



**London Borough of Barking and
Dagenham**

**Local Plan Reg 18
Consultation Summary
Report**
Draft Local Plan 2019-2034

Draft report

Prepared by LUC
March 2020

London Borough of Barking and Dagenham

Local Plan Reg 18 Consultation Summary Report Draft Local Plan 2019-2034

A summary of the responses to the second stage of public consultation on the draft Local Plan (Regulation 18), held between Friday 29th November 2019 - Saturday 29th February 2020.

Version	Status	Prepared	Checked	Approved	Date
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Contents

Chapter 1 Introduction	1	Appendix F Full Reg 18 Consultation Response	F-1
Chapter 2 Consultation Methods	2		
a) Hard Copies			
b) Website			
c) Email Correspondence			
d) Press & Social Media			
e) Consultation Events and Meetings			
Chapter 3 Overview of Consultation Responses	5		
Chapter 4 Summary of Key Responses Themes	8		
Appendix A List of Statutory and General Consultees	A-1		
Statutory Consultees:	A-1		
General Consultees:	A-1		
Appendix B Example Emails Sent to Statutory Consultees	B-2		
Appendix C Example Emails Sent to General Consultees	C-3		
Appendix D Article in Planning Magazine	D-1		
Appendix E Articles in Dagenham Post	E-1		

Chapter 1

Introduction

1.1 Be First is in the process of developing a new Local Plan for the London Borough of Barking and Dagenham (LBBD), when adopted by the LBBD Council (the Council) the new Local Plan will provide a framework for guiding development within the borough until 2034.

1.2 Between 29th November 2019 and 29th February 2020, the Council consulted with a range of stakeholders, including both statutory and non-statutory bodies (see **Appendix A**), as well as local communities, in order to seek views on the draft Vision, Objectives and Draft Policies within the Draft Local Plan 2019 - 2034. The consultation was carried out in accordance with Regulation 18 of the *Town Planning and Country Planning (Local Planning) (England) Regulations 2012* (Regulation 18).

1.3 This report contains a summary of the consultation carried out during this period of consultation and is prepared in accordance with Regulation 18. It provides an overview of the consultation responses received; and considers how these responses should be taken into consideration to inform the next iteration of the Local Plan. The key points to note are:

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

Chapter 2

Consultation Methods

Consultation Methods

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

- printed materials;
- online resources;
- direct e-mail correspondence;
- press and social media; and
- consultation events and meetings.

2.2 The details are set out below.

Printed Materials

Printed copies of the draft Local Plan were available to view at the following locations:

- Barking Town Hall;
- Barking Learning Centre;
- Dagenham Library;
- Marks Gate Library;
- Robert Jeyes Community Library;
- Barking & Dagenham College, Rush Green Campus Library;
- Thames View Library;
- Valence Library Archives and Local Studies Centre; and
- Participatory City Foundation “Every One Every Day” retail locations.

Online Resources

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

2.4 Link to the Council’s website:

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

2.5 The webpage included a link to ‘One Borough Voice’ an online public consultation platform hosted by Engagement HQ,

which is frequently used to host public consultations by both BeFirst and the Council. On the 'One Borough Voice' page, the public were able to provide structured feedback in the form of a questionnaire.

2.6 Link to the online consultation portal:

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

Direct Email Correspondence

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

Press and Social Media

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

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

Consultation Events and Meetings

2.9 LBBDD hosted four workshops and twelve pop-ups to help prompt conversation about the individual areas, as part of the Borough & Me/Local Plan consultation events. The details of the events are set out in **Table 2.1**.

2.10 Feedback obtained through the workshops that related to Local Plan's Visions for sub areas have been considered. Where appropriate, they have been fed into the development of policies in the next stage of the plan.

Table 2.1: Summary of Consultation Events

Type	Venue Location	Date	Time
Workshop	The Roost, Becontree	14 January	Tuesday AM
Pop Up	Hub at Castle Point, Becontree	22 January	Wednesday Lunch
Pop Up	Corner Coffee House, Becontree	18 January	Saturday AM
Pop Up	Future Youth Zone, Becontree	21 January	From 4pm
Pop Up	Marks Gate Community Centre, Chadwell Heath & Marks Gate	3 February	Monday 9.15 - 11.45 Everyday English
Workshop	Eastern Avenue Baptist Church, Chadwell Heath & Marks Gate	29 January	Wednesday PM
Pop Up	CU London, Becontree Heath & Rush Green	14 January	Tuesday Lunchtime
Workshop	B&D College, Becontree Heath & Rush Green	29 January	College Council
Workshop	U3A at Dagenham & Redbridge FC, Dagenham East, the Village & Beyond	20 January	Monday from PM
Pop Up	Leys Children Centre, Dagenham East, the Village & Beyond	28 January	Tuesday 1.30-2.30 Babbling babes
Pop Up	Cross Keys Pub, Dagenham East, the Village & Beyond	28 January	Tuesday 4-6pm
Pop Up	Rivergate Centre, Thames & Riverside	31 January	Friday 9-11am Little Fingers Play group
Workshop	Riverside School, Thames & Riverside	TBC	Young Citizen Action Group
Pop Up	Sue Bramley Centre, Thames & Riverside	23 January	Thursdays 10.30am Shed Life Thames View
Pop Up	Dagenham Dock train station / Asda, Dagenham Dock & Beam Park	5 February	From 4pm
Pop Up	Parents at Gascoigne Coffee Mornings, Barking, The Roding & More	21 January	Tuesday 9-10 Parent Coffee Morning
Pop Up	Vicarage Fields - Studio 3 Arts shop, Barking, The Roding & More	18 January	Saturday Midday
Workshop	Boathouse Creative Studios or BLC, Barking, The Roding & More	30 January	Evening

Chapter 3

Overview of Consultation Responses

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

3.2 In total, the Council received written representations from 75 individuals or organisations. Of these, 15 were statutory consultees. These representations generated 368 individual comments in relation to the Local Plan.

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

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

3.4 In total, 1,400 visitors were recorded as visiting the draft Local Plan webpages during the consultation period (29th November – 29th February).

3.5 Figure 3.1 illustrates the respondents by type e.g. Councillor or Developer.

3.6 Figure 3.2 illustrates the nature of the comments received e.g. support or objection

3.7 Figure 3.3 illustrates the number of comments received for each chapter.

Figure 3.1: Respondents by Type

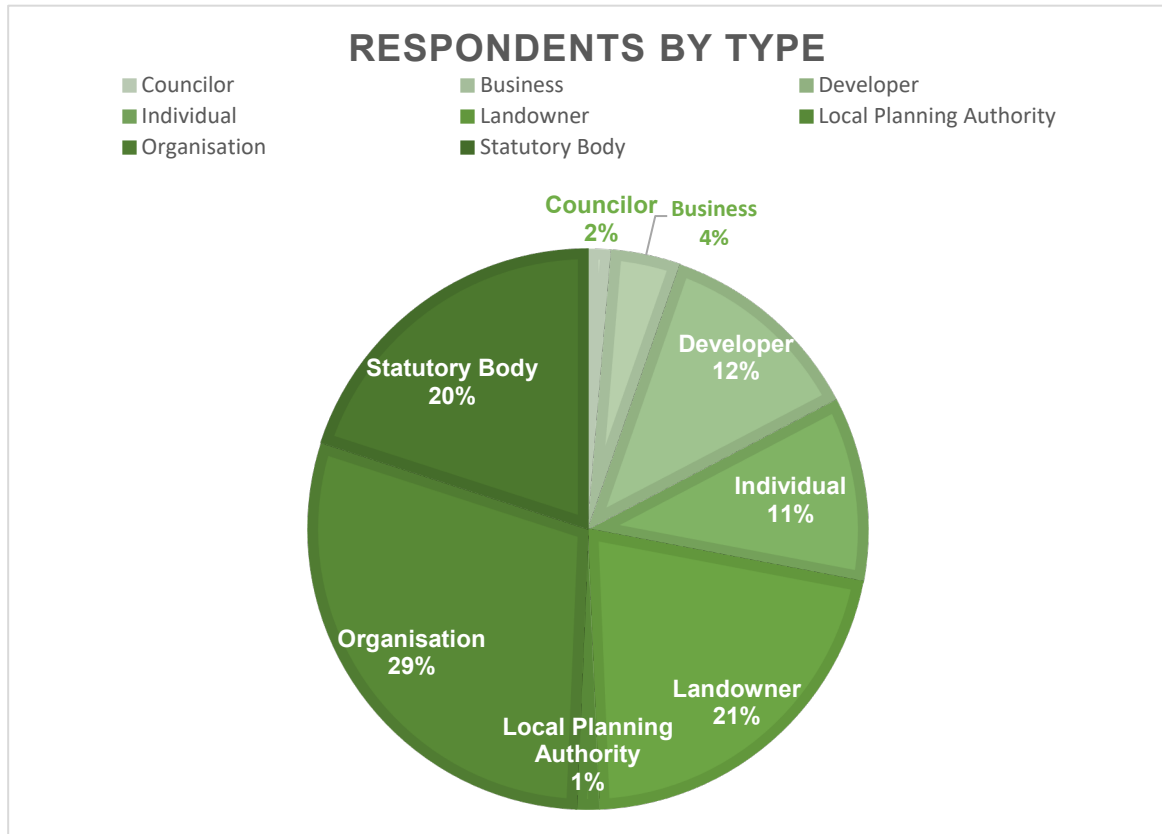


Figure 3.2: Nature of Responses by Comments

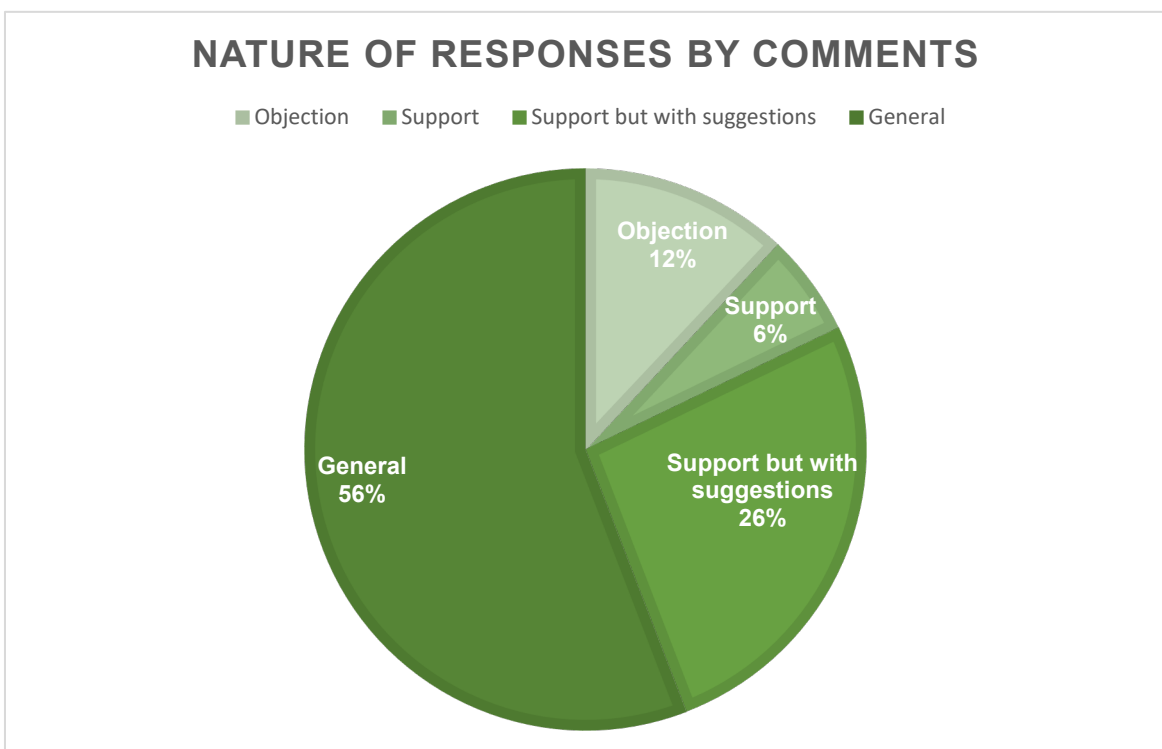
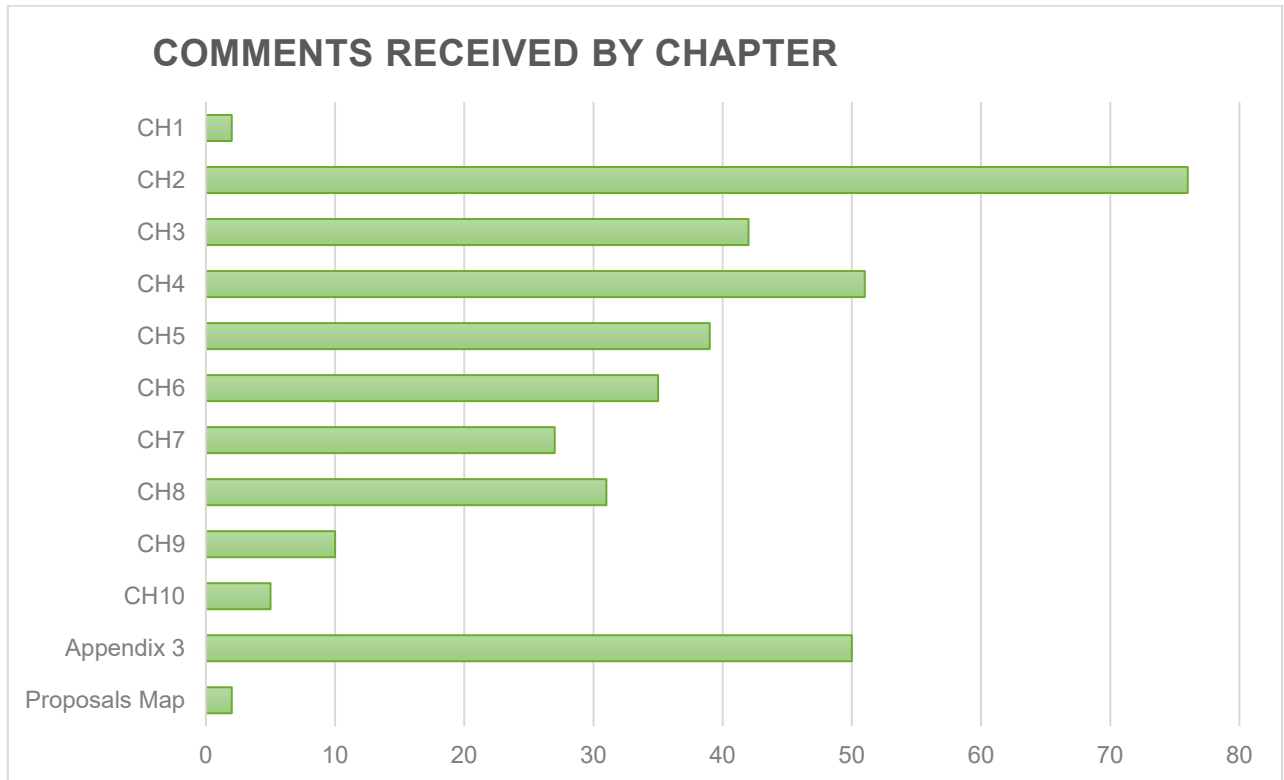


Figure 3.3: Number of Comments Received by Chapter



Chapter Headings

- Chapter 1: About this Consultation
- Chapter 2: Vision and Borough Places
- Chapter 3: Housing
- Chapter 4: Delivering a Resilient Economy
- Chapter 5: Design
- Chapter 6: Green and Blue Infrastructure and the Natural Environment
- Chapter 7: The Green Capital of the Capital
- Chapter 8: Transport
- Chapter 9: Social Infrastructure
- Chapter 10: Delivery and Monitoring
- Appendix 3: Potential Development Sites Proforma

Chapter 4

Summary of Key Responses Themes

4.1 A summary of the main issues raised during the Regulation 18 Consultation is provided below, along with the Council's response to the comments received.

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

	Policy/Theme	Summary of Issue	Council/BeFirst Response
1	Small Sites	The Council should consider the allocation and use of small sites within the existing developed areas to contribute towards exceeding the current target and meeting the housing need.	The potential to use small sites to meet housing need has been considered as part of the Strategic Land Availability Assessment (SLAA). An update to Draft Policy SP1 has been considered in light of the updated SLAA.
2	London Riverside Opportunity Area	The intention to contribute towards the delivery of the indicative capacity for 44,000 new homes and 29,000 new jobs at the London Riverside Opportunity Area, as set out in Table 2.1 of the Intend to Publish London Plan should be better demonstrated.	The use of maps and text to illustrate the London Riverside Opportunity Area have been considered to be aligned with the Intend to Publish London Plan.
3	The 10 Healthy New Town Principles	The 10 Healthy New Town Principles should apply to sites of fewer than 26 homes, or to sites that are less than 0.25 hectares. While there are clear examples of some principles that should not apply to smaller development, there may nevertheless be cases of small sites that can make a positive proportionate contribution to better walking and cycling conditions.	The use of the 10 Healthy New Town Principles for sites of up to 25 new homes and less than 0.25ha have been considered as part of the SLAA.
4	Placemaking	Placemaking is key. Good design and the protection of heritage should be considered.	The Local Plan has been updated to establish how local character and design will be valued by new developments over the plan period. It has also clarified that developments will have to abide by a design guide.
5	Loss of Industrial Uses and Existing Businesses	Concerns about the loss of industrial uses and existing businesses.	The Council has been working closely with existing businesses and other stakeholders in producing appropriate masterplans or design guidance for each sub-area. The Draft Local Plan has been updated to provide more specific guidance on area

	Policy/Theme	Summary of Issue	Council/BeFirst Response
			priority, which includes more detailed site allocation information.
6	Industrial Land Strategy	The extent of the loss of industrial capacity, either across the borough or in specific areas, is not clearly set out. The location of residential development is not reflected in either a draft Policies Map or individual maps for specific areas. There is an absence of any specific requirements for employment floorspace within the Borough. The Council should provide more clarity on the approach to releasing protected industrial land. The release of industrial land through the Local Plan process should not lead to unacceptable and uncontrolled release of industrial capacity. There is no certainty in regard to the relocation and/ or consolidation of designated industrial sites, which must first be agreed prior to considering where residential or other land uses can be introduced to such sites.	The Council will publish an Industrial Land Strategy as part of its evidence base, which will address the release and intensification of strategic industrial land in more detail.
7	Dwelling Size and Mix	It is suggested that it would be useful to provide a better understanding of the Borough's overarching housing size and mix requirements in draft Policy DM2. Housing mixes should reflect the fact that smaller dwelling sizes will be required to deliver higher density developments.	The relevant housing policies have been reviewed to ensure that sufficient smaller dwellings are facilitated by the Local Plan.
8	Affordable Housing	LBBD should better-reflect the approach to affordable housing including the threshold approach, off-site affordable housing and cash in lieu payments for affordable housing in the Intend to Publish London Plan.	Draft Policy DM1 has been updated to clarify general compliance with wording in the Intend to Publish London Plan.
9	Specialist Housing	The Local Plan should provide separate policy requirements for homes for older people, households with specialist needs, supported housing, hostels and student accommodation.	Draft Policy DM1 and its supporting text have been updated to consider requirements for older people, households with specialist needs, supported housing, hostels and student accommodation based on the Council's most up to date Strategic Housing Market Assessment (SHMA).

	Policy/Theme	Summary of Issue	Council/BeFirst Response
10	Health and Wellbeing	Health and wellbeing should embed throughout the plan, including within the sub areas, smaller sites and non-residential development. The opportunities section should reflect the full range of opportunities to support health and wellbeing arising from the scale of growth and change set out in the Local Plan. There is limited reference to providing new or improved sport facilities.	The Draft Local Plan has been reviewed to consider whether there is scope to include more support for health and wellbeing within smaller sites and non-residential development. Further discussions are being held with Sport England to address its concerns regarding the provision of new or improved sports facilities.
11	Tall Buildings	The current draft policy wording 'significantly taller than their neighbours' is not specific enough, the impact of this definition on new multi-layered industrial buildings should be considered.	The policy wording has been reviewed to take account of the impact on new multi-layered industrial buildings. Tall Building zones have been included within the revised Proposals Map.
12	Tall Buildings	Impacts of tall buildings on ground water have not been adequately addressed.	The policy wording has been reviewed and updated to require an assessment of impacts to groundwater (where necessary).
13	Tall Buildings	Policy wording does not adequately align with National Planning Policy Framework (NPPF) in relation to harm to heritage assets.	The policy wording has been reviewed so that it adequately aligns with the NPPF in relation to harm to heritage assets.
14	Tall Buildings	Suggestions that Public Transport Accessibility Levels (PTAL) alone are not the best measure to determine acceptability of tall buildings. Other suggestions include the creation of a 'landmark or gateway', or to include a consideration of future planned Public Transport accessibility.	The policy wording has been reviewed to consider future planned Public Transport alongside PTAL. The Proposals Map has been updated.
15	Tall Buildings	Protected views should be marked on the Proposals Map.	An indicative location of Tall Building Zones has been considered as part of the policy development. The Proposals Map has been updated to include all protected views.
16	Agent of Change	DM11 should be updated to place further emphasis on the need to safeguard existing and future occupiers to enable them to function as industrial uses effectively.	The policy wording has been reviewed to provide further clarity.

	Policy/Theme	Summary of Issue	Council/BeFirst Response
17	Design	Further clarity is required on when 'independent design scrutiny' referenced in Policy DM11 is required.	Further detail has been provided within the Local Plan regarding when 'independent design scrutiny' will be required.
18	Design	Policy DM2 should be updated, regarding unit sizes that are required to ensure compliance with the Intend to Publish London Plan.	Part 2 of Draft Policy DM2 has been updated to include reference to the Council's latest Strategic Housing Market Assessment (SHMA).
19	Flood Risk	Policies for managing flood risk lack consistency with national policy	The policy wording for SP4 has been reviewed to be consistent with national policy.
20	Heritage	Confirmation is required about when, and to what extent, Historic England should be engaged.	The policy wording for DM14 has been reviewed to provide clarity.
21	Natural Environment	A number of the policies need to be brought in line with the Intend to Publish version of the London Plan (e.g. Biodiversity Net Gain and the Urban Greening Factor).	All relevant policies have been updated in line with the new Intend to Publish London Plan requirements, where appropriate.
22	Natural Environment/Sustainability	Some of the policy wording needs to be updated in line with the Council's latest evidence base (e.g. Infrastructure Delivery Plan and Green Belt Review).	All relevant policies have been updated based on the Council's latest evidence base.
23	Blue Infrastructure	More reference to blue infrastructure, and the use of rivers for freight, is required throughout the Chapter.	The relevant policies have been reviewed and updated, where appropriate.
24	Open Space	Greater clarity needs to be provided on the definition of open space, to allow for greater flexibility for its provision.	All relevant policies have been reviewed and updated to provide further clarity of the definition of open space.
25	Trees/ Planting	More clarification is required for terms such as "native planting", "equivalent value of replacement trees", "trees and vegetation within flooding buffer zones" and "financial contributions to planting programmes".	All relevant policies containing the phrases "native planting", "equivalent value of replacement trees", "trees and vegetation within flooding buffer zones" and "financial contributions to planting programmes" have been reviewed and updated to provide further clarification.
26	Bird/ Bat Nesting	Stronger policy wording is required for bird/ bat nesting and roosting sites.	All relevant policies have been reviewed and updated to provide further clarification.
27	Sustainability	A number of the policies need to be brought in line with the Intend to Publish version of the London Plan (e.g. Waste Apportionment and Agent of Change principle)	All relevant policies have been reviewed and updated in line with the new Intend to Publish London Plan requirements for major developments.
29	District Heating Networks	Clarification of Section 2 of Draft Policy SP6 has been requested to more clearly define the time limitations regarding when	The Council have arranged a meeting with B&D Energy to discuss updates to Draft

	Policy/Theme	Summary of Issue	Council/BeFirst Response
		'future-proofing' for district heating is required, and that adequate financial and practical compensation is considered when seeking any future connections, after scheme implementation and operation.	Policy SP6 in relation to the Borough's District Energy Networks.
30	Air Quality	LBBD is affected by Air Quality Focus Areas and this should be made clear and identified on the Borough maps.	Air Quality Focus Areas have been added to the Proposals Map and all relevant illustrations and graphics have been updated accordingly.
31	Water	The conservation of water resources needs to be included within Draft Policy SP3.	The policy wording has been reviewed and updated.
32	Water	Developers should make early contact with Thames Water for pre-application advice.	The policy wording and supporting text have been reviewed and updated to include this.
33	Car Parking	Draft Policy DM32 should be updated to allow flexibility for car parking provision in line with the NPPF	Draft Policy DM32 has been updated to align with the NPPF.
34	Transport Mitigation Measures	Draft Policy DM31 should be updated to provide more clarity on transport mitigation measures.	Draft Policy DM31 has been reviewed and updated to provide more clarity on transport mitigation measures.
35	Infrastructure Delivery Plan	The Mayor of London has requested further detail within the Infrastructure Delivery Plan (e.g. sustainable transport modes and cycle ways).	The comments have been considered in the updates to the Council's evidence base.
36	Road Danger	Policy wording should be updated in line with the Vision Zero ambition of Barking and Dagenham's LIP3 and the Mayor's Transport Strategy.	The relevant draft policy wording has been reviewed and updated as necessary to align with the Vision Zero ambition of Barking and Dagenham's LIP3 and the Mayor's Transport Strategy.
37	TfL Guidance	Some policies need to be updated or need to at least reference TfL guidance (e.g. London Cycle Design Standards and Construction Logistics Plans, Delivery and Servicing Plans and Parking Design and Management Plan).	Draft Policies DM32 and DM33 have been reviewed and updated as necessary to reflect TfL guidance.
38	Freight	The draft policy fails to make any reference to the need to safeguard sites which allow for modal shift from road to rail/river.	The wording of Draft Policy SP7 has been reviewed and updated to reference the safeguarding of sites which allow for modal shift of freight from road to rail/river - in line with the Council's latest Industrial Strategy.
39	Infrastructure	Inadequate provision of child play spaces in specific areas.	The Council's Infrastructure Delivery Plan has been updated to support the Local Plan site allocation.

	Policy/Theme	Summary of Issue	Council/BeFirst Response
40	Infrastructure	Infrastructure requirement should be linked to Community Infrastructure Levy (CIL) to provide an opportunity for Works in Kind.	The Council's Infrastructure Delivery Plan has been updated to support the Local Plan site allocation. Delivery timescales of infrastructure projects have been provided based on the findings of the evidence base study.
41	Infrastructure	Policy should be reviewed to exclude the loss of sports pitches, which would be contrary to Sport England policy.	All relevant policies have been reviewed and updated to provide clarity.
42	Cultural Facilities	Suggestion that these should be protected along with other social infrastructure.	The policy wording has been updated to include protection of cultural facilities 'where the existing operation is viable'.
43	Cultural Facilities	24 months evidence is required (not 12) to demonstrate that public houses have been marketed before redevelopment will be allowed.	The policy wording has been updated to align with the Intend to Publish London Plan.
44	Cultural Facilities	Consideration of the requirements of future communities should be required.	The policy wording has been reviewed and updated to consider the requirements of future communities.

Appendix A

List of Statutory and General Consultees

Statutory Consultees:

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

Non-Statutory Consultees:

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

Appendix B

Example Emails Sent to Statutory Consultees

Example Email Sent to Statutory Consultees

Dear consultee,

Regulation 18 (2) Consultation on the LBBD draft Local Plan 2019-2034

I am writing to let you know that Be First are launching a period of public consultation on the new draft Local Plan on behalf of the London Borough of Barking and Dagenham (the Council).

As part of our statutory Duty to Co-operate (DtC) in accordance with the Localism Act 2011, we have identified your organisation as a statutory consultee, and welcome your feedback on this Regulation 18 draft of the Barking and Dagenham Local Plan.

This period of consultation will run from **29th November to 29th February 2020** for a total of 13 weeks.

You can view and download a copy of the draft Local Plan online on our website at <https://www.lbdd.gov.uk/local-plan-review>.

Printed copies are also available to read at Barking Town Hall, Barking Learning Centre, and the borough libraries.

If you would like to submit comments, you can do so via the online consultation platform at <https://oneboroughvoice.lbdd.gov.uk/local-plan>.

Alternatively, you can email planningpolicy@befirst.london, or post your comments to: Planning Policy Team, Be First, 9th floor, Maritime House, 1 Linton Rd, Barking IG11 8HG.

Please note the consultation closes on **29th February 2020**.

Kind regards,

Appendix C

Example Emails Sent to General Consultees

Example Email Sent to Non-Statutory Consultees

Subject: Public Consultation on the draft Local Plan 2019-2034 for Barking & Dagenham

Dear Sir/ Madam,

We'd like your views on the draft Local Plan 2019-2034

I am writing to tell you that between now and the end of February, we will be working with the council to consult local people and organisations about how our borough should develop and grow over the next 15 years.

In the first stage of this consultation, we are asking for views on the new draft Local Plan.

What is a Local Plan?

The Local Plan is an important planning document for Barking and Dagenham. It will provide a framework to guide growth and development within the borough up until 2034. It will set out how the borough will grow, where new homes will be built and jobs created, and decide what facilities are needed to support our changing population. It will also protect the features of the borough that our communities cherish, such as local parks, conservation areas and historic buildings.

Public consultation

We will undertake a period of public consultation from **29th November to 29th February 2020**. This will be your opportunity to shape the draft of the Local Plan and tell us how you think Barking and Dagenham should develop between now and 2034.

In Spring 2020 we will present you with a final submission version of the Local Plan for you to comment on prior to submitting the document to the Planning Inspectorate.

How can I comment?

You can read the Local Plan online on our website at <https://www.lbbd.gov.uk/local-plan-review>, and submit comments by post, email, and through our consultation webpage.

Printed copies are also available to read at Barking Town Hall, Barking Learning Centre, and the borough libraries.

You can comment online at <https://oneboroughvoice.lbbd.gov.uk/local-plan>.

Email: localplan@lbbd.gov.uk.

Or, send us your comments by post:

London Borough of Barking and Dagenham
Planning Policy
C/O Be First
9th Floor Maritime House
1 Linton Road
Barking, IG11 8HG

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

We look forward to hearing from you.

Be First Planning Policy Team

Appendix D

Article in Planning Magazine

East London borough consults on plans to almost double housing target

27 November 2019 by Colin Marrs

A London borough is to consult on a draft version of its local plan that would see its housing target almost double from current levels.



Barking town centre. Image by Julian Walker, Flickr

The London Borough of Barking and Dagenham has voted to seek views on [the draft plan](#), which proposes delivering more than 33,765 homes between 2019 and 2034 – equivalent to 2,251 a year.

This is a rise of 89 per cent on the annual target of 1,190 homes a year included in the current plan, adopted by the council in 2010 and covering the period to 2025.

To cope with the sharp increase, the draft document sets out a stepped trajectory, with a different target for each five years of the 15-year plan.

PLANNING

The document says: "This is to ensure that planned housing requirements are met fully within the plan period based on local circumstances."

[Sign out](#)

The [draft London Plan](#) has identified that the borough has the capacity to deliver [22,640 homes](#) between 2019 and 2029 – a figure of 2,264 homes each year.

The draft Barking and Dagenham plan would see an annual delivery target of 2,380 homes in the first five years, rising to 3,350 between 2024 and 2029.

For the remaining years of the plan (2029-24), the document proposes the annual delivery of 2,770 homes, using the government's standard methodology for calculating housing need.

The draft plan says: "The council aims to improve housing delivery within the borough by capitalising on opportunities provided by investment in, and regeneration of, its underutilised industrial land and existing town centres."

Barking and Dagenham Council undertook a call for sites between May and June, and the draft document said the authority will undertake detailed assessments on the submitted sites after the current consultation.

The housing policies in the draft plan include a requirement for 1,581 affordable homes per year, pushing for 50 per cent on-site provision.

