critical loads of atmospheric pollution which if exceeded could lead to habitat damage. However, no critical loads are provided for the habitat - open standing water – on which the bird species forming the reason for the international designation rely. The APIS website states that *'No Critical Load has been assigned to the EUNIS classes for meso/eutrophic systems. These systems are often phosphorus limited; therefore, decisions should be taken at a site-specific level'*. In this case, no likely significant effects are anticipated since the Lee Valley SPA/Ramsar, like most freshwater environments, is phosphate limited, rather than nitrogen limited, meaning that it is phosphate availability that controls the growth of macrophytes and algae.
- 4.14 Epping Forest SAC is known to be adversely affected by relatively poor local air quality alongside roads that traverse the parts of the site that lie in Epping Forest District and this has been demonstrated to have negatively affected the epiphytic lichen communities of the woodland as well as other features. The nature of the road network around Epping Forest is such that journeys between a number of key settlements around the forest by car, van or bus effectively necessitate traversing the SAC. However, in contrast to authorities located closer to the SAC data indicates that few daily journeys to work arising in the London Borough of

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

Barking and Dagenham necessitate traversing Epping Forest SAC. This is illustrated by examination of 2011 census data. Journeys to work to the London Borough of Waltham Forest are those which are most likely to pass within 200m of the SAC. However, 2011 census data indicate that 747 commuters from Barking and Dagenham either drive a car or van (or are a passenger in such) into Waltham Forest. This is approximately 1% of journeys to work arising in Barking and Dagenham and not all of these will travel within 200m of the SAC. A negligible percentage of journeys to work arising in the London Borough of Barking and Dagenham thus involve passing the SAC.

- 4.15 In addition to the very low number of journeys to work potentially travelling within 200m of the SAC, the road most likely to be traversed for journeys to work between Barking and Dagenham is Waltham Forest is the North Circular, the A406. A National Vegetation Classification (NVC) survey was undertaken along the A406 as part of a report to inform the HRA for the Meridian Water development in Enfield²⁶ in March 2019. This survey specifically sought to assess the presence of SAC qualifying habitats within 200m of the A406. The survey found that the habitats within 200m of the A406 were aligned with NVC classification W10 – Oak Woodland, which is not a qualifying feature of Epping Forest SAC.
- 4.16 The very small number of trips past Epping Forest SAC expected to be associated with increased housing in Barking and Dagenham will also exist within the context of overarching measures to improve London's air quality being undertaken by the Mayor of London. The HRA of the London Plan²⁷ states that, *"the Mayor has been producing a number of other strategies including several that are intended to improve air quality and reduce NO_x and other emissions over the London Plan period and beyond"*. These include the London Environment Strategy and the Mayor's Transport Strategy. Among the actions in the Mayor's Transport Strategy over the duration of the London Plan period up to 2030, include but are not limited to; zero emission capable taxis, town centre Zero Emission Zones, electric single-deck buses and bus charging infrastructure, supporting low emission freight, deliver of 2000 electric vehicle charging points, further investment in charging and refuelling infrastructure, and an Extended Ultra Low Emission Zone.
- 4.17 As a result of these initiatives, the Mayor's Transport Strategy Supporting Evidence Outcomes Summary Report²⁸ concludes that *'... with the actions identified in this strategy, a sustainable mode share of 80 per cent can be achieved, meaning that eight in ten journeys made in London will be made on foot, by bicycle or by public transport and just two in ten by car, taxi, private hire vehicle or motorcycle'* and that *'Traffic reduction and improvements in vehicle technology will deliver large scale reductions of 94 percent in NO_x'*. In light of the evidence considered above, it is concluded that the Barking and Dagenham Local Plan will not result in likely significant effects via negative changes in air quality on either the Lee Valley SPA/Ramsar or Epping Forest SAC.

Summary of Test of Likely Significance 'Alone'

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

Summary of Test of Likely Significance 'In Combination'

- 4.20 Of the 57 Local Plan policies, six policies, were considered to have the potential to result in a likely significant effect in combination:
- **SPDG 1: Delivering growth in Barking and Dagenham** – This policy regards delivering growth within the Borough of Barking and Dagenham and specifies the repurposing and release of former industrial land for development and delivering development as set out in Chapter 3: Borough Places and Site Allocations of the Local Plan (see SPP Policies listed below).

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

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

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

- **SPP 1: Barking and the River Roding Area** – This policy provides for the broad location (Thames and the Riverside) of 13,000 new homes during the plan period. A portion of this strategic area is located within 6.2km of Epping Forest SAC.
 - **SP 3: Delivering homes that meet people's needs** – This policy relates to delivering a net increase in new residential dwellings over the plan period through supporting the delivery of the most up-to-date London Plan. The Council will support proposals that contribute to the increase of a minimum of **40,00 additional quality homes** between 2019 and 2037.
 - **DMH 3: Specialist homes** – Although this policy does not allocate a quantum of housing it does support the provision of specialist housing within the Borough. The supporting text provides examples of supported housing which include student accommodation, sheltered housing, nursing and care homes, staff accommodation and hostels.
 - **DMH 5: Gypsy and traveller accommodation** – This policy supports the development of new gypsy and traveller accommodation. Within the supporting text it highlights the need for **24 new gypsy and traveller pitches** over the Plan period.
 - **DME 4: Visitor accommodation** – This proposal supports the development of visitor accommodation within the borough. Visitor accommodation includes hotels and serviced apartments.
- 4.21 The above policies provide for the following realistic potential linking impact pathways that could result in likely significant effects on international sites in combination:
- **Recreational pressure: as a result of new residential dwellings**
- 4.22 All remaining policies are development management policies that do not provide impact pathways that could potentially link to international sites.
- 4.23 Each of the above policies will be discussed further within the 'in combination' section of the appropriate assessment in relation to the following international sites.

5. Appropriate Assessment

‘Alone’ Assessment

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

‘In Combination’ Assessment

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

Recreational Pressure on Epping Forest SAC

- 5.3 The Barking and Dagenham Local Plan Strategic Policy SP 3: Delivering homes that meet people’s needs – states that the council will deliver “*a minimum of 40,000 homes on Site Allocations (including development of small sites), supporting the achievement of the housing targets identified in accordance with the Place policies*”. In addition to this the supporting text of Policy DMH 5 (Gypsy and Traveller Accommodation) highlights the need for 24 new gypsy and traveller pitches within the borough up to 2037. There are several other policies relating to the provision of specialist housing including residential care housing and student accommodation (DMH 3) and visitor accommodation e.g. hotels (DME 4) within the borough although these policies and supporting text do not specify a quantum of this development within the borough.
- 5.4 Recreational pressure is well known vulnerability of Epping Forest SAC. Epping Forest is a forest of national and international conservation importance. The Forest is made up of woodland, grassland and heathland and contains over 50,000 ancient pollard trees and 100 lakes and ponds spanning 2,400 ha²⁹.
- 5.5 The recreational impacts considered to be of concern within the SAC include:
- Eutrophication from dog fouling;
 - Trampling/wear, leading to soil compaction, vegetation wear, erosion and damage to veteran tree roots
 - Increased fire risk (and potentially difficulties in access for emergency vehicles if gates etc. are blocked);
 - Difficulties in establishing the best grazing management due to interactions between visitors and livestock;
 - Direct damage to veteran trees, for example from climbing on them;
 - Harvesting, for example fungi, deadwood;
 - Disturbance to invertebrates and other wildlife;
 - Spread of disease;
 - Spread of alien plants;
 - Staff time taken away from necessary management due to the need to deal with vandalism, breaches of byelaws etc.; and,
 - Direct damage and vandalism of infrastructure.

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

- 5.6 Visitor survey³⁰ of the SAC has concluded that the core recreational area, the area within which 75% of all visitors of the site reside, is a 6.2 km radius from the boundary of the site. The London Borough of Barking and Dagenham falls partially within this 6.2 km zone of influence surrounding the SAC. As there is no way to prevent new residents utilising the SAC for recreational purposes within this zone of influence there is a need to undertake measures to mitigate these likely significant effects to ensure no effect on the integrity of the SAC.
- 5.7 The Barking and Dagenham Local Plan proposed residential development within the 6.2 km zone of influence for the Epping Forest SAC is restricted to the north west corner of the borough and includes the following developments in Table 4 below.

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

Site ID	Site Name	Proposed No. Dwellings	No. Dwellings with Current Planning Permission
BB	Tesco Car Park	1,800	1,800
AU	Abbey Retail Park	597	597
DJ	Clockhouse avenue	250	0
CD	London Road, Barking Town Centre	196	196
DO	Town Quay Wharf	160	0
AM	Crown House	396	396
EA	Barking Station including Trocoll House	198	198
DG	Bamford Road	98	0
HA	Wickes (Hertford Road)	734	0
HN	Ripple Road and Methodist Church	250	0
XC	Harts Lane Estate	1,422	0
YM	Phoenix House, 12-14 Wakering Road, Barking	188	0
HL	Small Housing Site Allocation	75	0
HO	Small Housing Site Allocation	29	0
Total		5,659	3,187

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

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

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

- 5.9 The total housing proposed within developments fully situated in the 6.2 km zone of influence is 5,659. A total of 3,187 of these houses currently already have planning permission, which leaves 2,472 without a current planning permission. There are also two sites situated partially within the 6.2 km zone of influence. The total number of dwellings associated with the sites located partially within 6.2km is 1,050 dwellings. Site allocation AK (Vicarage Field) for 900 dwellings has already been granted planning permission. Site allocation WD (a Small Housing Allocation) for 150 dwellings, is not yet permitted however, only a small portion of the site (0.0058 ha) is located within the Epping Forest 6.2km Zol.

³⁰ Footprint Ecology, 2018. Epping Forest Visitor Survey 2017. Footprint Ecology, Dorset.

- 5.10 A strategic approach to mitigating the effect of recreation of Epping Forest is currently being devised. However, interim advice from Natural England was published in March 2019 to all Local Authorities within 6.2 km radius of the SAC³¹. This advice note sets out the measures with which the Local Authorities must comply in regard to mitigation for Epping Forest until such time as the full Mitigation Strategy is completed. With regard to large sites e.g. those with 100 dwellings or more within the zone of influence, the preferred method of mitigating the effects of recreational pressure is to provide Suitable Alternative natural Greenspace (SANG) - *“well designed open space/green infrastructure within the development. These sites will have to be of a certain size and quality to actively encourage visits away from the SAC.”*
- 5.11 Herts Lane Estate is a development site of approximately 32 ha. At this size it is recommended that opportunities for SANG delivery on site are explored to mitigate the ‘in combination’ effects on the SAC. In urban areas of London housing density can vary considerably from 35 units per ha up to 260 units per ha depending on the number of habitable rooms. However, with a site of 32 ha and a total of 1,500 dwellings based on the above densities, and assuming that some high-rise buildings may be involved, an average of 47 dwellings per ha is likely. This means that the site may be able to support a small SANG of approximately 5 ha.
- 5.12 If this is not possible within the development, there are a number of alternatives that can be explored by the applicant, such as improving and upgrading current green spaces within the vicinity of the development to provide a SANG style experience. One example of this is Barking Park, which is situated within the north east section of Barking that overlaps with the 6.2 km recreational catchment around Epping Forest SAC and lies much closer to Herts Lane Estate than does the SAC. Others are Abbey Green and improving the naturalisation of the banks of the River Roding. It is recommended that the developer seeks guidance from London Borough of Barking and Dagenham (LBBD) to provide enhancements to such features, particularly where owned by LBBD. These improvements would need to focus on more ‘natural’ recreation rather than formal pitches and play areas. For example, there are potentially areas within Barking Park that can be turned from short mown grass into a more ‘natural’ landscape. Alternatively, the developer should provide contributions to enable Strategic Access Management and Monitoring (SAMM) of the SAC with the funding secured by the developer or Local Authority prior to the occupation of the dwellings.
- 5.13 It is noted that Tesco Car Park site, is also a large site (to provide 1,800 net new dwellings), but this is a permitted site and as such does not require consideration within this HRA since in granting planning consent the development has already been deemed acceptable regarding European sites.
- 5.14 According to the Natural England advice SAMM contributions are not required for sites with fewer than 100 dwellings over 3 km from the boundary of the SAC. As the London Borough of Barking and Dagenham is over 3 km from the boundary of the SAC sites put forward with less than 100 dwellings will not be required to provide contributions. Developments that have already been granted consent cannot be retrospectively required to make a financial contribution to the SAC mitigation strategy. That still leaves five allocated sites of more than 100 dwellings which have not yet been entirely consented, other than Herts Lane Estate. These are Clockhouse avenue (DJ) for 250 new dwellings, Town Quay Wharf (DO) for 160 new dwellings, Wickes (Hertford Road) (HA) for 734 new dwellings, Ripple Road and Methodist Church (HN) for 250 new dwellings, and Phoenix House, 12-14 Wakering Road, Barking (YM) for 188 new dwellings. These developments are unlikely to be sufficiently large to provide SANG and would therefore need to make financial contributions to the emerging Epping Forest SAC SAMM strategy to comply with Natural England’s advice.
- 5.15 Site allocation WD is partially located within the 6.2km ZoI and provides 150 new dwellings, but due to the small portion of the site actually within the ZoI (0.0058 ha) the area would not contain any housing.
- 5.16 It should be noted that contributions will also be required for residential care homes (excluding nursing homes), gypsy and traveller sites and student accommodation if they are within the zone of influence.
- 5.17 Currently there is no mention in the Local Plan of mitigation required for the developments within the 6.2 km core recreational catchment area of the SAC and therefore, it is recommended that a paragraph stating compliance with the Interim Mitigation Advice from Natural England (March 2019) and when released the

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

Full Mitigation Strategy, is inserted into the supporting text of Policy SPDG1 or DMNE3. It is recommended that the paragraph includes for example:

- ***“An area of approximately 135 ha in the north west corner Barking lies between 3 and 6.2 km from the boundary of Epping Forest SAC. A recreational pressure zone of influence of 6.2 km around the SAC has been confirmed by visitor studies since 2017 (the most recent in 2019). Within this zone developers will be required to mitigate the impacts of recreational pressure upon the SAC in compliance with Natural England’s Interim Mitigation Advice (March 2019) and any subsequent Full Mitigation Strategy released. The interim advice requires developments of 100 dwellings or greater within this zone (3 km to 6.2 km) to provide mitigation in the form of Suitable Alternative Natural Greenspace (SANG) within the footprint of the development site. If this is not possible due to space constraints, contributions will be required for Strategic Access Management and Monitoring (SAMM) of the SAC. It is jointly the responsibility of the developer and the Local Authority to devise an appropriate mitigation package of mitigation measures on a site by site basis to ensure no adverse impact on the integrity of Epping Forest SAC. Any development which would cause an adverse impact upon the integrity of Epping Forest SAC will not be supported”***

5.18 In addition to this it is recommend that the existing wording of Policy DMNE3 is amended as follows:

- 5.19 1: Development should not lead to **adverse effects on the integrity of Epping Forest Special Area of Conservation**, or loss or degradation of Sites of Importance for Nature Conservation (SINCs), including local nature reserves **and Epping Forest's Special Area of Conservation (SAC)**. All existing SINC boundaries are defined on the Policies Map.

6. Conclusions and Recommendations

- 6.1 This assessment undertook both a Test of Likely Significant Effects and Appropriate Assessment of the policies and any allocations within the London Borough of Barking and Dagenham Local Plan (Regulation 19)
- 6.2 The international designated sites, considered within the Appropriate Assessment for impact pathways that could not be screened out at the screening stage were:
- Epping Forest SAC
- 6.3 The impact pathway considered was recreational pressure.
- 6.4 There are several policies within the Barking and Dagenham Local Plan that allude to the provision of a minimum of 40,000 houses within the borough between 2019 and 2037. In addition, there is a policy supporting the development of specialist residential dwellings e.g. care facilities and student accommodation, a policy to support visitor accommodation and within the supporting text support for up to 24 new gypsy and traveller pitches. All of this accommodation will increase the recreational pressure upon international sites which are vulnerable to this impact pathway, where the accommodation is built in its catchment area.
- 6.5 The London Borough of Barking and Dagenham is partially within the core recreational catchment area for the Epping Forest SAC. An area of approximately 166 ha within the north west of Barking lies within the 6.2 km core catchment area. This catchment was devised by a visitor study undertaken by Footprint Ecology in 2017 and relates to the radius of where 75% of visitors to the SAC reside. It has been determined by Natural England that new developments within this core catchment area are likely to cause an effect upon the SAC either alone or in combination and therefore are required to mitigate the effect of this visitor pressure upon the SAC. A Mitigation Strategy is currently being developed to ensure that no development affects the integrity of the SAC, however, until this is complete Interim Mitigation Advice which was set out by Natural England in conjunction with the London Boroughs and the Greater London Authority in March 2019 must be followed. This advice sets out that any development where 100 or more dwellings are being built between 3 km and 6.2 km from the SAC boundary must provide a suite of mitigation measures for recreational pressure upon the SAC. The preferred method of this mitigation is to provide Suitable Alternative Natural Greenspace (SANG) within the development, however, if this is not possible the developer and Local Authority are advised to agree on developer contributions to the suite of management and monitoring measures which are to be undertaken within the SAC through Strategic Access Management and Monitoring (SAMM). There is currently another visitor survey being undertaken at Epping Forest to assess any changes of the core recreational catchment, however until this is published the 6.2 km catchment area must be used to assess the need for mitigation.
- 6.6 **Table 4** and **Table 5** in **Chapter 5** show the number of proposed dwellings within the 6.2 km core recreational catchment area which amounts to 5,659 dwellings fully within the zone of influence and additional 1,050 located in developments situated partially within the zone of influence. Of these, 2,472 (all over 100 dwellings per development) are yet to gain planning permission. Therefore, this is the number of dwellings likely to require mitigation within the Barking and Dagenham Local Plan. Those with planning permission granted after September 2020 are likely to already have secured mitigation to be approved through planning process.
- 6.7 Currently there is no mention of mitigation required for the developments within the 6.2 km core recreational catchment area of the SAC and therefore, it is recommended that a paragraph stating compliance with the Interim Mitigation Advice from Natural England (March 2019) and when released the Full Mitigation Strategy, is inserted into the supporting text of Policy SPDG1 or DMNE3. It is recommended that the paragraph includes for example:
- ***“An area of approximately 135 ha in the north west corner Barking lies between 3 and 6.2 km from the boundary of Epping Forest SAC. A recreational pressure zone of influence of 6.2 km around the SAC has been confirmed by visitor studies since 2017 (the most recent in 2019). Within this zone developers will be required to mitigate the impacts of recreational pressure upon the SAC in compliance with Natural England’s Interim Mitigation Advice (March 2019) and any subsequent Full Mitigation Strategy released. The interim advice***

requires developments of 100 dwellings or greater within this zone (3 km to 6.2 km) to provide mitigation in the form of Suitable Alternative Natural Greenspace (SANG) within the footprint of the development site. If this is not possible due to space constraints, contributions will be required for Strategic Access Management and Monitoring (SAMM) of the SAC. It is jointly the responsibility of the developer and the Local Authority to devise an appropriate mitigation package of mitigation measures on a site by site basis to ensure no adverse impact on the integrity of Epping Forest SAC. Any development which would cause an adverse impact upon the integrity of Epping Forest SAC will not be supported"

- 6.8 In addition to this it is recommend that the existing wording of Policy DMNE3 is amended as follows:
- 6.9 1: Development should not lead to **adverse effects on the integrity of Epping Forest Special Area of Conservation**, or loss or degradation of Sites of Importance for Nature Conservation (SINCs), including local nature reserves **and Epping Forest's Special Area of Conservation (SAC)**. All existing SINC boundaries are defined on the Policies Map.
- 6.10 Provided the above recommendation is included within the Barking and Dagenham Local Plan it can be concluded that the Plan document will not result in an adverse effect on the integrity of any international sites either alone or in combination.

