

## **PLANNING COMMITTEE MEETING: THURSDAY JULY 9<sup>th</sup> 2009**

### **LONDON BOROUGH BARKING & DAGENHAM CONSULTATION ON LDF DOCUMENTS:**

- **SITE SPECIFIC ALLOCATIONS**
- **BARKING TOWN CENTRE AAP**
- **BARKING TOWN CENTRE URBAN DESIGN GUIDANCE SPD**

### **REPORT BY THE DIRECTOR OF PLANNING**

#### **1. PURPOSE**

- 1.1 The London Borough of Barking and Dagenham (LBBD) is currently conducting consultation on three local development documents that will form part of the Local Development Framework (LDF). The consultation period runs for six weeks from 5<sup>th</sup> June to 17<sup>th</sup> July 2009.
- 1.2 Since LTGDC does not have policy-making powers, it is imperative that the interests of the Corporation are reflected in emerging planning policy of the constituent boroughs to assist in the delivery of the Corporation's aims and objectives.
- 1.3 The three documents for consideration are:
  - Site Specific Allocations Development Plan Document (DPD)
  - Barking Town Centre Area Action Plan (AAP) Development Plan Document (DPD)
  - Barking Town Centre Urban Design Guidance Supplementary Planning Guidance (SPD)
- 1.4 These documents can be accessed at: <http://www.lbbd.gov.uk/8-leisure-envir/planning/local-dev-framework/local-dev-framework.html>
- 1.5 The AAP document has been developed in conjunction with the Corporation. LTGDC has seconded a staff member to LBBD to produce this policy document and therefore has fed in the process of its development and refinement. Design consultants ('East') were employed to produce the SPD and the Corporation was a member of the steering group, together with the borough and Design for London.
- 1.6 The Corporation has provided a response on previous rounds of consultation on the two development plan documents (see section 4 below for further information.)
- 1.7 This report provides a summary of the documents and a proposed response of the Corporation to LBBD.

## 2. DECISION REQUIRED

- 2.1 To AGREE the response to the consultation documents subject to any amendments

## 3. BACKGROUND

- 3.1 The consultation on the two DPDs (site specific allocation and AAP) is at pre-submission stage. This is the penultimate stage in producing the proposals in the documents. Based on what was said at the 'issues and options' stage, the proposals have been refined to produce the final versions of the proposals. The borough is therefore seeking views on the final version of these documents, particularly in relation to whether they are in line with the law and whether they are 'sound'. Further details of these criteria are set out at Appendix 1.
- 3.2 Following the consultation period, the borough will submit the final version of the Site Specific Allocations and Area Action Plan to the Secretary of State for independent examination.
- 3.3 The Barking Town Centre Urban Design Guidance is Supplementary Planning Guidance (SPD) rather than a DPD, and therefore has a different process for adoption. It is also subject to 6 weeks public consultation, but following this it will be amended as necessary to take account of comments, before formally being adopted by the Council.

## 4. LTGDC PREVIOUS COMMENTS

- 4.1 The LTGDC Board and Planning Committee have previously considered and provided comments on the two development plan documents, the Town Centre AAP and Site Specific Allocations.
- 4.2 In relation to the **Site Specific Allocations DPD** (Issues and Options Stage consultation, September 2008), the Corporation previously noted that the suggested land uses for these sites generally accord with the proposals that the LTGDC are progressing, and as such, the document is supported in principle. It was noted that the document includes major sites for regeneration such as Dagenham Dock, Barking Riverside and Renwick Road.
- 4.3 In relation to specific comments, it was suggested that the Renwick Road improvements should be shown on a key plan, reference should be made to the Sustainable Industries Park (SIP) in South Dagenham, and a comment was made against each of the sites that are within the LTGDC boundary.
- 4.4 Please see Appendix 2 for a summary of LBBB's response to these comments.
- 4.5 In relation to the **Barking Town Centre AAP**, the Corporation has commented on both the issues and options consultation (September 2007) and the preferred option consultation (September 2008).

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- 4.6 In relation to specific comments, the response noted that the AAP should reference the Corporation's Planning Obligations Community Benefit Strategy, stressed the need for a town centre wide parking study, made comments on the proposed tall building policy and the allocation of primary school locations.
- 4.7 Please see Appendix 3 for a summary of LBBB's response to these comments.