A total of seven sub-areas have been identified within the plan area, covering: Barking town centre and the river Roding; Thames and Barking Riverside; Dagenham Dock, Beam Park and the Ford Stamping Plant; Becontree; Chadwell Heath and Marks Gate; Becontree Heath and Rush Green; and Dagenham East and Dagenham Village.

Within each of these sub-areas, the plan says it would allocate a number of strategic sites and specify where supplementary planning documents, design codes and other intervention strategies should be prepared.

A policy on employment sites says the council's "preference is to resist development proposals which would result in the net loss of viable employment floorspace, particularly affordable and low-cost workspace".

However, it adds it may consider proposals that can clearly demonstrate a site is genuinely unsuitable for continued employment use.

A further policy aims to limit the number of hot food takeaways, betting shops and pay-day loan shops. This includes a hot food takeaway exclusion zone around primary and secondary schools and other educational facilities.

The consultation will run from 29 November to 29 February.

Last month, Westminster City Council voted to submit its new draft City Plan for examination. A consultation last year prompted changes to the document including a relaxed maximum size limit on new homes plus stronger environmental and affordable housing targets.

Also last month, *Planning reported* that the London Borough of Croydon is considering releasing green belt land for 5,350 new homes in a review of its local plan in order to accommodate a 40 per cent hike in its annual housing need figure.

NOTE: This article was updated at 1.45pm on Friday 29 November to make clear that the consultation on the draft plan runs until 29 February and not 4 January as previously stated.

Appendix E

Articles in Dagenham Post

Editor's comment: Have your say on council's Local Plan

 **PUBLISHED:** 08:30 08 December 2019 | [Michael Adkins](#)



Group editor Michael Adkins.

Having a say on the decisions that affect your community and the lives of you and your loved ones is an important fabric of our society.

At the extreme end of the spectrum are votes like the upcoming general election or the EU referendum.

More localised consultations - often run by local authorities or organisations - are extremely important too.

It's often the local decisions that have a greater impact on our lives than the national agenda that leads the headlines on the mainstream news.

Local planning decisions could involve housing developments, leisure, education or transport decisions that can benefit you and your family.

That's why it's important that as many people as possible respond to the council's Local Plan consultation.

Development and progress is inevitable as Caroline Harper, chief planner for Be First, [outlines](#).

Barking and Dagenham is situated in a unique position because of its proximity to London and also Kent via the Dartford Crossing (with not perfect but much improved traffic flow since the removal of the tolling booths and barriers).

The A13 and surrounding area offers a fantastic amount of land and with land comes opportunity.

So why not set aside some time to digest the Local Plan and respond. Have your say on the things that matter to you and will affect you and your family for many years to come.

And don't forget to get out and vote in the general election on December 12.

Council set to poll people on new developments in Barking and Dagenham

 PUBLISHED: 12:26 26 November 2019 | UPDATED: 13:39 26 November 2019 | [Luke Acton](#)



A Be First fence in Barking. The council is setting out its plan for the borough up to 2034 in a new draft Local Plan. People can comment on the document from November 29 to the end of February. Picture: Luke Acton.

With the consultation opening on Friday, November 29, the document will ultimately set out what kind of development the council is expecting and what it'll throw its weight behind.

The Local Plan is a technical document used by planners to decide what to allow from investors, developers and builders. Every borough is required to have a Local Plan by law.

Caroline Harper is chief planner for the council's development arm Be First. She said: "The council is obliged to plan to accommodate growth and our ambition is to do this in a way that will benefit residents.

"We want to be sure the right sort of housing is available for our young people. And we want to attract new businesses that will generate good jobs.

"The Local Plan guides those who want to invest in our community to deliver what the community has said it wants between now and 2034.

"[It] talks about lots of key policy issues," Ms Harper added, "such as how we protect and enhance the environment and how we encourage residents to live more active, healthier and more sustainable lives. These issues are vitally important for the borough, so residents' views and suggestions are really important."

Developments for housing and industry are popping up across the borough, with more in the pipeline.

One of the most recent projects to get the go-ahead is a new laboratory for University College London in Dagenham. The council is hoping to see a new film studio built on the same site.

Appendix E

Summary of Key Responses Themes

Local Plan Reg 18 Consultation Summary Report
March 2020

The Local Plan consultation is set to run until the end of February. Be First said it's the first step in a wider programme asking people about growth and regeneration in Barking and Dagenham. The authority is planning to ask how people they see their neighbourhoods changing and how it should approach growth and regeneration in the new year.

Those who want to comment on the draft Local Plan for Barking and Dagenham 2019-2034 can visit lbbd.gov.uk/local-plan-review. It will also be available to review at the borough's libraries and at Barking Town Hall.

Appendix F

Full Reg 18 Consultation Response

Category	Rep ID (Be First)	Nature of Response	Relevant Chapter	Relevant Policy Number	Relevant Paragraph	Site Reference	Comment ID	Summarised Comment	LBBD/BeFirst Response
IND	LP001_EHQ	General	Chapter 7	n/a	n/a	n/a	LP18-001	The representation suggests that the Council should make use of individual recycling pods with underground removable collectors instead of loose bins in the main street.	The Council considers this to be a very specific reference to a design which can be introduced irrespective of references in the Local Plan and subject to discussions with the Council's waste team. The Council will hold an internal meeting to discuss this.
IND	LP001_EHQ	General	Chapter 8	n/a	n/a	n/a	LP18-002	Plan and spread installation for electric charge points for vehicles.	Chapter 8 has been reviewed and updated to ensure the relevant policy refers to electric vehicle charging points.
IND	LP001_EHQ	General	Chapter 9	n/a	n/a	n/a	LP18-003	Create permanent infrastructure for markets across the borough, with diversity of offer, including social media and events to enhance social behaviour and sense of belonging of locals and visitors.	Noted. No amendment to the Local Plan is required. Such infrastructure could be introduced irrespective of references in the Local Plan.
IND	LP002_EHQ	Support	Chapter 2	n/a	n/a	n/a	LP18-004	Yes, the vision is great and promising. It is suggested that the roundabout from the Barking Park Road entering the Barking Station is very ugly and needs to be changed. Also, there needs to be a playground near Northbury Primary School, the playground near the school does not fit the borough, the children there always complaining.	The Council/BeFirst is reviewing its Infrastructure Delivery Plan which will include transport and social infrastructure such as children's play space provision. The evidence base will help inform the next iteration of the Local Plan, as well as the Council's decision on planning for infrastructure to meet the Council's needs.
IND	LP002_EHQ	General	Chapter 5	DM11	n/a	n/a	LP18-005	Supported, but there is no playground for kids near Foresters Apartments on Linton road. The nearest one is near Northbury Primary School; which is not fit for purpose and ugly.	No, amendment is not required. The Council/BeFirst is reviewing its Infrastructure Delivery Plan which will include transport and social infrastructure such as children's play space provision. The evidence base will help inform the next iteration of the Local Plan, as well as the Council's decision on planning for infrastructure to meet the Council's needs.
IND	LP002_EHQ	General	Chapter 6	DM 18	n/a	n/a	LP18-006	Supported, but there is no playground for kids near Foresters Apartments on Linton road. The nearest one is near Northbury Primary School; which is not fit for purpose and ugly.	No, amendment is not required. The Council/BeFirst is reviewing its Infrastructure Delivery Plan which will include transport and social infrastructure such as children's play space provision. The evidence base will help inform the next iteration of the Local Plan, as well as the Council's decision on planning for infrastructure to meet the Council's needs.
IND	LP002_EHQ	General	Chapter 9	DM34	n/a	n/a	LP18-007	Supported, but there is no playground for kids near Foresters Apartments on Linton road. The nearest one is near Northbury Primary School; which is not fit for purpose and ugly.	No, amendment is not required. The Council/BeFirst is reviewing its Infrastructure Delivery Plan which will include transport and social infrastructure such as children's play space provision. The evidence base will help inform the next iteration of the Local Plan, as

Category	Rep ID (Be First)	Nature of Response	Relevant Chapter	Relevant Policy Number	Relevant Paragraph	Site Reference	Comment ID	Summarised Comment	LBBD/BeFirst Response
									well as the Council's decision on planning for infrastructure to meet the Council's needs.
BUS	LP003_BREWERS Decorator Centres	Support	Chapter 2	SP1	n/a	n/a	LP18-008	It encourages the Council to consider the allocation and use of small sites within the existing developed areas to make a contribution towards meeting the housing need, while also protecting existing employment use at such sites. The Brewers store at Colliers Row Road, Romford provides such an opportunity which should be included within the Draft Local Plan for the Regulation 19 consultations, which is due to take place later in 2020	The Council/BeFirst are undertaking a review of its Strategic Land Assessment to consider the allocation of small sites which meet the policy requirements at national and regional level
BUS	LP003_BREWERS Decorator Centres	Support	Chapter 3	SP2	n/a	n/a	LP18-009	Through this policy, the borough should look to allocate and promote the redevelopment of small sites where the employment uses are sought to be protected and other uses introduced to assist in making an effective use of land.	The Council will consider site allocations and support for the redevelopment of small sites following completion of the Housing Land Availability Assessment.
IND	LP004_CK	Objection	Chapter 2	n/a	Sub Area 5 - Chadwell Heath and Marks Gate	n/a	LP18-010	Concerns about existing residents if residences are to be demolished? Impact of new houses on traffic congestion.	Noted. Consideration of the points raised would be addressed through any future development estate renewal programme and development proposals in the area. The Council will make sure that local residents and businesses will be engaged on any future development at the earliest opportunity.
IND	LP005_CN	General	Chapter 9	n/a	n/a	n/a	LP18-011	Document should spell out how NHS has been consulted and the schools which are existing or are planned to be built or expanded.	The NHS has been consulted as part of the IDP process, and this will be outlined within the IDP report within the Regulation 19 consultation.
IND	LP005_CN	General	Chapter 8	n/a	n/a	n/a	LP18-012	Impact of additional development on capacity on the London, Tilbury and Southend Railway. There should be a clear statement that capacity issues have been considered.	The capacity of the London, Tilbury and Southend Railway will need to be considered as part of the Local Plan evidence base studies on transport.
ORG	LP007_TheatresTrust	Support	Chapter 2	n/a	Table 1	n/a	LP18-013	There is currently only one theatre on our records within the borough. Cultural facilities and venues can help attract and retain people, as well as support the success of town centres by increasing footfall. Therefore, there may be an opportunity to more strongly promote these types of uses within the vision.	Cultural facilities and venues have been promoted through policies where appropriate.
ORG	LP007_TheatresTrust	Support	Chapter 4	n/a	n/a	n/a	LP18-014	We welcome the supportive nature of the plan to cultural uses.	Noted.
ORG	LP007_TheatresTrust	Support	Chapter 9	DM34	n/a	n/a	LP18-015	Support the protection to facilities. For conformity with paragraph 92 of the NPPF it should be made clear the policy also applies to cultural facilities.	Draft Policies DM38 and DM8 have been reviewed and updated to ensure that the requirements of Para 92 of the NPPF are satisfied and that viable cultural facilities are afforded some level of protection within the Local Plan.

Category	Rep ID (Be First)	Nature of Response	Relevant Chapter	Relevant Policy Number	Relevant Paragraph	Site Reference	Comment ID	Summarised Comment	LBBD/BeFirst Response
STA	LP008_GLA	General	Appendix 3	n/a	n/a	All	LP18-016	It is important that flood risk is approached in an integrated way in line with the Thames Estuary 2100 Plan and more detail should be provide in relevant site allocations and other area-based strategies and emerging masterplans. We encourage the continued involvement of the Environment Agency as part of the emerging Local Plan.	The Council/BeFirst are undertaking ongoing engagement with the Environment Agency to discuss the Thames Estuary 2100 Plan.
STA	LP008_GLA	General	Chapter 2	n/a	Table 1, Figure 2	n/a	LP18-017	Reference to capacity improvements and upgrades and Barking station and environs should be included in Table 1 and Figure 2.	Reference to capacity improvement and upgrades, as well as Barking Station and environment will be included in the Draft Local Plan, where appropriate.
STA	LP008_GLA	General	Proposals Map	DM8	Figure 1	n/a	LP18-018	It is not clear whether plans for a new district town centre for Castle Green and Merriellands Crescent are one and the same, with these names being used interchangeably, or whether there is an intention to create three new district centres as opposed to two. LBBD should provide more clarity regarding its plans for these new district centres and should include maps setting out clearly the proposed (or indicative at this stage) town centre boundaries for each.	A Draft Proposals Map has been published for consultation alongside the Draft Local Plan as part of the Regulation 19 stage.
STA	LP008_GLA	Objection	Chapter 4	DM6	n/a	n/a	LP18-019	<p>The comment is related to conformity with the London Plan. The Local Plan should proactively consider whether selected parts of SIL or LSIS could be intensified to support residential and other uses.</p> <p>The Plan should set out the extent of loss of industrial capacity, the location of residential development and the revised SIL and LSIS boundaries. This should be set out in the draft policies map or individual maps for specific areas.</p>	The Regulation 19 draft Local Plan provides details on the strategic approach to the borough's designated industrial land based on the Council's latest evidence base - Strategic Industrial Land Strategy.

Category	Rep ID (Be First)	Nature of Response	Relevant Chapter	Relevant Policy Number	Relevant Paragraph	Site Reference	Comment ID	Summarised Comment	LBBD/BeFirst Response
STA	LP008_GLA	Objection	Appendix 3	n/a	n/a	n/a	LP18-020	<p>The comment is related conformity with the London Plan. The draft site allocations are largely driven by the potential redevelopment of large amounts of industrial land across the borough and other alternative spatial approaches have not been explored or tested. If LBBDs approach is to release, reconfigure, intensify and co-locate industrial land the approach should be informed by local up-to-date evidence setting out how, when and where this should happen and at what scale. The absence of evidence therefore makes it difficult for the Mayor to be able to support the potential release of industrial land at this scale and for that reason this is a matter of non-conformity with the current London Plan and the Intend to Publish London Plan.</p> <p>The Mayor encourages LBBD within the site allocations to identify those industrial sites where industrial intensification can take place and to identify sites where improvements might be made so that the industrial operations are able to function more effectively and so that vacancy rates are reduced while making the best use of land. Where existing industrial areas are identified for residential uses which would result in the loss of industrial floorspace capacity it should be noted that the threshold for the Fast Track Route is set at 50%.</p> <p>The site allocations should contain more detail regarding local context, prevailing building heights, listed buildings, conservation areas, areas at risk of flooding, nature conservation and strategic and local views among other material planning considerations. Proposed site allocations should indicate potential development capacities and appropriate building heights among other criteria so that there is an indication of how much development can be delivered realistically over the plan period.</p> <p>Proposed site allocations which are currently council housing estates should be identified clearly. The implications are that Intend to Publish London Plan Policy H8 will apply to these sites and where the demolition and replacement of affordable housing is proposed, the Viability Tested Route should be followed.</p> <p>The Former Ford Stamping Plant has been included twice in the site allocations and one of them should be removed to avoid double counting.</p>	<p>The Council/BeFirst are have been undertaking discussions with the GLA regarding the potential redevelopment of the borough's designated industrial land. The outcomes of these discussion are reflected in the latest version of the Draft Local Plan.</p> <p>The Regulation 19 draft has updated the housing trajectory to avoid double counting regarding the Former Ford Stamping Plant.</p>

Category	Rep ID (Be First)	Nature of Response	Relevant Chapter	Relevant Policy Number	Relevant Paragraph	Site Reference	Comment ID	Summarised Comment	LBBD/BeFirst Response
STA	LP008_GLA	General	Chapter 2	n/a	n/a	n/a	LP18-021	Each Sub Area map will benefit from being larger and clearer with a key alongside.	Clear sub-area maps have been included in the Regulation 19 iteration of the Draft Local Plan.
STA	LP008_GLA	General	Chapter 2	n/a	Sub Area 1 - Barking Town Centre and the River Roding	n/a	LP18-022	<p>The section should provide additional detail on how the needs of bus passengers will be considered, particularly as part of plans to review the road network. Existing bus stands and stops should be protected as necessary and the provision of new bus stand space or stops identified where needed. In particular, there is no bus stop east bound on London Road immediately east of the River Roding. This is likely to be necessary in light of the Plan's stated intention to 're-centre Barking around the Abbey Green' if emerging proposals for redevelopment of nearby sites are to be adequately served by the public transport network. The additional land needed to facilitate safe stopping for buses, as well as space for bus passengers and pedestrians on the footway, should be considered. It was agreed under the Gascoigne Estate Masterplan that a bus stand would be provided at the southern end of Gascoigne Estate to enable the 62 to terminate, turn around and serve Gascoigne Road in both directions. We request confirmation that this is still the intention and that it is reflected in any plans for the area.</p> <p>We support the re-establishment of connectivity for cyclists from Barking Town Centre across to Abbey Green and the onward link to Cycle Superhighway 3 (located in LB Newham to the south). However, the proposed Cycleway between Barking Riverside and Ilford through Barking Town Centre partially relies on the Council's desire to make Station Parade bus/taxi-access only, or something similar reducing traffic dominance and we would like to see any detailed plans for this included.</p>	The Council/BeFirst have been in discussions with the TfL regarding various transport projects across the Borough. The outcome of the discussions is reflected in the Draft Local Plan at Regulation 19 stage.
STA	LP008_GLA	General	Chapter 2	n/a	Sub Area 1 - Barking Town Centre and the River Roding	n/a	LP18-023	A further bullet point should be added which makes reference to capacity improvements and the upgrading of Barking Station to support development in the Barking Station environment.	A further bullet point has been added to make reference to capacity improvements and the upgrading of Barking Station to support future development in the Barking station environment.

Category	Rep ID (Be First)	Nature of Response	Relevant Chapter	Relevant Policy Number	Relevant Paragraph	Site Reference	Comment ID	Summarised Comment	LBBB/BeFirst Response
STA	LP008_GLA	General	Chapter 2	n/a	Sub Area 2 - Thames Road, Barking Riverside and Castle Green	n/a	LP18-024	<p>Within this sub-area there are a number of bus garages on River Road and the A13. Any potential loss of these facilities would need to be discussed at an early stage with TfL. In considering any changes we would need to consider total garage capacity including space needed to cater for future network changes, the availability of replacement facilities, the impact on day to day operations and the impact on competition for bus contracts. There is a bus strategy for Barking Riverside which should be referenced within the Plan.</p> <p>While reference is made to developments at Castle Green, we would welcome sight of an indicative layout to better understand how the bus network may adapt to accommodate this.</p> <p>The concept of a sustainable transport link (bus, cycle and pedestrians) from Barking Riverside to the Royal Docks across the mouth of the Roding is welcomed. Further work will be required to establish if this is feasible.</p> <p>Thames Road currently acts as a barrier for cyclists due to the severing effects and dominance of HGVs. While an alternative solution is via the Ripple Greenway, more up-to-date information on the Thames Road developments is welcomed in order to develop the most appropriate solutions.</p>	The Council/BeFirst have been in discussions with the TfL regarding various transport projects across the borough. The outcome of the discussions is reflected in the Draft Local Plan at Regulation 19 stage.
STA	LP008_GLA	General	Chapter 2	n/a	Sub Area 2 - Thames Road, Barking Riverside and Castle Green	n/a	LP18-025	<p>It is not clear whether plans for a new district town centre for Castle Green and Merriellands Crescent are one and the same, with these names being used interchangeably, or whether there is an intention to create three new district centres as opposed to two. LBBB should provide more clarity regarding its plans for these new district centres and should include maps setting out clearly the proposed (or indicative at this stage) town centre boundaries for each.</p> <p>Where new district centres are proposed these should be supported by appropriate and up-to- date evidence of demand, ensuring that where LBBB intends to create them that they provide a range of goods and services, and social infrastructure for the local communities they will serve and that they are accessible by public transport, walking and cycling. The new district centres should typically contain between 5,000 and 50,000 sqm of retail, leisure and service floorspace.</p>	<p>A Draft Proposals Map has been published for consultation alongside the Regulation 19 Draft Local Plan.</p> <p>The town centre policies have been reviewed to reflect the threshold of a new district centres based on the Council's latest Town Centre retail and leisure study updates.</p>

Category	Rep ID (Be First)	Nature of Response	Relevant Chapter	Relevant Policy Number	Relevant Paragraph	Site Reference	Comment ID	Summarised Comment	LBBD/BeFirst Response
STA	LP008_GLA	General	Chapter 2	n/a	Sub Area 3 - Dagenham Dock, Beam Park and Former Ford Stamping Plant	n/a	LP18-026	Where new district centres are proposed these should be supported by appropriate and up-to- date evidence of demand, ensuring that where LBBD intends to create them that they provide a range of goods and services, and social infrastructure for the local communities they will serve and that they are accessible by public transport, walking and cycling. The new district centres should typically contain between 5,000 and 50,000 sqm of retail, leisure and service floorspace.	The town centre policies have been reviewed to reflect the threshold of a new district centres based on the Council's latest Town Centre retail and leisure study updates.
STA	LP008_GLA	General	Chapter 2	n/a	Sub Area 3 - Dagenham Dock, Beam Park and Former Ford Stamping Plant	n/a	LP18-027	<p>We look forward to continuing to work with the Council on the strategic review of the A13 and support the recognition of this within the draft plan.</p> <p>We also support the aspiration to maximise permeability and improve walking and cycling routes, including those to the new rail station at Beam Park. Routes east-west are needed into Barking Riverside as well as north-south. There is a bus strategy for this area: http://content.tfl.gov.uk/review-of-bus-services-in-london-riverside-east.pdf which shows that parts of the sub-area are more than 400m from the bus network. Consideration might be given to the highway layout within the site to enable efficient bus movements through the site that are attractive to through passengers while maximising local access to the bus network. This might include the provision of a bus stand at Dagenham Dock station (which is not referred to in the above bus strategy review).</p>	Noted. The Council/BeFirst are undertaking a strategic review of the A13 alongside the development of the Draft Local Plan.
STA	LP008_GLA	General	Chapter 2	n/a	Sub Area 4 - Becontree	n/a	LP18-028	We note the aspiration to undertake feasibility work for rapid transit along arterial routes and would welcome further discussion on the matter.	The Council/BeFirst have been in discussions with the TfL regarding various transport projects across the Borough. The outcome of the discussions is reflected in the Draft Local Plan at Regulation 19 stage.
STA	LP008_GLA	General	Chapter 2	n/a	Sub Area 6 - Becontree Heath and Rush Green	n/a	LP18-029	Consideration should be given to Becontree Heath becoming a focus for buses, including as a bus terminus with route 150 and EL2 already terminating there - with the possibility to extend this to include the proposed EL4 route. Generally, bus stops are busy within the local area and these, and the relocated bus stand, should be protected.	The Council/BeFirst have been in discussions with the TfL regarding various transport projects across the Borough. The outcome of the discussions is reflected in the Draft Local Plan at Regulation 19 stage.

Category	Rep ID (Be First)	Nature of Response	Relevant Chapter	Relevant Policy Number	Relevant Paragraph	Site Reference	Comment ID	Summarised Comment	LBBD/BeFirst Response
STA	LP008_GLA	General	Chapter 2	n/a	Sub Area 7 - Dagenham East and Dagenham Village	n/a	LP18-030	Provision of a bus stand and turning facility in the vicinity of the site would provide the opportunity to serve the site better. The decision on providing a bus service would be dependent on a successful business case.	The Council/BeFirst have been in discussions with the TfL regarding various transport projects across the Borough. The outcome of the discussions is reflected in the Draft Local Plan at Regulation 19 stage.
STA	LP008_GLA	General	Chapter 2	SP1	n/a	n/a	LP18-031	In this section, use maps and text to illustrate the extent of the London Riverside Opportunity Area in relation to the Local Plan and show how the Local Plan reflects the borough's intention to contribute towards the delivery of the indicative capacity for 44,000 new homes and 29,000 new jobs as set out in Table 2.1 of the Intend to Publish London Plan. This should also be in accordance with Intend to Publish London Plan Policy SD1 which also recognises the importance of protecting industrial capacity in these locations through borough's development plans.	The Draft Proposals Map has been updated to include the London Riverside Opportunity Area.
STA	LP008_GLA	General	Chapter 2	SP1	n/a	n/a	LP18-032	The Council's commitment to improving the health and wellbeing of its residents and the importance of active travel in achieving this is welcomed. Draft policy SP1 on delivering growth promotes 10 Healthy New Town Principles, which is supported. It is noted that the policy states that it does not apply to sites of fewer than 26 homes, or to sites that are less than 0.25 hectares. While there are clear examples of some principles that should not apply to smaller development, there may nevertheless be cases of small sites that can make a positive proportionate contribution to better walking and cycling conditions. It is requested that this point is clarified, or that small sites should have regards to the principles as they apply to the site in question.	Draft Policy SP1 has been reviewed to include wording to support the principles of Healthy New Town Principles for small sites.
STA	LP008_GLA	General	Chapter 3	n/a	n/a	n/a	LP18-033	Updates should be made to this Chapter with strategy and policy provided to exceed the 22,640 target through greater delivery of housing from small sites in line with London Plan small sites policies. The borough's small sites target is for the delivery of 199 homes per year.	The Council has considered allocation and support for the redevelopment of small sites as part of the Housing Land Availability Assessment.

Catego ry	Rep ID (Be First)	Nature of Response	Relevant Chapter	Relevant Policy Number	Relevant Paragraph	Site Reference	Comment ID	Summarised Comment	LBBB/BeFirst Response
STA	LP008_GLA	General	Chapter 3	n/a	3.5	n/a	LP18-034	The housing targets established in the Intend to Publish London Plan are based on site capacity calculations carried out as part of the London Strategic Housing and Land Availability Assessment (SHLAA) 2017 which was carried out in collaboration with London Planning Authorities and the resulting housing targets, including LBBB's, are not based on the extensive release of industrial land. In fact, the strategic approach in the Intend to Publish London Plan is one where there is no net loss of industrial capacity across London as a whole and one which recognises the importance of protecting London's industrial capacity as set out in Paragraph 6.4.1 as being essential to the functioning of the Capital's economy and for the servicing needs of the growing population.	The Council has considered this as part of the updated strategic land availability assessment. Further engagement with the GLA has been undertaken on this issue in the context of the SoS's response to the 'Intend to Publish' London Plan.
STA	LP008_GLA	General	Chapter 3	n/a	3.6	n/a	LP18-035	Beyond 2029, the target should instead be based on a combination of the figures taken from the SHLAA 2017, local up-to-date evidence of identified capacity and the small sites target, which should be rolled forward in accordance with paragraph 4.1.12 of the draft new London Plan Intend to Publish version.	The Reg 19 Local Plan has been updated based on the local strategic housing land assessment, which is in line with the 2017 GLA SHLAA methodology.
STA	LP008_GLA	Objection	Chapter 3	DM1	n/a	n/a	LP18-036	This comment is related to conformity with the London Plan. The Local Plan needs to be amended to conform to the Mayor's Threshold Approach to affordable housing e.g. a strategic target of 50%. The threshold level for affordable housing is 50% where proposals would result in the loss of industrial floorspace capacity.	The Local Plan's affordable housing target is in line with the London Plan and its relevant SPG. Draft Policy SP2 sets out the Council's commitment to seek to meet 50% on-site provision of affordable housing, 35% is a minimum target. The Council will welcome further discussion with the GLA to improve the clarity of the policy wording.
STA	LP008_GLA	General	Chapter 3	DM1	n/a	n/a	LP18-037	The policy needs to clarify whether contribution to affordable housing for small sites is a requirement.	Draft Policy DM1 has been reviewed and updated to clarify affordable housing contribution on small sites.
STA	LP008_GLA	General	Chapter 3	DM1 Part 5	n/a	n/a	LP18-038	The Council should reflect the approach on the Intend to Publish London Plan that affordable housing should be delivered on-site but exceptional circumstances could justify off-site delivery only where it can be robustly demonstrated that affordable housing cannot be delivered on-site or where an off-site contribution would better deliver mixed and inclusive communities. Amendments should also make it clear that cash in lieu contributions should be used in even more limited circumstances in accordance with paragraphs 4.4.9 and 4.4.10 of the Intend to Publish London Plan.	Draft Policy DM1 has been reviewed and updated to reflect the wording on off-site affordable housing and cash in lieu payments for affordable housing in the Intend to Publish London Plan and its updated version soon.

Category	Rep ID (Be First)	Nature of Response	Relevant Chapter	Relevant Policy Number	Relevant Paragraph	Site Reference	Comment ID	Summarised Comment	LBBD/BeFirst Response
STA	LP008_GLA	General	Chapter 3	DM1 Part6 (c)	n/a	n/a	LP18-039	<p>The Council should note that 'low cost rented homes' does not include intermediate housing.</p> <p>It should also be updated to reflect up to date local evidence contained in the borough's SHMA which should set out clearly the level of need for different types of affordable housing over the plan period.</p>	Draft Policy DM1 has been reviewed and updated to clarify tenure split to reflect the most up to date local Strategic Housing Market Assessment (SHMA).
STA	LP008_GLA	General	Chapter 3	DM3	n/a	n/a	LP18-040	<p>It should provide separate policy requirements for homes for older people, households with specialist needs, supported housing, hostels and student accommodation.</p> <p>The London Plan annual indicative benchmarks for specialist older persons housing for LBBD is for 70 new dwellings a year as set out in Table 4.3 of the Intend to Publish London Plan. LBBD should work closely with providers to identify the locally specific needs for specialist older persons housing and identify specific sites within site allocations.</p> <p>LBBD should work with Coventry University London to identify any unmet accommodation needs and to address that need through its site allocations.</p>	Draft Policy DM1 and its supporting text have been reviewed and updated to consider requirements for older people, specialist needs, supported housing, hostels and student accommodation based on the council's most up to date SHMA.
STA	LP008_GLA	General	Chapter 4	SP3	n/a	n/a	LP18-041	<p>Draft Policy SP3 advocates the rationalisation or relocation of Safeguarded Wharves without providing detail about what that might mean. In this respect, Intend to Publish London Plan Policy SI15 should be followed, which is clear that boroughs should protect existing locations and identify new locations for additional waterborne freight where there are opportunities. As set out in the Intend to Publish London Plan, there may be opportunities to consolidate wharves as part of strategic land use change, however, this would need to ensure that existing and potential capacity and operability of the wharves is retained as a minimum and where possible expanded. The approach to rationalisation suggested in the draft Local Plan implies a reduction in wharf capacity which would not be acceptable. The draft plan should also be clear that where proposals come forward on sites adjacent to wharfs, that the importance of the agent of change policy is recognised so that future development is designed to ensure that there are no conflicts of use and freight capacity is not reduced. The ability of wharfs to operate on a 24-hour basis should not be compromised.</p>	Noted. The approach to Safeguarded Wharves is based on the Council's latest evidence base and also the Mayor's Safeguarded Wharves Review.

Category	Rep ID (Be First)	Nature of Response	Relevant Chapter	Relevant Policy Number	Relevant Paragraph	Site Reference	Comment ID	Summarised Comment	LBBB/BeFirst Response
								The Council should note that the Mayor's Safeguarded Wharves Review 2018-2019 is in its final stages. The recommendations have been approved by the Mayor, with the final stage being endorsement by the Secretary of State to issue any new/revised Directions.	
STA	LP008_GLA	General	Chapter 4	DM6	n/a	n/a	LP18-042	<p>This comment is related conformity with the London Plan. The site allocations give limited guidance regarding areas within SIL or LSIS that would be protected, or an analysis of how much industrial capacity would be retained and what scale and format this would take.</p> <p>A borough-wide strategic approach is required to bring all the site allocations together and not allocated to be determined on a case-by-case or even a masterplan-by-masterplan process. The borough-wide approach should attempt to apply the principle of no-net-loss of industrial floorspace capacity across the borough. It is also crucial that the extent of intended residential development within current SIL and LSIS areas is consistently referenced throughout the plan.</p> <p>Evidence base work should be conducted to investigate the underlying reasons for existing high levels of vacancy so that positive steps might be taken to bring these back into industrial use where there is demand and to support the re use of genuinely surplus industrial land and floorspace through the Local Plan process in the most suitable places.</p> <p>The Mayor's Practice Note on industrial intensification and co-location through plan-led and masterplan approaches (November 2018) sets out clear guidance which LBBB is advised to follow. LBBB should pay particular attention to the guidance on the preparation of industrial land demand/supply studies as part of the Local Plan evidence base.</p>	Noted. Details of the site selection method will be provided in the Strategic Land Availability Assessment as well as the Council's Industrial Land Strategy.
STA	LP008_GLA	General	Chapter 4	DM6	n/a	n/a	LP18-043	Suitable up-to-date evidence must be provided in the first instance before any land for utilities infrastructure or transport functions can be released in agreement with service and utility providers and this should be made clear in the draft Local Plan.	Noted. The updated Infrastructure Delivery Plan (IDP) has been published as part of the Regulation 19 consultation.
STA	LP008_GLA	General	Chapter 4	DM8	n/a	n/a	LP18-044	The office guidelines set out in Table A1.1 of the Intend to Publish London Plan should be followed. This identifies Barking town centre as having demand for existing office functions, normally within smaller units.	Noted. Draft Policy DM8 has been updated to take account of Table A1.1 of the Intend to Publish London Plan.