Appendix A International Site Background Information and Locations

Epping Forest SAC

Introduction

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

Conservation Objectives³²

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

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

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

Qualifying Features³³

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

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

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

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

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

- Stag beetle *Lucanus cervus*

Environmental Vulnerabilities³⁴

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

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

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

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

Lee Valley SPA/Ramsar

Introduction

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

Conservation Objectives³⁵

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

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

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

Qualifying Features³⁶³⁷

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

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

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

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

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

The Ramsar qualifies for the following criteria:

Criterion 2

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

Criterion 6

Qualifying species populations (as identified at designation):

Species with peak counts in spring/autumn:

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

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

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

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

Species with peak counts in winter:

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

Environmental Vulnerabilities³⁸

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

Thames Estuary and Marshes SPA/Ramsar

Introduction

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

Conservation Objectives³⁹

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

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

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

Qualifying Features⁴⁰⁴¹

With regards to the SPA:

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

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

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

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

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

Over winter:

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

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

On passage:

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

Over winter:

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

Assemblage qualification: A wetland of international importance

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

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

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

The Ramsar qualifies for the following criteria:

Criterion 2

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

Criterion 5

Assemblages of international importance:

Species with peak counts in winter:

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

Criterion 6

Species/populations occurring at levels of international importance

Qualifying species/populations (as identified at designation:

Species with peak counts in spring/autumn:

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

Species with peak counts in winter:

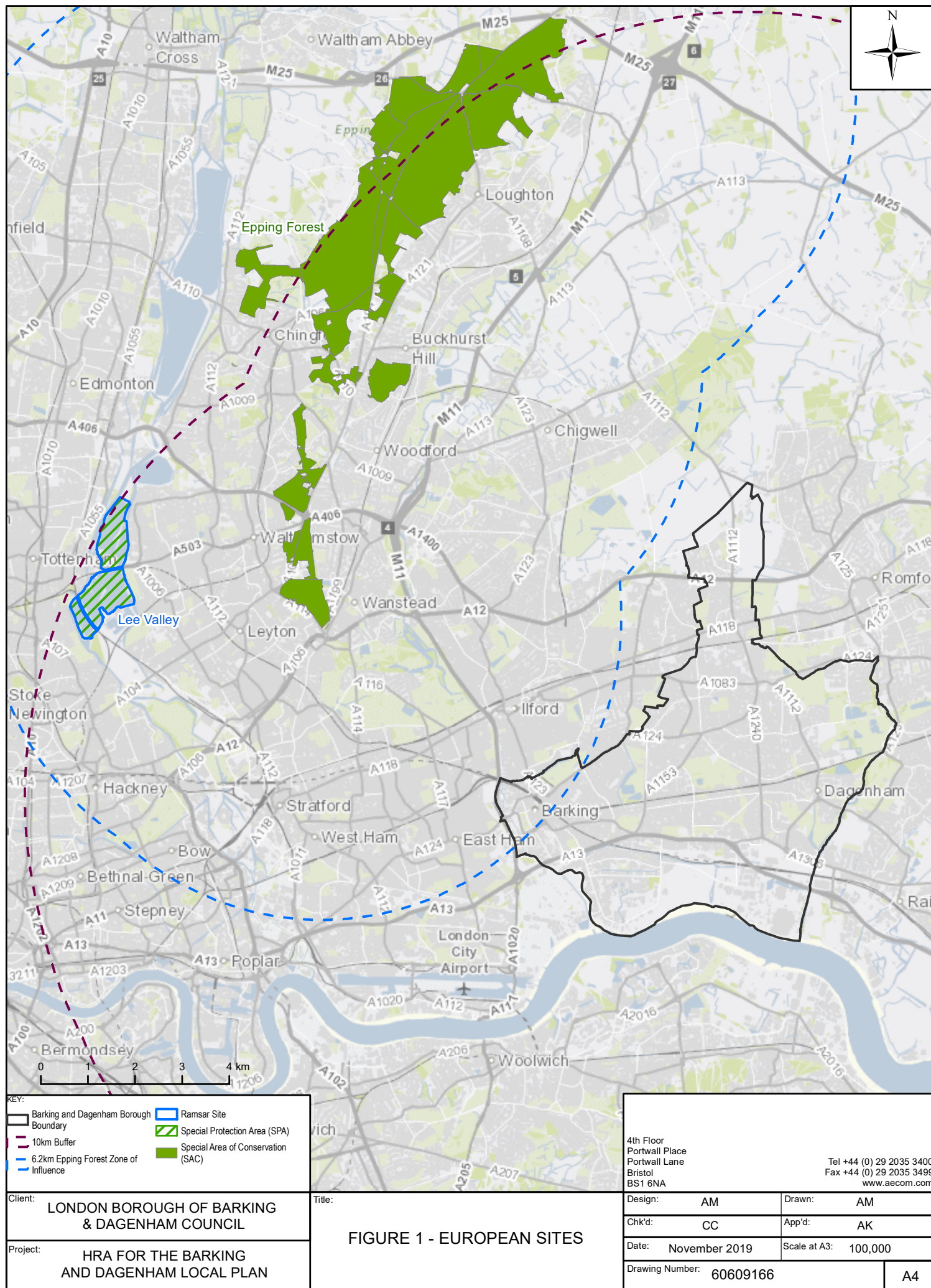
- Grey plover, *Pluvialis squatarola*. 1643 individuals, representing an average of 3.1% of the GB population (5 year peak mean 1998/99 – 2002/03)
- Red knot, *Calidris canutus islandica*. 7279 individuals, representing an average of 1.6% of the GB population (5 year peak mean 1998/99 – 2002/03)
- Dunlin,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

Environmental Vulnerabilities⁴²

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

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

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



Appendix B Policy Screening: Likely Significant Effects

Policy	Description	Likely Significant Effects
Policy SPDG1 – Delivering Growth in Barking and Dagenham	<ol style="list-style-type: none"> The Council will take a positive approach to development and will work with the local community, landowners, developers and other key stakeholders to proactively deliver the borough's development vision and objectives. <p>Intelligent use of our industrial land</p> <ol style="list-style-type: none"> The Council will support the development of 50,000 new homes and 20,000 new jobs across the borough. This will be largely achieved through intensification and redistribution of borough's industrial floorspace and complementary commercial uses, particularly focusing on the existing sites south of the A13 including Castle Green and Box Lane, River Road and Creekmouth and Dagenham Dock; Chadwell Heath Industrial Estate; and Dagenham East. <p>Transformation Areas</p> <ol style="list-style-type: none"> Extensive and larger scale development will be focused primarily in Transformation Areas. These are: <ol style="list-style-type: none"> Barking town centre and surrounds Barking Riverside Thames Road and River Road Castle Green Chadwell Heath Dagenham Dock Dagenham East These Transformation Areas offer the potential for higher density and taller development, particularly near the existing or planned transport hubs. Existing residential neighbourhoods, including Becontree Estate and Dagenham Village, will be the focus of smaller-scale developments and improvements to connectivity, local environmental and design quality, as well as new services and opportunities. <p>Town centres</p> <ol style="list-style-type: none"> Barking's major town centre and district centres of Chadwell Heath, Dagenham Heathway and Green Lane, together with proposed new District Centres at Barking Riverside and Merriellands Crescent, will remain as our focus for retail development and also for complementary 	<p>Likely Significant Effects</p> <p>This policy regards delivering growth within the Borough of Barking and Dagenham. This policy supports the development of 50,000 new homes and 20,000 new jobs across the borough. The delivery of this development is set out in Chapter 3 of the Local Plan.</p> <p>New development may cause an increase in some impact pathways which can cause a likely significant effect upon international sites in combination including:</p> <ul style="list-style-type: none"> Recreational pressure Air pollution Water resources Water quality

Policy	Description	Likely Significant Effects
	<p>commercial, cultural and community uses. At a neighbourhood level, existing neighbourhood centres will also continue to have an important role in providing for convenience shopping.</p> <p>Key transport improvements</p> <p>6. Delivery of key transport improvements, which support strategic links into London, regionally and internationally will be promoted through providing greater access to the rail network, new and enhanced local public transport and walking and cycling connections, which address the north-south severance across the borough and the barrier created by the A13 road. We will support schemes that prioritise pedestrians over cars, improve the cycling environment and increase access to stations. These will be prioritised as follows:</p> <ul style="list-style-type: none"> a) Barking town centre and surrounds b) Barking Riverside c) Thames Road and River Road d) Castle Green e) Chadwell Heath f) Dagenham Dock g) Dagenham East <p>7. We will plan and seek future funding to deliver more liveable and low-emission neighbourhoods, which promote good streetscape, healthy streets, and road safety. This will provide benefits in terms of air quality and health, and with new infrastructure, it will encourage cycling and walking and reduce reliance on car use.</p> <p>Social and sustainable infrastructure</p> <p>8. We will seek the delivery of other social and sustainable infrastructure, identified in the Council's most up-to-date Infrastructure Delivery Plan, which will be prioritised as follows:</p> <ul style="list-style-type: none"> a) expanded education provision b) primary health care facilities c) parks and open spaces d) new or improved community and cultural facilities e) energy infrastructure including District Heat networks f) improved digital infrastructure 	
<p>STRATEGIC POLICY SPP2: Thames and the Riverside</p>	<p>Development potential</p> <p>1. In this area there is indicative capacity for 13,000 new homes in the plan period. The key site allocations are illustrated in Figure 8 below</p> <p>Barking Riverside Transformation Area</p> <p>2. The Council will support the comprehensive residential-led redevelopment of Barking Riverside, the largest development in East London, by working collaboratively with the</p>	<p>Likely Significant Effects.</p> <p>This policy provides for the broad location (Thames and the Riverside) of 13,000 new homes during the plan period. A portion of this strategic area is located within 6.2km of Epping Forest SAC.</p>

Policy	Description	Likely Significant Effects
	<p>strategic developer, Barking Riverside Limited, and stakeholders. This will optimise the development potential of the site in line with existing and planned transport, including the Barking Riverside Overground Station and the expanded Thames Clipper Service. The Council will support development that contributes to:</p> <ul style="list-style-type: none"> a) strengthening the relationship with the adjacent Transformation Areas. Robust consideration of the long-term relationship with Creekmouth site, and potential for a more integrated development approach, including this location, particularly for infrastructure provision such as school provision. b) intensifying residential development and commercial and leisure development in the new District Centre, adopting more innovative delivery models c) on-site social infrastructure projects that create capacity for additional new homes and accelerate delivery, enabling new primary school provision in addition to projects already planned for the area d) sustainable places that create new local identity and distinctive character within the area, each defined by location, density, form and materiality, providing a sensitive design response to the riverside and focus on higher density development and taller building forms within the new district centre. a central boulevard to create a central spine through the area with a dedicated bus-only route e) high-quality new open space across the entire site, divided between the natural landscape and public parks f) East-west green links connecting existing green infrastructure assets and link Barking Riverside to River Road and removing physical and perceptual barriers between Barking Riverside and Thames View Estate and prioritising access to the Riverside by opening up 2km of riverfront to walkways and cycle ways g) a new cycle link CFR10 linking Barking Riverside to Ilford and also prioritising the needs of bus passengers h) high-quality design that reflects the 10 'Healthy New Town Principles' in development and dissemination of learning to inform other developments within LBBD <p>Castle Green Transformation Area</p> <p>3. The Council will support development that creates a new, thriving community and employment hub that assists the socio-economic development of LBBD. The Council will support development that contributes to the delivery of:</p> <ul style="list-style-type: none"> a) high-quality and cohesive residential, employment and industrial zones including: 	<p>New development may cause an increase in some impact pathways which can cause a likely significant effect upon international sites in combination including:</p> <ul style="list-style-type: none"> • Recreational pressure • Air pollution • Water resources • Water quality

Policy	Description	Likely Significant Effects
	<ul style="list-style-type: none"> • new residential development and a new neighbourhood around the new railway station at Castle Green • A primary school linked to a secondary school with shared sites, subject to feasibility • Units suitable for heavier industries and new commercial hubs containing a hybrid of employment uses that provide high-quality workspaces, suitable for a range of occupier sizes <p>More efficient and intensified use of the freight sites in Box Lane</p> <p>b) a fundable and affordable solution for the A13 improvements:</p> <ul style="list-style-type: none"> • exploring a new tunnel or sustainable treatment of the A13 by burying or innovatively covering the road to reduce air pollution and releasing development land; • enabling new transport and cycle links to improve existing vehicular and pedestrian routes and connections through the site and reducing severance by connections across the A13 <p>c) digital infrastructure enhancements, including telecommunications and internet such as superfast broadband</p> <p>d) improvements to the Green infrastructure network, in particular:</p> <ol style="list-style-type: none"> I. Longbridge Road and the junction of Longbridge Road with the A124 Roding Valley and Abbey Road II. links between Mayesbrook Park, Barking Park and Goodmayes III. works to de-culvert the Gores Brook in Parsloes Park IV. Choats Road north and the interface with Pylon Park. <p>4. A Masterplan Supplementary Planning Document will provide further details and policy guidance on this Transformation Area to support design and expedite delivery.</p> <p>Thames Road and River Road Transformation Area</p> <p>5. The Council will support delivery of the station to unlock the creation of a thriving mixed-use neighbourhood characterised by a rich mix of industrial and commercial space alongside new homes, community uses and open space. The Council will support development that contributes positively to the delivery of:</p> <p>a) a mixed-use neighbourhood accommodating housing, industrial and commercial space, focusing on industrial uses to the west of the area, adjacent to the River Roding – potentially through stacking of uses, supported by sufficient yard space and delivery access</p>	

Policy	Description	Likely Significant Effects
	<p>b) new residential development, especially to the east of the area, linking the residential areas to the north and south of Thames Road, and creating greater separation of these area from heavy industrial uses</p> <p>c) new community uses and smaller scale retail provision to support new residential communities</p> <p>d) expanded education provision</p> <p>e) connections with district heat network at Barking Riverside</p> <p>f) a clear network of streets that prioritise pedestrian and cycle movements to encourage active travel and improving pedestrian and cycle routes to the new station at Castle Green and to Barking Riverside</p> <p>g) flood defences investment focusing on improved river frontage along the River Roding, realignment and landscaping along the River Thames</p> <p>Improved pedestrian and connectivity within and between the Transformation Areas through:</p> <ul style="list-style-type: none"> ▪ establishing north-south green links connecting Thames Road with the Ripple Greenway, Thames View and Barking Riverside Phase 1 development ▪ creation of a riverside walk along River Roding, with pedestrian crossing at Mayesbrook and A13 underpass enhancements ▪ enhancements to pedestrian and cycle links between Thames Road, River Road and Barking Riverside to River Roding and Barking centre ▪ a new green link along the Roding via Newham into Redbridge and to Wanstead flats. 	
STRATEGIC POLICY SPP3: Dagenham Dock, Beam Park and Stamping Plant	<p>Development potential</p> <p>1. In this area there is indicative capacity for 6,300 new homes in the plan period. The key site allocations are illustrated in Figure 10 below.</p> <p>Dagenham Dock Transformation Area</p> <p>2. Dagenham Dock is already one of London's key industrial and commercial areas, home to the Ford Motor Company, and many other leading food, logistics industry and energy sector businesses. It is the new location for London's three main wholesale food markets and will be the focus of innovative forms of industrial design, including stacked industrial buildings. The Council are working with partners, including the Thames Estuary Commission, Department of Education, as well as existing main landowners including SEGRO, Network Rail, Peabody and the Ford Motor Company Development to regenerate the area and unlock regeneration in the wider Thames Estuary. The Council will support development that contributes positively to the delivery of:</p>	<p>Likely Significant Effects.</p> <p>This policy provides for the broad location (Dagenham Dock, Beam Park and Stamping Plant) of 6,300 new homes during the plan period.</p> <p>New development may cause an increase in some impact pathways which can cause a likely significant effect upon international sites in combination including:</p> <ul style="list-style-type: none"> • Recreational pressure • Air pollution • Water resources • Water quality

Policy	Description	Likely Significant Effects
	<p>a) comprehensive redevelopment of this area as London's premier Sustainable Industrial Business Park – incorporating a sustainable and green industries hub and building on its location's logistics, food and energy operations, capitalising on the extensive road, rail and river infrastructure connections, which provide national and international connections</p> <p>b) the successful relocation and consolidation of London's three wholesale city markets – Billingsgate, Smithfield and New Spitalfields, enabling development that will support its operation within the borough.</p> <p>c) expansion and intensification of employment floorspace across and complementary commercial uses across the area</p> <p>d) supporting and developing opportunities to use waste as energy, and to consolidate current waste operations to minimise any detrimental impacts to the wider area</p> <p>e) supporting the development of existing rail, maritime and river transport infrastructure to be utilised within the wider area and the Thames Estuary as a whole</p> <p>f) a new secondary school to the north of the area</p> <p>g) strengthening links to Dagenham Dock Station with a clear hierarchy of movement routes through the site up to New Road. There will be a strong focus on improved visual connections, including cycling and walking paths and green infrastructure</p> <p>h) creating an active frontage to northern boundary of site.</p> <p>3. The Council will support development that celebrates the unique industrial heritage value of the site through design and architectural features, as well as introducing new cultural facilities such as museums and art galleries.</p> <p>4. The scale and massing of development in this area should contribute to the creation of a new coherent townscape and, taking as its starting point, the appearance and materiality of existing spaces and built form to create a organised, unified character.</p> <p>5. The areas along the A1306 and the railway line, which are primarily higher density plots and frame vistas from this transport infrastructure into the site and areas in this location are particularly appropriate to building significantly taller than prevailing heights, subject to design quality. Development sites close to and adjacent the River Thames could also accommodate taller buildings; however, a variety of heights should be along the river to avoid the homogeneous canyoning effect.</p> <p>Beam Park Transformation Area</p> <p>6. The Council will continue to support the comprehensive redevelopment of Beam Park by working collaboratively with the Greater London Authority, London Borough of Havering and other stakeholders to support development that contributes to the delivery of a</p>	

Policy	Description	Likely Significant Effects
	<p>thriving, mixed-use residential neighbourhood supported by health, education and other community infrastructure. The Council will support development that contributes to the delivery of:</p> <ol style="list-style-type: none"> new affordable family homes with low rise housing terraces two new primary schools, a new medical centre a station square to provide a new retail and commercial focus to the area, integrated with the planned new transport interchange – Beam Park Station new park and community meeting spaces in an open space and parkland setting to form a natural meeting place for the neighbourhood new hierarchy of routes for safe connections within and between neighbourhoods; a street pattern provides wide shared footpaths and cycle routes a landscape identity that creates clear wayfinding links to and from the park; visible verdant environments that can double for amenity and ecological value a green corridor providing a pedestrian connection to the station and enhancements to the pedestrian and cycle network and experience across the area. 	
<p>STRATEGIC POLICY SPP4: Chadwell Heath and Mark's Gate</p>	<p>Development potential</p> <ol style="list-style-type: none"> In this area there is indicative capacity for 3,800 new homes in the plan period. The key site allocations are illustrated in Figure 12 below. <p>Chadwell Heath Transformation Area</p> <ol style="list-style-type: none"> A new liveable mixed-use neighbourhood is planned – optimising the development potential arising from Crossrail – to deliver new homes and jobs that are ‘stitched’ together with existing neighbourhoods. The Council will support development that contributes to the delivery of: <ol style="list-style-type: none"> intensification and modernisation of industrial uses and integration of these new uses as part of a mixed-use neighbourhood, including through innovative new typologies that enable co-location of industrial and residential uses new homes supported by expanded social infrastructure, such as health facilities, schools, community and faith spaces, and cultural facilities development that is seamlessly woven into the surrounding context with an appropriate massing strategy that responds to the existing context and urban grain focusing <ol style="list-style-type: none"> larger-scale development, including buildings significantly taller than prevailing heights in the heart of the area centred on Chadwell Heath 	<p>Likely Significant Effects.</p> <p>This policy provides for the broad location (Chadwell Heath and Mark's Gate) of 3,800 new homes during the plan period.</p> <p>New development may cause an increase in some impact pathways which can cause a likely significant effect upon international sites in combination including:</p> <ul style="list-style-type: none"> Recreational pressure Water resources Water quality