## 5. DOCUMENT SUMMARY

- 5.1 The **Site Specific Allocations DPD** sets out the sites that are suitable for future development and protection in the borough (excluding Barking Town Centre) in-line with the Core Strategy. It considers sites for such purposes as housing, employment, open space, transport and facilities that support people and communities (such as schools and health centres). The DPD identified 48 sites and the table below provides a summary of the sites allocated for specific uses:

Housing	Over the next 15 years, 15,000 more homes may be built in the borough of Barking and Dagenham. The document aims to identify a number of places where this new housing could be built. Many homes can be built on some large sites (such as Barking Riverside and South Dagenham) while small sites (such as sites that used to have garages on them) will only be able to hold a few homes.
Transport	LBBB aims to ensure that no development takes place on three sites in the borough where transport improvements are needed. One of these sites is at the junction at Renwick Road and the A13. This improvement is needed so that people living in the south of the borough are able to travel more easily to other areas. LBBB also wants to protect two other sites that are suitable for a rail freight terminal and the East London Transit bus route.
Retail	Retail should be safeguarded in existing town centres and shopping parades. The document shows where shop buildings are in the borough and protects them so they can be used for shops (and for other uses, such as banks and hairdressers).
Parks and Open Space	LBBB wants to ensure that certain areas of land are not built on. These areas include 16 allotment sites, 33 open spaces that the public can use and 25 sites that are important for nature conservation (such as Eastbrookend Country Park, the lower Beam River and Parsloes Park). The borough also wants to bring the Groveway allotment site back into use.
Community Facilities	LBBB want to ensure that there are enough community facilities for people in the borough today and in the future. These facilities include schools, children centres, health centres, libraries, leisure centres and religious meeting places. LBBB have found a number of sites in the borough

	where these facilities could be built.
Employment	LBBB want to ensure that there is enough land in the borough to provide jobs. The plan sets out the areas to be protected for business to use.

5.2 The **Town Centre Area Action Plan DPD** sets out the Council's planning policies for the AAP area together with 11 site specific allocations in the town centre. The Area Action Plan aims to guide regeneration to ensure the community's interests are taken into account by setting out how land, buildings and space are used in the town centre and the area around it. It suggests uses for particular sites and sets out the policies that the borough will use to judge planning applications in the area. The table below provides a summary of the key issues contained within the AAP:

Retail	LBBB want to make Barking a better town centre by encouraging extra shops to open, particularly well-known / department stores. They want to see a large supermarket on the site next to the new temporary market square off East Street, extra shops in Vicarage Field and some new shops to improve the area around Barking station. LBBB may also be content for Tesco to move from their current site by the North Circular Road to a larger store on the Abbey Retail Park. If it happens, this would bring the store closer to the town centre and homes could then be built on their current site.
Other town centre uses	LBBB will encourage leisure facilities in the town centre, particularly ones that will provide entertainment in the evenings and ones that will cater for families. They will also encourage offices and hotels to be built in the town centre
Employment	Although LBBB may allow new homes to be built on some industrial land, this will be limited to protect potential jobs. LBBB expect the site around the Malthouse off Abbey Road to be used for creative uses such as artists' studios and design workshops LBBB will build a business centre on part of the recently demolished Lintons Estate site, which will help new businesses start-up.
Transport	LBBB want significant improvements to Barking Station to help bus and rail passengers and will also support the proposed East London Transit bus links that will go through the town centre. The intention is to make it easier and more pleasant for people to walk and cycle. The borough will provide a little extra car parking in the town centre for visitors and shoppers because the borough think this is important for the success of the town centre.
Housing	LBBB propose to build 6,000 extra homes over the next 10 years, — knocking down the Lintons and the east side of the

	Gascoigne Estate and building more homes on those sites. New homes will also be built on the Fresh Wharf Estate, the Abbey Retail Park, Vicarage Field shopping centre, London Road, North Street, the area around Barking Station and possibly the current Tesco site by the A406. LBBB want to make sure that there are different types of home tenures and that at least three out of 10 extra new homes are large enough for families.
Education	The borough want to build a new primary school on the Abbey Retail Park and provide extra primary school facilities on the council depot in the Gascoigne Estate. They would also like to provide a skills centre for young people in the town centre.
Environment	LBBB want to make sure that new buildings, streets and public areas are of a high standard. Tall buildings will only be allowed where they fit in with their surroundings and where they will not look out of place. LBBB will protect and improve historic buildings.
Parks and Open Spaces	The borough want more parks and open spaces (including in the redevelopment of the Lintons and Gascoigne estates) and also want to improve the quality of current parks (particularly Abbey Green). They also want linked open spaces and a pleasant riverside walk along the River Roding.