Category	Rep ID (Be First)	Nature of Response	Relevant Chapter	Relevant Policy Number	Relevant Paragraph	Site Reference	Comment ID	Summarised Comment	LBBD/BeFirst Response
STA	LP008_GLA	General	Chapter 5	DM12	n/a	n/a	LP18-045	<p>The current draft policy wording ‘significantly taller than their neighbours’ is not specific enough and the draft Local Plan should set out the appropriate building heights for specific localities in accordance with paragraph 3.9.3 and Policy D9 of the Intend to Publish London Plan</p> <p>Tall building heights and appropriate locations should be identified on maps in the draft Local Plan and should not be left for inclusion in masterplans.</p>	The definition of ‘Tall Buildings’ has been reviewed within the Regulation 19 version of the Local Plan.
STA	LP008_GLA	General	Chapter 6	DM19	n/a	n/a	LP18-046	LBBD should note that Intend to Publish London Plan Policy G5 sets out that boroughs should develop their own locally appropriate urban greening factor and LBBD is encouraged to do so.	It is considered that the current Draft Policy DM19 is aligned with the Intend to Publish London Plan Policy G5. The current Draft Policy DM19 has adopted the New Draft London Plan approach to achieve the Greater London Authority’s minimum target score of 0.3 for predominantly commercial developments and 0.3/0/4 for predominantly residential developments. It has recognised that the Council could operate an Urban Green Factor Scheme as a way of promoting green infrastructure and increasing the quantity and quality of green infrastructure through a separate study of the Urban Greening Factor for the London Borough of Barking and Dagenham.
STA	LP008_GLA	General	Chapter 6	DM20	n/a	n/a	LP18-047	Draft Policy DM20 should make clear that biodiversity offsetting will only be considered as a last resort and that losses must ideally be avoided in accordance with Intend to Publish London Plan paragraph 8.6.5.	Draft Policy DM20 has been updated to ensure it complies with Policy G5 'Biodiversity and access to nature' of the Intend to Publish version of the London Plan. This aims to make it clear that the approach "does not change the fact that losses should be avoided, and biodiversity offsetting is the option of last resort".
STA	LP008_GLA	General	Chapter 7	DM26	n/a	n/a	LP18-048	LBBD is affected by 4 Air Quality Focus Areas and this should be made clear and identified on borough maps.	Air Quality Focus Areas have been added to the Proposals Map and all relevant illustrations and graphics will be updated accordingly.

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STA	LP008_GLA	General	Chapter 7	DM29	n/a	n/a	LP18-049	<p>The draft Local Plan does not adequately demonstrate LBBD's ability to meet its waste apportionment targets for household, commercial and industrial waste as set out in Table 9.2 of the Intend to Publish London Plan. For LBBD the apportionment is for 505,000 tonnes by 2021 and 537,000 tonnes by 2041. Guidance set out in Policy SI8 of the Intend to Publish London Plan should be followed and reflected in the draft Local Plan in order to deliver the Mayor's ambition that 100% of London's waste is managed in London by 2026.</p> <p>As the Joint Waste Plan is at an early stage of development the Mayor would like to see a commitment from LBBD about how its apportionment needs will be met and how they are planning to meet waste needs beyond those apportioned over the plan period. Following on from this, the draft policy should seek to clearly protect waste sites until the joint waste plan is completed at which point it will form part of LBBD's development plan and will set out the strategic approach for the sustainable management of waste over the plan period in accordance with the Intend to Publish London Plan Policy SI9.</p>	<p>Policy DM29 has been updated in accordance with Table 9.2 and Policy SI8 of the Intend to Publish version of the London Plan to demonstrate LBBD's ability to meet its waste apportionment targets for household, commercial and industrial waste.</p> <p>The Council have been engaging with relevant stakeholders to discuss how the LBBD's waste apportionment targets will be met and how they are planning to meet waste needs beyond those apportioned over the plan period.</p> <p>Meanwhile, LBBD will continue to engage with all relevant stakeholders in the preparation of a new East London Joint Waste Plan through Duty to Cooperate.</p>
STA	LP008_GLA	General	Chapter 8	n/a	8.2	n/a	LP18-050	<p>Look forward to continuing to work with the Council on its transport modelling scenarios and the forthcoming publication of the Strategic Transport Assessment and supporting evidence base. This should examine outcomes for both road and public transport networks taking into account proposed mitigation measures. Dependent on the final outcomes from that work, consideration may need to be given to lower maximum parking standards than the draft London Plan and the introduction of wider parking controls, as well as other measures to reduce car use, increase public transport capacity and support higher levels of cycling and walking. The Infrastructure Delivery Plan should identify how such measures should be funded in order to support the proposed level of development.</p>	<p>The Council is undertaking additional transport studies across the borough, focusing on Barking Town Centre and along the A13. When available, updated information will be considered and incorporated into the Infrastructure Delivery Plan (IDP) where appropriate.</p>
STA	LP008_GLA	General	Chapter 8	SP7	n/a	n/a	LP18-051	<p>The Council is encouraged to set out a clearer recognition and support for the proposed Cycleway between Barking Riverside and Ilford through Barking Town Centre and prioritising the needs of bus passengers.</p> <p>The representation requests a reference to upgrading and increasing capacity at Barking station to support growth.</p> <p>The representation seeks to ensure that output of the forthcoming transport evidence base informs the policy framework as it is finalised.</p>	<p>The Council is undertaking additional transport studies across the borough, focusing on Barking Town Centre and along the A13. When available, updated information will be considered and incorporated into the Infrastructure Delivery Plan where appropriate.</p>

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STA	LP008_GLA	Support	Chapter 8	SP7 Part 2	n/a	n/a	LP18-052	Council's support for the Mayor's strategic target of 80 per cent of trips to be made by walking, cycling and public transport is welcomed. It would be helpful for the policy to highlight a few of the schemes more relevant to the borough and its growth, such as Beam Park station and the London Overground extension to Barking Riverside, and build upon it by making reference to more locally significant improvements, such as by referring to the upgrade of Barking station, the proposed station at Castle Green and the proposed Cycleway between Barking Riverside and Ilford. It should also include any other mitigation identified in the emerging transport evidence base. It may also be helpful for the additional information such as timing and financial status of such infrastructure proposals to be specified where known.	Draft Policy SP7 has been reviewed to make a reference to the relevant sections within the IDP which will include borough-relevant schemes.
STA	LP008_GLA	General	Chapter 8	SP7 Part 5 & 6	n/a	n/a	LP18-053	<p>It is noted that the key diagram contains a London Overground extension over the river to Abbey Wood. While it is possible that this link could come forward at some stage in the future, it should be recognised that there are challenges around such an option, including its high cost.</p> <p>It supports the safeguarding of land, buildings, sites and space for sustainable transport and its support functions. The policy could be strengthened with regard to buses, such as considering bus access to larger site/groups of sites, which may require land for bus standing or funding new junctions/road connections to allow the bus to travel through the site. It supports the approach to securing more sustainable freight. This could benefit from a reference to the role safeguarded wharves can play in supporting non-road-based freight.</p> <p>Welcomes the reference in point 6 to designing sites for walking, cycling and access to public transport. A reference to the Healthy Streets Approach and/or Indicators would help provide more detail in this regard. A variety of TfL guidance is available (https://tfl.gov.uk/corporate/about-tfl/how-we-work/planning-for-the-future/healthy-streets) as well as the contents of Policy T2 in the draft London Plan.</p>	The Draft Local Plan has been updated to reflect the latest transport evidence base and make a reference to the Healthy Streets Approach and/or indicators that would help provide more detail in this regard.

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STA	LP008_GLA	General	Chapter 8	DM31	n/a	n/a	LP18-054	<p>Requirements for transport assessments and the reference to TfL guidance in supporting text is welcomed. Likewise, the requirements for mitigation for any adverse impacts as a result of development, although impacts on active travel should also be addressed. Where the policy requires effective mitigation for development sites that would otherwise have an adverse impact on the highway network, it should be noted that at sites with car parking, reducing provision is an option for reducing road network impacts. This may not be captured by the wording 'contribute and deliver' which is more applicable to infrastructure/services improvements.</p> <p>It supports the reference to designing cycle routes in line with current best practice guidance. TfL have developed a spreadsheet tool and technical note to help implement our new quality criteria. It may be useful to include a link to these, which are available at: https://tfl.gov.uk/corporate/publications-and-reports/cycling.</p> <p>The policy would also benefit from referring to how road danger will be reduced in the borough, in line with the Vision Zero ambition of Barking and Dagenham's LIP3 and the MTS.</p>	Draft Policy DM31 has been reviewed and updated in line with the comments and references to quality criteria. The support texts have also included references to the Vision Zero ambition of Barking and Dagenham's LIP3 and the Mayor's Transport Strategy.
STA	LP008_GLA	General	Chapter 8	DM32 Part 1	n/a	n/a	LP18-055	The Mayor would prefer that parking standards be made into a real commitment rather than a preference.	Draft Policy DM32 Part 1 has been reviewed and updated regarding parking based on updated evidence base.
STA	LP008_GLA	General	Chapter 8	DM32 Part 1	n/a	n/a	LP18-056	The representation welcomes the reference to meeting or exceeding the minimum standards for cycle parking in the draft London Plan. The policy should also require cycle parking to be designed and located in accordance with TfL guidance set out in the London Cycle Design Standards (Chapter 8), including provision for larger and adapted cycles. It is noted that point 3 refers to sub-division of cycle stores. While there can be merit in this, particularly at larger developments, this approach can increase the total space required for cycle parking. It may also make specific types of cycle parking – such as larger bays for disabled users with adapted cycles – significantly less convenient for those using it, which should be avoided. If the Council favours separation for security reasons, it should be noted that suitable door control, natural surveillance preferably supported by CCTV, and good quality stands can be sufficient to ensure security.	Draft Policy DM32 Part 1 has been reviewed and updated to accord with the TfL guidance set out in the London Cycle Design Standards (Chapter 8), including provision for larger and adapted cycles. Additional detail will be added to the point on sub-division of cycle stores, as recommended.

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STA	LP008_GLA	General	Chapter 8	DM32 Part 5	n/a	n/a	LP18-057	The representation would welcome greater clarity on point 5, a clearer separation between road network impacts (i.e. the movement of cars) and parking impacts (i.e. the storage of cars). Regarding the former, if development in the borough is expected to cumulatively have negative outcomes on the road network, suitable mitigation should be identified and secured. Regarding the latter, car-free/lite policies are necessary to minimise the congestion impacts of new development, but this can be undermined if new residents are permitted to park on existing streets. The implementation of controlled parking zones is therefore an essential supporting tool in securing less car-dependent development and minimising the impact on existing residents.	Draft Policy DM32 Part 5 has been reviewed and updated to provide further clarification regarding road network impacts and suitable mitigation.
STA	LP008_GLA	General	Chapter 8	DM32 Part 7	n/a	n/a	LP18-058	The representation strongly welcomes reference to not exceeding the car parking standards of the draft London Plan, which will be essential in minimising the congestion, emissions and road danger associated with new development in the borough. It welcomes the encouragement of car-free development in point 7, though this could go further to encourage less than the draft London Plan maximum standards where appropriate, as the standards already require car-free and car-lite development in most locations. It is worth noting in the policy that the London Plan applies lower maximum standards in Opportunity Areas, reflecting their potential to deliver more sustainable, planned growth compared to areas with more incremental growth.	The Council/BeFirst are undertaking further transport evidence base studies regarding car parking and the policy will be updated to reflect any recommendations from transport studies where appropriate.
STA	LP008_GLA	General	Chapter 8	DM32 Part 8	n/a	n/a	LP18-059	While the reference to improving the design of car parking is welcome, it should be noted that there is little guidance within the London Plan itself. Instead the policy should refer to forthcoming TfL/GLA parking design and management plan guidance. It is noted that there is reference to the allocation of car parking spaces. The policy should make clear that if spaces are to be allocated, they should be allocated to occupants rather than dwellings, as London Plan Policy T6.1(B) requires parking spaces to be leased rather than sold. There are cases where unallocated parking can be efficiently managed in a way that allows for spaces to be reduced over time which the Council may wish to consider. This includes through the use of permits allowing for access to parking areas, which can allow space to be used more efficiently overall.	Draft Policy DM32 Part 8 has been reviewed and updated to refer to the forthcoming TfL/GLA Parking Design and Management Plan guidance and make it clear on policy requirements to allocate parking spaces in accordance with the Intend to Publish version of the London Plan.

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STA	LP008_GLA	General	Chapter 8	DM33	n/a	n/a	LP18-060	<p>The representation would welcome further detail in this policy, informed by draft London Plan policy T7. Given the location of the borough relative to the rivers Thames and Roding, there appears to be a particular opportunity to provide more direction on supporting freight movements by water rather than by road. Reference to cycle freight as well as electric vehicles would be beneficial.</p> <p>While drones are mentioned as an alternative delivery option that will be encouraged, their safety as a delivery method has not yet been established. It is recommend that all reference to drones be deleted from the policy and accompanying text until a wider policy view by the Mayor and/or Government is put forward.</p> <p>A link to TfL guidance on Construction Logistics Plans and Delivery and Servicing Plans could usefully be included in the accompanying text: https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guide/freight.</p> <p>The Council may also wish to consider the role lockers in residential developments could play in reducing deliveries</p>	Draft Policy DM33 has been reviewed and updated in line with the Intend to Publish version of the London Plan Policy T7. Additional information has been added regarding freight movements by water, cycles and electric vehicles, as recommended; reference to drones has been deleted and a link to the TfL guidance on Construction Logistics Plans and Delivery and Servicing Plans has been added.
STA	LP008_GLA	General	Chapter 4	SP3	n/a	n/a	LP18-061	LBBD's currently adopted Local Plan contains policies which protect and promote the diversification of the borough's evening economy. The Mayor would like to see this approach carried through into the draft Local Plan so that is more aligned with Policy HC6 of the Intend to Publish London Plan and builds on the Mayor's vision of London as a 24-Hour City.	Draft Policy SP3 has been updated accordingly.
STA	LP008_GLA	General	Chapter 5	DM8	n/a	n/a	LP18-062	It is encouraged to identify, protect and promote culture within the borough like it has in the past and to reflect the approach set out in Policy HC5 of the Intend to Publish London Plan.	Draft DM8 has been reviewed and updated to refer to the emerging London Plan Policy HC5.
STA	LP008_GLA	General	Chapter 9	DM35	n/a	n/a	LP18-063	Policy DM35 should be amended to reflect the authoritative marketing period set out in Paragraph 7.7.7 and Policy HC7 of the Intend to Publish London Plan which requires at least 24 months marketing as a pub at an agreed price following an independent valuation.	Policy has been amended to require 24 months marketing evidence.
STA	LP008_GLA	General	Chapter 8	n/a	n/a	AA Barking Riverside	LP18-064	The representation requires protection of all the bus infrastructure secured in the masterplan / previous consents	The Council will give the protection of bus infrastructure further consideration as part of the ongoing Infrastructure Delivery Plan update and masterplan work.

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STA	LP008_GLA	General	Appendix 3	n/a	n/a	CJ Former Ford Stamping Plant	LP18-065	Consideration to be given to the road layout to meet objectives in London Riverside East study.	Site CJ has been reviewed to take account of the road layout to meet objectives in London Riverside East Study.
STA	LP008_GLA	General	Appendix 3	n/a	n/a	AH Freshwharf Estate	LP18-066	Buses are expected to be routed through the development. There is also potential for bus routeing on the southern perimeter and across the Roding into the Shaftesburys.	The Council/BeFirst are undertaking ongoing discussions with the TfL regarding various transport projects across the Borough. The outcome of the discussions will be reflected in the Draft Local Plan at Regulation 19 stage.
STA	LP008_GLA	General	Appendix 3	n/a	n/a	AI Becontree Heath	LP18-067	Possible risk to the bus stand and this requires protecting. The site is also adjacent to important bus stops.	Site AI has been reviewed to take account of the comment regarding protecting the existing bus stand and adjacent bus stops.
STA	LP008_GLA	General	Appendix 3	n/a	n/a	AJ Gascoigne Estate East	LP18-068	Require protection of bus infrastructure and routeings as per current masterplan / consents.	Site AJ has been reviewed to take account of the comment regarding protecting the existing bus stand and adjacent bus stops.
STA	LP008_GLA	General	Appendix 3	n/a	n/a	AL Gascoigne Estate West	LP18-069	Protection of possible 2-way bus routeing along The Shaftesburys across the Roding to southern perimeter of Fresh Wharf.	Site AL has been reviewed to take account of the bus routing along the Shaftesburys across the Roding to southern parameter of Fresh Wharf Estate.
STA	LP008_GLA	General	Appendix 3	n/a	n/a	BC 160 London Road	LP18-070	Consideration to the provision of a bus stop on this part of London Road	The Council/BeFirst are undertaking ongoing discussions with the TfL regarding various transport projects across the Borough. The outcome of the discussions will be reflected in the Draft Local Plan at Regulation 19 stage.
STA	LP008_GLA	General	Appendix 3	n/a	n/a	CD London Road, BCT	LP18-071	Risk of loss of bus stand. This requires protecting.	Site CD has been reviewed to take account of the comment regarding protection of the existing bus stand.
STA	LP008_GLA	General	Appendix 3	n/a	n/a	CF Castle Green	LP18-072	Risk of loss of a bus garage. Implications need to be properly considered.	Site CF has been reviewed to take account of the comment regarding protecting the existing bus garage.
STA	LP008_GLA	General	Appendix 3	n/a	n/a	CG Creekmouth	LP18-073	We need to have more information to establish if the site interacts with the current busway and stand at the western end of the final phase of Barking Riverside. This includes a possible public transport connection over the Roding.	Site CG has been reviewed to take account of the comment regarding the current bus way and stand at the western end of the final phase of Barking Riverside, as well as considerations for a possible public transport connection over the Roding.
STA	LP008_GLA	General	Appendix 3	n/a	n/a	XJ Former Ford Stamping Plant	LP18-074	Consideration needs to be given to how buses might traverse across the site to get to Dagenham Dock station. There is a potential need for a bus stand and turning facility at the station.	Site XJ has been reviewed to take account of the comment regarding protection of the existing given to how buses might traverse across the site to get to Dagenham Dock station.

Catego ry	Rep ID (Be First)	Nature of Response	Relevant Chapter	Relevant Policy Number	Relevant Paragraph	Site Reference	Comment ID	Summarised Comment	LBBD/BeFirst Response
STA	LP008_GLA	General	Appendix 3	n/a	n/a	DN South of Gascoigne	LP18-075	Protection of bus infrastructure and routeings as per current masterplan / consents.	Site DN has been reviewed by taking account of the comment regarding protecting the existing routeings as per current masterplan / consents.
STA	LP008_GLA	General	Appendix 3	n/a	n/a	EA Barking Station	LP18-076	Better provision of bus stands in the town centre required.	Site EA has been reviewed by taking account of the comment regarding protecting the existing in the town centre required.
STA	LP008_GLA	General	Appendix 3	n/a	n/a	EB Hertford Road	LP18-077	As with site BC - needs a bus stop on the London Road frontage.	Site EB has been reviewed by taking account of the comment regarding protecting the existing a bus stop on the London Road frontage.
STA	LP008_GLA	General	Appendix 3	n/a	n/a	XC Harts Lane Estate	LP18-078	Risk of loss of bus stand, this requires protecting.	Site XC has been reviewed to take account of the comment regarding protection of the existing bus stand, this requires protecting.
STA	LP008_GLA	General	Appendix 3	n/a	n/a	XE Ibscott Close Estate and highways land at Rainham Road South/Ballards Road	LP18-079	Risk of loss of bus stand.	Site XE has been reviewed to take account of the comment regarding protection of the existing of loss of bus stand.
STA	LP008_GLA	General	Appendix 3	n/a	n/a	ZW Here East and Film Studio	LP18-080	Consideration should be given to a bus stand to enable the former Sanofi site to be better served.	Site ZW has been reviewed to take account of the comment regarding protection of the existing site to be better served.

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STA	LP008_GLA	General	Appendix 3	n/a	n/a	Various	LP18-081	The A13 DBFO contract is in its 20th year and finishes in 2030 the current Concessionaire Road Management Services A13 PLC will then hand back the network to TfL. Any potential development, including any planning proposals that interface or require access into the DBFO highway boundary will require discussion and approval from the concessionaire (to be contacted through TfL Spatial Planning) the following sites are of interest: Site AA Site AE Site CF (conflict with Lodge Avenue Flyover scheme) Site CM Site DN Site XY (interface with Dagenham Dock Viaduct, resulting maintenance issues and caveats regarding protection of the structure) Site ZZ (interface with Dagenham Dock Viaduct, resulting maintenance issues and caveats regarding protection of the structure)	Noted. The Council/BeFirst will work with TfL on any potential development that interface or require access into the A13 DBFO highway boundary. Additional wording has been inserted into the supporting texts of the Draft Plan.
STA	LP008_GLA	General	Appendix 3	n/a	n/a	YK N&C Chadwell Heath	LP18-082	The site is in close proximity to the railway alignment and Crossrail safeguarded limits. The infrastructure along this alignment is owned by Network Rail with Rail for London operating along this alignment until such time as the Elizabeth line becomes operational. Greater Anglia Railway also operates along this route. See map in TfL submission.	Noted. Site YK will be reviewed to take account of its proximity to the railway alignment and Crossrail safeguarded limits. The site map will include information submitted by TfL as part of the Regulation 18 consultation response.
ORG	LP009_Modomo	General	Chapter 4	DM8	n/a	n/a	LP18-083	The representation requests that housing as a meanwhile use within its own dedicated policy in the draft Local Plan, as per the Intend to Publish London Plan Policy H3.	Draft Policy H3 has been reviewed to take account of the comment.
ORG	LP009_Modomo	General	Chapter 7	DM23	n/a	n/a	LP18-084	The representation requests that housing as a meanwhile use within its own dedicated policy in the draft Local Plan, as per the Intend to Publish London Plan Policy H3.	Noted.

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ORG	LP009_Modomo	General	Chapter 4	DM10	n/a	n/a	LP18-085	It is necessary to ensure there is visitor accommodation available within a broad price range and in a range of locations. It is equally important for the construction workers, site managers and general workforce tasked with delivering the development pipeline in the Borough to have accommodation close to development sites. The representation strongly suggests that Part 1 of Policy DM10 is amended as follows – 1. Proposals for new visitor accommodation (C1) will be supported within the borough's where: a) it accords with principal land uses and does not compromise regeneration visions; b) the size, scale and nature of the proposal is proportionate to its location; c) it does not create an over-concentration of such accommodation, taking account of other proposals and unimplemented consents in the local area; and d) it does not have significant adverse impact on surrounding amenity or local character.	Draft Policy DM10 has been reviewed to take account of the comment.
LAN	LP010_Blooming DaleLtd (GL Hearn)	Objection	Chapter 4	SP3	n/a	n/a	LP18-086	The representation objected to Draft Local Plan Policy SP3 'Promoting inclusive economic growth' which in the main seeks to retain and increase the overall amount of B8/B2 floorspace within the Chadwell Health industrial Area. There is low demand for industrial floorspace in Barking and Dagenham and this has led to high vacancy rates and low rents. These factors impact on development viability particularly where the Council insists on the retention of existing B2/B8 floorspace and even more so if Policy SP3 'Promoting inclusive economic growth' seeks to increase the overall floorspace that is in low demand. It is recommended that LBBD adopts a flexibly worded policy to take into consideration of site-specific and wider market conditions.	The Local Plan has been reviewed and updated in light of the Council's latest Industrial Land Strategy in discussion with the Greater London Authority.
LAN	LP010_Blooming DaleLtd (GL Hearn)	General	Chapter 2	n/a	n/a	Sub Area 3: Dagenham Dock, Beam Park and Former Ford Stamping Plant.	LP18-087	The accompanying Master Plan Vision Document (produced by DAP Architecture) sets out the owner's vision for comprehensive redevelopment of Parcels 1-4 at Mirravale Trading Estate in Dagenham for 3,500 sqm of B1(c) floorspace on ground floor and 250 dwellings of which 35% will be affordable on the upper floors.	Noted. The Council/BeFirst are undertaking Strategic Land Assessment, which will provide information on development potential. Any detailed site proposals will be considered and assessed through the planning application process on a case by case basis.

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LAN	LP011_SERGO	General	Chapter 2	n/a	n/a	Sub Area 3: Dagenham Dock, Beam Park and Former Ford Stamping Plant.	LP18-088	<p>Redevelopment of Dagenham Dock should not be at the expense of traditional industrial uses including logistic+U85s uses. The land use paragraph should be expanded to confirm a flexible approach to allowing land uses in the area.</p> <p>The representation recommends that the Council consider encouraging, where feasible, the development of multi-storey industrial units in the Dagenham Docks SIL to intensify the employment land use in the area through the stacking of floorspace and ancillary areas.</p> <p>Dagenham Dock is designated Strategic Industrial Land and that any residential development should compromise the development of industrial uses in the area. It would expect to be consulted on in relation to the referred emerging 'strategic approach' for 'identifying appropriate locations / zones for the development of waste management, sustainable power generation facilities and poor neighbour uses like scrap metal processing' in the Dagenham Dock area. There is a pressing need to deliver new employment floorspace in the area and the Council should ensure that the drafting and publication of an SPD for the area does not impede this. It is expected to be consulted on any further SPDs or strategies.</p>	The Regulation 19 Local Plan has been updated to provide more specific guidance on area priority, which will include includes more detailed site allocation information.
LAN	LP011_SERGO	General	Appendix 3	n/a	n/a	Various	LP18-089	<p>The representation recommends that further detail is added to the site allocations, and that the proposed land uses for all 6 plots are consistent.</p> <p>The representation has prepared a suggested site proforma for each of the 6 plots. The 6 proposed proformas are appended to this letter. The proformas set out information that should be included in the allocations for each site, including confirmation of the flexible approach to industrial uses in order to maximise the economic benefits of Dagenham Dock to the local area; identification of the potential for multi-level industrial buildings to optimise the use of sites; and the design principles that should apply to each site.</p>	Further detail has been added to the site allocations.
LAN	LP011_SERGO	General	Chapter 2	SP1 Part 1	n/a	n/a	LP18-090	The representation proposes that part 1 of Draft Policy SP1 'Delivering Growth' is updated to read "Development will be focused in Barking Riverside and our town centres as well as a number of industrial locations, including Dagenham Dock, where uses will be reconfigured and intensified".	Policy SP1 has been updated to including the wording " a number of industrial locations, including Dagenham Dock...", in light of the Industrial Land Strategy.

Category	Rep ID (Be First)	Nature of Response	Relevant Chapter	Relevant Policy Number	Relevant Paragraph	Site Reference	Comment ID	Summarised Comment	LBBD/BeFirst Response
LAN	LP011_SERGO	Support	Chapter 4	SP3	n/a	n/a	LP18-091	The representation is fully supportive of this policy and proposes that Draft Policy SP3 'Promoting inclusive economic growth' is carried through to the next stage of the Local Plan Review.	Noted.
LAN	LP011_SERGO	General	Chapter 4	DM6 Part 2	n/a	n/a	LP18-092	The representation suggests that the following policy wording is amended: "2. The Council's preference is to support development proposals where they can deliver employment floorspace (within use classes B1(c) / B2 / B8) that: ..."	Draft Policy DM6 has been reviewed in light of the Council's latest Industrial Land Strategy.
LAN	LP011_SERGO	General	Chapter 4	DM7 Part 2	n/a	n/a	LP18-093	The representation seeks the inclusion of a sentence in part 2 of Draft Policy DM7 'Providing flexible, affordable workspace' to state that affordable workspace and a payment in lieu will not be required where justified by the specific use of a development, or where identified in a site allocation. The supporting text should also specify that affordable workspace is not expected to be required in the development of industrial uses.	Draft Policy DM7 has been reviewed in light of the Council's latest Industrial Land Strategy and Local Plan Viability Assessment.
LAN	LP011_SERGO	General	Chapter 4	DM10	n/a	n/a	LP18-094	The policy wording should include reference to the need for visitor accommodation to support employment sites. "Proposals for new visitor accommodation (C1) will be supported within the borough's designated town centres, or along primary routes adjacent to transport interchanges, and in locations where they will support the function of employment and strategic industrial land".	Draft Policy DM10 has been reviewed and updated to take account of the comment.
LAN	LP011_SERGO	General	Chapter 4	DM11	n/a	n/a	LP18-095	Supporting text should be provided in relation to the policy that makes specific reference to the Dagenham Docks SIL, and the need to safeguard its existing and future occupiers to enable them to function as industrial uses effectively.	Draft Policy DM11 has been reviewed and updated to make specific reference to the Dagenham Docks SIL, and the need to safeguard its existing and future occupiers to enable them to function as industrial uses effectively.
LAN	LP011_SERGO	General	Chapter 5	DM12	n/a	n/a	LP18-096	The representation considers that the Local Plan should support multi-level industrial buildings without requiring them to be treated as tall buildings. However, the representation recognises the difficulty of introducing exceptions to Policy DM12. Instead, it proposes that Draft Policy DM12 'Tall buildings' should include reference to allowing taller buildings in locations where they make the best use of land, and on sites that have allocations that identify the potential for taller buildings than their surroundings.	The definition of 'Tall Buildings' has been reviewed within the Regulation 19 Local Plan.

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LAN	LP011_SERGO	General	Chapter 6	DM20	n/a	n/a	LP18-097	The representation proposes that part 3(c) of Draft Policy DM20 'Nature conservation and biodiversity' is updated to read "use native and non-native species in soft landscaping schemes within 250m of Sites of Importance for Nature Conservation, waterways and wildlife corridors, and on green/brown roofs and roof gardens".	Draft Policy DM21 has been reviewed to consider the proposed wording of "use native and non-native species in soft landscaping schemes within 250m of Sites of Importance for Nature Conservation, waterways and wildlife corridors, and on green/brown roofs and roof gardens".
LAN	LP011_SERGO	General	Chapter 6	DM21	n/a	n/a	LP18-098	The representation recommends that the following sentence is added after point (I): "Developments will be required to address every single part of this policy, and the response should be proportionate to the scale of the waterway impacted by or in close proximity to the development in question".	The Council will review Policy DM21 and consider adding the proposed wording after point (I): "Developments will be required to address every single part of this policy, and the response should be proportionate to the scale of the waterway impacted by or in close proximity to the development in question".
LAN	LP011_SERGO	General	Chapter 6	DM22	n/a	n/a	LP18-099	The representation proposes that part 3 of Draft Policy DM22 'Trees' is updated to read "Where possible to provide adequate replacement trees as part of a development, the applicant may 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". It proposes that part 5 of Draft Policy DM22 'Trees' is updated to read "Major development is expected to include additional planting, including trees, shrubs, and vegetation over and above any existing provision. Planting should use trees, shrubs and vegetation that is appropriate to the context of the development".	Draft Policy DM22 has been reviewed and updated to clarify the policy requirements. The suggested updates in relation to the appropriate planting of trees, shrubs and vegetation, as well as financial contributions to planting programmes, will be taken into consideration.
LAN	LP011_SERGO	General	Chapter 7	DM25	n/a	n/a	LP18-100	It recommends the following wording for part (c) of the policy: "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".	Draft Policy DM25 Part 1C has been reviewed and updated to clarify the policy requirements recommended as follows "...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".