Policy	Description	Likely Significant Effects
	<p>Crossrail Station and Chadwell areas along the Freshwater Road and Selinas Lane</p> <p>II. smaller, lower-scale buildings on the perimeter to respond to the existing terraced housing</p> <p>a) a 'sense of place' and local identity through the creation of distinctive character areas across the neighbourhood within the Transformation Area, each defined by location, density, form and materiality</p> <p>b) improvements to Freshwater Road and Selinas Lane for vehicular access and public transport</p> <p>c) improvements to the pedestrian environment and connections throughout the area, including markers for intuitive wayfinding</p> <p>d) improvements to the green infrastructure network, including a green spine, through the area connected to a variety of public realm spaces including parks and squares which are pedestrian and cycle friendly and integrated with existing street and movement patterns</p> <p>e) enhancement and refurbishment of buildings with local heritage value.</p> <p>3. A Masterplan Supplementary Planning Document is being prepared for Chadwell Heath Transformation Area to provide further policy guidance to support design and expedite delivery.</p> <p>Other locations</p> <p>4. The Council will work in partnership with the London Borough of Redbridge, and in consultation with existing residential communities, to achieve more efficient use of land adjacent to Padnall Lake and redevelopment at Mark's Gate.</p> <p>5. Padnall Lake site will be a significant focus on placemaking activity to create a more liveable residential area that development in this location must contribute to:</p> <p>a) enabling delivery of more homes set in an improved public realm</p> <p>b) reconfigured and better located open space that improves quality, access and function</p> <p>c) provide small-scale community use</p> <p>d) enhancing areas for wildlife and biodiversity around Padnall Lake as part of any future development masterplans.</p> <p>6. Mark's Gate site will be a focus of estate renewal through proactive consultation and engagement with existing community in terms of design principles and community infrastructure, particularly where appropriate, sharing of community infrastructure such as schools and library facilities. Further area specific guidance will be set out in a planning brief or a masterplan.</p>	

Policy	Description	Likely Significant Effects
STRATEGIC POLICY SPP5: Dagenham East and Dagenham Village	<p>Development potential</p> <ol style="list-style-type: none"> 1. In this area there is indicative capacity for 1,200 new homes in the plan period. The key site allocations are illustrated in Figure 12 below. <p>Dagenham East Transformation Area</p> <ol style="list-style-type: none"> 2. A new media, science and technology cluster is planned alongside the expanded development of new homes that are well integrated with existing residential neighbourhoods. The Council will support development that contributes to the delivery of: <ol style="list-style-type: none"> a) London's newest and largest film studios on the former May and Baker site b) enhancements to the Dagenham Heathway District Centre in Dagenham Village to create a mixed-use development and create a heart of the residential community c) special education needs school provision d) improvements to the environmental quality and public realm in the district centre e) improvements to the Green infrastructure network including: <ol style="list-style-type: none"> I. new Green Infrastructure grid route – Wood Lane and Rainham Road North II. Reed Road, Rainham Road and Foxlands Crescent III. linkages to Thames Chase Community Forest IV. new Green Infrastructure grid route – Wood Lane and Rainham Road North V. Reed Road, Rainham Road and Foxlands Crescent VI. linkages to Thames Chase Community Forest <p>Dagenham Village</p> <ol style="list-style-type: none"> 3. Dagenham Village is the historic heart of the borough, and the design will need to respond to this unique and sensitive development context. Development proposals must comply with the local plan policies and the Dagenham Village Conservation Area Character Appraisal (or its updated equivalent) to preserve and where possible enhance the borough's historic environment. <p>Supporting infrastructure</p> <ol style="list-style-type: none"> 4. The Council will support and enable the delivery of infrastructure to support communities in Dagenham East and Village to ensure development is sustainable. Key infrastructure interventions and projects planned include: <ol style="list-style-type: none"> a) flood defences including measures to reduce flood risk at Dagenham East Station and numerous defence structures along the Wantz Stream b) transport and connectivity improvements, including the new C2C station at Dagenham East and Dagenham East Station Accessibility Scheme c) digital infrastructure enhancements including telecommunications and fast broadband d) healthcare facilities (e.g. new primary care hub) e) early years facilities f) parks and open spaces g) community centres and faith spaces 	<p>Likely Significant Effects.</p> <p>This policy provides for the broad location (Dagenham East and Dagenham Village) of 1,200 new homes during the plan period.</p> <p>New development may cause an increase in some impact pathways which can cause a likely significant effect upon international sites in combination including:</p> <ul style="list-style-type: none"> • Recreational pressure • Water resources • Water quality

Policy	Description	Likely Significant Effects
	h) children's play and youth facilities	
STRATEGIC POLICY SPP6: Becontree	<p>Development potential</p> <ol style="list-style-type: none"> 1. In this area there is indicative capacity for 1,300 new homes in the plan period. The key site allocations are illustrated in Figure 16 below. 2. Development of new homes that integrate with the existing character of the area and enable preservation and restoration of the historic fabric of the estate. The Council will support development that contributes to the delivery of: <ol style="list-style-type: none"> a) inclusion of the urban 'set pieces' and street types that are unique to the area b) Improvements to the public realm, including greening and tree planting, renewing or improving surface treatments, street furniture, signage and lighting c) improvements to Parsloes Park, including the expansion of sports facilities. d) rationalised car-parking and improved cycle links to Crossrail Station at Chadwell Heath e) retention of small shops and services where they meet community needs f) improvements to shopfronts and reintroducing awnings g) improvement to the Green infrastructure network, including the east-west green grid route (Porters Avenue and Parsloes Avenue). 3. The Council will support and enable delivery of infrastructure to ensure development is sustainable including: <ol style="list-style-type: none"> a) transport and connectivity improvements, including Becontree Station access improvements b) creation of liveable or low-traffic neighbourhoods set out in the Mayor's Transport Strategy, with measures to improve safety, health and air quality including measures to reduce speeding and rat-running c) digital Infrastructure improvements e.g. fast broadband d) early years facilities, primary and secondary school places e) special education needs school provision f) parks and open spaces g) indoor and outdoor sports facilities h) community centres and faith spaces i) children's play and youth facilities. 	<p>Likely Significant Effects.</p> <p>This policy provides for the broad location (Becontree) of 1,300 new homes during the plan period.</p> <p>New development may cause an increase in some impact pathways which can cause a likely significant effect upon international sites in combination including:</p> <ul style="list-style-type: none"> • Recreational pressure • Water resources • Water quality
STRATEGIC POLICY SPP7: Becontree Heath and Rush Green	<p>Development potential</p> <ol style="list-style-type: none"> 1. In this area there is indicative capacity for development of 570 new homes. The key site allocations are illustrated in Figure 17 below. 2. The Council will support environmental and connectivity improvements across the area and build on the successful integration of Coventry University's new campus by expanding education and other social infrastructure. The Council will also support development that contributes to: 	<p>Likely Significant Effects.</p> <p>This policy provides for the broad location (Becontree Heath and Rush Green) of 570 new homes during the plan period.</p>

Policy	Description	Likely Significant Effects
	<p>a) smaller-scale development of new homes that are well-integrated with the existing area</p> <p>b) improvements to pedestrian routes through the area including strengthening east-west walking and cycle links</p> <p>c) a continuous walking or cycling route, running through the green belt edge and waterways that follow the eastern edge of through to Hainaut Country Park</p> <p>d) restoration and improvements that preserve or reinstate original features in existing 1930's suburban homes that are characteristic of the northern part of Rush Green</p> <p>e) active ground floors in development that comes forward on Dagenham Road public realm improvements throughout the area, in particular Rainham Road High and the area of Dagenham Civic Centre and other key points of interest in this area</p> <p>f) improvements to the Green infrastructure network, including a new Green Infrastructure grid route at Wood Lane and Rainham Road North and improved linkages to Thames Chase Community Forest.</p> <p>Supporting infrastructure Infrastructure that is required to support sustainable development, identified in the Infrastructure Delivery Plan will be supported, including:</p> <p>a) transport and connectivity improvements, for example, Wood Lane roundabout</p> <p>b) improvements to bus services and connections to ensure good public transport access</p> <p>c) digital infrastructure improvements</p> <p>d) fire and rescue service</p> <p>e) early years facilities, primary and secondary schools</p> <p>f) parks and open space</p> <p>g) community centres and faith spaces</p> <p>h) children's play and youth facilities.</p>	<p>New development may cause an increase in some impact pathways which can cause a likely significant effect upon international sites in combination including:</p> <ul style="list-style-type: none"> • Recreational pressure • Water resources • Water quality
<p>STRATEGIC POLICY SP 2:</p> <p>Delivering a well-designed, high-quality and resilient built environment</p>	<p>1. The Council will promote high-quality design, providing a safe, convenient, accessible and inclusive built environment and interesting public spaces and social infrastructure for all through:</p> <p>a) recognising and celebrating local character and the borough's heritage, adopting a design-led approach to optimising density and site potential by responding positively to local distinctiveness and site context</p> <p>b) encouraging development to use local context and, where applicable, to inform detail, materials and landscape. Local character should be incorporated and interpreted with developments</p>	<p>No Likely Significant Effects</p> <p>This policy outlines the provision of well-designed, high quality and a resilient built environment. There are no linking impact pathways present and thus, no likely significant effects.</p>

Policy	Description	Likely Significant Effects
	<ul style="list-style-type: none"> c) protecting important identified views and vistas, conservation areas and historic assets within the borough as shown in the Policies Map d) championing sustainable design and construction principles; including water and waste management, resource efficiency and emission control, and by encouraging the efficient use of existing buildings and previously developed land and seek to mitigate and adapt to climate change 	
POLICY DMD 1: Securing high-quality design	<ul style="list-style-type: none"> a) The Council will support development proposals that make a positive contribution to the character of the surrounding area, have regard to the ten design characteristics, as prescribed by the National Design Guide and or its equivalent, local policies and guidance including the Council's Design Principles, Conservation Area Guidance, Construction Guidelines and Public Realm Guidelines. a) All development proposals should: where appropriate, commit to using mechanisms such as Section 106 agreements and planning conditions, to ensure that design quality is carried through into the detailed design and construction of the development; amendments to the design of major applications may be subject to a Section 106 monitoring contribution if the original architects or landscape architects are not retained for the detailed design stage b) where appropriate, demonstrate high-quality design as a result of early engagement with planners and the Barking & Dagenham Quality Review Panel (QRP) in accordance with its Terms of Reference c) enable active lifestyle by designing for walkable neighbourhoods with attractive public realm and supporting infrastructure for cycling 	<p>No Likely Significant Effects</p> <p>This policy outlines the provision for securing high quality design. There are no linking impact pathways present and thus, no likely significant effects.</p> <p>This is a positive policy as it encourages and supports sustainable transport such as walking and cycling.</p>
POLICY DMD 2: Tall buildings	<ul style="list-style-type: none"> 1. Tall buildings are defined as buildings that significantly taller than the prevailing building height or have a significant impact on the skyline. 2. The Council will prepare a localised planning framework to identify sites, form and density of locations suitable for tall buildings as proposed within the Transformation Areas in Chapter 3. 3. Tall buildings will be assessed using the design criteria set out in policy DMD1, Securing High-quality Design and against the following criteria alongside the London Plan Policy and the Historic England Advice note 4⁴³ on tall buildings. 	<p>No Likely Significant Effects</p> <p>This policy relates to tall buildings. There are no linking impact pathways present and thus, no likely significant effects.</p>

⁴³ Historic England's Tall Building note is available at: <https://historicengland.org.uk/images-books/publications/tall-buildings-advice-note>.

Policy	Description	Likely Significant Effects
	<p>a) The Council will support tall buildings where they:</p> <ul style="list-style-type: none"> I. contemplate local design guidance and, where relevant, be fully justified in respect of the Council's place policy for the area II. where applicable, are subject to independent design scrutiny by the QRP by referring to appropriate best practice design guidance 	
POLICY DMD 3: Development in town centres	<p>1. Proposals for development within town centres (as defined in Part 4 of Policy SP5 and identified on the Policies Map) should, where relevant and appropriate:</p> <ul style="list-style-type: none"> a) respect the building lines of the existing urban environment and build up to the edge of the curtilage b) co-ordinate and consolidate elements of street furniture, such as seating, bins, bollards, cycle stands and lighting, to streamline the appearance of the public realm and avoid visual clutter c) avoid the creation of inactive frontages and contribute positively to the street scene and public realm to coordinate the design of development around town centres consider street widths, crossings locations; integration of bus stands along with other public realm elements (as mentioned in b) above) and focus on reducing vehicle dominance along with promoting safe walking and cycling environment d) provide clearly defined public and private space, placing servicing away from street frontages, for example at the rear of building e) provide level access and ensure new development is fully accessible. <p>2. New or replacement shop fronts are required to be robust and well-designed. Proposals must ensure that:</p> <ul style="list-style-type: none"> a) they retain or restore traditional shop fronts and existing architectural and heritage features b) active shop fronts are maintained at all times in order to contribute positively to the building, street-scene and public realm 	<p>No Likely Significant Effects</p> <p>This policy relates to development in town centres. It does not outline any type or quantum of development. There are no linking impact pathways present and thus, no likely significant effects.</p>

Policy	Description	Likely Significant Effects
	<ul style="list-style-type: none"> c) a sensitive relationship is maintained between the shop front and the upper floors, with neighbouring shop fronts and surrounding buildings d) the use of materials is appropriate to and enhances the local character and value of existing architectural and historic features e) the use of external mounted shutters or solid roller shutters are avoided f) traditional and historic shop fronts are retained and refurbished, where reasonably practicable restoring existing architectural and heritage features g) signage location and design are sensitive (see Policy DMD 7), and not overly dominant to the shop fronts and the surrounding area h) out of hours lighting is incorporated to enhance a well-lit, safe and secure streetscape. 	
POLICY DMD 4: Heritage assets and archaeological remains	<ol style="list-style-type: none"> 1. The borough's designated and non-designated heritage assets⁴⁴, conservation areas and Archaeological Priority Area (APA) are identified on the Policies Map. 2. Other heritage assets and the wider historic environment, aside from the four conservation areas and other areas that are locally distinctive and historically important (e.g. Becontree Estate) will be identified, celebrated and promoted where relevant through the Council's heritage strategy (or its updated equivalent). <p>Designated heritage assets</p> <ol style="list-style-type: none"> 3. The Council will give great weight to the preservation or enhancement of the significance of designated heritage assets, including their settings, in accordance with Paragraph 195 and 916 of the NPPF (or its updated equivalent). 4. Applicants must undertake a Heritage Impact Assessment that sets out: <ul style="list-style-type: none"> a) a description of the significance of any affected heritage assets and their settings b) how the application accords with the latest relevant national guidance and London Plan policies c) how the application justifies any harm to the significance of designated heritage assets d) how the application positively responds to the relevant heritage themes (as set out in the Council's latest heritage strategy) in their design. <p>Non-designated heritage assets</p>	<p>No Likely Significant Effects</p> <p>This policy relates to heritage assets and archaeological remains. There are no linking impact pathways present and thus, no likely significant effects.</p>

⁴⁴ London Borough of Barking and Dagenham's conservation areas and listed buildings are available at: <https://www.lbld.gov.uk/conservation-areas-and-listed-buildings>

Policy	Description	Likely Significant Effects
	<p>5. When assessing the impact of a proposal (individually and cumulatively) on a non-designated heritage asset, applicants must:</p> <ul style="list-style-type: none"> a) demonstrate that the proposed use is the optimum viable use, which causes the least harm to the significance of the building and its setting and secures its long-term viability b) demonstrate that the development is appropriate in terms of height, scale and massing, form, materiality and detailing and its relationship to the surrounding context 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 d) agree an appropriate strategy for conserving, where appropriate, enhancing in a manner appropriate to their significance as key and distinctive elements of the areas' character having regard to the relevant Conservation Area Appraisal and Management Plan, as well as the Townscape and Socioeconomic Study (2017) (or its updated equivalent). <p>Other heritage assets</p> <p>6. Development within or affecting any heritage feature should respect its local context and avoid materially detracting from its significance, including its archaeological, architectural, historic, landscape or biodiversity interest, or harming its setting.</p> <p>Conservation areas</p> <p>7. Development proposals affecting conservation areas or their settings will be supported where they preserve or enhance the character and appearance of the area including, the established local character of individual buildings and groups of buildings in accordance with the relevant Conservation Area Appraisal and Management Plan, as well as the Townscape and Socioeconomic Study (2017) (or its updated equivalent).</p> <p>8. Demolition of buildings or structures that are considered to make a positive contribution to a conservation area will not generally be permitted. In exceptional circumstances, where this is permitted, replacement buildings or structures must demonstrably preserve or enhance the conservation area's distinct character.</p> <p>Archaeological heritage</p> <p>9. All new development must protect, or enhance, and promote archaeological heritage (both above and below ground) within the borough. Proposals that would adversely affect or have the potential to affect archaeological heritage assets or their setting will be not supported.</p> <p>10. Where development is proposed on sites of archaeological significance or potential significance, the Council will require desk-based assessments and appropriate level of investigation and recording within an Archaeology Impact Statement before development proposals are determined.</p> <p>Scheduled monuments (designated heritage assets)</p>	

Policy	Description	Likely Significant Effects
	The site of Barking Abbey is Barking and Dagenham's only scheduled ancient monument. It includes the ruins of the Abbey and most of Abbey Green. Works affecting the scheduled ancient monument (including repair works) are subject to a statutory consent regime administered by Historic England on behalf of the Secretary of State ⁴⁵ .	
POLICY DMD 5: Local views	<ol style="list-style-type: none"> The Council will protect the borough's local views identified on the policies map and set out as follows: <ol style="list-style-type: none"> View 1: The main view of the Malthouse south from the Mill Pool View 2: 360-degree views from junction of Station Parade, London Road and Ripple Road, north along Station Parade, east along Ripple Road and west along Linton Road View 3: From Town Quay across Abbey Green towards St Margaret's Church and Barking Town Hall View 4: From the front of the Curfew Tower along East Street View 5: From the Ripple Road entrance of Vicarage Field shopping centre, Ripple Road, to 2 Town Square View 6: From in front of 32 East Street (currently the National Westminster Bank) towards the Curfew Tower, this gives a glimpse of the Abbey Green area and a hint of the Abbey beyond View 7: From the A406 across Town Quay towards St Margaret's Church and Barking Town Hall View 8: From the Mill Pool west towards Canary Wharf and south east towards Shooters Hill View 9: From the bridge on the A13 which crosses the River Roding towards the town centre and the Clock Tower. Development must seek to positively contribute to the characteristics and composition of identified local views of significant landmarks relevant to the development proposal within Barking and Dagenham. Development that affects the borough's local views (its updated equivalent) should provide Accurate Visual Representations (AVRs) to demonstrate the impact of the proposal upon them. 	<p>No Likely Significant Effects</p> <p>This policy relates to local views. There are no linking impact pathways present and thus, no likely significant effects.</p>
POLICY DMD 6: Householder extensions and alterations	<ol style="list-style-type: none"> Householder extensions and alterations will need to be designed in a sensitive and appropriate manner, in line with the latest government guidance such as permitted development right (PD) and the latest Council's Supplementary Planning Document and any local design guidelines that apply to the surrounding area. Proposals must not significantly impact on quality of life for surrounding residents. Development proposals must respect the character of the area. This will be achieved through: <ol style="list-style-type: none"> being sympathetic to the design of the original dwelling with regards to scale, form, materials and detailing 	<p>No Likely Significant Effects</p> <p>This policy relates to residential extensions and alterations. There are no linking impact pathways present and thus, no likely significant effects.</p>