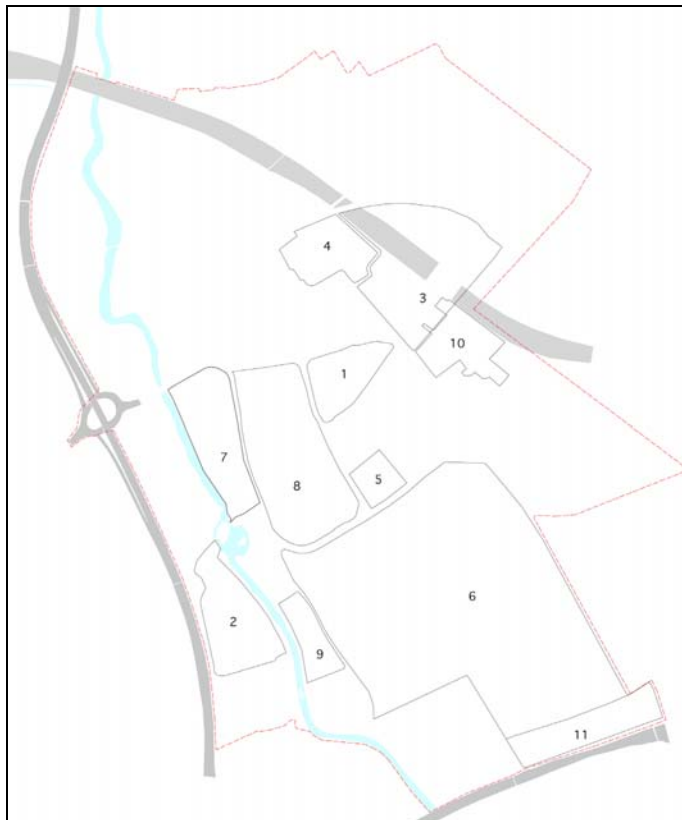
- 5.3 The **Barking Town Centre Urban Design Guidance SPD** provides urban design guidance to landowners, developers and architects in order to raise design expectations and secure high quality development. It supports the policies and site allocations of the AAP by providing detailed design guidance to assist developers in preparing schemes in the complex area that is Barking Town Centre and the Council in assessing their urban design quality. It provides a set of architectural and public realm design principles, guides and rules, to steer development and ultimately improve the environmental quality, image and identity of Barking.
- 5.4 In November 2007, the borough adopted an Urban Design Framework SPD for the whole of the borough. Whilst this remains in use for the rest of the Borough, it is proposed that the Barking Town Centre Urban Design Guidance SPD will replace the urban design framework for the Action Plan area.
- 5.5 The SPD is not a masterplan for the area and does not seek to prescribe a particular way of developing individual sites. However, it makes use of precedent images, drawings and a model of the area to:
- Provide area-wide guidance on topics such as movement and public realm, active frontages, scale and massing, architecture and landscape, environmental sustainability and inclusive design
  - Expand on the AAP site-specific 'design requirements' and illustrate the qualities that are sought from new development on these sites

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- Outline how high quality design is to be secured through the planning application process
- 5.6 The SPD reviews 'Barking Today' (section two) to provide relevant context about Barking as a place and its important qualities. Section 3 of the document sets out 'Area Wide Guidance', outlining key urban design principles that should apply to the different Character Areas. It also identifies the Barking 'Glue' (spaces and features that help bind different parts of the town together) and provides area-wide guidance on Transport and Movement, Scale and Massing, Energy and Environmental Sustainability, Community Cohesion, Safety and Inclusive Design and Public Art. Section 4 'Site Specific Guidance' contains specific guidance for the 11 sites that are earmarked for significant change (the AAP Site Specific Allocations sites within the town centre) and expands on the Area Wide Guidance set out in Section 3. The following site areas are identified on the plan overleaf, and detailed guidance is provided:

- 1 London Road/North Street - BTCSSA1 + buildings to east of the Site
- 2 Fresh Wharf -BTCSSA2
- 3 Barking Station - BTCSSA3
- 4 The King William Quarter - BTCSSA4
- 5 Axe Street/Abbey Sports Centre - BTCSSA5
- 6 The Gascoigne Estate - BTCSSA6
- 7 The Abbey Retail Park - BTCSSA7
- 8 Abbey Green - BTCSSA8
- 9 The Cultural/Creative Industries Quarter - BTCSSA9
- 10 Vicarage Field - BTCSSA10
- 11 A13 Between Gascoigne Road and King Edward Road - BTCSSA11

### Barking Town Centre Site Specific Allocations:



## 6. SUGGESTED LTGDC RESPONSE

- 6.1 It is suggested that the Corporation responds to LBBB as follows:
- 6.2 In relation to the pre-submission consultation on the Site Specific Allocations and Barking Town Centre Area Action Plan DPDs, the Corporation notes that it has worked closely with the borough in the development of these documents and has provided comments on earlier iterations of both documents, which have been incorporated in the final drafts. LTGDC supports the process of identifying sites that are suitable for future development and protection, for purposes such as housing, employment, open space, transport and facilities that support people and communities. The Corporation also recognises the importance of the AAP which aims to guide regeneration of Barking town centre by setting out how land, buildings and space are used most effectively.
- 6.3 In relation to the public consultation on the Barking Town Centre Urban Design Guidance SPD, the Corporation notes that it was a member of the steering group for the development of the document, together with the borough and Design for London, and therefore officer-level

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comments have been incorporated during the evolution of the guidance.

- 6.4 It should be noted that the SPD references the Barking Town Centre Conservation Area, which was extended in 2009, despite the Corporation's comments that not all the building in this area merited a conservation area status and that the status may complicate future regeneration proposals. The SPD also highlights the importance of 'fine grained strip', such as the shops and flats along Station Parade, which are detailed as having distinct urban grain and profile. The Corporation notes that the emerging Station Masterplan SPD outlines the potential for a large-floorplate anchor retail or leisure building at the corner of Station Parade and Linton Road. The Corporation therefore supports the statement in the Urban Design SPD that the borough will seek to ensure that any large format store is designed to respect, as far as possible, the fine grain of buildings in the vicinity and provide animated frontages to Station Parade and the old Bandstand junction.

## **7. RECOMMENDATION**

- 7.1 That a response is sent to the London Borough of Barking and Dagenham, as amended by any comments from Committee, as outlined above.

**Date: June 2009**

## Appendix One

### DPD Assessment Criteria:

#### What does 'in line with the law' and 'sound' mean?

Whether the proposals are 'in line with the law' and the way the proposals have been produced – issues for consideration:

- Whether the proposals have been prepared in line with the local development scheme (the project plan that shows when the proposals will be produced)
- Whether the proposals have been prepared in line with the statement of community involvement
- Whether the proposals have been prepared in line with planning regulations
- Whether the borough has considered the effects of the proposals on society, the economy and the environment
- Whether the proposals are in line with the Government's policies and the policies produced by the Mayor of London in the London Plan
- Whether the proposals reflect the community strategy (which sets out how people's quality of life, economy and environment of the borough can be improved)

Whether the proposals are 'sound'. There are 3 different issues that should be considered, called the 3 'tests of soundness':

- Whether the proposals are justified (whether people with an interest in Barking and Dagenham have been able to take part in producing the proposals and whether the proposals are backed up by facts)
- Whether the proposals are effective (whether the proposals clearly say who will make them happen and when they will make them happen, whether the proposals are flexible enough to deal with any changes that may affect them and whether the proposals can be monitored)
- Whether the proposals are in line with the Government's policies