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LAN	LP011_SERGO	General	Chapter 7	DM28	n/a	n/a	LP18-101	The representation recommends that part 5 of the policy is amended to read: "Development should seek to deliver a neutral or positive reduction in flood risk, on and off-site, by demonstrably being given sufficient consideration from the outset of the design and during the preapplication process".	The Council will hold an internal meeting to discuss the suggested changes on "neutral or positive reduction in flood risk" to Policy DM28 (Part 5) with the Council's Flooding Team. In addition, the wording will be considered as part of the Sustainability Appraisal process.
LAN	LP011_SERGO	General	Chapter 8	DM31	n/a	n/a	LP18-102	The representation suggests that part 4 of Draft Policy DM31 'Making better connected neighbourhoods' should be amended to only relate to mixed use developments.	Draft Policy DM31 has been reviewed to take account of the comment.
LAN	LP011_SERGO	General	Chapter 8	DM32	n/a	n/a	LP18-103	The representation proposes that Draft Policy DM32 'Cycle and car parking' should confirm that the policy can be applied flexibly to reflect the specific nature of development proposals, where the need for such flexibility is identified in site allocations.	Draft Policy DM21 and its supporting texts have been reviewed to provide clarification.
LAN	LP011_SERGO	General	Chapter 10	DM36	n/a	n/a	LP18-104	The representation considers that the wording of the Development Contributions policy is not clear. In Part C, the wording should include 'where necessary' as it currently reads that all developments will be required to enter into a S106 agreement. Add 'where necessary' to the end of part C. Add text to clarify what constitute 'necessary' as defined by the legislation.	Draft Policy DM36 has been reviewed and updated to provide clarity.
ORG	LP012_B&DEnergyLtd	General	Appendix 3	n/a	n/a	XC Harts Lane Estate	LP18-105	<p>The representation is seeking to create a town centre wide district energy scheme. This will incorporate the Gascoigne East Energy Centre but will also require a second Energy Centre to be built within close proximity to the town centre. The proposed Energy Centre site (see Appendix I of respondent's letter) has been included within Draft Allocation XC, which proposes the site for residential mixed-use development. However, Draft Allocation XC is a key site to enable the representation's author to provide an Energy Centre for a viable Barking Town Centre Network. The location of the Energy Centre within this key site will also facilitate network growth through enabling future developments to connect as well.</p> <p>Given the potential for residential led mixed-use development within the area, it is proposed that the site allocation and supporting policy includes specific reference to an Energy Centre located on land south of Cowbridge Road and west of Gurdwara Way.</p>	Site SC has been reviewed to include information on potential to provide an Energy Centre for a viable Barking Town Centre Network located on land south of Cowbridge Road and west of Gurdwara Way.

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ORG	LP012_B&DEnergyLtd	Support	Chapter 2	n/a	Table 1	n/a	LP18-106	It is supportive of the referencing of District Energy Networks across the Borough, particularly within Table 1.	Noted.
ORG	LP012_B&DEnergyLtd	General	Chapter 7	SP6	7.3	n/a	LP18-107	In relation to Paragraph 7.3, the representation would welcome the opportunity to discuss the technical requirements of the network with the Planning Policy Team to look at opportunities for including infrastructure requirements within site allocations in the next Regulation 19 draft. The representation author would welcome opportunities to work with BeFirst to set up working groups with developers, landowners and key stakeholders to ensure that development can connect to the Borough's District Energy Networks that they have identified. This ties in well with Draft Strategic Policy SP6 (Securing a sustainable and clean borough).	The Council will arrange a meeting with the representation author to discuss updates to Policy SP6 in relation to the Borough's District Energy Networks.
ORG	LP012_B&DEnergyLtd	General	Chapter 7	DM24	7.7	n/a	LP18-108	The representation would welcome the opportunity to discuss how the Local Plan can support its long-term strategy for low carbon energy in Barking and Dagenham. This is particularly relevant given that Draft Policy DM24 goes on to state that decentralised energy will be prioritised.	The Council will arrange a meeting with the representation author to discuss updates to Policy DM24 in relation to the Council's long-term strategy for low carbon energy.
DEV	LP013_Millennium Group (City Pavilion)	General	Chapter 6	SP5	1(b)	n/a	LP18-109	It suggests that the removal of land at City Pavillion, Collier Row (postcode RM5 2BH) from Metropolitan Green Belt based on the Green Belt Assessment undertaken by Liz Lake Associates. The Green Belt Assessment produced by Liz Lake Associates has identified the land as not fulfilling the functions of four Green Belt functions. The Green Belt Review undertaken in 2016 for the Council was carried out at a very high level and did not provide an analysis of the City Pavilion Site. It is considered that this provides limited value, and ignores opportunities presented by, for instance, smaller scale previously developed sites.	The submitted evidence work by Liz Lake Associates has been considered and amendments to the Draft Local Plan have been introduced where appropriate.
DEV	LP014_Barking Tesco	General	Appendix 3	n/a	n/a	n/a - close to site BA	LP18-110	It has pointed out that the land very close to the site (fronting onto Collier Row Road) is proposed for residential development in the Regulation 18 Plan (Draft Allocation BA). a drawing package prepared by RMA Architects is enclosed to demonstrate how an acceptable form of residential development could be achieved at the City Pavilion site. The existing site contains a large volume of existing development, with the entire City Pavilion site covered in hardstanding, and includes built form which is tall and bulky. Moreover, it comprises a poor quality and dated form of development which is considered to detract	The Council/BeFirst have considered the site as part of the Council's Strategic Land Availability Assessment.

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								<p>from the quality of the local character. The concept masterplanning diagram demonstrates how residential development could be achieved at a smaller scale that would provide for family housing, whilst also helping to reduce the wider landscape impact. Subject to further detailed design and densities it is anticipated that the site could provide for approximately 125 to 175 homes to meet housing needs within the Borough. Car and cycle parking, amenity space, landscape and potential biodiversity enhancements would be incorporated within the scheme. Alternatively, there would be potential for the redevelopment of the Elmstead Nurseries site to provide for residential use, with the City Pavilion site being retained for leisure use.</p> <p>The emerging Local Plan should recognise the opportunity presented by the redevelopment of the Barking Tesco site and the benefits that regeneration will bring to the existing and new communities within Barking Town Centre and demonstrates how such regeneration will be achieved.</p>	
DEV	LP014_Barking Tesco	General	n/a	n/a	n/a	n/a	LP18-111	<p>Whilst the Council has sought to give the Local Plan a 15 year life span, the reality is that the London Plan will be subject to review early in the plan's life span if as it is progressing towards adoption.</p> <p>It is considered that the Local Plan should seek to set a development strategy that will endure beyond the immediate horizon of the London Plan. This will require a degree of flexibility if the local plan is to be undermined by an early review of the London Plan.</p>	The Local Plan is prepared in conjunction with the emerging London Plan. The Council/BeFirst are continuously working with the Greater London Authority to make sure that the Plan is in general conformity with the London Plan and agree on wordings where appropriate to take account of its future review.
DEV	LP014_Barking Tesco	General	Chapter 2	n/a	Sub Area 1 - Barking Town Centre and the River Roding	n/a	LP18-112	<p>Whilst the vision is to re-centre Barking around the Abbey Green, transport accessibility on the western side of the town centre remains relatively low, and development will need to accommodate this in order to be viable. It has suggested text addition (underlined) could be as follows: <u>"Transport accessibility on the western side of the town centre remains relatively low and car parking levels should reflect this, with the current road circulation system being rationalised to better address through and local traffic, car parking and cycle and pedestrian priorities."</u></p>	The parking policy has been reviewed to take account of the comment. A clear reference of the car parking and cycle parking will be made to Sub Area 1 to provide clarity.

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DEV	LP014_Barking Tesco	General	Chapter 3	SP2	n/a	n/a	LP18-113	<p>The Draft Plan states in draft Policy SP2 that the Council “will support the delivery of the ten-year net housing target for Barking and Dagenham, as set out in the most up-to-date London Plan”. The figure in the draft London Plan has since been reduced to 19,440. It seeks clarification on whether LBBD continues to support the higher figure for new homes, bearing in mind the figure of 2,225 per annum supported in the borough’s 2019 Strategic Housing Market Assessment update (SHMA) based on the standard methodology for determining the “minimum starting point”¹ in assessing need. Whilst the draft London Plan, when adopted may set a lower minimum figure, it is against the figure determined in the national planning guidance against which the LPA’s targets should be set. It encourages the highest borough housing delivery targets supported by evidence.</p> <p>It welcomes the broad consistency with the draft London Plan’s Fast Track approach (draft London Plan Policy H5).</p>	The Council will review SP2 to clarify the housing supply target over the plan period is based on the most up to date evidence base.
DEV	LP014_Barking Tesco	General	Chapter 3	DM1	n/a	n/a	LP18-114	<p>We request clarification regarding LBBD’s preferred affordable housing tenure mix as set forth in Section 6. At present, category “c” is unclear as to the LPA’s preferred mix after the London Plan’s preferred minimums for specific tenure mixes have been reached (in “a” and “b”). We would encourage an appropriately flexible allowance in order to account for different housing needs and products in the borough.</p>	Draft Policy DM1 has been reviewed and updated in light with the Council's updated Strategic Housing Market Assessment (SHMA).
DEV	LP014_Barking Tesco	General	Chapter 3	DM2	n/a	n/a	LP18-115	<p>The representation welcomes the Council's support for housing products such as Build to Rent products.</p> <p>Clarification is needed on how the current draft policy can be reconciled with the draft Local Plan and the exemption under NPPF paragraph 64(a), which states: “64. Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups. Exemptions to this 10% requirement should also be made where the site or proposed development: a) provides solely for Build to Rent homes;”.</p>	Draft Policy DM2 has been reviewed and updated where appropriate to include an exemption under NPPF paragraph 64(a) for build to rent housing.

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DEV	LP014_Barking Tesco	General	Chapter 4	DM8	n/a	n/a	LP18-116	<p>The representation has requested that Section 2 of Draft Policy DM8 be amended so that it can to apply to sites with an existing retail provision or in instances where re-provision would unlock the site for a sizable net uplift in new housing. This proposed clarification would ensure that redevelopment of sites with potential to provide new housing is inhibited by the potential market need to re-provide an existing retail offer on the edge of centre. It would therefore propose to add the following policy wording or footnote to the end of Section 2 in draft Policy DM8:</p> <p>“This requirement does not apply to re-provision of existing floorspace or in cases where a compact and contiguous new supporting commercial cluster would be provided and a substantial uplift in net new housing is delivered”.</p>	Draft Policy DM8 has been reviewed and updated to take account of the comment.
DEV	LP014_Barking Tesco	General	Chapter 5	DM12	n/a	n/a	LP18-117	<p>The representation suggests that any adverse impact on a heritage asset would make a tall building unacceptable. However, the NPPF expressly allows for public benefits to outweigh harm to heritage assets if the harm is less than substantial.</p> <p>It proposes to make amendments to DM12 part d as follows:</p> <p>"and do not cause substantial harm to heritage assets or their settings. In the event that a proposed tall building may cause less than substantial harm to a heritage asset or its setting, the Council will expect the public benefits of the proposal to outweigh the less than substantial harm. Applications should be supported by a detailed townscape analysis carried out as part of the application process, including long and short view".</p> <p>This amendment would also make draft Policy DM12 consistent with draft Policy DM14 (Conserving and enhancing heritage assets and archaeology).</p>	Draft Policy DM12 has been reviewed and updated to take account of the comments.
DEV	LP014_Barking Tesco	General	Chapter 6	DM21	n/a	n/a	LP18-118	<p>The representation requests that Section 1(h) be appropriately qualified bearing in mind the requested naturalised buffers may be of different distances with agreement of the Environment Agency and may not require to be appropriate for all sites, particularly previously developed sites.</p>	The Council will seek the Environment Agency's comments on Policy DM21 regarding naturalised buffers and will hold an external meeting to discuss.

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DEV	LP014_Barking Tesco	General	Chapter 7	DM24	n/a	n/a	LP18-119	<p>Making business decisions based on an unknown risk factor can be difficult and prohibitive. Preparing for possible eventualities can be wasteful and affect viability and the maximum deliver of affordable housing, particularly so when the advent of any district heating network may never materialise despite best intentions, making any investment in future compatibility a total loss of money.</p> <p>The representation therefore requests clarification of Section 2 to more clearly define the time limitations regarding when 'future-proofing' for district heating is required, and that adequate financial and practical compensation is considered when seeking any future connections after scheme implementation and operation.</p>	The Council will review Policy DM24, subject to discussions with relevant stakeholders.
DEV	LP014_Barking Tesco	General	Chapter 8	SP7	n/a	n/a	LP18-120	<p>The representation welcomes LBBD's intention to meet the Mayor's strategic target of 80% of all trip to be made by foot, cycle, or public transport by 2041. It also acknowledges that vehicle trips will still play a necessary role in London for the foreseeable future. As such, amendments to rationalise the policy relative to the Mayor's 80% goal is requested.</p> <p>It is considered that it would logically flow that draft Policy SP7 should allow for up to 20% parking provision for residential development, bearing in mind 80% of residents would live car-free and of the 20% eligible for car ownership, not all trips made by these persons would necessarily be by car. It would concurrently be contented to support new policies that prohibit an uplift in vehicle parking relative to existing provision and would also be contented to support a monitoring and review mechanism to remove car parking spaces in the future for which there is no longer a demonstrable need.</p>	Draft Policy SP7 has been updated based on the Council's latest transport evidence base study.
DEV	LP014_Barking Tesco	General	Chapter 8	DM32	n/a	n/a	LP18-121	<p>The representation requests a Section is added to this draft policy to acknowledge that re-provision of existing on-site car parking may be appropriate in cases where such re-provision would unlock the site for a sizable provision of net new housing.</p> <p>The representation recommends a separate clause permitting re-provision of vehicle parking in redevelopment schemes where an existing retail use will be re-provided in situ. It supports policy for an expectation that the ratio of car parking spaces per square metre of retail floor space may not increase.</p> <p>The representation is willing to accept that the site</p>	Draft Policy DM32 has been updated based on the Council's latest transport evidence base study.

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								allocation includes an expectation that car parking provided on this site would need to be reviewed in the future to assess its continued need, in accordance with NPPF Paragraph 56 on Planning Obligations.	
DEV	LP014_Barking Tesco	General	Appendix 3	n/a	n/a	BB Tesco car park	LP18-122	<p>This new opportunity to redevelop the site in its entirety should be acknowledged in the Local Plan with an amendment to include the entire boundary of the site to be in a single allocation to avoid piecemeal development of this key riverside site. It supports the site to be used for residential-led mixed use development. The anticipated residential capacity of the site with the rationalised longer boundary would be c.1,600 units and a replacement Tesco store, bearing in mind the current Resolution to Grant scheme (LPA Ref: 18/02131/FUL) and the site's location in a Major Town Centre and the London Riverside Opportunity Area. The intention is to deliver development on this site to optimise its use for much needed housing immediately following the grant of planning permission. The pre-application process with LBBD (via BeFirst), GLA, and TfL is currently ongoing.</p> <p>The site is facing market constraint that the current supermarket must be reprovided for the site to be unlocked for intensification. The site also has low PTAL rate but has high potential to deliver a sizable quantum of new homes in a town centre location. There is a need for appropriate levels of car parking in the context of the Mayor's ambition that 80% of all journeys are made by means other than private car.</p>	The Council/BeFirst have considered the site as part of the Council's Strategic Land Availability Assessment.
	LP014_Barking Tesco	General	Chapter 2	n/a	Sub Area 1 - Barking Town Centre and the River Roding	BC, EB, XC	LP18-123	<p>In the interest of bringing forward cohesive and comprehensive redevelopment in Barking Town Centre, we would seek clarity on the three overlapping site designations to the immediate north of the proposed Site BB.</p> <p>The representation requests allocations for these sites fully acknowledge the substantial potential for tall buildings and to continue revitalisation of the River Roding corridor by extending the new dense urban quarter, including tall buildings, which is emerging to the south.</p> <p>The representation recommends the allocations provide more detail of LBBD's vision for these sites, bearing in mind some details may be repeated in the emerging Barking Town Centre Masterplan when this is published.</p>	The Council/BeFirst have considered the site as part of the Council's Strategic Land Availability Assessment.

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								<p>Site EB is not on the borough-wide map of Potential Development Sites and may be suitable for removal given its potential redundancy to Site XC.</p> <p>Should the Council prefer to retain all three designations, clarity on which allocations (and their associated visions for redevelopment) were ranked in order of preference by the Council.</p>	
LAN	LP015_Millennium Group (King Edwards Rd)	Support	Appendix 3	SP4	n/a	DN South of Gascoigne	LP18-124	<p>Information regarding the site: Land at King Edwards Road, Barking, has been provided.</p> <p>The site lies within an Opportunity Area as shown in the Key Diagram of the Local Plan consultation and is also shown within Appendix A as a 'Proposed residential development site to 2034' (Site DN), as part of a wider area together with the land to the east and west. National and Regional Planning Policy is set out to support the selection of the site. Indicative proposals have been put together to demonstrate how 260 dwellings could sit on the Site. Planning considerations have also been provided. It is suggested that the Council should be ensuring that the Local Plan maximises the delivery of new homes in sustainable locations such as the Site, particularly where these comprise underutilised previously developed land. Policy SP4 is supported as it sets out that the Council will adopt a design-led approach. However, in accordance with paragraph 123 of the NPPF, the Council should consider whether setting minimum density guidance would be appropriate. Specifically, guidance on site capacity should be provided. It is also important that there is no requirement for the land parcels to be brought forward concurrently. Overall, support is given to the proposed allocation of Site DN for residential development, however, alterations have been proposed to the allocation to ensure that an efficient scheme is achieved.</p>	Site DN has been reviewed through the Council's Strategic Land Availability Assessment.

Category	Rep ID (Be First)	Nature of Response	Relevant Chapter	Relevant Policy Number	Relevant Paragraph	Site Reference	Comment ID	Summarised Comment	LBBD/BeFirst Response
LAN	LP016_ChatsworthSettlementTrust	General	Appendix 3	n/a	Sub Area 4 - Becontree	n/a	LP18-125	<p>The representation promotes the allocation of a new site for residential development. The adopted Site-Specific Allocations DPD (SSA) allocates the Site (B&M Store, Whalebone Lane South, Chadwell Heath RM8 1AS, and the land immediately surrounding it, for community uses, in particular, religious meeting places to meet the needs of the Borough's faith groups (Policy SSA SC4). It is confirmed that there is no community user or operator seeking to use the site for a religious meeting place or similar use have come forward since the DPD's adoption in 2010. This demonstrates that the need has not been as pressing as originally considered, or the need has reduced since the evidence base to support the allocation was prepared, or the need has been met elsewhere in the Borough.</p> <p>Therefore, support is not required for the removal of the remaining area designated under site allocation SSA SC4 to allow development to come forward in line with updated strategic and development management policies, and only reallocate individual sites within the existing site allocation boundary where they have been promoted for alternative uses. The representation seeks the allocation of the site of the B&M store at Whalebone Lane South for residential development. The site has been assessed through the Sustainability Appraisal and the case for its allocation is robust. It is also located at the edge of Sub Area 4: Becontree set out in the Draft Local Plan. The vision for this Sub Area states that sensitive, sympathetic infill of underutilised, disused and vacant sites will be encouraged and supported to deliver homes and appropriate supporting uses. It is believed that the Site would help fulfil this vision. The Site is also in close proximity to local shops, community facilities and transport links and it is on brownfield land.</p>	The Council/BeFirst have considered the sites as part of the Council's Strategic Land Availability Assessment.

Category	Rep ID (Be First)	Nature of Response	Relevant Chapter	Relevant Policy Number	Relevant Paragraph	Site Reference	Comment ID	Summarised Comment	LBBD/BeFirst Response
DEV	LP017_InlandHomes(Thames Road)	Support	Chapter 2	SP1	Sub Area 2 - Thames Road, Barking Riverside and Castle Green	n/a	LP18-126	<p>The Borough's spatial vision for development is supported. The approach of utilising inefficient industrial land to deliver housing-led regeneration and the opportunities this presents in terms of creating vibrant, balanced new communities is endorsed.</p> <p>The representation support a masterplan-led approach to maximising the development potential of sub-areas such as Thames Road, and would welcome the opportunity to work collaboratively with other stakeholders to deliver a holistic development vision.</p>	No amendment to the Draft Local Plan is required at this point. The Council/BeFirst will work closely with the key stakeholders to develop detailed masterplan work on both Thames Road and Castle Green areas.
DEV	LP017_InlandHomes (Thames Road)	Support but with suggestions.	n/a	n/a	n/a	CI Thames Road	LP18-127	<p>It is important that individual land parcels can progress independently of their neighbours, where circumstances dictate. The area of Thames Road is dominated by small plots in separate land ownerships. While the assembly of larger land parcels in multiple ownerships is desirable in terms of promoting comprehensive development proposals, it is not always straight-forward. A pragmatic approach to the development of individual land parcels can stimulate short-term delivery and is beneficial, providing that the development potential of adjacent sites is not prejudiced. A masterplan led approach would set out development parameters for individual sites to respond to. It is strongly considered that the Local Plan is prepared to ensure that land assembly requirements or overly restrictive requirements do not unduly delay development. The Council's emerging vision identifies how the proposed redevelopment will enhance and support the new neighbourhood at Barking Riverside. It is agreed that that by enabling residential led redevelopment along Thames Road, the redevelopment potential and wider regeneration benefits associated with Barking Riverside can be optimised.</p> <p>The representation supports the Council's aspirations to improve the connectivity of Thames Road through improved pedestrian and sustainable transport methods, and promoting high quality, function public realm, which is at the forefront of the Intend to Publish London Plan. The delivery of the new station at Castle Green needs to be fully taken into consideration when considering the development potential of sites. The connectivity of the area is set to significantly improve and as such the development strategy should align with infrastructure planning across the plan period.</p> <p>The Intend to Publish Version of the London Plan emphasises the contribution small sites can make to delivering housing need (Policy H2), stating that Boroughs</p>	Site CI has been reviewed through the Council's Strategic Land Availability Assessment.

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								should pro-actively support well-designed new homes on small sites. Small sites can often be built-out quickly. Small sites will potentially play a key role in stimulating the regeneration of Thames Road, given the predominance of individual land parcels, which may not necessarily be progressed under large land assembly proposals.	
DEV	LP017_InlandHomes (Thames Road)	Support	Chapter 2	SP1	n/a	n/a	LP18-128	A transparent approach to policy tests regarding the release of protected land should be adaptable to changing circumstances and the strategic priorities of the borough.	Noted.
DEV	LP017_InlandHomes (Thames Road)	Support	Chapter 3	SP2	3.7	n/a	LP18-129	<p>The representation supports the approach of seeking to exceed the annual housing targets established by the London Plan as it takes a positive and proactive approach to accelerating housing delivery and recognises the central role that LBBD can play in this regard. Whilst the Intend to Publish London Plan has reduced the proposed annual housing target for Barking and Dagenham from that previously proposed in the early iteration of the Draft London Plan, from 22,640 homes to 19,440 over a ten year period, this is still a significant increase from the current Adopted London Plan ten year target for Barking and Dagenham which stands as 12,355 dwellings per annum (dpa). Accordingly, the Council should maintain its ambitious approach to housing delivery, maximising the delivery from sites identified as suitable for housing. At the time of publication of the Issues and Options consultation draft Local Plan, the emerging London Plan remains in draft form. However, LBBD have committed to seeking to deliver the initial, higher, housing target of 22,640 homes over the ten years. It endorses this approach. Paragraph 3.7 of the Issues and Options Consultation Draft acknowledges that “the Council has identified sufficient land suitable for residential development and intensification in the 2017 SHLAA to meet and exceed the New Draft London Plan 10- year housing delivery target”. The new lower target should not affect the Council’s aspirations as the housing targets, which should be viewed as a minimum.</p> <p>A stepped housing trajectory is proposed, of 2,140 dpa until 2024, 2,966 dpa between 2024 and 2029 and 2,803 dpa for the remainder of the plan period until 2034. Whilst supporting the Council’s desire to meet the higher London Plan housing target through this trajectory, it urges the Council to maximise housing delivery from the earliest opportunity, including recognising the value of delivering small sites and taking a pragmatic approach to the</p>	The Council will review the policy wording on small site to ensure sufficient alignment with the NPPF and the emerging London Plan.

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								development of complex land parcels – providing individual proposals are masterplan-led (where appropriate) and do not inhibit the development potential of adjacent sites.	
DEV	LP017_InlandHomes (Thames Road)	Support	Chapter 3	DM1	n/a	n/a	LP18-130	The representation supports the Council's approach to affordable housing and the promotion of on-site delivery unless exceptional circumstances are presented to evidence why this is not appropriate. It is committed to the delivery of affordable housing at a financially viable level, as part of a wider offering of planning and regeneration benefits.	Noted.
DEV	LP017_InlandHomes (Thames Road)	Support	Chapter 5	SP4	n/a	n/a	LP18-131	The representation advocates a design-led approach development and considers this to be a cornerstone of successful planning and place-making. The Intend to Publish London Plan avoids an overly mechanistic approach to appropriate development densities, instead proposing under draft Policy D3 a design-led approach to optimising site capacity. We fully support the consistency of draft Policy SP4 in this regard.	The status of masterplan areas has been clarified within the Regulation 19 Plan.
DEV	LP017_InlandHomes (Thames Road)	Support but with suggestions.	Chapter 5	DM11	n/a	n/a	LP18-132	<p>The representation endorses the positive approach proposed by the borough, which recognises that tall buildings must be in sustainable locations, demonstrate exemplary architectural design and have regard to local context. We envisage that the masterplan for Thames Road would identify areas where tall buildings are appropriate, to help establish a strong sense of place, identity and character. The area is set to be radically transformed and tall buildings will play a central role in optimising its development potential.</p> <p>As recognised in the context of Thames Road, the draft employment policies seek to intensify industrial land and provide affordable, flexible workforce to ensure that the borough responds to local needs and maximises the efficiency of industrial land. It agrees that rationalising existing employment uses, and releasing surplus employment land, is integral to the proposed housing delivery strategy and support the Council's proposed approach. However, it is also recognised that a retained industrial function is integral to the wider masterplan and is a key component of the Good Growth principles – in particular, GG5 (growing a good economy).</p>	Draft Policy DM11 has been reviewed to take account of the comments. Further detailed guidance on tall buildings may be considered subject to internal discussions.

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LAN	LP018_ExpressConcrete	Objection	Chapter 2	n/a	Sub Area 2 - Thames Road, Barking Riverside and Castle Green	n/a	LP18-133	‘Emerging Vision’ - to relocate ‘suitable businesses’ from Castle Green, so as to free up these locations for alternative land uses – if this includes DBC/Express land at Ripple Road Logistics Centre. ‘Infrastructure’ – omission of any reference/requirement to safeguard key rail infrastructure/rail heads at Ripple Road and Euro Hub and work with the rail freight operator.	The Council/BeFirst have updated the emerging vision for Sub Area 2 based on the up to date Industrial Land Strategy.
LAN	LP018_ExpressConcrete	Objection	Chapter 2	n/a	n/a	CF Castle Green	LP18-134	It is recommended to include DBC Ripple Road Logistics Centre site within the proposed/identified ‘Castle Green’ allocation and identification for possible future use options – residential-led mixed use development. (ii) Proximity of proposed potential residential-led mixed uses coming forward adjacent to Euro Hub site – which if not appropriately planned, designed, laid out and mitigated could prejudice the future operation of the site.	The Council/BeFirst have considered the sites as part of the Council’s Strategic Land Assessment
LAN	LP018_ExpressConcrete	Objection	Chapter 2	SP1	n/a	n/a	LP18-135	Reliance on reconfiguration of industrial locations if predicated on the loss of the DBC Ripple Road site.	The Council/BeFirst have undertaken a Strategic Industrial Land Strategy. The study considers that the Rippleside SIL as an opportunity for the Council to demonstrate its transformation through the emerging Castle Green Masterplan Supplementary Planning Document. Further site details will be provided in the next iteration of the Draft Local Plan.
LAN	LP018_ExpressConcrete	Objection	Chapter 4	SP3	n/a	n/a	LP18-136	Omission of any reference in the Council’s preferred option to the need to protect and safeguard rail served sites from any development that would prejudice their future use for rail transport.	Draft Policy SP3 has been reviewed and updated to take account of the comment.
LAN	LP018_ExpressConcrete	Objection	Chapter 4	DM6	n/a	n/a	LP18-137	Under the heading Designated SIL and LSIS Boundary and confirmation of the Council’s preference to support development proposals where they can deliver specified employment floorspace – there is omission of any specific reference to sites that offer the ability to transfer freight from road to rail.	Draft Policy DM6 has been reviewed and updated to take account of the comment.
LAN	LP018_ExpressConcrete	Support	Chapter 7	DM25	n/a	n/a	LP18-138	Managing Nuisance – specifically the inclusion of confirmation that development proposals are required to have regard to the Agent of Change principle (Policy D12 of the Draft New London Plan).	Draft Policy DM25 has been reviewed and updated in line with the Intend to Publish version of the London Plan Policy D12 and the Agent of Change principle.

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LAN	LP018_ExpressConcrete	Objection	Chapter 8	SP7	n/a	n/a	LP18-139	Planning for Integrated Transport – whilst referencing that the council ‘will seek a more sustainable approach to freight transport by working with developers, local business, freight operators and other partners to reduce traffic congestion and environmental impacts...’ – the draft policy fails to make any reference to the need to safeguard sites which allow for modal shift of freight from road to rail/river. Safeguarding of such sites should be a key element of planning for integrated transport and should be expressly referenced.	Draft Policy SP7 has been updated to include a reference of the safeguarding of sites which allow for modal shift of freight from road to rail/river.
LAN	LP019_Seabrook Holdings	General	Chapter 2	n/a	Sub Area 2 - Thames Road, Barking Riverside and Castle Green	n/a	LP18-140	The vision for reconfigured and regenerated industrial land to increase job densities and deliver housing, particularly in identified growth areas such as the Sub Area 2: Thames Road, Barking Riverside and Castle Green is supported. Objection to the emerging vision for Sub-Area 2 to relocate suitable businesses from Castle Green if it includes DBC land at Ripple Road Logistics Centre.	The Council/BeFirst have undertaken a Strategic Industrial Land Strategy. The findings from the study will be reflected in the emerging Sub Area vision.
LAN	LP019_Seabrook Holdings	General	Appendix 3	n/a	n/a	n/a	LP18-141	The allocation of Welbeck Wharf, 8 River Road, Barking for residential or residential-led mixed use redevelopment is sought. It is believed that the allocation of this site will contribute to the regeneration of the Thames Road area. It is a brownfield site that comprises three warehouses that are currently in use and a vacant office building. The site is designated in the adopted Local Plan as Strategic Industrial Land (‘SIL’) and as a Safeguarded Wharf, but it also forms part of the London Riverside Opportunity Area and is next to the Barking Riverside Gateways Housing Zone and Barking Riverside which are all identified for redevelopment to deliver a significant amount of housing. The site has been identified for release in the GLA’s Safeguarded Wharves Review 2018/19 and has not had any waterborne use since 2007. It is argued that the site should be released from its Safeguarded Wharf designation and SIL designation. The overall message is that the site should be re-designated in Plan for residential-led mixed use redevelopment to enable it to play an important part in the delivery of new homes and jobs.	The Draft Local Plan has been updated to take account of the comments.
LAN	LP020_DBCARGO	objection	Chapter 2	n/a	Sub Area 2 - Thames Road, Barking Riverside and Castle Green	n/a	LP18-142	There is an omission of any reference/requirement to safeguard key rail infrastructure at Ripple Road and Euro Hub and work with the rail freight operator.	The Council/BeFirst have reviewed the Draft Local Plan policies and Sub Area priorities to include reference/requirement to safeguard key rail infrastructure at Ripple Road and Euro Hub.