⁴⁵ The relevant information about Scheduled Monument Consent is available at: <https://historicengland.org.uk/advice/planning/consents/smc/>

Policy	Description	Likely Significant Effects
	b) considering the impact on the amenity of neighbouring properties, avoiding significant overlooking (loss of privacy and immediate outlook) and overshadowing (loss of daylight and sunlight).	
POLICY DMD 7: Advertisements and signage	<ol style="list-style-type: none"> The Town and Country Planning (Control of Advertisements) (England) Regulations 2017 (as amended) sets out the different classes of advertisements and groups according to whether they require consent. Advertisements that do not fall into one of the classes in Schedule 1 or Schedule 3 of the regulations will need to be subject to an application for consent from the Council. An excessive amount of signage can lead to visual clutter in the street scene and negatively impact on amenity and public safety. The amount of signage must therefore be appropriate to the character of the area and must consider proximity to conservation areas and listed buildings. Proposals for advertisements and signage are required (individually and cumulatively) to: <ol style="list-style-type: none"> avoid adverse impacts on amenity, including its visual and aural impact and impact on trees or other aspects of the natural and historic environment design fascias and projecting signs of an appropriate size and depth in relation to the building and respect its architectural features and be designed for public safety relevant to the safe use and operation of any form of traffic or transport for all users. For illumination of hoardings (a billboard or large outdoor signboard), the illumination levels of advertisements should be in accordance with the guidance set by the Institute of Lighting Engineers PLG05 The Brightness of Illuminated Advertisements. The Council will resist the illumination of hoardings where it is a nuisance or out of character with the area. All outdoor advertisements are expected to comply with the standard conditions outlined in the DCLG's Outdoor Advertisements and Signs: A Guide of Advertisers (2007)⁴⁶, or its updated equivalent. 	<p>No Likely Significant Effects</p> <p>This policy relates to advertisements and signs. There are no linking impact pathways present and thus, no likely significant effects.</p>
STRATEGIC POLICY SP 3: Delivering homes that meet peoples' needs	<ol style="list-style-type: none"> The Council will support the delivery of the ten-year net housing target for the borough, as set out in the most up-to-date London Plan. This will be achieved through: <ol style="list-style-type: none"> supporting proposals that contribute to building new homes that seek to meet and exceed the draft New London Plan target (1,944 per annum) in general accordance with the 'delivery phases' outlined below (table 2) delivering a minimum of 40,000 homes on Site Allocations (including development of small sites), supporting the achievement of the housing targets identified in accordance with the Place policies (see Chapter 2: Transforming Barking and Dagenham) 	<p>Likely Significant Effects</p> <p>This policy relates to delivering a net increase in new residential dwellings over the plan period through supporting the delivery of the most up-to-date London Plan. The Council will support proposals that contribute to the increase of a minimum of 40,000 homes.</p>

⁴⁶ The guide is available at: <https://www.gov.uk/government/publications/outdoor-advertisements-and-signs-a-guide-for-advertisers>.

Policy	Description	Likely Significant Effects
	<p>c) seeking the maximum reasonable amount of affordable housing on all private sector housing schemes, subject to viability and site context</p> <p>d) building council homes by developing residential-led schemes on council-owned land, and ensuring that this estate regeneration delivers improved social facilities and environmental amenity</p> <p>e) supporting planning applications for self-build and custom-build, as well as purpose built shared housing through innovative approaches, subject to proposals adhering to meeting other development plan policies</p> <p>2. In order to address borough's housing need, the Council will:</p> <p>a) seek to ensure development does not undermine the supply of self-contained housing, in particular family homes</p> <p>b) seek to meet wheelchair accessible accommodation and require it across all tenures where possible</p> <p>c) support planning applications that seek to meet the needs of specific communities, including older people, disabled and vulnerable people, students and Gypsies and Travellers</p> <p>d) encourage community groups and local organisations to develop their capacity to lead on the delivery of new homes through the Council's programme of housing innovation⁴⁷, taking the opportunity to test and trial innovations around sustainability and construction</p> <p>e) deliver quality new homes to high design and build quality standards in accordance with the Mayoral supplementary planning guidance, the Council's latest design guides, and the Building Regulations and emerging guidance regarding building safety</p> <p>work proactively with the local community, landowners, developers and other key stakeholders to ensure that, wherever possible, homes are marketed to, and occupied by, people who live and work primarily in Barking and Dagenham, or within the surrounding areas of London.</p>	<p>The Council has provided within the supporting text a proposed stepped trajectory for housing delivery within the plan period:</p> <ul style="list-style-type: none"> • Overall housing target of 42,737 between 2019 and 2037. • Short term – 2019 – 2024 – 10,817 houses (2,163 per year) • Medium term – 2024 – 2029 – 18,470 houses (3,694 per year) • Long term – 2029 – 2038 – 13,450 houses (1,681 per year) • Small and windfall sites – long term 2019 – 2037 – 1,242 (69 per year) <p>New residential dwellings may cause an increase in some impact pathways which can cause a likely significant effect upon European sites including:</p> <ul style="list-style-type: none"> • Recreational pressure • Air pollution • Water resources • Water quality
POLICY DMH 1: Affordable housing	<p>1. All development with the capacity to provide 10 or more self-contained units, or have a gross internal residential floorspace of more than 1,000 sqm will be required to provide affordable housing as follows:</p>	<p>No Likely Significant Effects</p> <p>This policy relates to affordable housing. There are no linking impact pathways present and thus, no likely significant effects.</p>

⁴⁷ The Council is undertaking further review of wider potential sites for housing development and also agreeing on the approaches in which homes will be delivered on the programme.

Policy	Description	Likely Significant Effects
	<p>a) Seek to meet an overarching 50% of on-site affordable housing target, by applying the threshold and viability approach set out in the Mayor of London's policy guidance and include early and advanced stage review mechanisms in line with Policy DMM1 'Planning Obligations'</p> <p>b) Where affordable housing is provided on site, applicants will be expected to demonstrate that their proposal distributes the affordable housing throughout a new development, wherever appropriate, and ensure that all new dwellings contribute to the delivery of a range of housing tenures in accordance with the following tenure split (or in any subsequent updates on affordable housing products:</p> <p style="padding-left: 40px;">I. 50% mix of social housing including London Affordable Rent (LAR) or Social Rent</p> <p style="padding-left: 40px;">II. 50% mix of intermediate housing including London Living Rent (LLR), Affordable Rent (AR) or London Shared Ownership (LSO).</p> <p>c) As set out in Figure 20, below, affordable housing should be genuinely affordable for the people they are intended for. Applicants will be required to include homes that are affordable to households on a range of incomes, including local average income levels in the borough. Applicants will also be required to demonstrate, through their Affordable Housing Statement, how the affordability of the proposed tenure mix compares to local average income levels in the borough.</p> <p>2. Off-site affordable housing or payments in-lieu will only be acceptable in the following circumstances:</p> <p style="padding-left: 40px;">a. Where other sites may be more appropriate to provide affordable housing than the site of the proposed development to better deliver mixed and inclusive communities. The applicant will need to clearly demonstrate that:</p> <p style="padding-left: 80px;">i. it is not practical to deliver affordable housing on-site;</p> <p style="padding-left: 80px;">ii. it will not result in an over-concentration of one type of housing in any one local area;</p>	

Policy	Description	Likely Significant Effects																				
	<div><div><div>iii. it can provide a minimum of 50% affordable housing overall; and</div><div>iv. it can provide a better outcome for all of the sites, including a higher level of affordable rented family homes and housing.</div></div><div>If a suitable site cannot be found in accordance with Part 3a), a financial contribution towards the off-site provision of affordable housing may be accepted in accordance with policy DMM1 Planning Obligations.</div></div>																					
POLICY DMH 2: Housing mix	<div><div>1. Development proposals will be required to provide a range of unit sizes (including larger family homes) in accordance with the Council’s preferred dwelling size mix table below, or in any subsequent affordable housing needs evidence in light of future circumstances. Where a different housing size mix is proposed, the Council will have regard to up-to-date evidence of housing need and all of the issues such as the housing type, site characteristics, viability, location and other constraints in accordance with the latest London Plan to determine whether the housing size mix is acceptable.</div><table><tr><th>Bedrooms/Dwelling size</th><th>Private</th><th>Intermediate</th><th>Social</th></tr><tr><td>1 bed</td><td>39%</td><td>17%</td><td>10%</td></tr><tr><td>2 bed</td><td>26%</td><td>44%</td><td>40%</td></tr><tr><td>3 bed</td><td>25%</td><td>19%</td><td>40%</td></tr><tr><td>4+ bed</td><td>10%</td><td>19%</td><td>10%</td></tr></table><div>Source: LBBD SHMA March 2020 and information provided by Reside.</div></div>	Bedrooms/Dwelling size	Private	Intermediate	Social	1 bed	39%	17%	10%	2 bed	26%	44%	40%	3 bed	25%	19%	40%	4+ bed	10%	19%	10%	<div>No Likely Significant Effects</div> <div>This development management policy relates to housing mix. There are no linking impact pathways present and thus, no likely significant effects.</div>
Bedrooms/Dwelling size	Private	Intermediate	Social																			
1 bed	39%	17%	10%																			
2 bed	26%	44%	40%																			
3 bed	25%	19%	40%																			
4+ bed	10%	19%	10%																			
POLICY DMH 3: Specialist housing	<div><div>1. Existing specialist housing will be protected where it is considered suitable for its use and it meets relevant standards for this form of accommodation. Loss of existing supported and specialist housing will be resisted unless re-provided elsewhere in the borough with at least the equivalent number of bed spaces and would result in improved standards and quality of accommodation, or where it can be demonstrated that there is no local need for its retention in current or refurbished format.</div><div>2. Development for specialist housing will be supported where can be demonstrated that:<div><div>a) it meets the relevant Mayoral policy requirements, including the Mayor’s annual indicative benchmarks for specialist older persons housing for the borough (Policy H13) and criteria for new accessible or adapted housing (Policy D7 Accessible Housing)</div></div></div></div>	<div>Likely Significant Effects</div> <div>Although this policy does not allocate a quantum of housing it does support the provision of specialist housing within the Borough.</div> <div>The supporting text provides examples of supported housing which include student accommodation, sheltered housing, nursing and care homes, staff accommodation and hostels.</div> <div>New specialist housing may cause an increase in some impact pathways which can cause a likely significant effect upon European sites including:</div>																				

Policy	Description	Likely Significant Effects
	<p>b) It meets an identified need within the borough based on up-to-date evidence base⁴⁸</p> <p>c) it is located in, or close to, designated town centres with good access to local services and public transport links. Alternatively, these services will need to be provided to serve the development (see chapter 5: Social Infrastructure)</p> <p>d) the design satisfies user requirements, and that the need for new or expanded specialist accommodation will be balanced against the need to preserve the amenity standards of existing residents and the various operational requirements of adjacent activities</p> <p>e) it is supported by agreement for occupation by a relevant operator.</p> <p>3. New dwellings for older person's specialist housing should be delivered through a diverse range of tenures, such as sheltered and Extra Care provision including two-bedroom plus provision, to meet varying needs, including opportunities to rent and buy, as well as schemes with varying levels of support and care (e.g. specialist support for mental health needs in Extra Care provision).</p> <p>The Council will expect developments to provide high-quality, future-proofed design, with the capacity for adaptations and care technology that can satisfy the requirements of the specific use or group it is intended for in terms of facilities, design of buildings, density, parking, internal space, and amenity space</p>	<ul style="list-style-type: none"> • Recreational pressure • Air pollution • Water resources • Water quality
POLICY DMH 4: Purpose-built shared housing and houses in multiple occupations (HMOs)	<p>1. The Council will support new purpose-built shared housing schemes (including student accommodation) where they:</p> <p>a) meet the relevant Mayoral policy requirements (Policy H15 and H16)</p> <p>b) meet an identified need within the borough based on up-to-date evidence base</p> <p>c) are located within preferred areas in accordance with Place Policies (see chapter 2: Transforming Barking and Dagenham).</p> <p>2. The Council is seeking to preserve and increase the stock of family housing in the borough. Proposals for conversions or loss of existing family housing with three bedrooms or more will be resisted. Other proposals for flat conversions of homes in multiple occupation (HMOs) will only be considered acceptable provided that:</p> <p>a) the number of houses that have been converted to flats or HMOs in any road (including unimplemented but still valid planning permissions) does not exceed 10% of the total</p>	<p>No Likely Significant Effects</p> <p>This development management policy relates to purpose built shared housing and HMOs. There are no linking impact pathways present and thus, no likely significant effects.</p>

⁴⁸ It is estimated that the borough needs 180 units of Extra Care between 2019 and 2029, via three 60 bedded units (LBBD, 2018).

Policy	Description	Likely Significant Effects
	<p>number of houses in the road. No two adjacent properties apart from dwellings that are separated by a road should be converted</p> <p>b) no significant loss of character or amenity occurs to the area as a result of increased traffic, noise or general disturbance</p> <p>c) Regard is had to the appropriate design, transport, and internal and external amenity space standards policies.</p> <p>Planning permission is required for all new HMOs due to an Article 4 Direction, which withdraws permitted development rights for small HMOs across the borough. A licence is also required for a large HMOs within the borough and is assessed independently of any planning application⁴⁹.</p>	
POLICY DMH 5: Gypsy and Traveller Accommodation	<ol style="list-style-type: none"> The Council will safeguard the existing Gypsy and Traveller site at Eastbrookend Country Park. All the Gypsy, Traveller and Travelling Showpeople sites considered to meet the identified accommodation needs for 2019 – 2024 as outlined in Table 2 below. Proposed broad locations are identified on the policies map and set out as follows: <ul style="list-style-type: none"> Choats Lane Lane at Collier Row Road The Council will consider granting temporary planning permission for proposals that come forward in advance of the allocated sites being developed and will be addressed against the criteria set out below. Future need in the latter periods of this Local Plan period (2034 – 2037) as a result of new household formation will be addressed against the criteria set out below and through any subsequent monitoring and review of the Local Plan. Development of a site to provide additional short-stay /or permanent Gypsy and Traveller accommodation to meet the long-term needs of these communities will be supported where: <ol style="list-style-type: none"> the site is able to accommodate the number of pitches identified in an up to date and robust needs assessment; the site is accessible to public transport, safe, convenient walking and cycling environment, essential services and facilities (e.g. water, power, sewerage and waste disposal) and be capable of supporting by local social infrastructure and does not place undue pressure on local infrastructure and services (such as healthcare, schools and shops); it provides safe access to and from the public road network; the site is a safe location (e.g. not located in an inappropriate area of high flood risk as defined by national planning policy and guidance); 	<p>Likely Significant Effects</p> <p>This policy provides a small quantum and two locations for Gypsy and Traveller accommodation within the Borough of Barking and Dagenham.</p> <p>New development may cause an increase in some impact pathways which can cause a likely significant effect upon international sites in combination including:</p> <ul style="list-style-type: none"> Recreational pressure Air pollution Water resources Water quality <p>The two site allocations identified in this policy are assessed in Appendix C</p>

⁴⁹ For details, please visit: <https://www.gov.uk/house-in-multiple-occupation-licence>.

Policy	Description	Likely Significant Effects
	<ul style="list-style-type: none"> e) the proposal would not result in significant adverse impacts on the amenity of other site occupants and the occupiers of neighbouring sites; f) the proposal supports the health and wellbeing of the occupiers of the site by providing appropriate facilities, layout and design quality; and g) Arrangements can be put in place to ensure the proper management of the site in line with the policy requirements above. 	
STRATEGIC POLICY SP 4: Delivering social and cultural infrastructure facilities in the right locations	<ol style="list-style-type: none"> 1. The Council will seek to ensure that a range of high-quality social and cultural infrastructure facilities for existing and new residents and workers are provided in appropriate locations throughout the borough by: <ul style="list-style-type: none"> a. protecting existing social and cultural infrastructure facilities in accordance with policy DMS1 Protecting and Enhancing Existing Facilities b. securing the delivery of, or contributions towards enhanced or new social and cultural infrastructure facilities to meet the needs arising from development, in accordance with policy DMM1 Planning Obligations c. working with service providers and other stakeholders to identify funding sources for the long-term management and maintenance of social and cultural infrastructure and where necessary and viable, securing contributions towards this from development d. supporting proposals for new and enhanced social and cultural infrastructure facilities where they: <ol style="list-style-type: none"> I. meet an identified need in line with the Council's Infrastructure Delivery Plan, taking account of the needs of the future local community II. contribute to the capacity, quality, usability and accessibility of existing facilities and services, particularly where development will increase demand III. can be delivered at an appropriate time to support new development, i.e. in advance of substantial need arising IV. promote the growth and expansion of educational facilities that meet the borough's requirements for all stages of life, and including special schools V. include connectivity through walking, cycling and public transport VI. work in partnership with health authorities and other key stakeholders to improve healthcare access and support people's overall health and well-being 	<p>No Likely Significant Effects</p> <p>This policy relates the delivery of social and cultural infrastructure facilities. There are no linking impact pathways present and thus, no likely significant effects.</p>

Policy	Description	Likely Significant Effects
	VII. undertake innovative approaches to the delivery and operation of social infrastructure; for example, creating the multi-functional use of spaces (including multi-use places of worships) and maximising use of existing community facilities (i.e. community use of educational facilities).	
POLICY DMS 1: Protecting and enhancing existing facilities	<p>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:</p> <ul style="list-style-type: none"> 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 and the relevant service provider to serve local needs 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: <ul style="list-style-type: none"> a) 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 multi-functional b) 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>2. The Council will expect applicants to submit competitive marketing evidence in accordance with Part 1 b), which should:</p> <ul style="list-style-type: none"> a) outline where and how marketing has been undertaken, with details also provided to demonstrate that the asking rent has been at a realistic rate for the type, size and condition of the property or unit⁵⁰ b) submit a report detailing the level of interest in the property over the agreed marketing period, details of any viewings and offers and details of why any interest had not been taken forward. <p>3. Notwithstanding the provisions of Part 1 of this policy, development proposals that would result in the net loss of sports and recreational buildings and land, including playing fields will not be considered acceptable. 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> <p>4. Extensions to existing schools should demonstrate that the current level of child play space will be enhanced and increased.</p> <p>The Council will allow six months for bidding to buy a community or cultural facility that is listed on the Assets of Community Value (ACV) register⁵¹. The marketing statement could be reduced to 12 months in</p>	<p>No Likely Significant Effects</p> <p>This policy relates to protecting and enhancing existing facilities. There are no linking impact pathways present and thus, no likely significant effects.</p>

⁵⁰ The Council would be expected that the property or site has been actively marketed, including appearing on local and national commercial property websites and visible display boards being displayed at the site.