## Appendix Two

### LTGDC Previous comments on SSA

Site	LTGDC comments	LBBB Response
<b>South Dagenham West and Chequers</b>	The proposals will support the regeneration of the Merriellands Retail Park and a new residential-led mixed use quarter and is thus supported by LTGDC. However, consideration should be given to non-noise sensitive uses being located close to the elevated A13.	Allocation recognises need to mitigate noise along the A13 through appropriate design solutions
<b>Kuehne and Nagel Site</b>	The designation should specify what 'mixed uses' would be acceptable	This site is now zoned as Strategic Industrial Land
<b>Rippleside Commercial Estate</b>	LTGDC supports the designation. There should also be a 'Barking Reach Gateway Site'.	The freight interchange allocation recognise the need for attractive frontage along Renwick Road
<b>Renwick Road Junction Improvement &amp; A13 Pedestrian/public transport north</b>	This site is not identified on the main plan but is shown within the schedule of sites; it would be useful if this were shown on the main plan to provide context with other major development sites which surround it.	This will be shown on the proposals map
<b>Freight Infrastructure at Ripple Road</b>	Site 100 is correctly identified as the site for rail freight interchange. However the site boundary also includes a significant housing area around Julia Gardens; this appears to be a drafting error. Site 100 also subsumes Site 114 which identifies much of the same land for employment purposes. It may be appropriate to cluster these plans together in a single drawing showing the infrastructure, freight and employment uses and their relationships. LTGDC supports the designation and have commissioned a logistics freight study to further project development.	This has been addressed
<b>Dagenham Dock</b>	There is a discrepancy in the boundary of the site with the adjacent site 133 compared to that indicated on the main plan. LTGDC supports the designation. In addition to industrial use some ancillary office linked to industrial uses could be allocated in order to facilitate the agglomeration of environmental businesses and the development of the Sustainable Industries Park.	Dagenham Dock is covered by Core strategy policy CE4 - Mix and balance of uses within designated employment areas  The Dagenham Dock employment area will be developed and promoted as a Sustainable Industrial Park, with an increased emphasis on high technology manufacturing and processing industries and a consequent control

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		over the development of further warehouse and distribution uses. Proposals to establish recycling and reprocessing activities and other industries in the environmental business sector are particularly encouraged within the Dagenham Dock area.
<b>Formatting</b>	The schedule of sites is listed by ward and not numerically, this makes sites identification laborious and complicated. It is suggested the preferred options includes a numerical index.	Noted and incorporated
<b>Community Benefits SPD</b>	The proposed SPD is welcomed in principle and should seek to choreograph its approach with the LTGDC adopted Planning Obligations Community Benefits Strategy. It is important that both the Site Allocations DPD and Community Benefits SPD make reference to the LTGDC Community Benefits strategy and pooled fund approach that will facilitate the timely delivery of infrastructure. It is noted that the approach that Barking & Dagenham will take is likely to be via a standard charge, in a similar manner to the approach adopted by the LTGDC system	Noted at 4.4 - The Council is preparing a Community Benefits Supplementary Planning Document. This will establish a standard charge which will represent the identified cost of providing the necessary environment, economic and social infrastructure to support new development.

## Appendix Three

### LTGDC Previous comments on AAP

Issue	LTGDC comments	LBBB Response
<b>Preferred Options Consultation</b>		
<b>General</b>	In general, it is considered that the Preferred Options Report presents a series of policy choices and draft policy statements which provide a very positive policy context to deliver the economic, social and environmental regeneration of the town centre area that the Council seeks. From the Development Corporation's own perspective it is also considered that it provides a policy context which will assist LTGDC in achieving our regeneration objectives and deliver projects.	Noted
<b>Design</b>	The AAP takes a position of requiring high standards of architecture and urban design but relies on other documents to provide the detailed guidance. Whilst this approach has been criticised by CABI during its consideration of some major development schemes in the Town Centre, LTGDC consider it to be the right approach. It does, however, rely on the supporting documents being of a high quality and providing the detailed design required.	Noted
<b>Issue 7: The Evening Economy</b>	The wording in BTC 7 is ambiguous and could lead to a small number of very large bars in the town centre.	Accepted. Revised wording included in the reasoned justification to policy BTC 5 of the pre-submission version.
<b>Issue 8: Employment Land</b>	In respect of the uses to which the DPS 10 site can be put, the AAP quite properly wishes to keep the main focus of the site for cultural and creative industries. It is possible however that to support the establishment of the creative and cultural industries complex, other uses such as a small element of general B1 floorspace will be needed to help subsidise the creative industries element. LTGDC suggest that additional wording should be added to Draft Policy Statement 10 as follows: "Other uses will be assessed on their merits, but all schemes should support and contribute towards the success of the establishment of a creative and cultural industries complex"	Partially accepted. B1 offices have been added as an acceptable use in BTCSSA 9 of the pre-submission version but they are required to be associated with and ancillary to cultural and creative uses
<b>Issue 9: Sustainable Local</b>	The station masterplan is now being taken forward as a Supplementary	Accepted. Appropriate wording has been