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LAN	LP020_DBCARGO	objection	Chapter 2	n/a	n/a	CF Castle Green	LP18-143	Objection to the inclusion of the DBC Ripple Road Logistics Centre site within the proposed/identified 'Castle Green' allocation and identification for possible future use options – residential-led mixed use development and proximity of proposed potential residential-led mixed uses coming forward adjacent to Euro Hub site – which if not appropriately planned, designed, laid out and mitigated could prejudice the future operation of the site. Objection to the reliance on reconfiguration of industrial locations if predicated on the loss of the DBC Ripple Road site.	The Council/BeFirst have undertaken a Strategic Industrial Land Strategy. The study considers that the Rippleside SIL as an opportunity for the Council to demonstrate its transformation through the emerging Castle Green Masterplan Supplementary Planning Document. Further site details will be provided in the next iteration of the Draft Local Plan.
LAN	LP020_DBCARGO	objection	Chapter 4	SP3	n/a	n/a	LP18-144	Objection to the omission of any reference in the Council's preferred option to the need to protect and safeguard rail served sites from any development that would prejudice their future use for rail transport.	Draft Policy DM6 has been reviewed and updated to take account of the comment.
	LP020_DBCARGO	objection	Chapter 4	DM6	n/a	n/a	LP18-145	Under the heading Designated SIL and LSIS Boundary and confirmation of the Council's preference to support development proposals where they can deliver specified employment floorspace there is an omission of any specific reference to sites that offer the ability to transfer freight from road to rail.	Draft Policy DM6 has been reviewed and updated to take account of the comment.
	LP020_DBCARGO	support	Chapter 7	DM25	n/a	n/a	LP18-146	Support is given for the inclusion of confirmation that development proposals are required to have regard to the Agent of Change principle (Policy D12 of the Draft New London Plan).	Policy DM25 has been reviewed and updated in line with the Intend to Publish version of the London Plan Policy D12 and the Agent of Change principle.
	LP020_DBCARGO	objection	Chapter 8	SP7	n/a	n/a	LP18-147	The draft policy fails to make any reference to the need to safeguard sites which allow for modal shift from road to rail/river. Safeguarding of such sites should be a key element of planning for integrated transport and should be expressly referenced.	Draft Policy SP7 has been updated to make a reference to safeguarding of sites which allow for modal shift of freight from road to rail/river - in line with the Council's latest industrial strategy. An internal meeting will be held to discuss this.

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	LP020_DBCARGO	objection	Appendix 3	n/a	Sub Area 2 - Thames Road, Barking Riverside and Castle Green	CF Castle Green	LP18-148	Changes have been suggested such as the full extent of the Ripple Road Logistics Centre should be excluded from the Castle Green (CF) boundary, the full extent of the Ripple Road Logistics Centre and the full extent of the Euro Hub Site should be identified on the Policies Map as retained SIL and additionally identified as 'safeguarded rail sites', and any housing/mixed use allocations adjacent to or in close proximity to either of the safeguarded rail sites should be expressly required by policy to ensure they are planned, laid out, designed and mitigated to ensure they do not prejudice the future operation of the rail depot in accordance with the agent of change principle and other national and London Plan requirements. Overall, the respondent does not find the plan sound.	The Council/BeFirst have undertaken a Strategic Industrial Land Strategy. The study considers that the Rippleside SIL as an opportunity for the Council to demonstrate its transformation through the emerging Castle Green Masterplan Supplementary Planning Document. Further site details will be provided in the next iteration of the Draft Local Plan.
LAN	LP021_HooHingLtd	Objection	Chapter 2	SP1	n/a	n/a	LP18-149	An effective justification or clear strategy for the quantum and distribution of housing and employment floorspace across the borough cannot be seen and it seems that discussions with key stakeholders such as the Mayor of London are at an early stage in this regard and there is no certainty in regard to the relocation and / or consolidation of designated industrial sites which must first be agreed prior to considering where residential or other land uses can be introduced to such sites. It is strongly recommended that the Council finalise and publish the evidence base that supports the Draft Local Plan as soon as possible to ensure the policies within the Draft Local Plan are supported by a robust evidence base and therefore justified. This needs to happen prior to any meaningful consultation.	Noted. The Draft Local Plan has been reviewed to take account of the comment by providing clarity on the quantum and distribution of housing and employment floorspace across the borough based on the latest evidence base studies.
LAN	LP021_HooHingLtd	General	Chapter 2	SP1	n/a	n/a	LP18-150	Whilst the Council's need to meet housing requirements within the borough is understood, there are concerns about the absence of any specific requirements for employment floorspace within the borough. In the absence of any specific requirements for employment floorspace throughout the borough, judgement is reserved on the ability of Draft Policy SP1 to meet residential and employment needs.	Noted. The Draft Local Plan has been reviewed to take account of the comment by providing clarity on the quantum and distribution of housing and employment floorspace across the borough based on the latest evidence base studies.

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LAN	LP021_HooHingLtd	Objection	Chapter 4	SP3	n/a	n/a	LP18-151	<p>There are concerns about the absence of evidence in support of Draft Policy SP3. In particular, the Council are unable to justify its position on the 'strengthening and intensifying the borough's extensive and underutilised Strategic Industrial Land (SIL) and Locally Significant Industrial Sites (LSIL)' in the absence of any robust evidence on employment / industrial need within the borough.</p> <p>Further to the above, unlike other policies contained within the Draft Local Plan, there is no supporting text or evidence to detail the rationale behind Draft Policy SP3. While, it is appreciated that this policy is to be informed by the emerging evidence base, it is requested that LBBD ensure that throughout the Local Plan a consistent approach is taken to the borough's SIL and LSIL.</p>	The Council/BeFirst has undertaken a review of the borough's Industrial Land. This is the key evidence base to support the Draft Policy SP3, which will be used to inform the next integration of the Draft Local Plan.
LAN	LP021_HooHingLtd	Objection	Chapter 2	DM6	Sub Area 5 - Chadwell Heath and Marks Gate	n/a	LP18-152	DM6 is not supported by robust evidence of employment / industrial need within the borough. As currently drafted, Policy DM6(2)(d) implies that development proposals will be supported where they achieve no net loss of industrial floorspace capacity and where feasible retains and intensifies use of industrial floorspace, and forms part of the mix in redevelopment proposals. Given that the Chadwell Heath LSIS is identified for comprehensive redevelopment under Sub-Area 5, it is contended that Draft Policy DM6 is contrary to the Council's objectives for the Chadwell Heath Industrial Area. It is recommended that Draft Policy DM6 is amended to clearly reflect the Council's wider redevelopment objectives for the Chadwell Heath Industrial Area, and other sub-areas to ensure it is compatible with the Council's other objectives.	Draft Policy DM6 has been reviewed and updated to reflect the latest changes to the emerging London Plan based on the SoS's letter to the Mayor of London issued on 13th March 2020. The Direction made in his letter has included changes in relation to industrial land. Specifically, it has required the Mayor of London to delete requirement for the industrial uses within the SIL or LSIS that are intensified to deliver an increase (or at least no overall net loss) of capacity in terms of industrial, storage and warehousing floorspace with appropriate provision of yard space for serving.

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LAN	LP021_HooHingLtd	General	Appendix 3	n/a	n/a	n/a	LP18-153	It is not understood how site allocations have been formulated. Site ID CH is not consistent with other policies. Errors have been identified with regard to why industrial buildings have been excluded; why TPOs have been included as a policy; and an irrelevant planning application ref. Site ID WC is not supported by a Proforma. Site ID YK is not on the Site Allocations Plan. Overall, the Chadwell Heath Industrial Estate is required to be identified as a Site Allocation to promote redevelopment, but clarifications and careful consideration is needed to ensure the Site comes forward appropriately and in accordance with the Draft Local Plan policies.	The Local Plan states, in both Chapter 2 and Appendix 3 of the Regulation 18 Draft, that those sites published for consultation at this stage are not site allocations but are sites identified with potential for developments. The methodology has been published for public consultation along the Regulation 18 Draft Local Plan here: https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/strategic-housing-land-availability-assessment . These potential development sites included site CH, YK and WC have been reviewed and updated through Strategic Land Assessment. The findings will be used to inform the site allocations in the next iteration of the Draft Local Plan.
LAN	LP022_CoLC	General	Chapter 2	n/a	Sub Area 3 - Dagenham Dock, Beam Park and Former Ford Stamping Plant	n/a	LP18-154	The vision for Sub-Area 3 should include more information about the Council's support for MCP. Suggested wording changes. As the masterplan is unlikely to be delivered before the outline planning application for MCP is submitted, further detail should be added to the Sub-Area 3 section of the Draft Local Plan to reflect the scale of opportunity that exists in Dagenham Dock for optimising its use for employment purposes. The Regulation 19 Plan should be informed by the London Riverside Strategic Transport Study which is currently being undertaken by Jacobs. It is supported that the recognition to reducing severance caused by the A13 under the 'Infrastructure' heading of Sub-Area 3. However, this should also be addressed against the backdrop of improving public transport and active travel links to the London Riverside Opportunity Area. The plan and site allocation should be updated to refer to "Barking Reach Power Station".	Suggested change to the reference of Barking Reach Power Station has been made. Further details on site allocations will be included in the Sub Area section of the next iteration of the Draft Local Plan.
LAN	LP022_CoLC	General	Appendix 3	n/a	n/a	XR Barking Reach Power Station	LP18-155	It is recommending that further detail is added to the site allocation. Suggested pro-forma has been prepared.	Yes, amendment is required. Further detail will be included in the Sub Area section of the next iteration of the Draft Local Plan.

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LAN	LP022_CoLC	General	Table 1: opportunities and challenges	n/a	n/a	n/a	LP18-156	The economic growth opportunity incorrectly refers to London's three strategic markets. MCP relates to the relocation of CoLC's three wholesale markets – Smithfield, New Spitalfields and Billingsgate. There are other wholesale markets in London that are not involved in MCP, so Table 1 could lead to confusion. It is proposed that the sentence is updated to read “The potential for City of London's three wholesale food markets to be relocated in the borough will enable investment in the long-run”.	Clarity on relocation of London's three wholesale food markets has been added into the next iteration of the Draft Local Plan.
LAN	LP022_CoLC	General	Key diagram	n/a	n/a	n/a	LP18-157	The key diagram identifies A13 undergrounding. In advance of the outcome of the London Riverside Strategic Transport Study, CoLC considers that it is premature to propose undergrounding. It is proposed that the key diagram is updated to reflect that options are being considered for improving the A13.	The key diagram is aspirational for supporting the spatial vision of the Draft Local Plan. The Council/BeFirst are undertaking a strategic overview of A13. Findings of the study will be used to inform the next iteration of the Draft Local Plan where appropriate.
LAN	LP022_CoLC	Support	Chapter 2	SP1	n/a	n/a	LP18-158	The representation supports the growth principle of Draft Policy SP1 'Delivering Growth', and the identification of sites on which to focus development. The representation suggests 'a significant opportunity for delivering growth in LBBD'. It seeks to make the best use of land in accordance with Draft Policies GG2 'Making the best use of land' and D3 'Optimising site capacity through the design-led approach' of the Intend to Publish London Plan. Therefore, it is considered that the Barking Reach Power Station should be identified as an area that development will be focused on in part 1 of Draft Policy SP1 'Delivering Growth'. It is proposed that part 1 of Draft Policy SP1 'Delivering Growth' is updated to read “Development will be focused in Barking Riverside and our town centres as well as a number of industrial locations, including Dagenham Dock and Barking Reach Power Station, where uses will be reconfigured and intensified”.	Draft Policy SP1 and its supporting text have been updated to provide clarity on distribution of the growth anticipated over the plan period where appropriate.
LAN	LP022_CoLC	Support	Chapter 4	SP3	n/a	n/a	LP18-159	The principles of Draft Policy SP3 'Promoting inclusive economic growth' are supported, in particular, part 1 which emphasises the Council's preferred option to focus on growing a thriving economy. Part 1(f) identifies that the Council will seek to meet forecast sector requirements for wholesale food markets. It is proposed that Draft Policy SP3 'Promoting inclusive economic growth' is carried through to the next stage of the Local Plan Review.	Noted.

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LAN	LP022_CoLC	Support	Chapter 4	DM6	n/a	n/a	LP18-160	The growth principles of Draft Policy DM6 'Utilising the borough's employment land more efficiently' is supported as the representation author seeks to optimise the use of a site which is in the designated Dagenham Dock Strategic Industrial Location. However, it is proposed that part 2(c) should make specific reference to the land uses within Draft Policy E4 'Land for industry, logistics and services to support London's economic function' of the Intend to Publish London Plan, which includes wholesale markets. Part 2(c) should be updated to read "comprise uses that are suitable for broad industrial-type activities, as identified in Policy E4 of the New London Plan 2020".	The Draft Policy DM6 has been reviewed in line with the emerging London Plan.
LAN	LP022_CoLC	General	Chapter 4	DM7	n/a	n/a	LP18-161	Greater flexibility to be provided in Draft Policy DM7 'Providing flexible, affordable workspace' to reflect the specific circumstances of a development proposal. The representation author's site is an example of a project that will require the flexible application of DM7. It will provide a range of floorspace for market traders, some of which will be small and medium-sized enterprises. However, it may not be possible to demonstrate that there will be provision of space "at below market rate", and the respondent would resist the submission of a viability assessment to demonstrate why affordable workspace provision is not viable. The respondent would also resist the requirements of a payment lieu as it would not be justified by the circumstances and composition of uses within the project. The inclusion of a sentence in part 2 of Draft Policy DM7 'Providing flexible, affordable workspace' is required to state that affordable workspace and a payment in lieu will not be required where justified by the specific use of a development, or where identified in a site allocation. The supporting text should also specify that affordable workspace is not expected to be required in the development of wholesale markets.	Draft Policy DM7 and its supporting texts have been reviewed in light of the Council's latest Industrial Land Strategy and Local Plan Viability Assessment.

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LAN	LP022_CoLC	General	Chapter 5	DM11	n/a	n/a	LP18-162	The inclusion of the 'Agent of Change' Principle in Draft Policy DM11 'Responding to Place' is supported. It is proposed that the Draft Policy should be updated to place further emphasis on the need to safeguard existing and future occupiers to enable them to function as industrial uses effectively. It is proposed that part 2(e) of Draft Policy DM11 'Responding to Place' is updated to read: "(e) adopt the Agent of Change principle and mitigate impacts from existing noise and other nuisance-generating activities or uses within proposed new development to ensure new development does not jeopardise the ability of existing uses to operate efficiently or to operate on a 24 hour basis".	Policy DM11 has been reviewed as part of the Regulation 19 Local Plan.
LAN	LP022_CoLC	General	Chapter 5	DM12	n/a	n/a	LP18-163	An outline planning application will be submitted on shortly, which will include maximum height and area parameters that could result in a 3-4 storey industrial building. As such, the site could be defined as being "significantly taller" than its neighbours. There is no definition of what constitutes a building that is "significantly taller" than its neighbours. Therefore, an amendment is sought for the Draft Policy DM12 'Tall Buildings' to allow the development of taller buildings where they result in the optimisation and intensification of industrial land. As currently drafted, the policy could result in resistance to multilevel industrial buildings because they are taller than their neighbours and not located in areas of high public transport accessibility. It is proposed that Draft Policy DM12 'Tall buildings' should include reference to allowing taller buildings in locations where they make the best use of land, and on sites that have allocations that identify the potential for taller buildings than their surroundings.	Draft Policy DM12 has been reviewed and updated to provide clarity on "significantly taller" within the context of Barking and Dagenham.

Category	Rep ID (Be First)	Nature of Response	Relevant Chapter	Relevant Policy Number	Relevant Paragraph	Site Reference	Comment ID	Summarised Comment	LBBD/BeFirst Response
LAN	LP022_CoLC	General	Chapter 6	DM20	n/a	n/a	LP18-164	Part 3(c) of Draft Policy DM20 'Nature conservation and biodiversity' precludes the use of non-native species within 250 metres of Sites of Importance for Nature Conservation. For most sites in London achieving an entirely native species palette is an unreasonable and unnecessary requirement. Most sites in London include both native and non-native species, with a particular focus on wildlife friendly species for the latter. It is proposed that part 3(c) of Draft Policy DM20 'Nature conservation and biodiversity' is updated to read "use native and non-native species in soft landscaping schemes within 250m of Sites of Importance for Nature Conservation, waterways and wildlife corridors, and on green/brown roofs and roof gardens".	Draft Policy DM20 has been reviewed and updated in line with the Council's most up to date evidence base on nature conservation and biodiversity.
LAN	LP022_CoLC	General	Chapter 6	DM22	n/a	n/a	LP18-165	Greater flexibility in Part 3 of Draft Policy DM22 'Trees' to reflect that financial contributions should be discussed on a case by case basis and considered in accordance with the value of the trees. Part 5 of Draft Policy DM22 'Trees' places an over reliance on native species which is unlikely to deliver the diversity and resilience in relation to climate change and pests/diseases that is typically required of urban trees. As currently drafted, the policy could result in native trees being planted despite being inappropriate to the context. It is proposed that part 3 of Draft Policy DM22 'Trees' is updated to read "Where it is not possible to provide adequate replacement trees as part of a development, the applicant may 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". It is proposed that part 5 of Draft Policy DM22 'Trees' is updated to read "Major development is expected to include additional planting, including trees, shrubs, and vegetation over and above any existing provision. Planting should use trees, shrubs and vegetation that is appropriate to the context of the development".	Draft Policy DM22 has been reviewed and updated to provide clarification on 'Trees' where appropriate.

Category	Rep ID (Be First)	Nature of Response	Relevant Chapter	Relevant Policy Number	Relevant Paragraph	Site Reference	Comment ID	Summarised Comment	LBBB/BeFirst Response
LAN	LP022_CoLC	General	Chapter 7	DM29	Sub Area 3 - Dagenham Dock, Beam Park and Former Ford Stamping Plant	n/a	LP18-166	The representation seeks to caveat Part 5 of Draft Policy DM29 'Managing our waste' which identifies that proposals for new waste facilities, or to replace or extend an existing waste facility, will be supported where they are appropriately located within a safeguarded waste site, or area of search, or integrated into a suitable new development. The anticipated waste capacity in the Dagenham Dock area has already been surpassed. Additional waste sites in the area will conflict with the Vision for Sub-Area 3 which aims to provide a flexible policy context for new employment provision and the creation of a modern wholesale food market. As currently drafted, the policy could result in new waste sites being developed in Dagenham Dock which would conflict with the vision for Sub-Area 3. It is proposed that part 5 of Draft Policy DM29 'Managing our waste' should be updated to add the following criteria: "a) the proposed waste uses do not conflict with the vision for the area in which they are located; b) the waste capacity for the area has not been surpassed".	The Council have reviewed Draft Policy DM29, particularly in relation to the vision for Sub-Area 3.
LAN	LP022_CoLC	General	Chapter 8	SP7	n/a	n/a	LP18-167	The objective of reducing vehicle trips by car, and to find more sustainable approaches to freight transport is supported. It has already demonstrated to LBBB that it is exploring ways to encourage more sustainable use of transport for the project. However, it is important that transport policy is applied in a sufficiently flexible way to recognise that, even with the availability of more sustainable modes, the operational characteristics of wholesale markets will still necessitate significant provision of vehicle parking. It is proposed that the site allocation acknowledges that the project will need to provide appropriate levels of vehicle parking for future occupiers and visitors to the market. Draft Policy SP7 'Planning for integrated transport' should confirm that the policy can be applied flexibly to reflect the specific nature of development proposals, where the need for such flexibility is identified in site allocations. Draft Policy SP7 should also seek to support practical and economically viable alternatives or strategies for local businesses and recognise coordination requirements at a regional level.	Draft Policy SP7 has been reviewed and updated to provide clarification on how the policy can be applied flexibly to reflect the specific nature of development proposals as well as support practical and economically viable alternatives or strategies for local businesses and recognise coordination requirements at a regional level.

Catego ry	Rep ID (Be First)	Nature of Response	Relevant Chapter	Relevant Policy Number	Relevant Paragraph	Site Reference	Comment ID	Summarised Comment	LBBD/BeFirst Response
LAN	LP022_CoLC	General	Chapter 8	DM31	n/a	n/a	LP18-168	It is acknowledged that the need to assess the transport impact of major development proposals, and for appropriate mitigation measures to be brought forward. However, it considers that part 4 of Draft Policy DM31 'Making better connected neighbourhoods' is unnecessarily vague and confusing. While it will be appropriate for developers of mixed-use development to consider how to locate different uses within easy reach of each other, this part of the policy should not apply to single use projects, which are entirely suitable in allocated industrial areas. Furthermore, contributions to mitigating transport measures should be proportionate and where possible be led by a strategic coordinated plan such as the emerging Infrastructure Plan (2019). It is suggested that part 3 of Draft Policy DM31 should also be updated to reference contributions to mitigating transport measures being led by a strategic coordinated plan, although planning applications should not be held up by the absence of a strategic plan. It is suggested that part 4 of Draft Policy DM31 'Making better connected neighbourhoods' should be amended to only relate to mixed use developments.	Draft Policy DM31 Parts 3 and 4 to has been reviewed and updated to provide more clarity on contributions to mitigating transport measures.
LAN	LP022_CoLC	General	Chapter 8	DM32	n/a	n/a	LP18-169	It is acknowledged that the general policy objective of controlling the level of car parking in new developments. However, it seeks that the policy includes some flexibility to reflect to specific requirements of projects, which will require an appropriate level of vehicle parking to reflect the operational characteristics, including hours of use, of the market. It is proposed that Draft Policy DM32 'Cycle and car parking' should confirm that the policy can be applied flexibly to reflect the specific nature of development proposals, where the need for such flexibility is identified in site allocations.	Draft Policy DM32 has been reviewed and updated to include flexibility and reflect the specific nature of development proposals.
DEV	LP023_L&Q	General	Chapter 4	DM7	n/a	n/a	LP18-170	The Draft Local Plan's approach to industrial land does not go on to explicitly address the opportunities (either in respect of SIL, LSIL or undesignated employment sites) to co-locate uses or substitute land to achieve the same purpose but increase housing supply, which the London Plan explicitly recognises. Equally, the additional requirements in respect of non-designated land use are overly onerous and it cannot be seen how this can be achieved or secured in practice.	The Council/BeFirst has undertaken a review of the borough's Industrial Land. This is the key evidence base to support the Draft Policies, which will be used to inform the next integration of the Draft Local Plan.

Category	Rep ID (Be First)	Nature of Response	Relevant Chapter	Relevant Policy Number	Relevant Paragraph	Site Reference	Comment ID	Summarised Comment	LBBD/BeFirst Response
DEV	LP023_L&Q	General	Chapter 5	DM11	n/a	n/a	LP18-171	Further clarity is required on when 'independent design scrutiny' referenced in Policy DM11 is expected to occur in the pre-application process and how this will be treated through the application determination process.	The Regulation 18 draft states that 'where relevant and appropriate' independent design advice from the LBBD Quality Review Panel should be sought as part of the pre-application process". DM 11 has been reviewed to add clarity on this issue.
DEV	LP023_L&Q	General	Chapter 8	DM32	n/a	n/a	LP18-172	The representation supports the approach in principle but request the wording of Policy DM32 is flexible enough to allow site specific consideration of car parking provision where evidence or site-specific circumstances supports alternative standards being applied. There are large parts of the borough which have limited infrastructure and relatively low PTAL ratings which would benefit from increased provision until such infrastructure is completed. This approach aligns with NPPF Paragraphs 105 and 106.	Draft Policy DM32 has been reviewed and updated to ensure alignment with the NPPF Paragraphs 105 and 106 in relation to car parking provision in areas with low PTAL ratings.
STA	LP024_EnvironmentAgency	Support	Chapters 6 and 7	n/a	n/a	n/a	LP18-173	The representation was pleased to see that the Council aims to be 'London's Green Capital', and that a Chapter of the Plan has been dedicated to this (Chapter 7), along with a dedicated Chapter on 'Green and Blue Infrastructure and the Natural Environment' (Chapter 6).	The Council acknowledges the support for Chapters 6 and 7.
STA	LP024_EnvironmentAgency	Objection	Chapter 5, 6	various	n/a	n/a	LP18-174	There are concerns with a number of the key policies (SP4, SP5, DM21, DM28). Specifically, the draft policies for enhancing rivers and waterways and managing flood risk lack consistency with national policy and the ability to effectively deliver sustainable development over the course of the plan. Without robust policies the respondent would likely find the Plan unsound at submission stage.	The Council has arranged an external meeting with the Environment Agency to review the policies and address the comments related to the test of soundness. The results of the discussion will be used to inform the next iteration of the Draft Plan.
STA	LP024_EnvironmentAgency	Support	Chapter 7	DM26	n/a	n/a	LP18-175	This is a strong policy with a good link to London Plan S11 policy.	The Council acknowledges the support for Policy DM26.
STA	LP024_EnvironmentAgency	General	Chapter 7	n/a	n/a	n/a	LP18-176	Recommendations have been made to create a more robust and effective policy e.g. approaches to tackling climate change, reducing air pollution and managing flood risk. Clarifications on "contaminated land", "waste activity" and impacts on water quality are recommended.	The Council will review the wording of all relevant policies within Chapter 7 in line with the Environment Agency's comments.
STA	LP024_EnvironmentAgency	Support but with suggestions.	Chapter 7	DM29	n/a	n/a	LP18-177	The representation is in support of this policy but has made recommendations to ensure an effective policy.	The Council acknowledges the support for Policy DM29 and has reviewed the recommendations made as part of the Regulation 19 Local Plan.

Category	Rep ID (Be First)	Nature of Response	Relevant Chapter	Relevant Policy Number	Relevant Paragraph	Site Reference	Comment ID	Summarised Comment	LBBD/BeFirst Response
STA	LP024_EnvironmentAgency	Support but with suggestions.	Chapter 6	DM22	n/a	n/a	LP18-178	While it is supported that the appropriate use of trees and vegetation in the 'buffer zone', all trees planted in close proximity to flood defences must have appropriate root containment systems installed, to prevent future tree root growth negatively affecting flood defence structures.	Draft Policy DM22 has been reviewed and updated to provide clarity on trees and vegetation within buffer zones.
STA	LP024_EnvironmentAgency	General	Chapter 6	DM21	n/a	Thames Policy Area	LP18-179	The representation is recommending the Roding is included within the 'Thames Policy Area'. It would be extremely beneficial if the policy included a requirement for new developments along the Thames to raise adjacent flood defences, to meet the TE2100 raising requirements, during construction. It is strongly recommended that this policy goes into more detail which encompasses the aspirations of the riverside strategy and TE2100 opportunities.	Draft Policy DM21 has been reviewed and updated to provide more detail and encompass the aspirations of the Riverside Strategy and TE2100 Opportunities. The Council will hold an external meeting to discuss this and updates to the Proposals Map.
STA	LP024_EnvironmentAgency	General	Chapter 6	DM20	n/a	n/a	LP18-180	To strengthen the policy and ensure developments make a meaningful contribution to biodiversity net gain, it should specify the amount of net gain a development should achieve i.e. minimum of 10%. Long term monitoring and management of biodiversity net gain should be required for 30 years. The definition for 'excluded development' should be considered.	The Council will review the wording of Policy DM20 in relation to Biodiversity Net Gain and will provide clarification on excluded development.
STA	LP024_EnvironmentAgency	General	Chapter 2	Sub-Areas	All	n/a	LP18-181	Flood risk has not been considered as a priority for any of the sub-areas allocated within the draft Local Plan, despite some areas being in areas of high risk of flooding from fluvial, tidal and surface water sources.	The Council/BeFirst are engaging with the EA to discuss further on the approach to mitigate flood risk as part of the plan making process. Further details will be provided within the Regulation 19 Local Plan.
STA	LP024_EnvironmentAgency	General	Chapter 3	DM5	n/a	n/a	LP18-182	The gypsy and traveller policy are welcome, but definition of flood risk should be reworded.	The definition of flood risk in Policy DM5 has been reviewed and updated to provide clarity.
STA	LP024_EnvironmentAgency	General	Chapter 5	DM12	n/a	n/a	LP18-183	Tall buildings policy should include managing risks to groundwater resources associated with deep piled foundations.	Draft Policy DM12 and its supporting text have been reviewed and updated to take account of this comment.
STA	LP024_EnvironmentAgency	General	Chapter 6	DM18	n/a	n/a	LP18-184	There is a significant lack of reference to blue spaces. Policy DM18 should be extended to include enhancements to watercourses and water bodies.	Policy DM18 has been reviewed within the Regulation 19 Local Plan Draft.

Category	Rep ID (Be First)	Nature of Response	Relevant Chapter	Relevant Policy Number	Relevant Paragraph	Site Reference	Comment ID	Summarised Comment	LBBD/BeFirst Response
STA	LP024_EnvironmentAgency	General	Chapter 2		n/a	n/a	LP18-185	The environment and sustainability sections should be expanded to highlight the challenges of population growth on water resources, the opportunity for land remediation through the regeneration of brownfield land, opportunities for biodiversity net gain, as well as being more specific on flood risk and climate change adaptation. As LBBD is an area of "Serious Water Stress" it is expected that water resources be recognised as both a challenge and opportunity. Specific reference to climate adaptation and mitigation should be seen under the 'Challenges' column.	Chapter 5 and Chapter 6 of the Draft Local Plan have been reviewed and updated to take account of the comment regarding water resource, land remediation, biodiversity net gain as well as flood risk and climate change adaptation.
STA	LP024_EnvironmentAgency	Objection	Chapter 7	DM27	n/a	n/a	LP18-186	It is believed that an appropriate evidence base to support the draft local plan strategic policies has been provided, however it is recommended that several amendments are made to ensure that the correct evidence is supporting the plan and that the policies are aligned fully with the evidence base.	The Council has arranged an external meeting with the Environment Agency to review the policies and address the comments related to the test of soundness. The results of the discussion will be used to inform the next iteration of the Draft Plan.
ORG	LP025_NationalTrust	Support	Chapter 5	Policy DM14	n/a	CF and CP	LP18-187	Support is given for Policy DM14 as it seeks to conserve and enhance heritage assets and archaeology. However, assurances are sought regarding the design of proposed schemes. High quality design that will take the significance of Eastbury Manor House and local character into account is vital, especially for sites CP and CF as those sites are within close proximity to Eastbury Manor House.	Noted. The Council/BeFirst may wish to consider this when contemplating amendments in relation to design / quality review during Pre-Application discussion.
BUS	LP026_HapagLloyd	General	Appendix 3	n/a	n/a	n/a	LP18-188	The representation is proposing a residential-led development on the site of Hapag-Lloyd House (HLH) at 48A Cambridge Road in Barking Town Centre. The site has a good PTAL rating and is also located within an area where high-density development and tall buildings are supported (respondent has provided examples of nearby proposed tall buildings). There are no heritage assets on the site, but the Abbey & Barking Town Centre Conservation Area is to the south of the site, in addition to a couple of Grade II listed buildings (Barking Station Booking Hall and Barking Baptist Tabernacle). The site is owned by Hapag-Lloyd and has existing vehicular access to Cambridge Road. Respondent has attached a design document for the site, which proposes a 13-storey building that will provide 56 residential units and approximately 450sqm of flexible commercial floorspace.	The Council will review the site at Hapag-Lloyd House at 48A Cambridge Road in Barking Town Centre as part of the updated Strategic Land Availability Assessment.