Policy	Description	Likely Significant Effects
	accordance with part 1 and 2 above (from a continuous period of six months that the community has to prepare a bid to buy it).	
POLICY DMS 2: Planning for new facilities	<ol style="list-style-type: none"> 1. Development that is within, or part of, a site allocation is expected to accommodate infrastructure requirements alongside the identified land uses and other development principles, or where appropriate contribute to provision or expansion off site (as part of an agreed strategy) in accordance with Policy DMM1 Planning Obligations. 2. In accordance with policy SP4, new social and cultural infrastructure facilities will be located across the borough, to support growth in each place (see Chapter 3: Transforming Barking and Dagenham); and the Council's latest IDP. 3. Development proposals for social infrastructure should accord with the relevant policies set out in the New London Plan. 4. Development proposals for residential and mixed-use development including provision of community facilities will need to submit a community needs strategy to accompany the planning application demonstrating how the community space needs generated by the development, including faith space, have been met. 5. Development proposals will be expected to deliver high-quality design that: <ol style="list-style-type: none"> a) is accessible and inclusive to all sections of the community b) adheres to the latest national, regional and local design guidelines c) provides opportunities to co-locate or integrate a range of community uses and functions, such as community halls, sport facilities and shared worship space, by taking account of the principles of active and inclusive design and making relevant provision outside of core hours where appropriate. 6. Development proposals for faith facilities in employment and industrial areas will only be permitted in accordance with other policies of the Local Plan and where conflicts between employment and industrial use and faith use can be avoided (i.e. with regards to increased traffic and parking issues, congregations of people, and noise; and the safety of users or workers will not be compromised). Applicants will be expected to consult on the proposal with the Council. 7. Development proposals for improved leisure and sports facilities (including any essential ancillary facilities⁵²) to support the endeavours of the sports organisations to use these facilities will be acceptable subject to discussions with Sport England. 	<p>No Likely Significant Effects</p> <p>This policy provides development management policy for the planning of new facilities. There are no linking impact pathways present and thus, no likely significant effects.</p>
POLICY DMS 3: Public houses	<ol style="list-style-type: none"> 1. The Council will protect public houses within the borough in accordance with the relevant policies set out in the New London Plan. Development proposals resulting in the loss of a public house will be strongly resisted unless justified by robust and up-to-date planning and marketing evidence in accordance with policy DMS1 Protecting and Enhancing Existing Facilities. 	<p>No Likely Significant Effects</p> <p>This is a development management policy relating to public houses. There are no linking impact pathways present and thus, no likely significant effects.</p>

⁵² These facilities could include uses such as changing rooms, clubhouses^{5b}, public toilets and nature education facilities.

Policy	Description	Likely Significant Effects
	<ol style="list-style-type: none"> 2. Development proposals which would make a public house unviable (e.g. loss of the cellar etc.) will not be considered acceptable. 3. Where a public house is replaced or re-provided, the new development: <ol style="list-style-type: none"> a) must provide adequate floorspace to ensure the continued viability of the public house, demonstrate that all reasonable efforts have been taken to preserve the facility as a public house, including evidence of appropriate maintenance and upkeep and efforts to diversify the business. A full detailed marketing report demonstrating that the public house has been continuously marketed for at least 24 months as a public house at a reasonable market rent and free of tie and restrictive covenant b) should make an equal or greater contribution to the street scene and community benefit. For example, buildings considered to be heritage assets (statutorily listed buildings, locally listed buildings) or making a strong contribution to local character are expected to be retained c) where appropriate, incorporates a community use in the redevelopment or contribute towards enhancing community facilities in the local area. 4. Where the public house is considered to be a heritage asset (see policy DMD4 'Heritage Assets and Archaeology Remains') or to make a valued contribution to the borough's history, the applicant will be required to send important components of the building for archiving or public display to the Council, in line with Historic England's guidance. 	
STRATEGIC POLICY SP 5: Promoting inclusive economic growth	<ol style="list-style-type: none"> 1. The Council will focus on growing a thriving and productive enterprise and small business economy, alongside new business investment, and ensuring the delivery of at least 20,000 new jobs and a wider employment base. 2. The Council will promote: <ol style="list-style-type: none"> a) efficient use of employment land to support economic growth sectors b) retention of suitable locations and capacity c) intensification with innovative approaches to building design d) plan-led managed release of land as set out in the Borough's Industrial Strategy. 3. Proposed LBBD Strategic Industrial Land (SIL) and Locally Significant Industrial Locations (LSIS) as shown on the Policies Map. They are designated as intelligent SIL and LSIL for protection, managed intensification in accordance with Policy DME1 Utilising the Borough's Employment Land More Efficiently. They are suitable for industrial type activities as identified in the New London Plan (Policy E4 and E5) and the Borough Industrial Strategy. 	<p>No Likely Significant Effects</p> <p>This policy promotes a strategy to improve the economic growth of the borough to ensure a thriving economy, strong communities and a distinctive place. The policy does not allocate a quantum of development merely advocates the Council's realignment of focus on developing businesses and jobs within borough.</p> <p>No likely significant effects are expected from this Policy.</p>

Policy	Description	Likely Significant Effects
	<p>4. All safeguarded wharves and maritime infrastructure will be protected and retained in line with Mayoral policy and the marine management Organisation. The locations are defined in the Policies Map and in Table 3 below. Opportunities for intensification of wharf use, or rationalisation of wharves and infrastructure, will require discussions with the Port of London Authority and the Marine Management Organisation at an early stage.</p> <p>5. The Council will support a new town centre hierarchy for the borough, in line with the latest town centre strategies and guidance; major office development will be directed to Barking town centre with secondary provision directed to District Centres as set out in the town centre hierarchy as show on the Policies Map.</p>	
POLICY DME1: Utilising the borough's employment land more efficiently	<p>Employment within the designated SIL and LSIS boundary</p> <ol style="list-style-type: none"> 1. The Council will support development proposals where they can deliver employment floorspace that: <ol style="list-style-type: none"> a) contributes to meeting the strategic target of a minimum 20,000 new jobs, focusing on enabling skills development and lifelong learning b) accords with the site allocations and the Council's most up to date area specific guidance c) comprises uses that are suitable for broad industrial-type activities as identified in the New London Plan d) provides a mix of unit sizes to meet the needs of small and medium enterprises (SMEs). 2. The Council will prepare localised planning framework, such as 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 (see chapter 2: Transforming Barking and Dagenham). These documents will include details on industrial intensification and redistribution including the relocation of existing businesses that cannot be incorporated within a redevelopment. They will also make reasonable endeavours to ensure such uses have a suitable alternative site secured and address transitional arrangements that are cognisant of their local and regional economic role. 3. Development proposals must ensure neighbourly development is achieved (in line with Policy DMSI 2 Energy, Heat and Carbon Emissions and DMSI 8 'Waste Sites' and must not jeopardise the functioning of any remaining employment uses, including those incorporated within the redevelopment. 4. Where the site is suitable for industrial intensification the applicant is expected to demonstrate that the proposal is a genuine intensification and will increase or maintain employment numbers on less space than the existing use, subject to development viability. 5. . Applicants must demonstrate that new employment floorspace within the redevelopment is designed to respond to market demand and occupier requirements to secure viable occupation. <p>Employment sites outside of SIL and LSIL</p>	<p>No Likely Significant Effects</p> <p>This is a development management policy relating to utilisation of the Borough's employment land efficiently. There are no linking impact pathways present and thus, no likely significant effects.</p>

Policy	Description	Likely Significant Effects
	<p>6. The Council will resist development proposals that would result in the net loss of viable employment floorspace, particularly affordable and low-cost workspace. The Council may consider proposals in exceptional circumstance where the applicant can:</p> <ol style="list-style-type: none"> clearly demonstrate that the site is genuinely unsuitable for continued employment use due to its history, condition and reasonable alternatives for restoring the site to employment use have been considered (including temporary employment use) <p>provide robust evidence of unsuccessful active marketing of the existing use over a continuous period of at least 24 months at a reasonable market rent, which accords with indicative figures.</p>	
POLICY DME 2: Providing flexible, affordable workspace	<p>1. Development of a minimum 1,000 sqm office and workspace will be required to incorporate an appropriate provision of affordable workspace on-site, offered at below market rate, for shared workspace or small business units through Section 106 agreement, subject to development viability. This must meet the needs of local start-ups, small-to-medium enterprises and creative industries. The applicant should establish robust management links with registered workspace providers agreed by the Council and be able to:</p> <ol style="list-style-type: none"> demonstrate that there is sufficient critical mass to ensure the sustainability of any provision provide units in turnkey form which are accepted by the Council or the registered workspace following completion. <p>2. In circumstances where it is not feasible to meet Part 1 of the policy, a payment in lieu may be accepted to support delivery of affordable workspace in other parts of the borough, focusing primarily in identified Transformation Areas (see Chapter 2: Area Development Strategy).</p> <p>3. The Council will expect developments to go beyond "shell and core" provision of affordable workspace. To be considered as acceptable turnkey spaces, upon the completion of the development, the Council will expect the workspace units to be secure, vacant, and fully glazed, with smooth sealed concrete finishes to ceiling and walls, functional lighting, running water, sanitary facilities, and having capped essential services such as electricity and gas, as well as access provision of wired and wireless broadband technologies delivering the highest speeds to provide a wide range of services. These works will avoid substantial fit out costs for potential occupiers and enable the workspace to be more affordable for smaller businesses.</p>	<p>No Likely Significant Effects</p> <p>This is a development management policy relating to the provision of flexible and affordable workspace. There are no linking impact pathways present and thus, no likely significant effects.</p>
POLICY DME 3: Encouraging vibrant, resilient, and characterful town centres	<p>1. The extent of town, district and neighbourhood centres are defined on the Policies Map. The boundaries will clearly relate to the application of the sequential and impact tests, which seek to direct retail and other key town centre uses to town centres, and requires proposed retail development in edge, or out of town centre sites to be considered against the sequential approach below:</p> <ol style="list-style-type: none"> Development proposals for commercial, businesses and service uses will be permitted within the town centre boundaries Development proposals for retail and leisure uses will be supported on the edge of or outside of designated town centre location where the sequential approach to site identification has been applied in accordance with the NPPF Preference would be given to accessible sites which are well connected to the town centre 	<p>No Likely Significant Effects</p> <p>This is a development management policy relating to vibrant, resilient and characterful town centres. There are no linking impact pathways present and thus, no likely significant effects.</p>

Policy	Description	Likely Significant Effects
	<p>d) Applicants should demonstrate flexibility on issues such as format and scale of the proposal, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored in accordance with paragraph 87 of the NPPF.</p> <p>2. Out-of-centre retail developments that include new local facilities should only be exempt from compliance with the sequential test where the proposed main town centre uses serve the local needs, generated by the development, or serve an area of deficiency, and where that need cannot be met by existing facilities within nearby centres.</p> <p>3. When considering applications for town centre uses the Council will recognise the need for flexibility to meet changing needs in terms of what contribution the new development will make to the success of our town centres. This could include the potential need for temporary or 'meanwhile or interim' space to support the creative industries or serve needs in the early phases of a business.</p> <p>4. Development proposals will be required to deliver and maintain active ground floor frontages generating high footfall (proportionate to the scale and nature of the centre). This includes, but is not limited to, shops, markets, community, cultural and civic uses .</p> <p>5. Outside the designated town centres, development proposals for retail and leisure development exceeding 500sq.m gross (or its updated equivalent) will be required to submit an impact assessment in accordance with the NPPF and NPPG.</p> <p>6. In addition to compliance with the impact criterion above (part 6) development proposals for a new local shopping centre must seek to meet the needs of local residents based on up to date evidence . The applicant should submit information which considers factors including:</p> <p>I. the relative size of a local parade and the range of shops and services each centre can offer</p> <p>II. the proximity of other town centres, local centres and 'standalone' shops, which may mean that local need may be met at an alternative location within walking distance and local needs are therefore still being met</p> <p>III. the quality of the shopping centre or parade, in terms of its environment, type and range of retailers, affecting how it is perceived and used by local residents</p> <p>IV. the relative accessibility of each centre since this is an important factor in how local people use the local shops and services. The reasonable and maximum walking distances as prescribed in GLA's Town Centre SPG and its equivalent update should be considered in the statement or assessment.</p> <p>7. 'Meanwhile' uses of buildings in designated town centres must not have an unacceptable impact on residential amenity or prevent development sites from being brought forward for development in a timely fashion. Meanwhile use of sites for housing uses should be consistent with other Local Plan policies in relation to the residential amenity.</p> <p>8. Development proposals for new hot food takeaways (sui generis), new betting shops and pay day loan shops (sui generis) within the designated town centres must submit:</p>	

Policy	Description	Likely Significant Effects
	a) a cumulative impact assessment of other existing uses of hot food takeaway, or betting shop or pay day loan shop (including extant but unimplemented planning permissions) b) a health impact assessment (HIA) and discuss proposals at the pre-application stage with the Council.	
POLICY DME 4: Visitor accommodation	1. Proposals for new visitor accommodation (C1) will be supported within the borough's designated town centre, along primary routes adjacent to transport interchanges, and in locations where they will support the function of employment and strategic industrial land, where: <ol style="list-style-type: none"> it accords with principal land uses and does not compromise regeneration visions the size, scale and nature of the proposal is proportionate to its location it does not create an over-concentration of such accommodation, taking account of other proposals and unimplemented consents in the local area it does not have significant adverse impact on surrounding amenity or local character. Applications for serviced apartments must demonstrate that they meet the criteria stated in Part (1) of this policy and will be managed appropriately as short-term accommodation (i.e. accommodation for up to 90 days). 	<p>Likely Significant Effects</p> <p>This proposal supports the development of visitor accommodation within the borough. Visitor accommodation includes hotels and serviced apartments.</p> <p>Although the policy does not allocate a quantum of this development within the borough, the policy has been included on a precautionary basis as dependent on location the developments brought forward under this policy may cause an increase in some impact pathways which can cause a likely significant effect upon European sites including:</p> <ul style="list-style-type: none"> Recreational pressure air quality water resources water quality
POLICY DME 5: Evening Economy	1. The Council will support development that contributes to the vitality of Barking town centre, and supports a balanced and socially inclusive evening and night-time economy, subject to the following considerations: <ol style="list-style-type: none"> cumulative impact – in areas where a concentration of night-time uses may be detrimental to the character or vitality and viability of the centre, there will be a presumption against further facilities. For example, the existing number of similar establishments in the immediate area and their proximity to each other; the potential impacts of the proposal on the wider community residential amenity – the proposed use should not create an unacceptable impact on neighbouring uses in terms of noise, traffic and disturbance. For example, the type and characteristics of other uses, such as housing, shops and public houses; any known unresolved amenity, traffic or safety issues arising from existing uses in the area balance – new uses in centres should support both the day-time and evening and night-time economies whilst not undermining the role and function of the designated town centres in accordance with DME3 Encouraging Vibrant, Resilient, and Characterful Town Centres. 	<p>No Likely Significant Effects</p> <p>This is a development management policy relating to the Evening Economy. There are no linking impact pathways present and thus, no likely significant effects.</p>
POLICY SP6: Green and blue infrastructure	1. The Council will protect and enhance the quality of the natural environment (including the borough's parks, public open spaces and playing pitches) and will work with a range of stakeholders to	No Likely Significant Effects

Policy	Description	Likely Significant Effects
	<p>maximise the creation of new green and blue infrastructure and address deficiencies in quantity, quality and access. This will be achieved through:</p> <ul style="list-style-type: none"> a) protecting and enhancing the borough's Green Belt and Metropolitan Open Land (MOL) to maintain its function, quality and openness b) ensuring development protects and enhances significant ecological features, achieves biodiversity net gain, and maximises opportunities for urban greening through appropriate landscaping schemes and the planting of street trees; c) working with local partners, the Environment Agency, Natural England and other key stakeholders including the local community to resurvey and review SINC's and areas of biodiversity deficiency every 5 to 10 years, to ensure development contributes as appropriate to the borough's overall biodiversity and environmental quality d) improving the quality, character, value and accessibility of existing publicly accessible open space across the borough, in line with the Council's Parks and Open Spaces Strategy, Green Infrastructure and Biodiversity Strategy and Sport England's Active Design Guidance (or updated equivalent) e) maximising the opportunity to deliver an improved network of green grid links to enhance access through walking, cycling and public transport to key destination points such as town centres, community facilities and publicly accessible open spaces, and along rivers and waterways f) protecting, improving and enhancing blue spaces, to create a blue network, improving walking and cycling accessibility to the water environment and improving the relationship with the river (including public realm, habitats and waste heat energy sources). Where possible, opportunities should be sought to 'naturalise' the riverbank by removing hard engineered walls and introducing new habitats to the river corridor g) protecting and enhancing the existing residential moorings located on the River Roding and explore opportunities for part of the River Roding in the borough, north of the existing safeguarded wharves as a potential residential mooring opportunity zone in line with local and regional planning policies h) maximising opportunities to create and increase publicly accessible open space (including playing pitches and ancillary sporting facilities) with a range of sizes and for a range of users, particularly in locations which experience the highest level of open space deficiency within the borough i) protecting and enhancing the borough's habitat and wildlife resources, including linking green spaces with identified wildlife corridors, protecting species and habitats identified in the London Biodiversity Action Plan or updated equivalent, and creating new nesting and roosting sites j) supporting community food growing through development and building partnerships with social enterprise and voluntary organisations that have already started working in the borough; and supporting communities that aspire to designate important local open spaces as local green spaces 	<p>This is policy provides for the management of green and blue infrastructure. There are no linking impact pathways present and thus, no likely significant effects.</p>

Policy	Description	Likely Significant Effects
	k) working with strategic partners, developers and the community to position the natural environment at the heart of estate regeneration and development, having regard to the Council's latest park masterplans.	
POLICY DMNE 1: Parks, open spaces and play space	<p>1. The Council will protect and enhance the borough's parks, public open spaces and playing pitches, working closely with a range of stakeholders to address deficiencies in quantity, quality and access. Public open spaces should be safe and easily accessible through walking, cycling, and public transport for all users, and supportive infrastructure such as crossings, cycle parking, bus stops and clear signage should be provided appropriately near the entrance of open spaces. To reduce car dominance, these should be provided in proximity to residential, commercial and social infrastructure.</p> <p>2. The Council will prevent inappropriate development within the Green Belt and on Metropolitan Open Land (MOL), except in very special circumstances, in line with the NPPF and Policy G3 of the Draft New London Plan Intend to Publish version.</p> <p>3. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</p> <p>a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirement</p> <p>b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and in a suitable location</p> <p>c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.</p> <p>4. Development on non-designated open space, including amenity greens and amenity spaces with limited public access, will be resisted, except where proposals accord with an agreed Council regeneration strategy, include replacement space of at least equivalent quality as close as possible to the open space that would be lost.</p> <p>5. Development should not rely upon existing publicly accessible open space to contribute towards on-site communal amenity space and child play space. All major and strategic development should contribute to the delivery of sufficient new publicly accessible open space on-site which should:</p> <p>a) meet the needs of current and any future residents</p> <p>b) be of a high-quality that is accessible to all</p> <p>c) provide multiple benefits, including recreation, food growing, SuDS, improvements to biodiversity and links to green infrastructure, as well as any blue infrastructure, on and adjacent to the development site</p> <p>d) consider taking the form of new parks (including pocket parks), allotments or play space in accordance with the Council's guidance as set out in the Parks and Open Spaces Strategy, the Green Infrastructure and Biodiversity Strategy and park masterplans and their updated equivalents</p> <p>e) comply with Policy G4 of the Draft New London Plan Intend to Publish version and the Council's guidance in the design of new open space. In exceptional circumstances, where on-site provision cannot</p>	<p>No Likely Significant Effects</p> <p>This is policy provides for the management, protection and enhancement of parks, open spaces and play spaces. There are no linking impact pathways present and thus, no likely significant effects.</p>