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LAN	LP027_BaymoorInvestingLtd	Support	Appendix 3	n/a	n/a	XC Harts Lane Estate	LP18-189	The representation expresses support for Allocation XC. It suggests the idea of the part of this site having its own allocation because it has already undergone a lot of pre-application discussion with the Council and residential development at the site has been supported in principle. There are no ownership issues with the site and its development would be in accordance with planning policy and guidance.	Noted. The site XC has been reviewed and updated through the Strategic Land Availability Assessment.
LAN	LP027_BaymoorInvestingLtd	Support	Chapter 2	n/a	Sub Area 1 - Barking Town Centre and the River Roding	n/a	LP18-190	The representation expresses support for the Sub-Area 1 Emerging Vision, specifically the intention to support growth, including optimising housing delivery and sustainable development.	Noted.
LAN	LP027_BaymoorInvestingLtd	Support	Chapter 3	SP2	n/a	n/a	LP18-191	The representation expresses support for this policy, specifically optimising housing delivery that contributes to meeting the strategic delivery target.	Noted.
LAN	LP027_BaymoorInvestingLtd	General	Chapter 3	DM1	n/a	n/a	LP18-192	The representation welcomes the reference that delivery should be subject to financial viability. It suggests that the Council should reference the viability-tested and fast-track route of Policy H5 in the Intend to Publish London Plan (December 2019) and the Affordable Housing and Supplementary Planning Guidance document (August 2017).	The Council will review Chapter 3 to include reference to the viability-tested and fast-track route of Policy H5 in the Intend to Publish London Plan (December 2019) and the Affordable Housing and Supplementary Planning Guidance document (August 2017).
LAN	LP027_BaymoorInvestingLtd	General	Chapter 4	DM6	n/a	n/a	LP18-193	The representation would like to make sure that the Council's employment land supply and designations are fully reviewed as part of the new Local Plan. It is believed the Locally Significant Industrial Site (LSIS) designation that cuts through the Wickes site to be a drafting error because it randomly cuts through the site and does not contribute to the overall function of the LSIS. The representation has no issue with Policy DM6, but it is considered that this policy should not apply to the Wickes site.	The Council/BeFirst has undertaken a review of the borough's Industrial Land. This is the key evidence base to support the Draft Policies, which will be used to inform the next iteration of the Draft Local Plan.
LAN	LP027_BaymoorInvestingLtd	General	Chapter 5	SP4	n/a	n/a	LP18-194	The representation acknowledges the need for design to be of high quality but considers that reference should be made to making effective use of land and optimising density in this strategic policy in order to meet as much of the identified need for housing as possible.	SP4 has been reviewed in consideration of this representation.

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LAN	LP027_BaymoorInvestingLtd	General	Chapter 5	DM12	n/a	n/a	LP18-195	The representation acknowledges the Council's aim to manage the location of tall buildings in order to fully assess their impact on an area. However, it is considered that point b) should refer to future areas of high accessibility/planned infrastructure. PTAL should not be the only measure of accessibility.	PTAL is an accepted measure of accessibility but planned infrastructure is not accounted for in calculating PTAL so it may be appropriate to include provision for considering the accessibility impact of planned and committed-to infrastructure. This has been included as part of the review of Draft Policy DM12.
LAN	LP028_10ThamesRd	Support	Appendix 3	n/a	n/a	CI Thames Road	LP18-196	The representation expresses support of this draft allocation and the inclusion of the owner's site within it. The masterplan the Council is preparing for Thames Road should set out a clear vision for the Thames Road area and the Council's intended approach and policy expectations for redevelopment of their existing industrial/employment land.	Noted.
LAN	LP028_10ThamesRd	Support	Chapter 2	n/a	Sub Area 2 - Thames Road, Barking Riverside and Castle Green	n/a	LP18-197	The representation expresses support for the Council's ambition for the area to optimise the use of land including through co-location residential on industrial land. Consideration should be made to intensification and release of industrial land (as opposed to just co-locations) so that sub-areas within the wider area can form their own identity. This should target having a residential/neighbourhood core in the middle of Thames Road.	Noted.
LAN	LP028_10ThamesRd	Support	Chapter 3	SP2	n/a	n/a	LP18-198	The representation expresses support for this policy, specifically optimising housing delivery that contributes to meeting the strategic delivery target.	Noted.
LAN	LP028_10ThamesRd	General	Chapter 3	DM1	n/a	n/a	LP18-199	The representation welcomes the reference that delivery should be subject to financial viability. They suggest that the Council should reference the viability-tested and fast-track route of Policy H5 in the Intend to Publish London Plan (December 2019) and the Affordable Housing and Supplementary Planning Guidance document (August 2017).	Noted.
LAN	LP028_10ThamesRd	General	Chapter 5	SP4	n/a	n/a	LP18-200	The representation acknowledges the need for design to be of high quality but considers that reference should be made to making effective use of land and optimising density in this strategic policy in order to meet as much of the identified need for housing as possible.	SP4 has been reviewed in consideration of this representation.

Category	Rep ID (Be First)	Nature of Response	Relevant Chapter	Relevant Policy Number	Relevant Paragraph	Site Reference	Comment ID	Summarised Comment	LBBD/BeFirst Response
LAN	LP028_10Thames Rd	General	Chapter 5	DM12	n/a	n/a	LP18-201	It acknowledges the Council's aim to manage the location of tall buildings in order to fully assess their impact on an area. However, it is considered that point b) should refer to future areas of high accessibility/planned infrastructure. PTAL should not be the only measure of accessibility.	PTAL is an accepted measure of accessibility but planned infrastructure is not accounted for in calculating PTAL so it may be appropriate to include provision for considering the accessibility impact of planned and committed-to infrastructure. This has been included as part of the review of Draft Policy DM12.
LAN	LP029_TownQuay Wharf	Support	Appendix 3	n/a	n/a	XC Herts Lane Estate	LP18-202	The representation expresses support for this allocation being included as a specific site allocation for residential development. The site is suitable for high density residential development and this will support the Council's intention for the wider Quay area. Any residential development should be optimised by making effective use of land for housing.	Noted.
LAN	LP029_TownQuay Wharf	Support	Chapter 2	n/a	Sub Area 1 - Barking Town Centre and the River Roding	n/a	LP18-203	The representation supports the Sub-Area 1 Emerging Vision and the overall intention to support growth, optimise housing delivery and deliver sustainable development. However, the specific bullet point on Town Quay states that it will become a leisure and creative hub including for house boats. This is acknowledged, but in order to avoid conflict with the residential allocation DO, the vision must make clear that the Town Quay area will also be a location for new homes in high density residential development. The agent makes reference to the Town Quay Vision document prepared on behalf of Be First by Bishop and Williams & DaeWha Kang Design (31 January 2020), which acknowledges that the site can accommodate high density development and the principle of residential development has been agreed in pre-application and in meetings with the Council. Therefore, the Vision for Sub-Area 1 should specifically reference high density residential development to bring vibrancy and promote activity in this new hub.	Noted.
LAN	LP029_TownQuay Wharf	Support	Chapter 3	SP2	N/A	N/A	LP18-204	The representation expresses support for this policy, specifically optimising housing delivery that contributes to meeting the strategic delivery target.	Noted.
LAN	LP029_TownQuay Wharf	General	Chapter 3	DM1	n/a	n/a	LP18-205	The representation welcomes the reference that delivery should be subject to financial viability. It suggests that the Council should reference the viability-tested and fast-track route of Policy H5 in the Intend to Publish London Plan (December 2019) and the Affordable Housing and Supplementary Planning Guidance document (August 2017).	Chapter 3 has been reviewed to include reference to the viability-tested and fast-track route of Policy H5 in the Intend to Publish London Plan (December 2019) and the Affordable Housing and Supplementary Planning Guidance document (August 2017).

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LAN	LP029_TownQuayWharf	General	Chapter 5	SP4	n/a	n/a	LP18-206	The representation acknowledges the need for design to be of high quality but considers that reference should be made to making effective use of land and optimising density in this strategic policy in order to meet as much of the identified need for housing as possible.	SP4 has been reviewed in consideration of this representation.
LAN	LP029_TownQuayWharf	General	Chapter 5	DM12	n/a	n/a	LP18-207	The representation acknowledges the Council's aim to manage the location of tall buildings in order to fully assess their impact on an area. However, it is not considered that point b) should refer to future areas of high accessibility/planned infrastructure. PTAL should not be the only measure of accessibility.	PTAL is an accepted measure of accessibility but planned infrastructure is not accounted for in calculating PTAL so it may be appropriate to include provision for considering the accessibility impact of planned and committed-to infrastructure. This has been included as part of the review of Draft Policy DM12.
ORG	LP030_IslingtonSwifts	General	Chapter 6	SP5	n/a	n/a	LP18-208	<p>The representation requests that Draft Policy SP5 (Enhancing our natural environment) includes a requirement for integrated nesting and roosting sites such as 'swift bricks' and bat boxes in new development, ideally including refurbishments and extensions where suitable - as taken from the NPPG Natural Environment July 2019 guidance.</p> <p>The DEFRA biodiversity net gain metric is orientated towards areas of habitat and does not directly regard such integrated nesting and roosting sites, which are very relevant to the urban environment. For example, the London Plan states that "in developing Development Plan policies, boroughs should...4) ...[include] features such as artificial nest sites that are of particular relevance and benefit in an urban context" (Chapter 8 Policy G6B). Furthermore, the draft Islington Local Plan provides an ideal model for a clause for this (G4 Biodiversity section 5.27 page 153). Hackney and Bexley have also recently included similar clauses in their draft Local Plans.</p>	Draft Policy SP5 has been reviewed to include a requirement for integrated nesting and roosting sites.
ORG	LP030_IslingtonSwifts	General	Chapter 6	SP5	n/a	n/a	LP18-209	<p>The representation requests that Draft Policy SP5 (Enhancing our natural environment) includes a requirement for integrated nesting and roosting sites such as 'swift bricks' and bat boxes in new development, ideally including refurbishments and extensions where suitable - as taken from the NPPG Natural Environment July 2019 guidance.</p> <p>The DEFRA biodiversity net gain metric is orientated towards areas of habitat and does not directly regard such integrated nesting and roosting sites, which are very relevant to the urban environment. For example, the London Plan states that "in developing Development Plan</p>	Draft Policy SP5 has been reviewed to include a requirement for integrated nesting and roosting sites.

Category	Rep ID (Be First)	Nature of Response	Relevant Chapter	Relevant Policy Number	Relevant Paragraph	Site Reference	Comment ID	Summarised Comment	LBBD/BeFirst Response
								policies, boroughs should...4) ...[include] features such as artificial nest sites that are of particular relevance and benefit in an urban context" (Chapter 8 Policy G6B). Furthermore, the draft Islington Local Plan provides an ideal model for a clause for this (G4 Biodiversity section 5.27 page 153). Hackney and Bexley have also recently included similar clauses in their draft Local Plans.	
ORG	LP031_Lagmar (Barking)Ltd	Support	Appendix 3	n/a	n/a	AK Vicarage Field	LP18-210	The representation supports this allocation and would like to see the site continues to be allocated for redevelopment.	Noted.
ORG	LP031_Lagmar (Barking)Ltd	Support but with suggestions.	Chapter 2	n/a	Sub Area 2 - Thames Road, Barking Riverside and Castle Green	AK Vicarage Field	LP18-211	The representation is supportive of the Council's emerging vision for Barking Town Centre and the River Roding (Sub-Area 1) as a place to live, work, visit and relax during both the day and night. The planning consent for the redevelopment of the Vicarage Field Shopping Centre to deliver a mixed-use development comprises of up to 900 new homes, retail, commercial, office, hotel floorspace alongside a primary school, healthcare facilities and leisure uses will make a significant contribution to this vision.	Site AK has been reviewed through the Strategic Land Availability Assessment.
ORG	LP031_Lagmar (Barking)Ltd	Support but with suggestions.	Chapter 2	SP1	n/a	n/a	LP18-212	The approach to focusing development in areas including the town centres is supported. It would also support the key stakeholder engagement in proactively delivering the Council's vision. The proposed 10 Healthy New Town Principles are aspirational and are supported but should not be applied mechanistically. It is not clear whether all developments are expected to meet each of the 10 Healthy New Town Principles, however it would appear difficult to do so for redevelopment proposals for a single use.	Draft Policy SP1 has been reviewed to include wording to support the principles of Healthy New Town Principles for small sites.
ORG	LP031_Lagmar (Barking)Ltd	Support	Chapter 3	SP2	n/a	AK Vicarage Field	LP18-213	The representation supports the draft policy and notes that the Barking and Dagenham's Five Year Land Housing Supply Statement which forms part of the Council's evidence base identifies that a total of 200 homes will be delivered on the site at Vicarage Field between 2022/23 and 2023/24 and forms part of the Boroughs expected future housing supply. It should be acknowledged that the outline consent is approved for up to 900 new units across the site and it is anticipated that these will come forward in the period between 2019 and 2034.	The Council notes the development at Vicarage Field Shopping Centre. Further work on the assessment of housing sites will be included in borough's updated strategic land assessment.

Category	Rep ID (Be First)	Nature of Response	Relevant Chapter	Relevant Policy Number	Relevant Paragraph	Site Reference	Comment ID	Summarised Comment	LBBD/BeFirst Response
ORG	LP031_Lagmar (Barking)Ltd	Support	Chapter 3	DM2	n/a	n/a	LP18-214	<p>The representation supports the strategic affordable housing target identified in policy SP2 which is aligned with the draft Local Plan. Point 4 is noted and supported as this acknowledges that lower levels of affordable housing may be necessary in ‘exceptional circumstances’ in order to ensure housing delivery and to take account of site-specific circumstances. It is also acknowledged that in certain circumstances the addition of market accommodation is more appropriate to redress the balance of tenures. It is considered that draft Policy DM2: Housing size and mix should take account of areas that may be more appropriate for smaller units within high density developments within Town Centre locations and less appropriate for family sized units. The support for PRS within the policy is welcomed given the important role this plays in housing delivery.</p>	The Council has considered the comments on affordable housing dwelling sizes and has reviewed policy wording and its supporting text to provide clarification on tenure mix regarding small site.
ORG	LP031_Lagmar (Barking)Ltd	Support	Chapter 4	SP3	n/a	n/a	LP18-215	<p>The representation supports the need for growth, particularly the need to direct major office development to Barking’s town centre to form part of a mixed and vibrant sustainable community in close proximity to Barking Station as set out in Policy SP3. The proposed redevelopment of Vicarage Field will deliver a truly mixed use scheme that includes both retail and office and the synergy between these different uses is critical to the success of a new vibrant place for all residents, workers and shoppers to enjoy.</p> <p>It fully supports the Council’s preferred option to support businesses who seek to evolve, diversify, and contribute to a more productive and future facing economy, particularly through supporting a range of appropriate town centre uses, not just limited to traditional retail. It is important that planning policy is sufficiently flexible to allow responses to market changes and encourage a wide range of retail, workspace and leisure facilities to come forward in the town centre. In particular, it is important that the policy facilitates new and less conventional types of retail and workspace to come forward, such as temporary uses/ pop- up shops, market halls, flexible commercial uses, and new types of businesses that do not neatly fit within a particular use class. These new forms of retail, commercial and workspace offers can form an important part of Barking Town Centre’s future and ensure it is dynamic, innovative and prosperous.</p>	Noted. Potential development sites have been reviewed through the Strategic Land Availability Assessment.

Catego ry	Rep ID (Be First)	Nature of Response	Relevant Chapter	Relevant Policy Number	Relevant Paragraph	Site Reference	Comment ID	Summarised Comment	LBBD/BeFirst Response
ORG	LP031_Lagmar (Barking)Ltd	Support	Chapter 4	DM8	n/a	n/a	LP18-216	The representation supports the sequential approach to the town centre hierarchy	Noted.
ORG	LP031_Lagmar (Barking)Ltd	Support	Chapter 4	DM9	n/a	n/a	LP18-217	The representation supports policy DM9.	Noted.
ORG	LP031_Lagmar (Barking)Ltd	Support	Chapter 4	DM10	n/a	n/a	LP18-218	The representation supports new visitor accommodation within Town centres.	Noted.
ORG	LP031_Lagmar (Barking)Ltd	Support but with suggestions.	Chapter 4	SP4	n/a	n/a	LP18-219	The aspirations set out within draft Strategic Policy SP4 in relation to delivering high quality design in the borough is supported. The need to deliver new homes which are economically viable within the Borough should be recognised as part of this consideration. The design principles relevant to development in town centres are recognised and supported although it is noted that these are repeated within draft Policy DM15 and the duplication is perhaps unnecessary.	Draft Policy DM15 has been reviewed and updated to provide clarity.
ORG	LP031_Lagmar (Barking)Ltd	Support but with suggestions.	Chapter 5	DM13	n/a	n/a	LP18-220	Regarding View 5: From the Ripple Road entrance to Vicarage Field shopping centre, Ripple Road, to 2 Town Square. It would be helpful if these were plotted on a map for clarification as well as being shown within the Conservation Area Appraisals.	The Proposals Map within the Regulation 19 Local Plan has been updated.
ORG	LP031_Lagmar (Barking)Ltd	Support	Chapter 6	SP5, DM19, DM23	n/a	n/a	LP18-221	The strategic approach to enhancing the natural environment set out in draft policy SP5 is supported. The aspirations of draft Policy DM19 (Urban Greening), and draft Policy DM23 (Local food growing including allotments) including maximising opportunities for food growing are particularly supported and are promoted within the Outline planning permission for Vicarage Field.	The Council acknowledges support for Draft Policies SP5, DM19 and DM23.
ORG	LP031_Lagmar (Barking)Ltd	Support	Chapter 7	SP6	n/a	n/a	LP18-222	The representation supports the draft Strategic Policy S6 for securing a sustainable and clean borough. In particular the aspiration to work with developers, landowners and other key stakeholders to ensure development supports and connects into the Borough's District Energy Networks and associated infrastructure is supported and promoted within the redevelopment proposals for Vicarage Field.	The Council acknowledges support for Draft Policy SP6.
ORG	LP031_Lagmar (Barking)Ltd	Support	Chapter 8	DM32	n/a	n/a	LP18-223	It is noted that this approach is aligned with the Draft London Plan and the Mayor's Transport Strategy and therefore the principle is supported and encouraged.	Noted.

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ORG	LP031_Lagmar (Barking)Ltd	Support but with suggestions.	Chapter 9 & 10	n/a	n/a	n/a	LP18-224	The Council's strategic policy for delivering social infrastructure in the right location to support housing and employment growth is supported. It is noted that all developments will be subject to the Borough Community Infrastructure Levy (CIL) charge. The scale and amount of development will therefore generate substantial capital expenditure for the Council to invest into essential infrastructure that is outlined on the Council's 123 list. Given the scale and pace of change envisioned in the draft Local Plan, we consider it important that the document sets out a clear strategic vision for the delivery of new schools, doctors and essential supporting infrastructure through the identification of existing or new sites and confirmed delivery timescales. This approach will ensure that new development and supporting infrastructure is delivery in tandem in a transparent and coordinated manner for the public to clearly understand. The policy should also allow for social infrastructure to be delivered by schemes in kind of CIL monies in accordance with the CIL Regulations (as amended).	The IDP, which will be published as part of the Regulation 19 Local Plan, will assist in providing a clear strategic vision for the delivery of new schools, doctors and essential supporting infrastructure through the identification of existing or new sites and confirmed delivery timescales.
ORG	LP032_RopemakerProperties	Support	Appendix 3	n/a	n/a	CH Chadwell Heath Industrial Estate	LP18-225	The representation supports the proposed allocation of the CHIE within the draft BDLP and looks forward to seeing how the proposals progress. The developer is keen to continue to collaborate with Be First in developing these proposals, however their support is subject to the following key points: 1. Agree with the masterplan approach; 2. The masterplan approach should not prejudice the operation of the ASDA food store operation. Draft NLP Policy D13 is therefore clear that the agent of change principle addresses both the future as well as the current operation of the Asda food store site (i.e. as it may evolve, with or without need for planning permission); 3. Note that the Asda food store is self-evidently a longer-term development opportunity in itself. Indeed, unlike much of the CHIE it has a frontage to an A road and public transport connections immediately alongside it. It may be helpful to explaining the BDLP's objectives to the wider public (and moreover to actually achieving these same objectives) for this aspect of NLP Policy H1 to be cited within the BDLP. 4. Any masterplan brought forward must not prejudice the future optimisation of the Asda food store site to support sustainable development objectives and accommodate new land uses. For example, the overall opportunity could be prejudiced through the footprint and massing of buildings (including distances from site boundaries); the	The Council/BeFirst are undertaking a masterplan study for Chadwell Heath Industrial Estate. The Sub Area priorities have been reviewed to take account of the comments related to the operation of the ASDA food store operation in terms of the agent of change principle and future development opportunity.

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								locations of specific land uses and outdoor amenity areas; and the locations of window openings, balconies and terraces.	
LAN	LP033_Peabody & Dagenham Dock	Support	Appendix 3	n/a	n/a	CJ Former Ford Stamping Plant	LP18-226	The site is an 18.41-hectare brownfield site located immediately north-east of Dagenham Dock station. On behalf of Peabody and Dagenham Dock Ltd, Savills submitted the site for consideration for redevelopment to provide up to 3,500 new homes within a residential-led mixed-use development as part of the “Call for Sites” process and these comments provide further detail in respect of the site and landowner's aspirations. The vision for the site is to collaboratively create a residential-led, mixed-use balanced community where people live, work, learn and play. They will build upon the site's rich heritage to create a truly great place by delivering up to 3,500 good quality homes and providing a new heart for the community. It has been agreed vision will be brought forward through a residential led masterplan in agreement with both the GLA and the Council. The work is due to be completed in spring 2020. Works approved under planning permission 17/00232/FUL and 17/02018/FUL. Detailed comments to the site pro-forma is set out in the table on page 4 of the representation.	Site XJ has been reviewed through the Strategic Land Availability Assessment. Further site details have been included in the Draft Local Plan.
LAN	LP033_Peabody & Dagenham Dock	Support	Chapter 2	n/a	n/a	n/a	LP18-227	The representation is in support of the spatial vision and recognise the need to consolidate and intensify current land uses to deliver new, residential-led, mixed-use neighbourhoods, and the provision of a new train station at Beam Park	Noted.

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LAN	LP033_Peabody & Dagenham Dock	Support but with suggestions.	Chapter 2	n/a	Sub Area 3 - Dagenham Dock, Beam Park and Former Ford Stamping Plant	n/a	LP18-228	The representation wholly supports the site's allocation. It notes that the Sub Area is going through a signification transformation with a number of new developments in the north and south to the sub-area. To support the site's allocation, it should be clearly identified for LSIS release within the Local Plan and policies maps. The Council is encouraged to produce a robust evidence to support the release of the site from LSIS in accordance with the requirements of the draft New London Plan. The current evidence base comprises the LBBB Economic Development Study (2014) which pre-dates the New London Plan and does not address the requirements of draft Policy E7 in our view. The representation is in supportive of the Council's vision for Merriellands Crescent which would build upon the area's existing retail and commercial offering and complement the new neighbourhoods at Ford Stamping Plant and Beam Park and other residential-led developments in the local area. However, consideration should be given to the potential incorporation of complementary commercial, retail, leisure and community floor space within the redevelopment of the Ford Stamping Plant site to create a successful new neighbourhood which includes active frontages and local amenities, without compromising the delivery of the District Centre. This policy wording should therefore provide support for potential complementary non-residential uses as part of the residential-led development at the Ford Stamping Plant. The site provides the opportunity to make significant improvements to public realm around Dagenham Dock Train Station and to improve connections and links between Dagenham Dock Train Station and the new neighbourhood at Beam Park, existing neighbourhoods to the north and the proposed District Centre at Merriellands Crescent. Such positive improvements could not be delivered without the release of the site from LSIS and its allocation as a residential-led neighbourhood.	Noted. The representation has been considered as part of the development of the Draft Local Plan site allocations.
LAN	LP033_Peabody & Dagenham Dock	Support	Chapter 2	SP1	n/a	n/a	LP18-229	The representation supports Draft Policy SP1 which sets out the Council's strategy to delivering growth. The delivery of the Ford Stamping Plant site as a new residential-led neighbourhood is a key component for the successful regeneration vision within Sub-Area 3, for the reasons set out above, and for delivering growth in the borough.	Noted.

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LAN	LP033_Peabody & Dagenham Dock	Support but with suggestions.	Chapter 5	DM12	n/a	n/a	LP18-230	<p>Draft Policy DM12 defines tall buildings as those that are significantly taller than their neighbours, or which have a significant impact on the skyline, and the policy states that the Council will support tall buildings where they (inter alia) “are located in sustainable locations with high public transport accessibility level (PTAL) ratings”.</p> <p>Restricting tall buildings to locations that have high PTAL ratings may lead to failure to optimise delivery of higher density development and tall buildings in the growth areas which may currently be subject to low to moderate PTAL ratings. The Ford Stamping Plant site has a PTAL of 2 / 3 despite its close proximity to the Dagenham Dock station and the future connections anticipated as part of Crossrail 2. Furthermore, the development at Beam Park, including new train and bus station, improvements to connections and linkages within and around the site, and creation of a new District Centre at Merrilands Crescent would all serve to improve the accessibility of the site to public transport and local amenities. The potential for tall buildings within the growth areas and within proximity of stations to aid legibility and wayfinding should therefore be supported.</p> <p>The Ford Stamping Plant site is a large site of some 18.41 hectares where the proposals themselves will define a neighbourhood scale. Development at Beam Park includes tall buildings of up to 16 storeys with up to 10 storeys granted planning permission at Merrilands Crescent. Within the emerging context, support should be given to the principle of taller buildings to be incorporated as part of the redevelopment proposals at the Ford Stamping Plant site. The emerging masterplan proposals will take a design-led approach and the incorporation of taller buildings will be explored as part of this process in seeking to optimise the potential of the site.</p>	<p>PTAL is an accepted measure of accessibility but planned infrastructure is not accounted for in calculating PTAL so it may be appropriate to include provision for considering the accessibility impact of planned and committed-to infrastructure. The intention of the Draft Policy DM12 is not to set restrictions to tall building locations but to set out the Council's preference of where tall buildings will be supported in the context of Barking and Dagenham.</p>

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LAN	LP033_Peabody & Dagenham Dock	Support but with suggestions.	Chapter 6	DM23	n/a	n/a	LP18-231	It is recognised that community food growing opportunities can bring substantial social benefits, including improving health and wellbeing. However, flexibility should be introduced into the policy to allow for appropriate engagement with key stakeholders and the local community, consideration of particular site constraints and capacities, future management and maintenance considerations and viability. It is suggested that the policy wording is amended as follows: “Major residential-led developments are expected to explore opportunities to provide community food growing opportunities and to provide a strategy for ongoing management of this where relevant.”	Draft Policy DM23 has been reviewed and updated in response to the comment on flexibility on food growing.
ORG	LP034_USS	Support but with suggestions.	Appendix 3	n/a	n/a	CF Thames Road	LP18-232	The Pro Forma for the wider potential site allocation identifies the existing use as 'industrial estate' and the possible future use as 'residential-led mixed use development'. This would be a significant policy change as the Site would no longer be designated as a SIL. USS recognises the need for housing on especially on brownfield sites however this should not be to the detriment of existing viable uses. The representor intends to continue to use the site as a commercial site and is taken forward as an allocation in the draft Local Plan. The proposed policy should not restrict its existing use. Under the proposed draft allocation, the Site would lose its protection as SIL. The representor opposes this approach until it is clear that the existing operations of the Site can continue to operate efficiently alongside the proposed new uses. They would want to be party to its preparation and encourages LBBB to ensure that the supporting policy is clear. They support LBBB's commitment to undertaking an industrial audit to determine how the Castle Green allocation should come forward. It recognises that commercial and residential uses can operate together in some contexts. However, they need to be well planned for to ensure they do not conflict with each other.	The Council/BeFirst have undertaken a Strategic Industrial Land Strategy. The study considers that the Rippleside SIL as an opportunity for the Council to demonstrate its transformation through the emerging Castle Green Masterplan Supplementary Planning Document. Further site details will be provided in the next iteration of the Draft Local Plan.

Catego ry	Rep ID (Be First)	Nature of Response	Relevant Chapter	Relevant Policy Number	Relevant Paragraph	Site Reference	Comment ID	Summarised Comment	LBBD/BeFirst Response
ORG	LP035_Essex and Suffolk Water	Support but with suggestions.	Chapter 7	SP3	n/a	n/a	LP18-233	<p>The representation would like to see any large water users, particularly those that require water for processing purposes to discuss their proposal with Essex and Suffolk Water at earliest possible stage. Water companies have a statutory obligation to meet and supply all domestic demands and would therefore not require consultation prior to seeking planning permission for new residential development or for instance domestic facilities in an office.</p> <p>The policies within this Chapter do not specifically refer to conserving water resources which they feel is essential.</p> <p>Specify the role the Boroughs waterways can play in achieving these aims, particularly through the increased use of the boroughs Safeguarded Wharves.</p>	Draft Policy SP3 has been reviewed and updated to include conserving water resources.
STA	LP036_PortofLon donAuthority	Support but with suggestions.	Chapter 2	SP1	Sub Area 2 - Thames Road, Barking Riverside and Castle Green	n/a	LP18-234	<p>The representation would support the maximisation of use of this part of the river for increased recreational opportunities.</p> <p>Sub Area 2: Wharves remain viable and are supported by policies at national and regional level. Given the amount of development, it is considered essential that the use of the River Thames and it's landing points are used to their full potential. As road freight is a major contributor of CO2 emissions, waterways must be considered as part of the solution to reduce dependency on the road network. SP1: special consideration must be given in the Local Plan towards the future use and intensification of use of the boroughs Safeguarded Wharves for waterborne freight handling uses.</p>	Draft SP1 and Sub Area 2 have been reviewed and updated to take account of the comments.
STA	LP036_PortofLon donAuthority	Support but with suggestions.	Chapter 2	n/a	Sub Area 3 - Dagenham Dock, Beam Park and Former Ford Stamping Plant	n/a	LP18-235	<p>It requests to be involved in all discussions with regarded to the future use of all of the boroughs Safeguarded Wharves at an early stage.</p>	Noted.

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STA	LP036_PortofLondonAuthority	Objection	Chapter 4	SP3	n/a	n/a	LP18-236	The representation does not support the rationalisation or relocation of the boroughs Safeguarded Wharves as advocated in part 1e of this draft policy and therefore considers the policy unsound.	The Council/BeFirst has undertaken a review of the borough's Industrial Land, including safeguarded wharves. There is ongoing conversation with the Greater London Authority on the borough's Safeguarded Wharves. The results of the conversation will be used to inform the relevant policies in the next iteration of the Draft Plan.
STA	LP036_PortofLondonAuthority	Support	Chapter 4	DM6	n/a	n/a	LP18-237	Whilst it is recognised that the London Plan seeks to maximise the delivery of housing it also seeks to support, sustain and intensify SILs. The Creekmouth area of the River Road Industrial Area supports a range of operational wharves, heavy industry and waste management operations and is not considered to be underutilised, and therefor play a key role in the local and wider economy.	Noted.
STA	LP036_PortofLondonAuthority	Support but with suggestions.	Chapter 6	SP5			LP18-238	Specific reference must be made to blue infrastructure within the policy text to emphasise the importance of blue infrastructure in the borough for Chapter 6 (Green and blue infrastructure) as a whole as this currently appears to be missing from the policy but is mentioned in associated evidence base documents.	Draft Policy SP5 has been reviewed and updated to include reference to blue infrastructure.
STA	LP036_PortofLondonAuthority	Support but with suggestions.	Chapter 6	DM21	n/a	n/a	LP18-239	The policy needs to include the need to 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/from the site or through the supply chain.	Draft Policy DM21 has been reviewed to include the need to maximise the use of the river for freight.
STA	LP036_PortofLondonAuthority	Support but with suggestions.	Chapter 7	SP6	n/a	n/a	LP18-240	Reference must be given to the use of these assets for developments to utilise the River Thames for the transportation of construction and waste materials, to help reduce road impacts and improve air quality in the borough.	Policy SP6 has been reviewed in relation to its application to utilising the River Thames for the transportation of construction and waste materials.
STA	LP036_PortofLondonAuthority	Support	Chapter 7	DM25	n/a	n/a	LP18-241	It proposes that London Plan policy SI15 is also referred to in this policy alongside policy D12, as both include reference to the Agent of Change principle.	Draft Policy DM25 has been reviewed to include a reference to policies SI15 and D12 of the Intend to Publish version of the London Plan and the Agent of Change principle.