Policy	Description	Likely Significant Effects
	<p>be adequately accommodated, the Council may agree a financial contribution towards improvements to existing or new open spaces within the borough via planning obligations.</p> <p>6. Large major development proposals for schemes that are likely to be used by children and young people should increase opportunities for play and informal recreation in line with Policy S4 of the draft New London Plan Intend to Publish version.</p> <p>7. Proposals for new playing pitches should be developed in accordance with Policy DMS1, the Council's Playing Pitch Strategy (or updated equivalent) and in consultation with Sport England.</p>	
POLICY DMNE 2: Urban greening	<p>1. Development proposals will be supported where they:</p> <p>a) maximise opportunities for urban greening, including landscaping, street trees, green and brown roofs, green walls, food growing, rain gardens and nature-based sustainable drainage etc</p> <p>b) contribute to the All London Green Grid, the Council's Green Infrastructure and Biodiversity Strategy and the Council's Parks and Open Spaces Strategy.</p> <p>2. The applicant is expected to calculate the site's Urban Greening Factor (UGF) in accordance with the Council's guidance. In line with Policy G5 of the draft New London Plan Intend to Publish version, a target score of 0.4 should be achieved for developments that are predominately residential, and a target score of 0.3 should be achieved for commercial development (excluding B2 and B8 uses).</p>	<p>No Likely Significant Effects</p> <p>This is policy relates to urban greening. There are no linking impact pathways present and thus, no likely significant effects.</p>
POLICY DMNE 3: Nature conservation and biodiversity	<p>1. Development should not lead to loss or degradation of Sites of Importance for Nature Conservation (SINCs), including local nature reserves and Epping Forest's Special Area of Conservation (SAC). All existing SINC boundaries are defined on the Policies Map.</p> <p>2. All development proposals are required to:</p> <p>a) minimise the impacts of development on biodiversity and nature in accordance with the mitigation hierarchy set out in Policy G6 of the draft New London Plan Intend to Publish version</p> <p>b) demonstrate a minimum of 10% biodiversity net gain using the DEFRA metric (or agreed equivalent). Applications where loss or degradation of habitat would be negligible, such as material change of use applications, alterations to buildings, and house extensions, are excluded from this requirement</p> <p>c) prepare a long-term monitoring and management plan of biodiversity net gain sites for a period of 30 years, whether within the development area or off-site</p> <p>d) provide wider, off-site, environmental net gain where possible.</p> <p>3. The Council's Green Infrastructure and Biodiversity Strategy identifies opportunities for habitat creation, wildlife corridors and Green Design Codes for different parts of the borough, which should be used to inform net gain proposals.</p> <p>4. Major development proposals are required to:</p> <p>a) contribute to the strategic network of green and blue spaces, as identified in the Council's Green Infrastructure and Biodiversity Strategy (or updated equivalent) and in accordance with Policy G1 of the Draft New London Plan Intend to Publish version</p>	<p>No Likely Significant Effects</p> <p>This is a positive policy that relates to nature conservancy and biodiversity. There are no linking impact pathways present and thus, no likely significant effects.</p> <p>Recommendations are made within the text of the report (paragraphs 5.17 to 5.19) to amend this policy to provide robust protection to international sites and to ensure to existing strategic mitigation strategies.</p>

Policy	Description	Likely Significant Effects
	<p>b) contribute to increasing local access to nature, in accordance with national and London Plan requirements and taking account of Natural England's latest Accessible Natural Greenspace Standards</p> <p>c) submit an ecology assessment demonstrating biodiversity enhancements that contribute to the objectives of the latest Council's strategies, as well as guidance and best practice for habitat creation</p> <p>d) submit a habitat management plan setting out the long-term maintenance and monitoring of all biodiversity protection and enhancement measures</p> <p>e) use only native species of local provenance in soft landscaping schemes within 250m of Sites of Importance for Nature Conservation, waterways, and wildlife corridors, and on green and brown roofs and roof gardens. On all other sites, the use of native plants of local provenance should be at least 75% by area of the soft landscaping scheme</p> <p>f) incorporate soft landscaping that minimises the risk of new plant diseases and avoids introducing invasive species by sourcing plants from stock grown in the UK and avoiding the use of plants listed in Schedule 9 of the Wildlife and Countryside Act (1981). Landscaping and planting around developments must control potentially invasive non-native species and eradicate these where possible as part of redevelopment</p> <p>g) create new nesting and roosting sites for wildlife (for example through integrated nesting and roosting bricks, towers and boxes together with street trees, green walls and green roofs).</p>	
POLICY DMNE 4: Water environment	<p>1. Development proposals within and adjacent to rivers and waterways will be required to:</p> <p>a. contribute to achieving the objectives of the Thames River Basin Management Plan, Water Framework Directive or updated equivalent and catchment partnership local measures</p> <p>b. protect and enhance biodiversity and geomorphology in and along watercourses, banks and waterways, adjacent terrestrial habitats, the foreshore and the floodplain</p> <p>c. improve water quality, including reducing or minimising pollution from adjacent land and roads (e.g. by using oil interceptors in car parks) and improve the ecological status of waterbodies (e.g. by investigating and rectifying misconnections, retrofitting sustainable urban drainage systems, fitting hydrocarbon interceptors and creating wetlands)</p> <p>d. conserve the waterways' heritage and improve public understanding of this</p> <p>e. avoid harm or negative impacts on navigation and use of existing waterways</p> <p>f. conserve and enhance the existing character of the waterway and its setting</p> <p>g. provide open space for recreation, habitat provision and increasing the blue space network, which can also be used to store excess floodwater, where appropriate</p> <p>h. provide a naturalised buffer zone between the proposed development and the top of bank of any nearby watercourse or body of water as follows:</p> <p>i. at least 16m for tidal watercourses</p> <p>ii. at least 8m for fluvial main watercourses</p> <p>iii. at least 8m for an ordinary watercourse</p>	<p>No Likely Significant Effects</p> <p>This is a positive policy that relates to the water environment. There are no linking impact pathways present and thus, no likely significant effects.</p>

Policy	Description	Likely Significant Effects
	<p>iv. at least 5m buffer around ponds or other standing water bodies</p> <p>v. buffer zones should not include development, hard standing, paths or lighting, underground structures (including tie rods and anchors), or be used for storage of materials. Land adjacent to flood defences should also be protected in line with Policy DMSI 5. Buffer zones should be designed to be dark (less than 1.0 lux) to protect their function as wildlife corridors; open up river corridors, making space for water through the creation of natural buffer zones adjacent to water courses, and increasing floodplain connectivity;</p> <p>i. improve safe, public access to waterways and provide opportunities for enjoyment and understanding of the waterways; development will be expected to provide appropriate riparian lifesaving equipment (e.g. grab chains, access ladders and life buoys) alongside the riverside areas to a standard recommended in the 1991 Hayes Report on the Inquiry into River Safety</p> <p>j. encourage active travel (walking and cycling) through the provision of cycle and foot paths adjacent to the waterway (but outside of the buffer zone)</p> <p>k. have regard to the HM Government's UK Marine Policy Statement (2011) or updated equivalent and the emerging South East Marine Plan, which applies to the River Thames and the River Roding</p> <p>l. identify and deliver natural flood management opportunities to help alleviate fluvial and surface water flooding, as well as measures to prevent litter entering waterways. On sites with culverted watercourses, proposals for new development will be expected to investigate and secure the implementation of measures to restore sections of the watercourse, with clear and robust justification provided, if considered unachievable</p> <p>m. maximise the use of the river for freight, including for the transportation of construction materials to, and waste from a development site either directly to and from the site or through the supply chain.</p> <p>Thames Policy Area</p> <p>2. The Thames Policy Area, including the River Roding, is designated on the Policies Map. Within this area, development will be supported where it meets the requirements above and it:</p> <p>a) improves public access to and along the River Thames</p> <p>b) protects and enhances views towards and along the River Thames</p> <p>c) facilitates and acts on the recommendations of the Thames Estuary 2100 Plan (or updated equivalent) for Action Zone 4, within which the borough lies</p> <p>d) protects safeguarded wharves and jetties from any development that would prejudice their future use for river transport.</p>	
POLICY DMNE 5: Trees	<p>1. Development proposals should retain existing trees, shrubs and 'vegetation of value' where possible unless it can be demonstrated that their removal would provide substantial public benefit or if they are damaged or deceased. This value should be assessed by an appropriate valuation system, as agreed with the Council.</p> <p>2. Trees, shrubs or vegetation must be retained where one or more of the criteria below are met:</p>	<p>No Likely Significant Effects</p> <p>This policy relates to trees. There are no linking impact pathways present and thus, no likely significant effects.</p>

Policy	Description	Likely Significant Effects
	<p>a) it is considered to be of significant value, including ecological value, as per an agreed appropriate arboriculture valuation system (such as i-tree or CAVAT) and subject to consultation with the Council</p> <p>b) it makes a significant contribution to amenity or local character</p> <p>c) it is of special character, age, or has scope for screening other properties or features.</p> <p>3. If existing trees and vegetation of value cannot be retained, they should be replaced by species of at least equivalent value with a preference for on-site planting.</p> <p>4. Where it is not possible to provide adequate replacement trees as part of a development, the applicant will be required to make a financial contribution to the Council's tree planting programme dependent on the specific development and the value of the trees.</p> <p>5. Major development is expected to incorporate planting including trees, shrubs and vegetation over and above any existing provision. Planting should use trees, shrubs and vegetation that are appropriate to the context and location of the development site.</p> <p>6. Applicants will be expected to demonstrate how a development has been designed to allow trees and other vegetation to grow and thrive, including during construction. This includes ensuring that urban planting allows tree roots to grow, allows water filtration and avoids soil compaction around street planting.</p> <p>7. When identifying locations for new trees, it is vital that eventual root and branch growth of a tree are taken into account when determining how much space will be needed in the future. This is to ensure the tree survives and thrives, and to prevent damage to existing properties and structures.</p> <p>8. All trees and vegetation planted in close proximity to flood defences and within the 'buffer zone' must have appropriate root containment systems installed, to prevent future tree root growth negatively affecting flood defence structures.</p>	
POLICY DMNE 6: Local food growing, including allotments	<p>Existing allotments</p> <p>Redevelopment of existing allotments will only be permitted in exceptional circumstances where it can be demonstrated that they are no longer needed by the community or existing allotment users are relocated to an alternative allotment that is within reasonable proximity to their homes.</p> <p>Creation of new food growing opportunities</p> <p>1. Proposals for community food growing and gardening will be encouraged in line with Policy G8 of the Draft New London Plan Intend to Publish version, particularly where this forms part of the overall landscaping and open space strategy for residential development or as part of a school, playground or recreational area. Innovative food growing solutions, such as edible landscaping, rooftop growing, vertical and hydroponic growing and indoor growing will be strongly encouraged.</p> <p>2. Major residential-led developments are expected to provide community food growing opportunities and to provide a strategy for the ongoing management of this.</p> <p>3. Proposals for new allotments will be supported where there is a demonstrable local need through appropriate engagement with key stakeholders and the local community, and where this does not prejudice alternative land uses from coming forward, including residential use.</p>	<p>No Likely Significant Effects</p> <p>This policy relates to local food growing including allotments. There are no linking impact pathways present and thus, no likely significant effects.</p>

Policy	Description	Likely Significant Effects
	<p>4. All new community food growing areas should include access for disabled residents, access to water and irrigation and access to composting facilities.</p> <p>Food growing is also encouraged as a meanwhile use on vacant or under-utilised sites.</p>	
STRATEGIC POLICY SP7: Securing a clean, green and sustainable borough	<p>1. The Council will:</p> <p>a) encourage innovative approaches to tackling climate change, reducing air pollution, managing flood risk and nuisance, and promoting sustainable infrastructure</p> <p>b) expect major development to be net zero carbon and employ low carbon technologies in line with the Council's agenda, and work with developers, landowners and other key stakeholders to ensure, where appropriate, development supports and connects into the borough's strategic District Energy Networks and associated infrastructure, utilising low or zero carbon fuel sources</p> <p>c) expect all development to minimise the risk of overheating through the prioritisation of passive design measures</p> <p>d) phase-out gas heating and encourage as much as renewable energy as possible</p> <p>e) ensure all development manages nuisance (such as noise, vibration, artificial light, odour, fumes and dust pollution) during both construction and operation through appropriate mitigation</p> <p>f) improve the borough's air quality in line with the Council's Air Quality Action Plan; requiring new development to be air quality neutral; and promoting sustainable transport and green infrastructure</p> <p>g) expect development and large-scale regeneration to facilitate the remediation of land affected by contamination</p> <p>h) work with developers and key stakeholders to reduce flood risk (including through the use of Sustainable Drainage Systems), improve wastewater infrastructure in line with the Council's Infrastructure Delivery Plan, and reduce mains water consumption</p> <p>i) co-operate with other boroughs to jointly address cross-boundary flood risk issues.</p> <p>j) safeguard all waste sites within the borough and review the approach until the new Joint Waste Plan is adopted</p> <p>k) minimise waste production by promoting sustainable waste management, the principles of circular economy and the use of sustainable materials</p> <p>l) seek to deliver secure, affordable and low carbon utilities and physical infrastructure.</p>	<p>No Likely Significant Effects</p> <p>This policy relates to securing a clean, green and sustainable Borough. There are no linking impact pathways present and thus, no likely significant effects.</p>
POLICY DMSI 1: Sustainable design and construction	<p>1. All development will be required to incorporate sustainable design and construction, relating to the scale, nature and form of the proposal.</p> <p>2. Major development proposals must demonstrate, in a supporting sustainability statement, how sustainable standards, and materials and low carbon technologies are integral to the design, construction and operation of the development; and be accompanied by a pre-assessment, demonstrating how the following standards, or any future replacement standards, will be met.</p> <p>a) all new non-residential development over 500 sqm floorspace (gross) must be designed and built to meet or exceed a BREEAM 'Excellent' rating (or updated equivalent)</p>	<p>No Likely Significant Effects</p> <p>This policy relates to sustainable building design. There are no linking impact pathways present and thus, no likely significant effects.</p>

Policy	Description	Likely Significant Effects
	<p>b) all non-residential refurbishment of existing buildings and conversions over 500sqm floorspace (gross) must be designed and built to meet or exceed a BREEAM non-domestic refurbishment 'Excellent' rating (or updated equivalent), and;</p> <p>c) all residential refurbishment development of 10 dwellings or more must be designed and built to meet or exceed a BREEAM Domestic Refurbishment 'Excellent' rating (or updated equivalent).</p> <p>3. All new residential development should meet a Home Quality Mark 3 star rating (or updated equivalent).</p>	
POLICY DMSI 2: Energy, heat and carbon emissions	<p>Carbon dioxide emissions</p> <p>1. The Council will expect major development to contribute and where possible exceed the borough's target of becoming carbon neutral by 2050 by maximising potential carbon reduction on-site and demonstrating the achievement of net zero carbon homes and buildings, in line with the Council's latest guidance.</p> <p>2. Development proposals are required to submit a detailed Energy Assessment, following the most recent guidance from the GLA, demonstrating how the development has been designed in accordance with the energy hierarchy and relevant policies set out in Policy SI 2 of the draft New London Plan Intend to Publish version.</p> <p>3. Where it is clearly demonstrated that the zero-carbon target cannot be achieved on-site and there is a well-justified shortfall, applicants will be expected to make a financial contribution in agreement with the Council, either through a cash in lieu contribution to the Council's Carbon Offset Fund, or agreement of sufficient alternative offsetting arrangements within the borough via planning obligations.</p> <p>Connection to district energy networks</p> <p>4. Development proposals will be expected to address an area's energy infrastructure requirements, as identified in the Council's Infrastructure Delivery Plan, with major development expected to adhere to the London Plan's heating hierarchy (Policy SI 3 of the Draft New London Plan Intend to Publish version). Decentralised energy will need to be prioritised in accordance with the London Plan's energy hierarchy and connect to any existing or planned low carbon District Energy Network (DEN) in the local area and be delivered with an on-site DEN serving the entire development site.</p> <p>5. Where there is no existing local DEN, developments should be designed to incorporate decentralised energy in accordance with the hierarchy outlined in the London Plan and subsequently connect to any future off-site DEN without modification. All new large-scale development (over 500 dwellings) should liaise with the Council about the creation of a new DEN.</p> <p>Low carbon and renewable energy technologies</p> <p>6. Development proposals will be expected to incorporate as much as low carbon and renewable energy technologies as possible with minimal impact on the environment, amenity and human health. They must demonstrate that the most appropriate and well-performing technologies are incorporated into new development and that any adverse effects on human health or the environment are avoided, or otherwise appropriately mitigated, including in respect of managing overheating risk.</p> <p>Overheating risk</p>	<p>No Likely Significant Effects</p> <p>This policy relates to energy, heat and carbon emissions. There are no linking impact pathways present and thus, no likely significant effects.</p>

Policy	Description	Likely Significant Effects
	7. All major development will be expected to mitigate overheating risk (for example through solar shading, building orientation, solar-controlled glazing and efficient mechanical ventilation) and submit an Overheating Assessment in accordance with the requirements of Policy SI 4 the New London Plan and the cooling hierarchy. This assessment must have regard to the Noise and Vibration Assessment in terms of managing both overheating risk and acoustics.	
POLICY DMSI 3: Nuisance	<p>1. Development proposals are required to:</p> <p>a) submit a noise and vibration assessment for all major applications to reduce any adverse impacts to an acceptable level using the most appropriate layout, orientation, design and use of buildings. This assessment must have regard to the overheating assessment in terms of managing both overheating risk and acoustics</p> <p>b) have regard to the Agent of Change principle (Policy D13 of the draft New London Plan Intend to Publish version)</p> <p>c) avoid, minimise and mitigate significant adverse demolition, construction and operational impacts (such as noise, vibration, artificial light, odour, fumes and dust pollution) on people and the built and natural environment through the development of a construction management plan</p> <p>d) manage nuisance resulting from development in areas where industrial and residential land uses are co-located; the emphasis should be on the developer of the sensitive use to provide accommodation that provides an acceptable level of amenity, particularly where this sensitive use will be located nearby an established industrial area</p> <p>e) ensure noise-sensitive and air quality-sensitive development is directed to appropriate locations, and protect these against any existing and proposed sources of noise and air pollution through careful design, layout and use of materials and adequate insulation</p> <p>f) where appropriate, work with the Council to manage noise by identifying and protecting areas of tranquillity that have remained relatively undisturbed by noise and are valued for their recreational and amenity value for this reason.</p> <p>2. Development proposals which generate unacceptable levels of nuisance, either individually or cumulatively, will generally be resisted.</p>	<p>No Likely Significant Effects</p> <p>This policy relates to nuisance. There are no linking impact pathways present and thus, no likely significant effects.</p>
POLICY DMSI 4: Air quality	<p>1. The whole borough is designated as an Air Quality Management Area (AQMA) for both nitrogen dioxide (NO₂) and particulate matter (PM₁₀). LBBB also have three designated Air Quality Focus Areas (see Policies map) – A13 Ripple Road, Barking town centre and Whalebone Lane North) where the EU annual mean limit value for NO₂ has been exceeded.</p> <p>2. Major development proposals must achieve or exceed the 'air quality neutral' benchmark (in line with Policy SI 1 of the draft New London Plan Intend to Publish version and LBBB's latest Air Quality Action Plan) by avoiding people's exposure to poor air quality. This should be achieved through:</p> <p>a) effective design solutions</p> <p>b) appropriate plant, machinery and technology</p> <p>c) facilitating the use of low or zero emission transport and reducing the reliance on private motor vehicles, while promoting walking and cycling</p>	<p>No Likely Significant Effects</p> <p>This policy relates to air quality. There are no linking impact pathways present and thus, no likely significant effects.</p> <p>Whilst this is a positive policy that aims to improve air quality overall in the Borough, it does not provide any specific mechanisms relating to international sites.</p>