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STA	LP036_PortofLondonAuthority	Support but with suggestions.	Chapter 7	DM26	n/a	n/a	LP18-242	Air Quality for the Thames includes a number of actions to encourage freight services on the river and should form part of the evidence base for the borough's Local Plan.	The Council will hold an internal meeting to discuss the wording of Policy DM26 in light of the Council's Air Quality Management Plan/Strategy.
STA	LP036_PortofLondonAuthority	Support but with suggestions.	Chapter 8	DM33	n/a	n/a	LP18-243	The role the river could play in achieving these aims is not recognised. The policy must give reference to the potential use of existing and proposed piers and structures as part of the delivery of small-scale freight ('last mile' delivery).	Draft Policy DM33 has been reviewed and updated to include a reference to the potential uses of existing piers and infrastructure.
ORG	LP037_UPS	Support	Chapter 2	n/a	Sub Area 2 - Thames Road, Barking Riverside and Castle Green	n/a	LP18-244	The representation is concerned regarding the potential of relocating current businesses and the emphasis on a "residential-led" neighbourhood. Urge the Council to consider vacant or under-utilised commercial properties first for development. Concerned about being moved further out of London.	Noted. The Regulation 19 Local Plan will be clear on-site allocations underpinned by the Strategic Land Availability Assessment.
ORG	LP037_UPS	Support	Chapter 4	DM6	n/a	n/a	LP18-245	Industrial land should also be supported as there is a need for more.	Noted.
ORG	LP037_UPS	Support	Chapter 8	DM33	n/a	n/a	LP18-246	Freight consolidation is an area they would like to know more about.	Draft Policy DM33 has been reviewed to include a reference freight and in light of the Industrial Lane Strategy.
ORG	LP038_CountrysidePropertiesPLC	Support but with suggestions.	Chapter 2	SP1	Sub Area 3 - Dagenham Dock, Beam Park and Former Ford Stamping Plant	n/a	LP18-247	It should recognise that Beam Park is providing primary education on site and would welcome clarification regarding secondary education. SP1: Supporting material should be made available as quickly as possible. Clarification is requested on the smart city agenda.	Additional information on provision of primary education on site at Beam Park are clarified. Draft Policy SP1 focuses on the Council's spatial vision for delivering growth. This policy should be read in conjunction with the rest of the plan. It is considered that the smart city agenda is a cross cutting theme throughout the Plan, particularly around supporting more digital devices to improve the lives of people living, working and visiting the borough. Detailed strategy on smart city agenda should be included in all council services.
ORG	LP038_CountrysidePropertiesPLC	Support but with suggestions.	All	various	n/a	n/a	LP18-248	There are minor recommendations for DM19, DM21, DM23, SP6, DM30, SP7, DM31, DM32, SP8, DM34, DM36.	Draft policy wording has been reviewed and updated to respond to the comments.

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ORG	LP038_CountrysidePropertiesPLC	Support but with suggestions.	Chapter 3	SP2	n/a	n/a	LP18-249	It is important that policy is made flexible to ensure that an excessive demand for such self-contained housing on all sites does not work against the ability to optimise delivery on key strategic sites. Just using London Plans higher housing figures.	The Council will review Policy SP2 to ensure that sufficient smaller dwellings are facilitated by the Local Plan.
ORG	LP038_CountrysidePropertiesPLC	General	Chapter 4	SP3	n/a	n/a	LP18-250	The Local Plan should recognise wider employment.	Noted.
ORG	LP038_CountrysidePropertiesPLC	Support but with suggestions.	Chapter 4	DM1	n/a	n/a	LP18-251	It states all applications should seek a viability assessment even if it achieves 35% target, but London Plan says only if it doesn't. Beam Park is 50% affordable and should not have to submit a viability assessment? The representor considers that this policy lacks clarity.	Draft Policy DM1 has been reviewed and updated to provide clarity.
ORG	LP038_CountrysidePropertiesPLC	Support	Chapter 5	DM2	n/a	n/a	LP18-252	Item 2 of policy would be helpful to detail thoughts on unit size and must ensure draft London Plan is not in conflict with LBBB.	The London Plan Intend to Publish version requires, in relation to the range of housing sizes, that robust local evidence of need where available or, where this is not available, the range of housing need and demand identified by the 2017 London Strategic Housing Market Assessment. Draft Policy DM2 has been reviewed and updated to include reference to the Council's Strategic Land Availability Assessment, which is supplement to the 2017 London Strategic Housing Market Assessment in terms of development capacity.
ORG	LP038_CountrysidePropertiesPLC	Support	Chapter 5	DM12	n/a	n/a	LP18-253	There are evolving communities where height and density will therefore bring a need for improved PTAL.	Noted.
ORG	LP038_CountrysidePropertiesPLC	Support	Chapter 5	SP4	n/a	n/a	LP18-254	It needs to recognise that development will need time to create its own context/ sense of place. Historic England engagement is only needed where there is inclusion or near proximity to appropriate historic interests.	Noted.
ORG	LP038_CountrysidePropertiesPLC	Support	Chapter 6	SP5	n/a	n/a	LP18-255	Expectations should be acknowledged to create positive quality outdoor experiences for all with appropriate budgets to suit whilst not necessarily being too prescriptive.	The information within this comment has been acknowledged and appropriate amendments to the local plan have been introduced.

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ORG	LP038_CountrysidePropertiesPLC	Support but with suggestions.	Chapter 6	DM18	n/a	n/a	LP18-256	Open space allocations need to be considered in various degrees of density where spaces will be tighter. It suggests clearer definition of 'open space' v 'green space' as vital hard open spaces add social value.	the definition of 'open space' referenced within the Local Plan has been reviewed in response to the comment on considering open space allocations in various degrees of density.
STA	LP039_CPPE	Objection	Appendix 3	n/a	n/a	Various	LP18-257	The representation does not support the release of 2 sites and the development of this land. 1. BA-Collier Row Road GB. The site is situated in a Green Belt parcel that clearly fulfils Green belt purpose 2 as stated in the Green Belt review. Preventing Mark's Gate and Collier Row from merging. 2. WE - Fels Farmyard GB. Clearly fulfils Green belt purpose 1 stated in the councils Green Belt review (2016). Preventing neighbourhoods of Dagenham and Elm Park from merging. Other comments: 3. CO-Eastern Avenue - the site is situated at a green parcel of land that complements Padnall Lake, PTAL rating 1b and 2. 4. XF-Land to the West of Scrattons Farm. The council acknowledges that the site's existing use is in a green space. The site also has a PTAL rating of 1.	The sites have been reviewed through the Strategic Land Availability Assessment. Further updates will be included in the next iteration of the Draft Local Plan.
ORG	LP040_MetropolitanPoliceService	General	Chapter 2	n/a	n/a	n/a	LP18-258	The representation requires a car pound facility within LBBB or surrounding Boroughs, which includes 6-7 acres of open industrial land to deal with vehicles that have been stolen, seized for offences or examination. Both of the current sites are subject to pressure for industrial or residential development and intensification of use. If the sites are taken, then the car pound services would not be able to continue which would have serious implications for safety. It requests the LP and/or the IDP includes a section highlighting the importance of the MPS car pound requirement in the Borough. The MPS also has an emerging infrastructure requirement for a neighbourhood police facility that can provide a base of operation for officers of the MPS.	The site has been reviewed through the Strategic Land Availability Assessment.

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STA	LP041_TfL	Support but with suggestions.	Chapter 8	n/a	n/a	n/a	LP18-259	<p>The representation supports the Council's commitment to improving the health and wellbeing of its residents and the importance of active travel in achieving this. Chapter 8 on transport is supported and is broadly in line with the London Plan and MTS.</p> <p>It requests that the Council should bring forward sustainable travel plans. It also encourages the Council to set out clearer recognition and support for the proposed Cycleway between Barking Riverside and Ilford through Barking Town Centre and prioritising the needs of bus passengers. Would welcome further detail on public and active travel.</p>	The Council will consider the comments in light of the review of transport studies and other relevant strategies.
STA	LP042_NHSLondonHealthyUrbanDevelopment	Support but with suggestions.	Chapter 2	n/a	3.2	n/a	LP18-260	The opportunities section should reflect the full range of opportunities to support health and wellbeing arising from the scale of growth and change set out in the Local Plan. Sub-area visions do not mention health and wellbeing or quality of life.	It is considered that health wellbeing as a cross-cutting theme throughout the Plan. The Draft Local Plan has been updated to reflect this where appropriate.
STA	LP042_NHSLondonHealthyUrbanDevelopment	Support but with suggestions.	Chapter 2	SP1	n/a	n/a	LP18-261	It would like to see health and wellbeing embedded through the plan including smaller sites and non-residential development.	Where appropriate, the Council/BeFirst will expect an applicant to contribute to the delivery of the 10 Healthy New Town Principle for development that is under 0.25ha and is capable of delivering up to 25 units.
STA	LP042_NHSLondonHealthyUrbanDevelopment	Support but with suggestions.	Chapter 3	n/a	3.2	n/a	LP18-262	The representation would like to understand the Council's response and implications for the demand on healthcare as a result of the significant increase in homes over 10-years.	The Council has considered the response and implications for the demand on healthcare as part of the updated Infrastructure Delivery Plan.
STA	LP042_NHSLondonHealthyUrbanDevelopment	Support but with suggestions.	Chapter 4	DM9	n/a	n/a	LP18-263	The representation supports the policy and suggests expansion of clause 7C in policy SP4 adding 'and reduces and mitigates adverse impacts'. The next draft of the LP should require major development schemes to include health impact assessments. .	Draft Policy DM9 has been reviewed and updated to provide clarity.
STA	LP042_NHSLondonHealthyUrbanDevelopment	Support but with suggestions.	Chapter 5	DM12	n/a	n/a	LP18-264	Tall buildings should make reference to safety and suicide prevention such as good lighting and physical barriers.	This has been considered as part of the review of DM12.
STA	LP042_NHSLondonHealthyUrbanDevelopment	Support but with suggestions.	Chapter 10	DM36	n/a	n/a	LP18-265	Development contribution should include the addition of 'and health'. It is important social infrastructure is not overlooked in S106 agreements. It suggests the draft plan goes further and refers to providing dementia friendly environments.	Draft Policy DM36 has been reviewed and updated to include suggested wording. The Council/BeFirst would welcome more specific discussions on dementia friendly environments in relation to the plan making process.

Category	Rep ID (Be First)	Nature of Response	Relevant Chapter	Relevant Policy Number	Relevant Paragraph	Site Reference	Comment ID	Summarised Comment	LBBD/BeFirst Response
ORG	LP043_RoseBusinessPark	Support but with suggestions.	Chapter 2	SP1	n/a	n/a	LP18-266	It has suggested that Council should prioritise development on viable brownfield land and maximise development for residential and other land uses on previously developed land.	Noted.
ORG	LP043_RoseBusinessPark	Support but with suggestions.	Chapter 3	SP2	n/a	n/a	LP18-267	Delivering homes that meet peoples' needs, the plan is more specific about its annual housing target and should reflect the correct interaction of the Local Plan.	Draft Policy SP2 has been reviewed and updated to provide clarity about small sites for housing.
ORG	LP043_RoseBusinessPark	General	Chapter 5	DM6	n/a	n/a	LP18-268	Utilising the Borough's employment land more efficiently, the London Plan Policy E7 states that consolidation can only be explored through a masterplan-led approach in consultation with the GLA.	Noted.
ORG	LP043_RoseBusinessPark	General	Chapter 5	DM12	n/a	n/a	LP18-269	The representation has suggested that the Council rigorously tests the capacity of brownfield land.	Noted. The Council/BeFirst would welcome more specific comments on testing the capacity of brownfield land.
ORG	LP044_ShellPensionTrust	Support	Chapter 2	SP1	Sub Area 5 - Chadwell Heath and Marks Gate	n/a	LP18-270	It supports SP1 and Appendix 3 pro-forma notes that the pre-application submission identified capacity for 365 units, but the Council does not provide its own capacity assessment. It supports growth at Chadwell Heath and Marks Gate sub-area. The Council should also maximise development for residential and other land uses on previously developed land. The plan should change wording to deliver a minimum of 365 units.	The detailed methodology to understand development potential for identified development sites are set out in the Strategic Land Availability Assessment.
ORG	LP044_ShellPensionTrust	Support but with suggestions.	Chapter 3	SP2	n/a	n/a	LP18-271	The representation is confused about the minimum annual housing targets.	The Reg 19 Local Plan will take account of the latest housing requirement in the London Plan at the time of publication.
ORG	LP044_ShellPensionTrust	Support but with suggestions.	Chapter 5	DM12	n/a	n/a	LP18-272	In principle this policy offers support for tall buildings within the Borough. the Council should test the capacity of brownfield land, so only when brownfield land has been exhausted can other locations be used.	The Council/BeFirst has undertaken a Strategic Land Availability Assessment to supplement the 2017 London Strategic Land Availability Assessment. This work has been used to inform the development capacity of identified housing and employment sites.

Category	Rep ID (Be First)	Nature of Response	Relevant Chapter	Relevant Policy Number	Relevant Paragraph	Site Reference	Comment ID	Summarised Comment	LBBD/BeFirst Response
STA	LP045_HistoricEngland	Support but with suggestions.	Chapter 5	various	paras 5.8-5.10	BP	LP18-273	Historic environment should be more prominent in the vision and should be considered an opportunity and a challenge. Welcome SP4 and DM11 as both offer a mechanism to achieve successful new development and growth. Urge the Borough too ambitious in the way historic environment is address and would welcome further engagement. SP4 should place prominent focus on the conservation of heritage significance. Individual assets at risk could be identified within sub-area vision statements and DM11 could be made locally specific in certain areas. The plan should create a framework that enables new residential development to sit comfortably within the historic environment. DM14: Conserving and enhancing heritage assets and archaeology, clause c implies that all harm can potentially be justified on the basis of public benefits and does not consider the staged approach to harm set out in the NPPF 193-196. The policy should be recorded in a more positive sense. Further clause supporting development that would address issues with HAR assets. Paras 5.8-5.10 should focus on background to successful development proposals affecting or involving heritage assets. DM8 policy and supporting text should be cross-referenced with policy DM11. Evidence documents should be updated. Inconsistency in relation to the approach to heritage within each of the sub-areas within Chapter 2. Historic environment considerations should be at the forefront in the Town Centre. Appendix 3: Potential Development Sites, notes a number of the sites are adjacent to Site ID BP. DM12 should define what tall is and D8 in the London Plan notes LP's should identify where tall buildings are appropriate.	The relevant policies have been reviewed and updated to take account of the comments.
ORG	LP046_BarkingRiversideLtd	Support but with suggestions.	Appendix 3	n/a	n/a	AA Barking Riverside	LP18-274	The LP should seek to set a development strategy that will endure beyond the immediate horizon of the LP with a focus on delivery of strategic sites. They state the end date of the local plan should be 2036, not 2034 as it is expected to be adopted in 2021. They support the LP Vision for provision of housing range and the creation of the new District Centre. Supports improvement to transport infrastructure. Sub Area policies should be set out in more detail: the core principles, aims and objectives. Tied back to the IDP and a trajectory showing key dependencies and requirements of others, such as TfL. Site AA should have capacity for another 2,500 homes and this should be reflected in the LP. Capacity of Castle Green or Thames Road should be set out. A clear commercial strategy for Castle Green District Centre should be provided to avoid compromising the deliverability of Barking Riverside	The plan period is aligned with the emerging London Plan. The additional information on site AA has been reviewed through the Strategic Land Availability Assessment.

Category	Rep ID (Be First)	Nature of Response	Relevant Chapter	Relevant Policy Number	Relevant Paragraph	Site Reference	Comment ID	Summarised Comment	LBBD/BeFirst Response
								Centres. Further information should be provided regarding Creekmouth. No information given regarding the site capacity of Ford Stamping Plant and Beam Park to accommodate new residential-led neighbourhoods which will for mixed-use quarter if the A13. Same for Merrielands. The IDP provides no clear mechanism or certainty. Draft policies that impact upon delivery and viability of development: affordable housing, housing size & mix, economic growth, design, open spaces and biodiversity.	
ORG	LP046_BarkingRiversideLtd	Support but with suggestions.	Appendix 3	n/a	n/a	CG Creekmouth	LP18-275	The LP should seek to set a development strategy that will endure beyond the immediate horizon of the LP with a focus on delivery of strategic sites. They state the end date of the local plan should be 2036, not 2034 as it is expected to be adopted in 2021. They support the LP Vision for provision of housing range and the creation of the new District Centre. Supports improvement to transport infrastructure. Sub Area policies should be set out in more detail: the core principles, aims and objectives. Tied back to the IDP and a trajectory showing key dependencies and requirements of others, such as TfL. Site AA should have capacity for another 2,500 homes and this should be reflected in the LP. Capacity of Castle Green or Thames Road should be set out. A clear commercial strategy for Castle Green District Centre should be provided to avoid compromising the deliverability of Barking Riverside Centres. Further information should be provided regarding Creekmouth. No information given regarding the site capacity of Ford Stamping Plant and Beam Park to accommodate new residential-led neighbourhoods which will for mixed-use quarter if the A13. Same for Merrielands. The IDP provides no clear mechanism or certainty. Draft policies that impact upon delivery and viability of development: affordable housing, housing size & mix, economic growth, design, open spaces and biodiversity.	The plan period is aligned with the emerging London Plan. The additional information on site AA has been reviewed through the Strategic Land Availability Assessment.

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ORG	LP046_BarkingRiversideLtd	Support but with suggestions.	Appendix 3	n/a	n/a	XJ Ford Stamping Plant	LP18-276	The LP should seek to set a development strategy that will endure beyond the immediate horizon of the LP with a focus on delivery of strategic sites. They state the end date of the local plan should be 2036, not 2034 as it is expected to be adopted in 2021. They support the LP Vision for provision of housing range and the creation of the new District Centre. Supports improvement to transport infrastructure. Sub Area policies should be set out in more detail: the core principles, aims and objectives. Tied back to the IDP and a trajectory showing key dependencies and requirements of others, such as TfL. Site AA should have capacity for another 2,500 homes and this should be reflected in the LP. Capacity of Castle Green or Thames Road should be set out. A clear commercial strategy for Castle Green District Centre should be provided to avoid compromising the deliverability of Barking Riverside Centres. Further information should be provided regarding Creekmouth. No information given regarding the site capacity of Ford Stamping Plant and Beam Park to accommodate new residential-led neighbourhoods which will for mixed-use quarter if the A13. Same for Merrielands. The IDP provides no clear mechanism or certainty. Draft policies that impact upon delivery and viability of development: affordable housing, housing size & mix, economic growth, design, open spaces and biodiversity.	Sites have been reviewed through the Strategic Land Availability Assessment. Further site details have been included in the Draft Local Plan. The Infrastructure Delivery Plan (IDP) has been updated to include up to date information on how the infrastructure will be delivered to support the growth over the plan period.
ORG	LP047_Snorton&Co	Objection	Chapter 6 and Chapter 2	DM21	n/a	Sub Area 2: Creekmouth	LP18-277	The Site is located in Sub-Area 2 'Thames Road, Barking Riverside and Castle Green'. Wharves will remain safeguarded through Direction under a Mayoral Order (Safeguarding Direction). The allocation conflicts with the London Plan SI15. Allocate a residential-led mixed use development on this site and other wharves along this part of the River Thames is not considered to be in general conformity with Policies 7.26 and SI15 of the London Plan and importantly the Safeguarding Direction. Creekmouth allocation in the emerging Local Plan is not considered to generally conform with the London Plan, Safeguarding Direction of draft Policy DM21 of the emerging Local Plan. The loss of the wharf would mean this activity could not occur which would clearly be less sustainable than current operations. The promotion of a residential-led mixed-use development on through Creekmouth allocation on S.Norton's site is not considered conformity with waste policies. It is considered unlikely that compensatory capacity in the Borough or London could be achieved. As such, the Creekmouth allocation in the emerging Local Plan as currently drafted is not considered to be in general conformity with the policies within the London Plan or	The Council will review wording of Draft Policy SP6 and utilising the River Thames for the transportation of construction and waste materials.

Category	Rep ID (Be First)	Nature of Response	Relevant Chapter	Relevant Policy Number	Relevant Paragraph	Site Reference	Comment ID	Summarised Comment	LBBD/BeFirst Response
								emerging Local Plan. Residential development should be refused in SILs. Whilst the London Plan seeks to maximise the delivery of housing it also seeks to support, sustain and intensify SILs. S. Norton's site is appropriately located in land use terms under the London Plan.	
LAN	LP048_ArchwayGroup	Objection	Chapter 2	n/a	n/a	Sub Area 5: Chadwell Heath and Marks Gate	LP18-278	The Site lies within this wider sub-area forming part of the wider Chadwell Heath Industrial Estate. It is the only land parcel omitted from the identified sub-area which is not explained in the Plan. It is objects to the exclusion of the Site from the Sub-Area. The Site is available and can be brought-forward in the short-term as an individual residential or mixed-use development opportunity. It continued omission will also only undermine the ability to deliver the wider Sub-Area for residential or mixed-use development. The Site and wider area have significant potential to deliver new housing as part of a wider gateway development either standalone or as mixed-use which justifies its inclusion in the Sub-Area.	The site has been reviewed through the Strategic Land Availability Assessment.
LAN	LP048_ArchwayGroup	Objection	Chapter 4	DM6	n/a	n/a	LP18-279	The policy does not identify whether the Site and wider Chadwell Heath Industrial Estate will be removed as an LSIS. It objects to the continued retention of the Site and the wider Industrial Estate as an LSIS. The previous version of the Plan which identified the removal of the Estate from employment to a future mixed commercial and residential use - help meet the housing target. Policy should be replaced with a more flexible one. Any decision to retain the LSIS in the LP has not yet been justified by any form of Evidence Base.	The Council/BeFirst has undertaken a review of the borough's Industrial Land. This is the key evidence base to support the Draft Policies, which will be used to inform the next iteration of the Draft Local Plan.

Category	Rep ID (Be First)	Nature of Response	Relevant Chapter	Relevant Policy Number	Relevant Paragraph	Site Reference	Comment ID	Summarised Comment	LBBD/BeFirst Response
ORG	LP049_B&D Heritage Conservation Group	Support but with suggestions.	All	n/a	n/a	n/a	LP18-280	The representation would like to see high rise and high-density development kept to a minimum as the Borough has been subject to overdevelopment which is causing social, environmental and health problems. These housing projects are not usually affordable. Local heritage and conservation areas should be preserved. All listed buildings should be retained where possible especially those that provide social benefit. Pollution and overcrowding need to be dealt with. Housing: Housing needs to be affordable and council housing stock should retain. Low rise housing with open garden space should be a priority. Economy: There should be proper maintenance of our town centres and industrial land using greener tech for the overall benefit of our residents and local workers. Design: Becontree Estate is designated as a Special Local Character Area so the Faircross and Leftley Estate areas should be designated in the same way. Cultural assets should be given full protection as they benefit the community just as much. Environment: The River Roding and Thames nature areas should be fully protected for environmental reasons, with no more housing developments on them due to flood risk. GI: Should make all effort to improve air quality and reduce carbon emissions. There should be more Electric Vehicle charging points. Transport: Public transport should be reliable and accessible. Social Infrastructure: Schools should be built with a minimal impact on green spaces and surrounding environment. Delivery & Monitoring: Pay attention to local population.	The Draft Local Plan has been reviewed to take account of the comments regarding a number of policy areas.
	LP051_Brakspear	Support but with suggestions.	Appendix 3	SP1	n/a	n/a	LP18-292	The representation states that the approach to delivery of development in such areas must be bold. There must be a strong statement of intent in terms of maximising development output and optimising the potential of brownfield development sites in the Town Centre, which is an approach that would be in keeping with Policies SD1 and SD6, for example, of the Intend to Publish London Plan (Dec 2019). Proposal for inclusion of The Victoria Site for allocation as a potential development site in the Draft Local Plan. The Site has not been taking forward at this stage because "it was decided this site did not meet the 'size or potential' criteria set out in the Call for Sites Guidance". The representation has reviewed the 'Size and Potential' section of the Call for Sites Guidance and the Barking & Dagenham Strategic Land Availability Assessment (SLAA) Draft Methodology for Consultation (November 2019) to re-iterate and consider the credentials of the Site for allocation further. The 'Size and Potential' section of the Call for Sites Guidance states referred to above states that sites with a developable area of less than	The Draft Local Plan has been updated to take account of the comments.

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								<p>0.25ha (which applies to The Victoria site) must have potential to:</p> <ul style="list-style-type: none"> •Deliver a critical piece of infrastructure identified for the area over the plan period; or •Provide a use/mix/of uses which is relevant and necessary and would not necessarily be approved through other planning policies; or •Contribute significantly to the delivery of overall plan aspirations in relation to housing delivery or other uses identified for the Plan's identified regeneration area. <p>Victoria Site can make a significant contribution to delivery of new homes and provide job creation through ground floor retail floorspace and a new public house which has been supported. Furthermore, the SLAA follows NPPG methodology guidance and 2017 London SHLAA methodology. This includes consideration of 'strategic small housing sites' (i.e. sites of less than 0.25ha capable of accommodating less than 50 residential units) among other categories of sites considered as part of the assessment of housing land availability. They state it is important that the new Local Plan identifies the site.</p>	
STA	LP052_DfE	Support but with suggestions.	Chapter 9	DM34	n/a	n/a	LP18-293	<p>Support is given with regard to the reference within the plan to support the development of appropriate social and community infrastructure and meeting the needs of the community. The principle of safeguarding land for the provision of new schools is also supported. Clarifications should be included within site allocations and associated policies regarding the delivery of new schools. A degree of flexibility should also be noted as need for school places can vary over time. Concern is expressed regarding Policy DM34 as it does not consider the needs of future communities.</p>	<p>The Infrastructure Delivery Plan will provide some guidance as to where community infrastructure will be required. DM34 has also been reviewed to include a requirement to consider future communities.</p>
STA	LP052_DfE	Support but with suggestions.	Chapter 6	SP5	n/a	n/a	LP18-294	<p>Changes to Policy DM34 are proposed. Changes are also proposed for Policy SP5 to ensure greater flexibility for open space provision in line with the NPPF. It is noted that continuous monitoring of the pupil places and school delivery, as part of ensuring the IDP is up to date and setting out clearly how the forecast housing growth, is essential.</p>	<p>Draft Policies DM34 and SP5 have been reviewed in response to the comments on ensuring greater flexibility for open space provision in line with the NPPF, as well as the continuous monitoring of pupil places and school delivery, as part of ensuring the IDP is up to date and setting out clearly how the forecast housing growth.</p>

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STA	LP052_DfE	Support but with suggestions.	Chapter 9	DM36	n/a	n/a	LP18-295	Policy DM36 should be updated to reference the need for developer contributions in relation to education and school places.	DM36 has been reviewed in light of this comment as part of the Regulation 19 Draft.
ORG	LP053_Dockgrange	Objection	Appendix 3	n/a	n/a	CG Creekmouth	LP18-296	Housing development at Creekmouth on River Road would damage the businesses within the industrial area that currently operates there.	Noted. As part of the plan making process, the Council will make sure that we will engage and consult with local business at the earliest opportunity.
CLLR	LP054_Cllr Carpenter	Objection	All	n/a	n/a	n/a	LP18-297	The representation is concerned that there is no mention of schools, education or training within the vision. Concerned that the regeneration of specific areas does not appear to take into account infrastructure needs including schools and early years settings. Even in Chapter 9 there is no sense that priority will be given to the location of schools and other education provision on prime land in the centre of communities. There is a fear that economic and housing development takes precedence.	The updated Infrastructure Delivery Plan has been used to inform the Local Plan regarding planning for social infrastructure. The emerging vision statement will be updated to refer to schools and training facility.
ORG	LP055_SwiftConservation	General	Chapter 6	SP5			LP18-298	<p>With regard to Draft Policy SP5: Enhancing our Natural Environment part (f): Protecting and Enhancing the Borough's Habitat and Wildlife Resources (page 72):</p> <ul style="list-style-type: none"> - It would like to see the beneficial species which make up our potentially rich urban biodiversity, and rely on buildings for their survival, to be given higher priority, as these species are becoming seriously endangered in the Borough and the UK as buildings are refurbished and demolished and their habitat is lost without replacement. In particular swifts, house sparrows and starlings, whose numbers have all dropped by 50% or more in the last 20 years, and also bats who are also threatened in many areas. Creating new nesting and roosting sites is straightforward, as integrated nest and roost bricks have been proven to be effective and are cheap, almost invisible, easy to install and involve zero maintenance. <p>NPPG Natural Environment 2019 confirms: "Relatively small features can often achieve important benefits for wildlife, such as incorporating 'swift bricks' and bat boxes in developments," (Paragraph: 023 Reference ID: 8-023-</p>	Draft Policy SP5 has been reviewed in response to the comments on integrated bird/bat bricks and the use of sustainable urban drainage systems.

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								<p>20190721 - https://www.gov.uk/guidance/natural-environment).</p> <ul style="list-style-type: none"> - It would like to see these integrated bricks installed in all new developments that are suitable, together with an emphasis on providing street shade trees, "green" walls, "green" roofs, and also a move towards sustainable urban drainage systems and rainwater harvesting to relieve the "hardening" of the London landscape by the covering over of front and rear gardens to provide parking, barbecue areas etc. This is directing rainwater straight to the sewers where it has the potential to cause flooding, while the associated drying out of the areas around dwellings is provoking subsidence, and altogether it is denying plants and trees the water they need to survive. Stand-alone combined swifts nest and bat roost towers are now available which are no larger than a mobile phone mast or lamp post, and It would like to see these installed for all major projects. - It would like to see ecological surveys becoming mandatory for building works in areas known to support the key species mentioned above, and appropriate protection measures taken following the project ecologist's recommendations. 	
STA	LP066_ThamesWater	General	Chapter 7	DM28	n/a	n/a	LP18-299	<p>General comments are provided that set out requirements of a Local Plan based on the NPPF. Support is given to Policy DM28 in particular the reference for all major development to be required to demonstrate that the local water supply and public sewage networks will have adequate capacity both on and off-site to serve the proposed developments. However, in light of the changes which took effect in April 2018 (regarding the way water and wastewater infrastructure will be delivered), it is requested that additional text is included in the supporting paragraphs of the policy to encourage developers to make early contact with Thames Water through the pre-planning service. The respondent would like to work with the Council as the plan progresses to understand where and when sites may come forward so as to factor any proposed growth into our future strategic business plan.</p>	Draft Policy DM28 and its supportive text have been updated to include a statement about seeking pre-application advice from Thames Water.

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STA	LP066_ThamesWater	Support but with suggestions.	Chapter 7	n/a	n/a	n/a	LP18-300	<p>New development should be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure in accordance with the NPPF.</p> <p>The Local Plan should ensure that investment plans of water and sewerage/wastewater companies align with development needs.</p> <p>The way water and wastewater infrastructure will be delivered has changed. From 1st April 2018 all off sites water and wastewater network reinforcement works necessary as a result of new development will be delivered by the relevant statutory undertaker. Local reinforcement works will be funded by the Infrastructure Charge which is a fixed charge for water and wastewater for each new property connected. Strategic water and wastewater infrastructure requirements will be funded through water companies' investment programmes which are based on a five-year cycle known as the Asset Management Plan process.</p>	Relevant policies relating to water and sewerage infrastructure have been reviewed in line with the comments.
STA	LP066_ThamesWater	General	n/a	n/a	n/a	n/a	LP18-301	<p>The representation would like to understand where and when allocated sites may come forward so as to factor any proposed growth into their strategic business plan. As such as early as the information is made available to them, the sooner they will be able to provide the council with more specific information on any known pinch points in both their network and treatment plants.</p>	Noted.
STA	LP066_ThamesWater	Support but with suggestions.	Chapter 7	DM28	n/a	n/a	LP18-302	<p>It requests that text as set out below is included in the supporting paragraphs to encourage developers to make early contact with Thames Water through our pre-planning service:</p> <p>“Developers need to consider the net increase in water and waste water demand to serve their developments and also any impact the development may have off site further down the network, if no/low water pressure and internal/external sewage flooding of property is to be avoided. Thames Water encourages developers to use their free pre-planning service (https://www.thameswater.co.uk/preplanning). This service can tell developers at an early stage if there will be capacity in Thames water and/or wastewater networks to serve their development, or what they will do if there is not.</p> <p>The developer can then submit this communication as evidence to support a planning application and Thames can</p>	Draft Policy DM28 and its supportive text have been updated to include a statement about seeking pre-application advice from Thames Water.