Policy	Description	Likely Significant Effects
	<p>d) improving traffic management</p> <p>e) providing new green infrastructure in line with the Council's Infrastructure Delivery Plan and Green Infrastructure & Biodiversity Strategy (or updated equivalents).</p> <p>3. All major development will be required to demonstrate this in an air quality impact assessment as part of the planning application. If avoidance is not possible, exposure should be appropriately minimised and mitigated in accordance with the London Plan requirements. Developments proposing biomass boilers will be required to forecast pollutant concentrations and permission will only be granted if no adverse air quality impacts are identified.</p> <p>4. Development located within the borough's designated Air Quality Focus areas will be closely scrutinised as to the approach to air quality and will be expected to help reduce air pollution in the area.</p> <p>5. Where proposals do not achieve the air quality neutral benchmark, applicants will be expected to make a financial contribution in agreement with the Council, either through the Air Quality Fund, or through off-site measures within the borough, agreed via planning obligations. During demolition and construction, all developments must adhere to the requirements of the GLA's Control of Dust and Emissions during Construction and Demolition SPG 2014 (or updated equivalent) including the emissions standards set for all Non-Road Mobile Machinery (NRMM) used on-site.</p>	
POLICY DMSI 5: Land contamination	<p>1. Development proposals on, or adjacent to land potentially affected by previous contaminative land use will be required to be accompanied by a preliminary risk assessment (desk study), site investigations and risk assessments in line with the current guidance, and to prepare remediation proposals to deal with any contamination. Remediation proposals must be agreed with the Council prior to the commencement of any works.</p> <p>2. Development proposals will:</p> <p>a) ensure safe transportation, storage, and use of hazardous substances</p> <p>b) protect neighbouring occupiers and the natural environment from remediation impacts</p> <p>consult the Health and Safety Executive (HSE) and the Environment Agency (EA) on proposals involving hazardous substances where required.</p> <p>3. Hazardous substances are to be located where they would not cause potential health and safety risks to neighbouring uses or to the environment. Other uses should be prevented from being located near potentially polluting substances where future users could be at risk.</p>	<p>No Likely Significant Effects</p> <p>This policy relates to land contamination. There are no linking impact pathways present and thus, no likely significant effects.</p>
POLICY DMSI 6: Flood risk and defences	<p>Flood risk</p> <p>1. Development should seek to deliver a neutral or positive reduction in flood risk, on and off-site, by demonstrably giving sufficient consideration from the outset of the design, and during pre-application discussions with the Environment Agency (EA) and Thames Water.</p> <p>2. Development is required to undertake Flood Risk Assessments for schemes meeting the thresholds set out in DEFRA and EA guidance:</p> <p>a) adapt to climate change by planning for future flood risk. If a site is not currently shown to be within Flood Zone 2 or 3, but detailed modelling shows it is expected to be impacted when climate change</p>	<p>No Likely Significant Effects</p> <p>This policy relates to flood risk and defences. There are no linking impact pathways present and thus, no likely significant effects.</p>

Policy	Description	Likely Significant Effects
	<p>is assessed, then the same design considerations should be applied as if it was within the present-day Flood Zone.</p> <p>b) consult the Environment Agency to obtain these models and any other updates to modelling that contribute to the SFRA .</p> <p>3. Development proposals for vulnerable uses and sleeping accommodation must be located away from areas of high flood risk, and above the tidal breach level or fluvial 1 in 100 plus climate change flood level.</p> <p>4. All development within sites at risk of flooding should be guided towards areas of lowest risk within the site and development should be designed in strict accordance with the Development Control recommendations set out in Section 7 of the Strategic Flood Risk Assessment (SFRA) Level 1 Report.</p> <p>5. Basements, and any development not classified as water compatible, are not considered appropriate in Flood Zone 3b, and there are restrictions on their use and design within Flood Zones 2 and 3a with the Development Control recommendations set out in Section 7 of the SFRA Level 1 Report.</p> <p>Flood defences</p> <p>6. Development proposals along the Thames will be expected to:</p> <p>a) maintain, repair, enhance or replace flood defence walls, banks and flood control structures to provide adequate protection for the lifetime of the development</p> <p>b) protect land adjacent to, and set buildings back from, flood defences to allow future replacement of defences and provision of public amenity and biodiversity, in accordance with the Thames Estuary 2100 Plan</p> <p>c) seek opportunities to raise existing tidal flood defences to the required levels in line with the Thames Estuary 2100 Plan (or updated equivalent) in preparation for future climate change impacts, or demonstrate how defences can be raised to the required levels in the future through submission of plans and cross-sections of the proposed raising</p> <p>d) demonstrate the provision of improved access to existing defences, or where opportunities exist to realign or set back defences</p> <p>e) provide landscape, amenity and habitat improvements, where appropriate, in line with the riverside strategy approach;</p> <p>f) safeguard land for future defence raising</p> <p>g) secure financial contributions from partners in order to enable flood defence works.</p> <p>7. Where appropriate the Council will require proposals to include a condition survey of existing flood defences and watercourse infrastructure to demonstrate that it will adequately function for the lifetime of the development, and if necessary, make provision for repairs or improvements or replacement.</p>	
POLICY DMSI 7: Water management	<p>Surface water management</p> <p>1. As a minimum all development must:</p> <p>a) utilise permeable surfaces (including on areas of public realm and on small surfaces such as front gardens and driveways) unless they can be shown to be unfeasible</p>	<p>No Likely Significant Effects</p> <p>This policy relates to water management. There are no linking impact pathways present and thus, no likely significant effects.</p>

Policy	Description	Likely Significant Effects
	<p>b) seek advice from the Council as the Lead Local Flood Authority (LLFA) as to their preference on Sustainable Drainage Systems (SuDS).</p> <p>2. Development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible in line with Policy SI 13 of the draft New London Plan Intend to Publish version and the drainage hierarchy. All major development must incorporate SuDS into proposals, where appropriate, having regard to the government's latest Non-Statutory Technical Standards for Sustainable Drainage Systems and the Council's latest Strategic Flood Risk Assessment (SFRA).</p> <p>3. Minor developments are also expected to incorporate SuDS, where feasible. SuDS should be green, provide multiple benefits and integrate with the Council's Green infrastructure network.</p> <p>4. Proposals for SuDS will also need to include a long-term SuDS Management and Maintenance Plan, including details of who is responsible for maintenance.</p> <p>Wastewater</p> <p>5. Major development is required to demonstrate that the local water supply and public sewerage networks have adequate capacity, both on and off-site, to serve the development, taking into consideration the cumulative impacts of current and proposed development.</p> <p>Reducing water consumption</p> <p>6. All new development is required to reduce water consumption. New residential development must achieve a maximum internal water use target of 105 litres per person, per day, and non-residential development must achieve at least the BREEAM 'Excellent' standard for the Wat 01 water category (or updated equivalent) in line with Policy SI 5 of the draft New London Plan Intend to Publish version. The use of rainwater and grey water to minimise the use of mains water will be encouraged.</p> <p>7. The Council will support development proposals where they:</p> <p>a) consider the net increase in water and wastewater demand to serve their developments and also any impact the development may have off-site further down the network, if no or low water pressure and internal or external sewage flooding of property is to be avoided</p> <p>b) engage with Thames Water and use their free pre-planning service at an early stage if there will be capacity in the Thames water or wastewater networks to serve their development, or what they will do if there is not. The outputs of the communication can be included as evidence to support a planning application.</p>	
POLICY DMSI 8: Waste sites	<p>Waste sites</p> <p>1. Development proposals will be supported where they:</p> <p>a) comply with the policies set out in the latest East London Waste Authority Plan and consult with the council on the emerging plans currently being updated</p> <p>b) safeguard the existing permitted capacity at the waste sites within the borough to meet the Council's apportionment requirements set out in Policy SI 8 of the draft New London Plan Intend to Publish version</p> <p>c) seek to maximise the efficiency and capacity of waste facilities within the borough.</p>	<p>No Likely Significant Effects</p> <p>This policy relates to waste sites. There are no linking impact pathways present and thus, no likely significant effects.</p>

Policy	Description	Likely Significant Effects
	<p>2. Proposals for non-waste uses on safeguarded sites will only be considered acceptable where it is clearly demonstrated that a compensatory site provision, or compensatory capacity, will be delivered on a suitable replacement site within the borough in the first instance or another part of London that provides equivalent to, or greater than, the maximum annual throughput than the existing site could achieve.</p> <p>3. Compensatory capacity will be sought which is equivalent to or greater than the maximum annual throughput over the last five years, as per the Environment Agency tonnage data for the site such as the waste data interrogator or waste returns data. Compensatory provision should be provided locally. The area of search for a replacement site, or increased capacity within an existing facility, should be within the borough in the first instance, or failing that, elsewhere in London. Compensatory provision will usually be secured through conditions or a legal agreement at the planning permission stage.</p> <p>4. Additional waste site allocations could be made by means of a specific review as part of the development of the new waste plan.</p> <p>New or enhanced waste facilities</p> <p>1. New waste management facilities will be directed towards existing safeguarded sites and areas of search in accordance with the latest ELWA strategy. Proposals for new waste facilities, or to replace or extend an existing waste facility, will be support where they:</p> <ul style="list-style-type: none"> a) are appropriately located within a safeguarded waste site, or area of search, or integrated into a suitable new development b) help to move waste up the waste hierarchy with a focus on reuse, repair and remanufacture c) ensure that the scale and nature are compatible with adjacent existing and proposed land uses d) do not conflict with the vision for the area (see Chapter 2 and Chapter 3) in which they are located e) propose technology which is suitable for the location and nature of the site, including future-proofed renewable energy generation opportunities (in line with Policy SI 8 of the New London Plan) f) are fully enclosed, unless it can be demonstrated that environmental and amenity impacts, including in respect of nuisance and traffic, can be mitigated both during and after operations g) it provides effective on-site measures to ensure safety and security. 	
POLICY DMSI 9: Demolition, construction and operational waste	<p>Demolition and construction waste</p> <p>1. Prior to demolition and construction, major development proposals will be expected to:</p> <ul style="list-style-type: none"> a) develop an appropriate construction waste management plan in order to reduce, reuse and recover waste and to mitigate environmental impact in accordance with the targets set out in Policy SI 7 of the draft New London Plan Intend to Publish version b) adopt the principles of circular economy in the design of the development, using sustainable materials and aiming to achieve net zero-waste. A circular economy statement should be submitted with all major planning applications, in line with requirements of Policy SI 7 of the draft New London Plan Intend to Publish version and associated guidance 	<p>No Likely Significant Effects</p> <p>This policy relates to demolition, construction and operational waste. There are no linking impact pathways present and thus, no likely significant effects.</p>

Policy	Description	Likely Significant Effects
	<p>c) consider the use of the river for freight, including for the transportation of waste, from a development site either directly to and from the site or through the supply chain in line with Policy DMNE 4 Water Environment.</p> <p>2. The Council supports sustainable waste management, however there are instances where it is not appropriate to re-use materials on site and the principles defined in CL:AIRE:The Definition of Waste: Development Industry Code of Practice (DoWCoP) should be applied. If a proposed material reuse scenario cannot meet these principals, it is likely that material is waste, and its reuse will need to be managed in line with the requirements of the Environmental Permitting (England and Wales) Regulations 2010.</p> <p>Operational waste</p> <p>3. All new and refurbishment development proposals must submit a strategy for the minimisation and collection of waste and recycling and include sufficient and accessible space in their design and layout for waste storage and collection within developments, in accordance with the London Waste Recycling Board's (LWARB) latest guidance on recycling and storage. As a minimum, appropriate facilities must be provided, both within individual units and for the building as a whole, in order to separate and store dry recyclables (card, paper, mixed plastics, metals, glass), organic and residual waste.</p> <p>4. Major residential developments are required to incorporate high-quality, on-site waste collection systems that are based on current best practice and do not include traditional methods of storage and collection, such as kerbside collections and wheeled bin methods. The type of systems could include compactors, underground storage containers, vacuum systems and automated or pneumatic waste collection systems. These systems require land to be set aside to store bulky waste materials, with the size and footprint of the space varying from system to system. Applicants should discuss options with the Council regarding waste collection prior to the submission of an application.</p> <p>5. Non-residential proposals involving the use or disposal of hazardous substances will be supported where can demonstrate that the risks to public safety and the environment are appropriately managed in line with Policy DMSI 3 Nuisance.</p>	
POLICY DMSI 10: Smart utilities	<p>1. Development proposals will be supported where they directly provide, and demonstrate in their design the flexibility and adaptability to:</p> <p>a) incorporate smart technologies and approaches that enable resources, space, systems and materials to be monitored and managed efficiently, as well as support the balancing of the grid</p> <p>b) adopt protocols and systems that are compatible with others used in the borough and London, such as the local planning authorities, statutory undertakers, independent distribution network operators, social infrastructure providers and other organisations that are responsible for managing the public realm and supply vital services to the area, in order to allow for the safe sharing of information and efficient service provision</p>	<p>No Likely Significant Effects</p> <p>This policy relates to smart utilities. There are no linking impact pathways present and thus, no likely significant effects.</p>

Policy	Description	Likely Significant Effects
	<p>c) ensure open access provision of wired and wireless broadband technologies delivering the highest speeds to provide a wide range of services</p> <p>d) work proactively with the Council to plan, deliver and manage development</p> <p>e) give access to place makers and service providers to provide joined-up and efficient services that respond to customer needs.</p> <p>2. Development should prioritise connecting to strategic area wide telecommunications networks when and where they are available.</p> <p>3. Telecommunications development should be sited and designed in such a way that it does not adversely affect the appearance of the surrounding area. The Council will only support such development where:</p> <p>a) the siting is not intrusive in the street scene</p> <p>b) the design is of a scale, height and appearance which does not disrupt the character of an area</p> <p>c) the equipment has been designed to keep the size of the installation to the technical minimum and sited, so far as practicable, to minimise the impact on the environment</p> <p>d) screening of equipment housing and other visually intrusive development associated with the proposal is provided</p> <p>e) applicants have considered the need to include additional structural capacity to take account of the growing demands for network development, including that of other operators</p> <p>f) the applicant has certified that the development will operate within the latest (ICNIRP) guidelines for public exposure.</p>	
STRATEGIC POLICY SP8: Planning for integrated and sustainable transport	<p>1. The Council will work proactively with the GLA, TfL and other network operators to develop strategic transport plans which enhance growth by improving local connectivity across the borough and the wider London area. The Council will promote sustainable active travel by extending current schemes including Liveable & Low Emission Neighbourhoods. The borough's overall transport vision is outlined in Figure 22 below and is continually evolving.</p> <p>2. The borough will continue to follow the Mayor's Transport Strategy through delivery of its Local Implementation Plan (LIP) and supporting programmes. This will be achieved by:</p> <p>a) seeking improvements to and, where necessary, safeguarding existing land and buildings used for active travel (walking and cycling), public transport or related support functions critical for delivering the borough's strategy for improving the transport network and services, as set out in the Local Implementation Plan</p> <p>b) identifying and safeguarding new sites and space and route alignments, as well as supporting infrastructure and sites which allow for modal shift of freight from road to rail or river</p> <p>c) seeking to adopt a multifaceted approach which recognises the inter-relationship with successful placemaking, health and wellbeing and the environment in developing an integrated, joined-up system that allows people to travel easily both within the borough and between other inner and outer London boroughs</p>	<p>No Likely Significant Effects</p> <p>This policy relates to planning integrated and sustainable transport. There are no linking impact pathways present and thus, no likely significant effects.</p> <p>Whilst this is a positive policy that aims to improve air quality overall in the Borough, it does not provide any specific mechanisms relating to international sites.</p>

Policy	Description	Likely Significant Effects
	<p>d) 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</p> <p>e) Work with rail operators and TfL to improve Barking Station, which projections show will require increased capacity over the next decade.</p> <p>3. The Council will work with key stakeholders and partners to support the delivery of the Mayor's two strategic target by 2041 to achieve improved air quality and the health and quality of life of borough residents:</p> <p>1) 75% of all trips in London to be made by walking, cycling or public transport; and 2) the adoption of the Mayor's Vision Zero ambition to eliminate all deaths and serious injuries on the roads.</p> <p>4. In order to support the borough's growth, the Council will seek as standard, schemes which are car-free or offer a low level of parking provision. This will be supported by further development of local public transport networks and sustainable modes of travel such as wider footpaths, good cycling infrastructure and well-designed public realm walking and cycling routes.</p> <p>5. We will also encourage developments which prioritise the installation of electric vehicle charging points, in line with London Plan targets.</p> <p>6. The Council will support new and planned schemes such as Cycle Route CFR10, the National Cycle Route NCN13 extension and the Barking to Chadwell Heath cycle route, which will reduce severance and improve connectivity across the borough.</p> <p>7. The Council will seek a more sustainable approach to freight transport by working with developers, local businesses, freight operators and other partners to reduce traffic congestion and environmental impacts, whilst recognising the role of businesses in the local economy.</p> <p>8. Wharves can play an important role in supporting non-road-based freight and the Council will seek to maximise their use by the Council's partners.</p> <p>9. Mixed-use development proposals should be located where employment, housing and supporting facilities and services are within easy reach of each other and ensure they are connected by high-quality, safe and attractive cycling and walking routes.</p>	
POLICY DMT 1: Making better connected neighbourhoods	<p>1. Strategic and major development proposals should be located where employment, housing and supporting facilities and services are within easy reach of each other and connected by high-quality, safe and attractive cycling and walking routes.</p> <p>2. Active travel routes, which support walking and cycling, should connect to areas of Green Infrastructure around the borough. Walking routes must be suitable for wheelchairs, pushchairs and other users with limited mobility and must include places to stop and rest.</p> <p>3. Cycle routes should, where possible, be segregated from road transport and pedestrian walkways, following the best current design guidance. Infrastructure proposals should also demonstrate how they meet the Mayor's Healthy Streets approach in line with TfL's guidance .</p> <p>4. Development proposals should reduce the dominance of vehicles on London's streets whether stationary or moving, in line with the Mayor's Transport Strategy.</p>	<p>No Likely Significant Effects</p> <p>This policy relates to better connected neighbourhoods. There are no linking impact pathways present and thus, no likely significant effects.</p> <p>Whilst this is a positive policy that has the potential to increase -sustainable modes of transport that have the potential to improve air quality, it does not provide any specific mechanisms relating to international sites.</p>

Policy	Description	Likely Significant Effects
	<p>5. 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.</p> <p>a) A travel plan should be prepared as part of a planning application so that it can be considered in parallel to development proposals and readily integrated into the design and occupation of the new site, rather than retrofitted after occupation</p> <p>b) Applicants should also ensure they engage early with relevant stakeholders, including the borough, in order to establish the likely transport impacts and agree appropriate mitigation measures</p> <p>c) All developments will be required to demonstrate how they contribute to promoting sustainable modes of travel and limiting car use.</p> <p>6. Development that will have an adverse impact on the highway network (in terms of congestion, safety, air quality and noise) as well as the operation of public transport (including crowding levels and journey times) will be required to contribute and deliver appropriate transport infrastructure or effective mitigation measures, including a reduction of vehicular parking spaces. Where appropriate, conditions will be imposed or planning obligations secured through a Section 106 Agreement and in accordance with Policy DMM1 Planning Obligations.</p> <p>7. Strategic developments should provide bus access and the land required for bus standing which is vital for making new services operable. Development should also design and implement new junctions and road connections to allow buses to travel through the site. The borough will seek cycle facilities and local cycle routes to be provided within individual development sites to form a series of routes which would integrate locally into the National Cycle Network (NCN).</p>	
POLICY DMT 2: Car parking	<p>1. Car-free or car-lite development should be the starting point for all development proposals on sites that are (or are planned to be) well-connected by public transport (designated by an appropriate PTAL 5 or 6 rating), with developments elsewhere designed to provide the minimum necessary parking ('car-lite'). Car-free development will have no general parking but should still provide disabled persons parking in line with London Plan policy.</p> <p>2. Development will be resisted where anticipated car parking and vehicle use will impact on the delivery and design of liveable neighbourhoods or increase congestion and parking stress. Developments must comply with the following standards:</p> <p>a) New residential development should comply with DMT2 (1), with 'car-free' or 'car-lite' development as standard. For developments which exceed this, developers must provide a robust justification through Transport Assessments and Travel Plans as to why this level of parking provision is necessary and prove that it would not have negative impacts in terms of congestion and air quality or the development of sustainable transport networks</p> <p>b) 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</p> <p>c) New retail development should comply with the parking standards as set out in Table 10.5 (Maximum retail parking standards) and policy T6.3 of the draft New London Plan Intend to Publish version</p>	<p>No Likely Significant Effects</p> <p>This policy relates car parking. There are no linking impact pathways present and thus, no likely significant effects.</p>

Policy	Description	Likely Significant Effects
	<p>d) For redeveloped sites vehicle parking provision should be based on a transport assessment as per policy DMT1 (4), reflecting the current approach and not being re-provided at previous levels where this exceeds the standards set out in this policy. Some flexibility may be applied where retail sites are redeveloped outside of town centres in areas which are not well served by public transport</p> <p>e) Disabled parking is provided for all development, including car-free proposals in line with standards set out in the Draft London Plan</p> <p>3. Where parking is provided in a development it will be expected to:</p> <p>a) Provide a parking design and management plan, which follows the guidance provided by TfL's Parking Design and Management Guidelines, detailing mechanisms for leasing spaces, providing disabled parking to meet future demand and activating passive electric charge points</p> <p>b) All car parking spaces must be allocated to occupants, and strategies to convert car parking spaces to appropriate non-car parking uses (such as pocket gardens, parklets, public realm etc.) over time are encouraged, provided this does not have significant detrimental impacts on street parking, traffic and highways</p> <p>c) Include a car-free agreement within s106 agreements, restricting new residents from accessing parking permits within controlled parking zones</p> <p>d) Where existing residents' parking would be significantly impacted by the additional cars from a development, and this cannot be appropriately mitigated, developments will be expected to fund the costs of implementing a Controlled Parking Zone (CPZ), including permits for existing residents for the first year</p> <p>e) Car Clubs should be proposed for all developments which are 'car-free' or 'car-lite'. In these cases, or if an existing Car Club is located within a reasonable distance of the development, free membership for residents will be required for at least the first two years after first occupation.</p> <p>4. Development is required to ensure that provision of on-street parking does not obstruct cycleways and pedestrian lines; all car parking spaces should be allocated with no potential for providing more spaces than planned for. Parking spaces should be designed in accordance with the draft New London Plan Intend to Publish version and London Cycle Design Standards, having regard to best practice guidance.</p>	
POLICY DMT 3: Cycle parking	<p>1. Cycle parking guidelines must be guided by New London Plan Policy T5, with Table 10.2 providing the minimum cycle parking requirements for developments. Any developments proposing a more generous provision of cycle parking will be supported.</p> <p>2. The design and layout of cycle parking should be in accordance with the guidance contained in the London Cycling Design Standards, supported by appropriate on-site security measures.</p> <p>3. Where it is considered that proposed developments cannot accommodate sufficient cycle parking provision, borough officers must work with developers to propose alternative solutions which meet the objectives of the standards. These may include options such as providing spaces in secure on-street parking facilities such as bicycle hangers.</p>	<p>No Likely Significant Effects</p> <p>This policy relates cycle parking. There are no linking impact pathways present and thus, no likely significant effects.</p>
POLICY DMT 4: Deliveries, servicing and construction	<p>1. Development proposals must explore the use of alternative delivery and servicing practices and emerging technologies, including freight consolidation and re-timing of deliveries, freight movements by</p>	No Likely Significant Effects

Policy	Description	Likely Significant Effects
	<p>water (see DMNE 4), the use of electric and low or zero-emission vehicles, cycle freight, and the use of lockers in residential developments.</p> <p>2. All major new development proposals must be supported by an Outline Construction Logistics Plan and a Delivery and Servicing Plan in accordance with relevant TfL guidance.</p> <p>3. All developments should maximise the use of the river for freight, where appropriate, including for the transportation of construction materials to, and waste from a development site either directly to and from the site or through the supply chain and follow TfL guidance on Construction Logistics Plans and Delivery and Servicing Plans.</p>	<p>This policy relates deliveries, servicing and construction. There are no linking impact pathways present and thus, no likely significant effects.</p>
STRATEGIC POLICY SP 9: Managing development	<p>1. The Council encourages development proposals to come forward as early as possible to support the regeneration of the borough and will secure:</p> <p>a) a phased approach to place-making, where appropriate, to ensure coordinated and comprehensive development</p> <p>b) delivery of key infrastructure to ensure development is sustainable.</p> <p>2. The Council will work with private sector and public sector partners including Homes England, Registered providers and, on cross boundary issues, neighbouring authorities, to front-load infrastructure investment and delivery and unlock development especially in the Transformation Areas identified in Chapter 2: Transforming Barking and Dagenham.</p> <p>3. The Council's Infrastructure Delivery Plan (IDP), which will be periodically reviewed, identifies the infrastructure necessary to support development and to connect it to its surroundings and integrate new and existing communities.</p> <p>4. The Council and developers will be expected to proactively engage with residents and local businesses, using communications that best suit the communities to ensure continued opportunity to inform and shape development.</p> <p>5. The Council will use planning tools, including preparation of masterplans and design codes to support the delivery of the Local Plan and secure delivery of key community priorities.</p> <p>6. The Council may also use compulsory purchase powers to facilitate land assembly and the acquisition of all necessary rights to carry out development to enable the delivery of the growth strategy, including key infrastructure, as set out in this Local Plan and detailed in the latest IDP.</p> <p>7. The Council will monitor implementation of this Local Plan to assess whether growth targets and development outcomes are aligned. A framework identifying the key indicators that will be monitored is included in Appendix 4.</p> <p>8. The Council will undertake a full or partial update of this Local Plan if our assessment indicates that changes to policy would better support delivery or if our monitoring indicates an amended development strategy would be more effective.</p>	<p>No Likely Significant Effects</p> <p>A delivery management policy that provides for the management of development. There are no linking impact pathways present and thus, no likely significant effects.</p>
POLICY DMM 1: Planning obligations (Section 106)	<p>Indicative planning obligations</p> <p>1. The Council may use planning obligations to address a development's impacts and to ensure it aligns with the development plan for the borough. This may include the following planning obligations applied in line with the requirements set out in the rest of this Local Plan and the Planning Obligations SPD:</p>	<p>No Likely Significant Effects</p>

Policy	Description	Likely Significant Effects
	<p>a) affordable housing on-site or, if acceptable, an off-site financial contribution in place of this</p> <p>b) carbon offset payment, where policy requirements are not met on-site</p> <p>c) air quality measures off-site or a financial contribution if development does not meet the 'air quality neutral' benchmark</p> <p>d) measures or payment to increase biodiversity where net gain is not feasible on-site</p> <p>e) contributions to new green infrastructure and ecological resilience</p> <p>f) highways works or payments towards addressing any impacts as a result of the development</p> <p>g) other transport (including public transport) requirements arising from transport assessments and travel plans</p> <p>h) construction-phase employment and procurement targets</p> <p>i) occupation-stage employment and procurement targets</p> <p>j) delivery of on-site social or physical infrastructure or payments necessary to mitigate the specific impacts of the development</p> <p>k) affordable workspace, where required, or a payment in lieu</p> <p>l) fees associated with the monitoring of any planning obligation secured which are separate and additional to any legal fees required to be paid to the Council for the preparation of the legal agreement or undertaking.</p> <p>2. Other planning obligations may also be sought, where necessary, to mitigate the specific impacts of the development and where these cannot be secured by planning condition. Requirements for planning obligations will be assessed on a case-by-case basis and used where they meet the legal tests set out in Community Infrastructure Levy Regulations (2010) as amended.</p> <p>3. Payments secured as planning obligations will normally be required prior to commencement of the development (or phase of development in the case of outline permissions) unless a financial appraisal demonstrates that later payment is acceptable. Where delivery of specific infrastructure or other works are required to enable development, the Council will use planning obligations to define the timing of development in relation to delivery of this.</p> <p>Financial appraisals and viability review mechanisms</p> <p>4. Developments which cannot meet the Local Plan requirements because of viability impacts will be expected to provide evidence of this in a financial appraisal submitted as part of their planning application. If a financial appraisal demonstrates that planning obligations cannot viably be afforded, the Council will prioritise affordable housing, sustainability, public transport improvements and employment.</p> <p>5. The Council may include a planning obligation requiring a viability review of a development including up-to-date values and costs. Payments up to the level required by policy will be necessary if the viability review indicates these can be supported when the review is undertaken.</p> <p>6. Viability reviews will be required to comply with the GLA's Homes for Londoners, Affordable Housing and Viability Supplementary Planning Guidance 2017 (or its updated equivalent) and will typically be undertaken when:</p>	<p>A delivery management policy that outlines the use of planning obligations (Section 106). There are no linking impact pathways present and thus, no likely significant effects.</p>

Policy	Description	Likely Significant Effects
	<p>a) substantial implementation, as agreed and defined in the legal agreement, of the scheme has not occurred within 24 months of planning permission</p> <p>b) 75 per cent of units are have been sold or rented</p> <p>c) prior to implementation of the second or defined phase of the development or on an annual basis for phased development.</p> <p>Vacant Building Credit</p> <p>7. Where a Vacant Building Credit is sought to reduce the affordable housing contribution, a Vacant Building Credit Statement must be submitted alongside a planning application and such schemes are not eligible for a Fast Track assessment. The statement should demonstrate that:</p> <p>a) No part of the building has been in continuous use for any six months during the last five years up to the date of the planning application is submitted;</p> <p>b) the building has not been vacated solely for the purpose of redevelopment; or</p> <p>c) the building has been marketed for at least 24 months prior to the point of application.</p> <p>8. The Vacant Building Credit must define the existing gross internal floor area and the proposed gross internal floor area. Where the total proposed floorspace is unclear at the time of application, such as may be the case for outline applications, the final calculation of any Vacant Building Credit will be deferred to a later phase of the development when details are available. This approach will be secured through a Section 106 agreement.</p>	

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

Site reference	Site name	Distance to closest international site (Epping Forest SAC)	Within Epping 6.2km Zol?	Is it committed development, has planning permission?	Likely Significant Effect
DG	Bamford Road	5.749 km	Yes	No	Likely Significant Effect. This site is located within the 6.2km Zol for Epping Forest SAC. This site is subject to in-combination assessment
AA	Barking Riverside	8.137 km	No	Yes	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. In addition, it is already committed development, so does not require further consideration within this HRA.
AC	Marrieland's Crescent Two	10.079km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.
AD	Dagenham Leisure Park	9.38km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. It does not require further consideration within this HRA.

AE	Beam Park (South Dagenham East)	10.842km	No	Yes	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. In addition, it is already committed development, so does not require further consideration within this HRA.
AJ	Gascoigne East Estate (3 phases)	6.259km	No	Yes	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. In addition, it is already committed development, so does not require further consideration within this HRA.
AK	Vicarage Field	5.993km	Yes	Yes	Likely Significant Effect. A portion of this site is located within the 6.2km Zol for Epping Forest SAC. However, it is already committed development, so does not require further consideration within this HRA.
AL	Gascoigne Estate West (phased development)	6.241km	No	Yes	No Likely Significant Effects. This site is located outside of the Epping Forest SAC Zol. In addition, it is already committed development, so does not require further consideration within this HRA.

AM	Crown House & Linton Road car park	5.825km	Yes	Yes	Likely Significant Effect. This site is located within the 6.2km ZoI for Epping Forest SAC. However, it is already committed development, so does not require further consideration within this HRA.
AU	Abbey Retail Park (South)	5.814km	Yes	Yes	Likely Significant Effect. This site is located within the 6.2km ZoI for Epping Forest SAC. However, it is already committed development, so does not require further consideration within this HRA.
BB	Tesco car park	5.633km	Yes	Yes	Likely Significant Effect. This site is located within the 6.2km ZoI for Epping Forest SAC. However, it is already committed development, so does not require further consideration within this HRA.
CD	Land at the Corner of London Road and North Street (Former Site of White Horse PH and Omnibus Park)	5.809km	Yes	Yes	Likely Significant Effect. This site is located within the 6.2km ZoI for Epping Forest SAC. However, it is already committed development, so does not require further consideration within this HRA.

CF	Castle Green	7.420km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC ZoI. It does not require further consideration within this HRA.
CH	Chadwell Heath Industrial Estate	7.843km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC ZoI. It does not require further consideration within this HRA.
CI	Thames Road	7.6km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC ZoI. It does not require further consideration within this HRA.
CM	Gascoigne Industrial Area (phased development)	6.591km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC ZoI. It does not require further consideration within this HRA.
CO	Padnall Lake	7.256km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC ZoI. It does not require further consideration within this HRA.

CW	90 Stour Road	9.607km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC ZoI. It does not require further consideration within this HRA.
DJ	Clockhouse Avenue	6.003km	Yes	No	Likely Significant Effect. This site is located within the 6.2km ZoI for Epping Forest SAC. This site is subject to in-combination assessment
DM	Dagenham Heathway Mall	9.818km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC ZoI. It does not require further consideration within this HRA.
DN	Gascoigne South (phased development)	6.863km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC ZoI. It does not require further consideration within this HRA.
DO	Town Quay	6.078km	Yes	No	Likely Significant Effect. This site is located within the 6.2km ZoI for Epping Forest SAC. This site is subject to in-combination assessment

EA	Barking Station	5.662km	Yes	Yes	Likely Significant Effect. This site is located within the 6.2km ZoI for Epping Forest SAC. However, it is already committed development, so does not require further consideration within this HRA.
HA	Wickes (Hertford Road)	5.453km	Yes	No	Likely Significant Effect. This site is located within the 6.2km ZoI for Epping Forest SAC. This site is subject to in-combination assessment
HN	Ripple Road and Methodist Church	6.116km	Yes	No	Likely Significant Effect. This site is located within the 6.2km ZoI for Epping Forest SAC. This site is subject to in-combination assessment
RC	Barking Rugby Club	8.888km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC ZoI. It does not require further consideration within this HRA.
WF	Sainsburys 97-131 High Road	8.038km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC ZoI. It does not require further consideration within this HRA.

XC	Harts Lane Estate	4.969km	Yes	No	Likely Significant Effect. This site is located within the 6.2km ZoI for Epping Forest SAC. This site is subject to in-combination assessment
XD	41-59 (Odd) Hepworth Gardens 38-64 (Even) Southwold Drive 1-32 Hepworth Court Hepworth Gardens	6.938km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC ZoI. It does not require further consideration within this HRA.
XE	Ibscott Close Estate and highways land at Rainham Road South and Ballards Road	10.809km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC ZoI. It does not require further consideration within this HRA.
XJ	Former Ford Stamping Plant	10.331km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC ZoI. It does not require further consideration within this HRA.
XK	Riverside Gateway	7.357km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC ZoI. It does not require further consideration within this HRA.

YM	Phoenix House, 12-14 Wakering Road, Barking	5.876km	Yes	No	Likely Significant Effect. This site is located within the 6.2km ZoI for Epping Forest SAC. This site is subject to in-combination assessment
ZZ	GSR and Gill Sites Land on the West side of Chequers Lane, Dagenham	10.164km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC ZoI. It does not require further consideration within this HRA.
CV – Small Housing Site Allocations	North Becontree Station	8.496km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC ZoI. It does not require further consideration within this HRA.
CX – Small Housing Site Allocations	Salisbury Road Car Park	10.593km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC ZoI. It does not require further consideration within this HRA.
DZ– Small Housing Site Allocations	Dagenham Labour Hall	8.860km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC ZoI. It does not require further consideration within this HRA.

HL– Small Housing Site Allocations	Hapag Lloyd House	5.774km	Yes	No	Likely Significant Effect. This site is located within the 6.2km ZoI for Epping Forest SAC. This site is subject to in-combination assessment
HO– Small Housing Site Allocations	14-34 London Road	5.877km	Yes	No	Likely Significant Effect. This site is located within the 6.2km ZoI for Epping Forest SAC. This site is subject to in-combination assessment
WD– Small Housing Site Allocations	Former Victoria Public House	6.195km	Yes but only a small proportion	No	Likely Significant Effect. This site is located within the 6.2km ZoI for Epping Forest SAC. This site is subject to in-combination assessment
YG– Small Housing Site Allocations	Garages at Keir Hardie Way	7.772km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC ZoI. It does not require further consideration within this HRA.
ZT– Small Housing Site Allocations	58-62 Church Street	10.572km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC ZoI. It does not require further consideration within this HRA.

RA – School Allocation	New Pondfield School (special school)	9.915km	No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC ZoI. It does not require further consideration within this HRA.
RB – School Allocation	Ford Polar (special school)		No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC ZoI. It does not require further consideration within this HRA.
XR – Employment Allocations	Barking Power Station		No	?	No Likely Significant Effects. This site is located outside of the Epping Forest SAC ZoI. It does not require further consideration within this HRA.
XW — Employment Allocations	Plot 67 SEGRO Park		No	?	No Likely Significant Effects. This site is located outside of the Epping Forest SAC ZoI. It does not require further consideration within this HRA.
XX— Employment Allocations	Plot 70 SEGRO Park		No	?	No Likely Significant Effects. This site is located outside of the Epping Forest SAC ZoI. It does not require further consideration within this HRA.

XV— Employment Allocations	Plot 65 SEGRO Park		No	?	No Likely Significant Effects. This site is located outside of the Epping Forest SAC ZoI. It does not require further consideration within this HRA.
XS— Employment Allocations	Plot 62 SEGRO Park		No	?	No Likely Significant Effects. This site is located outside of the Epping Forest SAC ZoI. It does not require further consideration within this HRA.
XT— Employment Allocations	Plot 63 SEGRO Park		No	?	No Likely Significant Effects. This site is located outside of the Epping Forest SAC ZoI. It does not require further consideration within this HRA.
XU— Employment Allocations	Plot 64 SEGRO Park		No	?	No Likely Significant Effects. This site is located outside of the Epping Forest SAC ZoI. It does not require further consideration within this HRA.
ZW— Employment Allocations	Here East and Film Studios	10.837km	No	?	No Likely Significant Effects. This site is located outside of the Epping Forest SAC ZoI. It does not require further consideration within this HRA.

Proposed Traveller Broad Location 1	Choats Road		No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC ZoI. It does not require further consideration within this HRA.
Proposed Traveller Broad Location 2	Collier Row Road		No	No	No Likely Significant Effects. This site is located outside of the Epping Forest SAC ZoI. It does not require further consideration within this HRA.

Client:	LONDON BOROUGH OF BARKING & DAGENHAM COUNCIL
Project:	HRA FOR THE BARKING AND DAGENHAM LOCAL PLAN

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Design:	AM	Drawn:	AM
Chk'd:	CC	App'd:	AK
Date:	September 2020	Scale at A3:	47,545
Drawing Number: 60609166			A4