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								prepare to serve the new development at the point of need, helping avoid delays to housing delivery programmes”.	
LAN	LP053_Dockgrange	Objection	Appendix 3	n/a	n/a	CG Creekmouth	LP18-303	Housing development at Creekmouth on River Road would damage the businesses within the industrial area that currently operates there.	Noted. The Council/BeFirst is keen to work with local businesses through the plan making process, particularly on developing masterplans in this area in the near future.
STA	LP056_HomeBuildersFederation	General	Chapter 10	n/a	n/a	n/a	LP18-304	It has suggested to set the plan period from 2019 to 2029 to be aligned with the New Draft London Plan 10-year housing target.	The National Planning Policy Framework is clear that strategic policies should be prepared over a minimum 15-year period and a local planning authority should be planning for the full plan period.
STA	LP056_HomeBuildersFederation	General	various	n/a	n/a	n/a	LP18-305	It is noted that with regard to Policy SP2 it is not expressed if there is a reliable land supply to provide the amount homes it aims to provide. One housing calculation method should be adhered to. Further work should be done to provide more homes on small sites. Currently, the plan is falling short. To ensure sufficient affordable housing is provided more small sites should be identified and allocated. There does not seem to be a policy that deals with the supply of older persons housing, this should be amended. Part 1 of Policy DM1 is unclear. Explanation of whether or not the Barking Local Plan is considering the Draft London Plan should be made clearer. Policy DM36 may need to be revised to be consistent with Policy DM1. Policies should be written more clearly and be aligned with national policy. Policy DM11 needs to be clear regarding what is expected from applicants in terms of design. Policy DM12 should also be clearer. A viability assessment to support the local plan that assesses the cost of Draft London Plan and Local Plan policies should be produced. For Policy SP7, contributions to public transport and walking and cycling networks should be a priority for S106 obligations along with affordable housing. It would be helpful to convene meetings with developers and housing	Additional information has been included to address the comments.

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								providers and landowners to discuss the viability of the plan.	
IND	LP057_EHQ	General	Chapter 2	n/a	n/a	n/a	LP18-306	The Council need to consider heavily on crime specific on drug dealing on borough. Policies should focus on population change, job, housing and crime & safety, as well as good road network.	Noted. The Council/BeFirst will welcome more specific comments on these issues and suggestions of how the Local Plan can help address these issues.
IND	LP058_KS	Objection	Chapter 3	n/a	3.14	n/a	LP18-307	There is not enough social housing within the Borough and providing additional social housing is not addressed thoroughly within the plan. Good design and protection of heritage assets must also be considered. Place making is key and must consider those who are most vulnerable.	The Local Plan has been reviewed to ensure it clarifies how much and where affordable housing will be provided and provide a more detailed guide on how local character and design will be valued. It has also clarified that developments will have to abide by a design guide.
IND	LP059_EHQ	General	n/a	n/a	n/a	n/a	LP18-308	It requires the Council to improve children playground in Parsloes Park.	Noted. The Infrastructure Delivery Plan has considered the comment related to improving existing parks and children's playground.
BUS	LP060_McDonalds	Objection	Chapter 4	DM9	n/a	n/a	LP18-309	The representation agrees with inclusion of policy's aim, but does not agree with the proposed policy approach. There is no evidence base behind achieving the policy's objective. It is not made clear how fast food restaurants can lead to obesity. The policy is too restrictive. The measurement behind the 400m exclusion zone proposed is not explained. The NPPF advises authorities to positively seek opportunities to meet development needs of the area, however there are concerns that DM9 undermines the NPPF aims. The policy is inconsistent, discriminatory and disproportionate as it simply restricts new development that comprises an element of A5 use. Similar policies have been found to be unsound when promoted in other plans. Alternative approaches should be considered. The policy fails to acknowledge the wider benefits that restaurants can have, including benefits relevant to community health and wellbeing.	Draft Policy DM9 has been reviewed and updated to provided clarity.
STA	LP061_NationalGrid	General	Chapter 2	SP1	n/a	n/a	LP18-310	One or more proposed development sites cross or are in close proximity to National Grid Assets. Guidance on development near National Grid assets is provided.	The information provided has been used to inform the Strategic Land Availability Assessment. Wording has been introduced to make a reference to the guidance on development near National Grid Assets.
STA	LP062_NaturalEngland	General	n/a	n/a	n/a	n/a	LP18-311	No comment is provided.	No response is required.
LPA	LP063_Peterborough City Council	General	n/a	n/a	n/a	n/a	LP18-312	No comment is provided.	No response is required.

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DEV	LP064_Picton	Support but with suggestions.	Chapter 2	SP1	n/a	n/a	LP18-313	Support is given to Policy SP1 as it aims to focus development in Barking Riverside, town centres and industrial locations. However, it is also considered that Part '1' of Draft Policy SP1 should not restrict the scope for redevelopment (e.g. industrial only) to the 'Potential Development Sites' only (as Lyon Business Park is currently not designated as such). Policy SP1 should apply to all under-used and vacant industrial land within the borough. On this basis, this policy should be amended as follows (in red text): '1. Development will be focused in Barking Riverside and our town centres as well as a number of industrial locations where uses will be reconfigured and intensified. Draft potential development sites are presented within Appendix 3. This will also apply to Strategic Industrial Sites (SIS), Locally Significant Industrial Sites (LSIS) and other large industrial sites which are inefficient, under-occupied or vacant. These sites present a number of significant development opportunities to deliver over 40,000 new homes together with new employment floorspace and support infrastructure over the plan period.'	Draft Policy SP1 has been reviewed to reflect findings from the latest Industrial Land Strategy.
DEV	LP064_Picton	Support but with suggestions.	Chapter 2	SP2	n/a	n/a	LP18-314	Support is shown in relation to Policy SP2 as it states that a significant increase in housing delivery over the plan period is expected to be brought forward by developing on the brownfield site, particularly by unlocking and developing the extensive industrial land in Barking and Dagenham. It supports this approach and consider that it is the most sensible way to ensure that the housing targets for the Council are met and exceeded. It is considered that affordable housing requirements should be applied pragmatically to ensure that development projects remain viable and ensure that they come forward for redevelopment.	Noted.
DEV	LP064_Picton	Support	Chapter 2	SP3	n/a	n/a	LP18-315	Policy SP3 is supported.	Noted.
DEV	LP064_Picton	Support but with suggestions.	Chapter 3	DM6	n/a	n/a	LP18-316	It is recommended to amend part 2 of DM6 as follows: Within the designated SIL and LSIS boundary 2. The Council's preference is to support development proposals where they can deliver employment floorspace that: a) contributes to meeting the strategic target as set out SP1: in line with emerging borough guidance and Regulation 18 feedback; b) accords with the Site Allocations and the Council's most up to date area specific guidance and advocates partial or wholly residential use, where this is identified within site specific allocations;	The proposal to provide an exception to Part 2 (d) in policy DM6 where the site allocation accepts a different approach has been considered based on the Council's latest Industrial Land Strategy.

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								<p>c) comprises uses that are suitable for broad industrial-type activities as defined in the Mayoral policy and /or guidance;</p> <p>d) achieves no net loss of industrial floorspace capacity and where feasible, retains and intensifies use of industrial floorspace, and forms part of the mix in redevelopment proposals, unless accepted within a site specific allocation; and</p> <p>e) provides a mix of unit sizes to meet the needs of small and medium enterprises. Existing small business units should be re-provided for.'</p>	
DEV	LP064_Picton	General	Chapter 4	SP3	n/a	n/a	LP18-317	<p>The draft Local Plan should be aligned with the emerging London Plan policy E7, which supports the intensification of business uses in Use Classes B1c, B2 and B8 occupying all categories of industrial land. Part A states that this can be achieved through:</p> <p>'1) introduction of small units; 2) development of multi-storey schemes; 3) addition of basements; 4) more efficient use of land through higher plot ratios having regard to operational yard space requirements (including servicing) and mitigating impacts on the transport network where necessary.'</p> <p>Overall, it is considered that the Local Plan policies should be sufficiently flexible to enable existing industrial sites to come forward for redevelopment for more intensive employment use; mixed-use employment and residential uses or wholly residential use, if viable. It is considered that the latter should only be permitted if identified as an option within the relevant site allocation.</p>	Draft Policy SP3 has been reviewed in line with the emerging London Plan in discussion with the Greater London Authority.
DEV	LP064_Picton	Support	Chapter 5	SP4	n/a	n/a	LP18-318	It supports policy SP4's key aims and design ambitions.	Draft Policy SP5 has been reviewed in response to the comments on integrated bird/bat bricks and the use of sustainable urban drainage systems.
DEV	LP064_Picton	Support but with suggestions.	Chapter 5	DM12 Part 1	n/a	n/a	LP18-319	It highlights the potential for tall buildings development proposals in Lyon Business Park aby comparing with Barking Riverside regeneration project, nevertheless the PTAL rate is 2. It suggests that the Council should not assess the site's development potential simply based on its PTAL, but to focus on the wider regeneration context. It also advocates that tall buildings sometimes are the only way to provide sufficient floorspace to make a development viable and also deliver high quality design. It	Policy wording of DM12 has been reviewed.

Category	Rep ID (Be First)	Nature of Response	Relevant Chapter	Relevant Policy Number	Relevant Paragraph	Site Reference	Comment ID	Summarised Comment	LBBD/BeFirst Response
								<p>is proposed to amend Policy DM12 as follows:</p> <p>a) are considered appropriate in the context of London policies and guidance, and support local regeneration aims; b) are located in sustainable locations with high public transport accessibility level (PTAL) ratings or will act as a landmark or gateway site if within less accessible locations...</p>	
DEV	LP064_Picton	Support but with suggestions.	Chapter 2	n/a	Sub Area 2 - Thames Road, Barking Riverside and Castle Green	n/a	LP18-320	<p>The representation requests to have the Lyon Business Park added to potential development sites for either residential, intensified industrial use or a combination of both. The site is located in a prominent position at the junction of River Road and the A13. It is designated as a locally significant industrial site within adopted Proposals Map. Support for the vision of Sub-Area 2 as it is stated that the development of the site would help achieve the vision and principles. It is considered that the site has the potential to be a 'landmark' site given its location.</p> <p>It suggests the following wording (or similar texts) to be included within the site allocation for Lyon Business Park:</p> <p>‘The Lyon Business Park is located at a key junction which acts as a landmark and gateway to the north of Barking Riverside. It has the potential to accommodate a tall (or taller) buildings, subject to detailed design and townscape assessments.</p> <p>Furthermore, the site has the potential to be redeveloped for more intensive employment uses; or more intensive employment and residential use or a wholly residential scheme, subject to scheme viability. The Council consider that the site is suitable for wholly residential use. However, should a mixed-use scheme be promoted, residential use should be located to the south-east of the site, adjacent the existing residential use.’</p>	The site has been reviewed through the Strategic Land Availability Assessment.

Category	Rep ID (Be First)	Nature of Response	Relevant Chapter	Relevant Policy Number	Relevant Paragraph	Site Reference	Comment ID	Summarised Comment	LBBD/BeFirst Response
ORG	LP065_Sustrans	General	Chapter 2	SP1	2.4	n/a	LP18-321	The addition of the following statements will assist in clarifying how the Borough's transport strategy can be achieved. Healthy Town Principles (P35 of the consultation document): 1. To continue to give priority to the planning and construction of cycling facilities and to link to and enhance those sections of the network which have been built since adoption of the LDF. 2. To develop an overall plan of cycle routes within the borough which can be constructed as opportunities arise within the development or redevelopment of sites.	Draft SP1 has been reviewed to take account of the comment.
ORG	LP065_Sustrans	Support but with suggestions.	Chapter 6	n/a	n/a	n/a	LP18-322	The following statements should be added to the Healthy town principles: to continue to link to and enhance those sections of the network which have been built since adoption of the LDF and to develop an overall plan of cycle routes within the borough which can be constructed as opportunities arise within the development or redevelopment of sites. Further information should be provided making it clear that the development of a cycle network will be a significant benefit to sustainable mobility within the area. Amendments to the Healthy Town Principles.	The relevant policies and supportive text on the Healthy Town Principles have been updated to account for the cycle networks, as recommended in the comments.
ORG	LP065_Sustrans	General	Chapter 8	SP7	n/a	n/a	LP18-323	Policy SP7 should also include: To negotiate with developers and landowners to allow the formation of cycle facilities within individual development sites either through the Planning process or by other Council initiatives to form a series of routes that would integrate into the National Cycle Network (NCN) at a local level.	Draft Policy SP7 and its supportive text have been reviewed and updated to ensure the development of cycle facilities form a series of routes that would integrate into the National Cycle Network at a local level.
STA	LP066_ThamesWater	Support but with suggestions.	Chapter 7	DM28	n/a	n/a	LP18-324	General comments are provided that set out requirements of a Local Plan based on the NPPF. Support is given to Policy DM28 in particular the reference for all major development to be required to demonstrate that the local water supply and public sewage networks will have adequate capacity both on and off-site to serve the proposed developments. However, in light of the changes which took effect in April 2018 (regarding the way water and wastewater infrastructure will be delivered), it is requested that additional text is included in the supporting paragraphs of the policy to encourage developers to make early contact with Thames Water through the pre-planning service. The respondent would like to work with the Council as the plan progresses to understand where and when sites may come forward so as to factor any proposed growth into our future strategic business plan.	Draft Policy DM28 has been reviewed and updated based on the proposed changes to include additional text on encouraging developers to make early contact with Thames Water through the pre-planning service. The Council will also set up a meeting with Thames Water to discuss where and when sites may come forward so as to factor any proposed growth into their future strategic business plan.

Category	Rep ID (Be First)	Nature of Response	Relevant Chapter	Relevant Policy Number	Relevant Paragraph	Site Reference	Comment ID	Summarised Comment	LBBD/BeFirst Response
STA	LP067_SportEngl and	Objection	n/a	n/a	n/a	n/a	LP18-325	It is suggested that policies relating to indoor and outdoor sport facilities, including playing fields, should be included within the Local Plan and these should be based on a robust and up-to-date evidence base, such as Playing Pitch and Built Sport Facility Strategies, that would steer which types of indoor and outdoor sports facilities need protecting, enhancing and where new facilities, if any, are needed to meet current demand and that from future growth. Concerns regarding the Playing Pitch Strategy which doesn't seem to be updated annually. It is not clear whether the Council has an up-to-date and robust strategy addressing sport facilities.	Draft Policy SP5 provides an overview of the Council's preferred policy approach to all existing publicly accessible open space across the borough. A Playing Pitch Strategy was approved by the Cabinet in 2016. It is recognised that the evidence base is slightly outdated although the principles to the policy approach still remain the same. The Council welcomes further discussion with Sport England regarding the evidence base.
STA	LP067_SportEngl and	Objection	Vision	Vision	n/a	n/a	LP18-326	The respondent is surprised that creating healthy communities, reducing inactivity and improving health and well-being does not form part of the borough's vision.	It is considered that health wellbeing as a cross-cutting theme throughout the Plan. The Draft Local Plan has been updated to reflect this where appropriate.
STA	LP067_SportEngl and	General	Chapter 2	Sub-Areas	n/a	n/a	LP18-327	The representation is concerned that the Sub Areas advocate considerable growth however there is limited reference to providing new or improved sport facilities.	The Council/BeFirst are engaging with Sports England to discuss issues around sports/leisure infrastructure required to support growth over the plan period.
STA	LP067_SportEngl and	Support but with suggestions.	Chapter 2	SP1	n/a	n/a	LP18-328	Support is given to the Council for Policy SP1, as it commits to improving resident's health and well-being and that it would expect all development to seek to demonstrate how it meets the 10 Healthy New Town. However, it is encouraged that the Draft Local Plan elaborate on each principle and provide examples to help developers coming forward with schemes.	Noted. Examples of how to implement the 10 Healthy New Town Principles have been included in the supporting text of Draft Policy SP1.
STA	LP067_SportEngl and	Support	Chapter 5	SP4	n/a	n/a	LP18-329	The representation offers support for this policy.	The Council acknowledges the support for Draft Policy SP5.
STA	LP067_SportEngl and	Support	Chapter 4	SP3	n/a	n/a	LP18-330	It offers support for this policy.	The Council acknowledges the support for Draft Policy SP3.
STA	LP067_SportEngl and	Support	Chapter 4	DM8	n/a	n/a	LP18-331	It offers support for this policy.	The Council acknowledges the support for Draft Policy DM8.
STA	LP067_SportEngl and	Objection	Chapter 6	SP5	n/a	n/a	LP18-332	It is suggested that Active Design should be incorporated within all design policies, not only just Policy SP5. The reference to 'playing pitches' is amended to 'playing fields' as it is playing fields that are protected by national policy and Sport England policy.	Design policies have been reviewed in relation to the requirement for 'active design'.

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STA	LP067_SportEngl and	Support but with suggestions.	Chapter 6	DM18	n/a	n/a	LP18-333	It is suggested that clarification is needed for Policy DM18. There are concerns that the Playing Pitch Strategy has not been used to inform the Local Plan.	The Council has discussed this issue with Sports England and has reviewed the wording to provide clarifications within Policy DM18.
STA	LP067_SportEngl and	Support	Chapter 7	DM25	n/a	n/a	LP18-334	The representation offers support for this policy.	The Council acknowledges the support for Draft Policy DM25.
STA	LP067_SportEngl and	Support	Chapter 8	SP7	n/a	n/a	LP18-335	The representation offers support for this policy.	Noted.
STA	LP067_SportEngl and	Objection	Chapter 9	DM34	n/a	n/a	LP18-336	The representation suggests that Policy DM34 is considered to be consistent with national policy. Policy DM34 would allow for the loss of sports facilities if there is demand evidenced by active marketing and that there is demand for alternative social infrastructure. This is contrary to not only Sport England's Planning Policy, including its Playing Field Policy, but also the NPPF, paragraph 97. Policy DM34 should be amended to also refer to enhancing facilities to meet identified current and future needs.	Draft DM 34 has been reviewed to include a restriction on the loss of sports pitches.
STA	LP067_SportEngl and	Objection	Chapter 10	DM36	n/a	n/a	LP18-337	The approach taken in Policy DM36 is contrary to the Council's commitment to improve health and well-being. There is concern that where it is demonstrated that planning obligations can viably be supported by a proposal, affordable housing and necessary public transport improvements should be prioritised. This would result in demand for sport facilities being increased without being mitigated and that this would be detrimental for local facilities and the community who would have difficulties accessing such facilities.	Draft Policy DM36 has been reviewed in light of this comment.
IND	LP068_EM	General	Chapter 8	n/a	n/a	n/a	LP18-338	Reduction of traffic should be considered more thoroughly within the Plan and improvements should be outlined, especially at the Ship and Shovel junction on Ripple Road and Movers Lane/River road.	Noted.
STA	LP069_LBHaverin g	General	n/a	n/a	n/a	n/a	LP18-339	No comments. It has asked to be notified when the Dagenham Dock Masterplan SPD is published for consultation.	Noted.

Category	Rep ID (Be First)	Nature of Response	Relevant Chapter	Relevant Policy Number	Relevant Paragraph	Site Reference	Comment ID	Summarised Comment	LBBD/BeFirst Response
DEV	LP070_GapsunPropertiesLtd	General	Appendix 3	DM6	n/a	CG Creekmouth	LP18-340	<p>The land extends to approximately 6.5 acres with frontages to River Road and the Thames and is currently used for open storage and industrial purposes.</p> <p>It is noted that within the Draft Local Plan this land is situated within the potential development site Creekmouth which falls within Sub-Area 2: Thames Road, Barking Riverside and Castle Green. Creekmouth (site ID:CG) is identified as having potential for residential-led mixed use development. Although this site was designated as a Protected Wharf, it has previously been recommended that the designation be removed as there has been a functioning jetty at the site for over 30 years. It is considered that this prominent site with extensive views across the river is eminently suitable for future residential development as a continuation of the major Barking Riverside housing development to the east. Therefore, it is request that consideration be given to the site being designated in the emerging Local Plan for residential use.</p>	The site has been reviewed through the Strategic Land Availability Assessment in light of the Council's latest Industrial Land Strategy.
DEV	LP071_Sabreleague Ltd	General	Chapter 4	DM6	n/a	n/a	LP18-341	<p>It is requested that the wording of Draft Policy DM6 is amended to reflect the support for co-location of industrial and residential uses.</p>	Draft Policy DM6 has been reviewed to take account of the comment.

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DEV	LP071_Sabreleague Ltd	Support but with suggestions.	Appendix 3	n/a	n/a	CF Castle Green	LP18-342	The representation supports the redevelopment of the Rippleside Commercial Estate and at Abbey Wharf. Support for the emerging vision for the area, including freeing up industrial locations for alternative land uses, including residential development. The Council's position of intensifying land use and optimising site potential, including the co-location of commercial and residential uses is also welcomed. Under the Draft London Plan Policy SD1, Rippleside Commercial Estate is considered suitable for residential development. The Issues and Options Report (July 2015) indicated that currently 119 hectares of protected industrial land in the borough are vacant, and that the total number of industrial jobs forecast for 2031 can be accommodated on approximately half the land currently protected for industry. Therefore, the site can be released for residential development. The allocation of the site for residential use will complement London's largest housing opportunity, Barking Riverside, which is located to the south of the site. Rippleside lies within the Castle Green site. It is requested that the site designation of Rippleside and Abbey Wharf are no longer designated for SIL.	The Council/BeFirst have undertaken a Strategic Industrial Land Strategy. The study considers that the Rippleside SIL as an opportunity for the Council to demonstrate its transformation through the emerging Castle Green Masterplan Supplementary Planning Document. Further site details will be provided in the next iteration of the Draft Local Plan.
DEV	LP072_InlandHomes (ChequersLane)	Support	Chapter 2	SP1	n/a	ZZ GSR & Grill	LP18-343	The principal focus of this response is the future redevelopment of GSR Self Storage, Chequers Lane. Alongside Gill Aggregates, the site is being considered for Mixed-Use Allocation (Ref: 'ZZ') and that the wider area is being considered for comprehensive regeneration. Overarching vision for regenerating the area is also supported. Chequers Lane is considered as part of Sub-Area 3: Dagenham Dock, Beam Park and the Ford Stamping Ground and the vision for the area is supported. The site benefits from good transport connections. The proposed allocation of ZZ is supported, however by grouping the site with Gill Aggregates the larger parcels of land are not always practical as they are harder to deliver. The production of a Dagenham Dock Masterplan could set parameters for the independent delivery of both sites. Small sites could potentially play a key role in stimulating the regeneration of Dagenham Dock, given the predominance of individual land parcels.	The site has been reviewed through the Strategic Land Availability Assessment.

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DEV	LP072_InlandHomes (ChequersLane)	Support	Chapter 3	SP2	n/a	n/a	LP18-344	The original housing target of 22,640 homes within Policy SP2 is supported compared to the new lower target. Although it supports the Council's stepped housing trajectory, it urges that the Council to seek to maximise housing delivery from the earliest opportunity, including recognising the value of delivering small sites and taking a pragmatic approach to the development of complex land parcels.	The Council will review the approach to small sites as part of the updated housing land assessment.
DEV	LP072_InlandHomes (ChequersLane)	Support	Chapter 4	SP3	n/a	n/a	LP18-345	It is agreed with the draft employment policies, with regard to rationalising existing employment uses, and releasing surplus employment land. However, it is also recognised that a retained industrial function is integral to the wider masterplan and is a key component of the Good Growth principles – in particular, GG5 (growing a good economy).	Noted.
DEV	LP072_InlandHomes (ChequersLane)	Support	Chapter 3	DM1	n/a	n/a	LP18-346	The respondent offers support for the Council's approach to affordable housing and the promotion of on-site delivery unless exceptional circumstances are presented to evidence why this is not appropriate.	Noted.
DEV	LP072_InlandHomes (ChequersLane)	Support	Chapter 4	DM6	n/a	n/a	LP18-347	The representation offers support for the Council's approach to affordable housing and the promotion of on-site delivery unless exceptional circumstances are presented to evidence why this is not appropriate.	Noted.
DEV	LP072_InlandHomes (ChequersLane)	General	Appendix 3	DM11	n/a	ZZ GSR & Grill	LP18-348	The representation suggests that the location of the site they are promoting has the potential to improve the public realm associated with the entrance to Dagenham Dock Train Station.	Site ZZ has been reviewed to take account of its potential for public realm improvement with the entrance to Dagenham Dock Train station.
DEV	LP072_InlandHomes (ChequersLane)	Support	Chapter 5	SP4	n/a	n/a	LP18-349	It offers support to the Policy SP4, suggesting that good design is integral to successful planning and place-making.	Noted.
DEV	LP072_InlandHomes (ChequersLane)	Support	Chapter 5	DM12	n/a	n/a	LP18-350	It endorses the positive approach proposed by the borough in relation to tall buildings in that they must be sustainably located demonstrate exemplar design.	Noted.

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ORG	LP073_NHSPROPERTY	Support but with suggestions.	Chapter 9	DM34	n/a	n/a	LP18-351	It supports the general principle of Policy DM34 of maintaining and improving community facilities within the borough. However, the wording of any future policies should allow for the loss within the context of estate regeneration in regard to medical facilities and health centres. It also suggests that efficient use of buildings sometimes requires the development of surplus properties for other uses to release capital to be recycled back into the system. It is concerned that that the drafted policy is overly restrictive and would provide a sufficiently flexible basis for the delivery of NHS facilities. Therefore, it is suggested the policy and supporting text recognise estate rationalisation programs carried out by public service providers. There will be a negative effect in investment in new/improved services and facilities as a result of the policy, especially in relation to those that require longer periods of marketing. They detail several amendments to the policy wording in order to improve its potential to have positive impacts in regard to the above.	Draft Policy DM34 has been reviewed to take account of the comments.
LAN	LP074_TFLCD	Support but with suggestions.	Chapter 2	n/a	Sub Area 4 - Becontree	n/a	LP18-352	It supports the emerging vision for Sub-Area 4 Becontree but suggests that it was difficult to understand what the plan was showing as there does not appear to be a key. It suggests that it would be helpful to delineate the estate area.	The Sub Area maps have been updated to include a key for clarity.
LAN	LP074_TFLCD	Support but with suggestions.	Chapter 2	n/a	Sub Area 7 - Dagenham East and Dagenham Village	n/a	LP18-353	It supports the emerging vision for Sub-Area 7: Dagenham East and Dagenham Village. It supports the development principle that existing homes around Dagenham Heathway station should be improved and redevelopment should optimise development. The potential to develop new homes above the station should also be referenced here.	Further details have been embedded into the emerging vision of the Sub Area 7 to recognise the development potential around Dagenham Heathway station as well as above the station.
LAN	LP074_TFLCD	Support but with suggestions.	Chapter 2	SP1	n/a	n/a	LP18-354	It is in agreement with the borough's focused housing development targets. However, it is important that Policy SP1 should recognise to make the most efficient use of land. Growth should be directed towards all suitable and available brownfield sites, especially those with existing or planned public transport access levels.	Further details have been embedded into the emerging vision of the Sub Area 7 to recognise the development potential around Dagenham Heathway station as well as above the station.
LAN	LP074_TFLCD	Support but with suggestions.	Chapter 4	SP2	n/a	n/a	LP18-355	The representation strongly supports the borough's aim to optimise housing supply and meet housing need. However, it is suggested that Policy SP2 should optimise housing supply on all suitable and available brownfield sites.	Noted.
LAN	LP074_TFLCD	Support	Chapter 3	DM1	n/a	n/a	LP18-356	The respondent supports the aim of the policy to supply a minimum of 35% affordable housing.	Noted.

Catego ry	Rep ID (Be First)	Nature of Response	Relevant Chapter	Relevant Policy Number	Relevant Paragraph	Site Reference	Comment ID	Summarised Comment	LBBD/BeFirst Response
LAN	LP074_TFLCD	Support	Chapter 3	DM2	n/a	n/a	LP18-357	The representation strongly supports Policy DM2 in relation to Built to Rent schemes and may consider developing such schemes in Barking and Dagenham.	Noted.
LAN	LP074_TFLCD	Support	Chapter 5	DM12	n/a	n/a	LP18-358	The representation strongly supports the policy in that tall buildings should be supported where they are located in sustainable locations.	Noted.
LAN	LP074_TFLCD	Support but with suggestions.	Appendix 3		n/a	n/a	LP18-359	The representation supports the site allocation for residential development for the land North of Becontree Station. It is suggested that three sites that have been promoted by TFL CD should also be identified in Appendix 3, which are - Former 'The Volunteer' public house and land at Alfred's Way; London Road; and, Dagenham-Heathway Station	The site has been considered through the Strategic Land Availability Assessment.
DEV	LP075_BerkeleyHomes	Support	Chapter 2	SP1	n/a	n/a	LP18-360	The representation welcomes the Council's ambitious target set out in Policy SP1 to deliver 40,000 additional homes.	Noted.
DEV	LP075_BerkeleyHomes	Support	Chapter 3	DM1	n/a	n/a	LP18-361	The representation supports the Council's affordable housing target.	Noted.
DEV	LP075_BerkeleyHomes	Support but with suggestions.	Chapter 3	DM2	n/a	n/a	LP18-362	The representation suggests that it would be useful to provide a better understanding of the borough's overarching housing size and mix requirements in draft Policy DM2.	Draft Policy DM2 has been reviewed and updated based on the Council's latest SHMA.
DEV	LP075_BerkeleyHomes	General	Chapter 4	n/a	n/a	n/a	LP18-363	It has suggested further discussions with the Council regarding SIL and LSIS locations to deliver new homes once the Council has reviewed the findings of an Employment Land Study.	Noted.
DEV	LP075_BerkeleyHomes	Support	Chapter 5	SP4	n/a	n/a	LP18-364	The representation strongly supports the design approach in Policy SP4 to recognise and celebrate local character and the borough's heritage.	Noted.
DEV	LP075_BerkeleyHomes	Support but with suggestions.	Chapter 5	DM12	n/a	n/a	LP18-365	The representation supports the approach of sustainable locations for tall buildings. However, it is suggested that tall buildings should be assessed on a site by site basis and that the Council should define locations where tall buildings may be acceptable.	Draft Policy DM12 has been reviewed to take account of the comments.
DEV	LP075_BerkeleyHomes	Support but with suggestions.	Chapter 6	SP5	n/a	n/a	LP18-366	The representation supports the approach of Policy SP5 in relation to protecting the natural environment.	The Council acknowledges the support for Draft Policy SP5.

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DEV	LP075_BerkeleyHomes	Support but with suggestions.	Chapter 6	DM20	n/a	n/a	LP18-367	The representation suggests that 75% native planting requirement in Policy DM20 is extremely onerous and unlikely to be achievable on the type of sites identified by the Council. It is suggested that the policy should refer to naturalistic planting rather than native planting, with a lower target of between 25 and 40 percent.	Draft Policy DM20 has been updated to provide clarification on the native planting requirement.
DEV	LP075_BerkeleyHomes	Support but with suggestions.	Chapter 6	DM22	n/a	n/a	LP18-368	The representation suggested that the Council needs to be clear how it defines "at least equivalent value" in relation to replacement trees in Policy DM22.	Draft Policy DM22 has been updated to provide a clearer definition of "equivalent value" in relation to replacement trees.