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<b>Transport</b>	<p>Planning Document so the DPS 11 text should be amended to reflect this and should be more explicit about the need for a comprehensive approach to development in this area, and that more detailed guidance will be set out in the SPD.</p> <p>LTGDC support the proposals in DPS 15 &amp;16 for pedestrian and cycle links across the River Roding, especially the pedestrian bridge between BTCSSA2 and BTCSSA10</p> <p>LTGDC support the proposals in DPS 31 for the pedestrian links along the river</p>	<p>included in BTCSSA 3 of the pre-submission version.</p> <p>Noted</p> <p>Noted</p>
<b>Issue 10: Off Street Parking</b>	<p>LTGDC would be unable to support a policy such as DPS 18 in the Submission version of the AAP if the parking needs study has not been completed and its findings justified the policy position taken.</p>	<p>Accepted. A Public Off Street Public Car Parking Demand Study was undertaken in early 2009 and the results of it have underpinned Policy BTC12 of the pre-submission version.</p>
<b>Issue 16: Good Design and tall Building</b>	<p>LTGDC is bringing forward a scheme at the Cultural Industries Quarter/Malthouse which is currently proposed at 6-12 storeys. Because the draft policy statement says “elsewhere in the AAP area, tall buildings will be resisted unless particular proposals can demonstrate significant regeneration or townscape benefits” the policy will not frustrate the LTGDC’s proposals, as it is anticipated that the scheme will demonstrate significant regeneration and townscape benefits. LTGDC therefore supports DPS 26</p>	<p>Noted. However, the Cultural Industries Quarter has been added to the list of sites where taller buildings are appropriate in policy BTC 17 of the pre-submission version.</p>
<b>Issue 24: Community Benefits and Section 106 Agreements</b>	<p>DPS 34 does not specifically mention the LTGDC Planning Obligations Community Benefit Strategy, and seeks to provide a list of priorities for contributions in the area in line with Policy CC5 of the Council’s Core Strategy. This is of concern, as the LTGDC strategy sets out mechanisms for pooling contributions on a London Riverside and Lower Lea Valley basis. It is considered that the draft policy statement should be amended to refer to the LTGDC Planning Obligations Community Benefit Strategy.</p>	<p>Although minor amendment has been made to the reasoned justification to policy BTC 23 of the pre-submission version, the point made goes to the LDF core Strategy policy rather than this AAP policy which, rather than setting out the Council’s approach to Section 106 contributions, merely seeks to identify local priorities for such contributions</p>
<b>Site Specific Allocations: Site 1 London Road/ North Street</b>	<p>The interrelationship between sites 1, 7 &amp; 8 and the aspirations of large food retailers is complicated but at this stage LTGDC do not object to the provisions of the AAP in relation to these sites.</p>	<p>Noted. Masterplanning for the London Road/North Street site indicates that the uses proposed in the Site</p>

	However, it is recognised that there appear to be a number of aspirations for the site that has been allocated for a food store on London Road/North Street, and that it may not be possible to achieve all the suggested land uses on the one site.	Specific Allocation of the pre-submission version can be accommodated.
<b>Site Specific Allocations: Site 7 The Abbey Retail Park</b>	The interrelationship between sites 1, 7 & 8 and the aspirations of large food retailers is complicated but at this stage LTGDC do not object to the provisions of the AAP in relation to these sites	Noted
<b>Site Specific Allocations: Site 8 London Road/A406 Junction</b>	The interrelationship between sites 1, 7 & 8 and the aspirations of large food retailers is complicated but at this stage LTGDC do not object to the provisions of the AAP in relation to these sites.	Noted - However, there is no site specific allocation for the site in the pre-submission version as the Council could not be confident about its delivery.
<b>Site Specific Allocations: Site 10 The Cultural/Creative Industries Quarter</b>	The following text should also be added to the Design and Implementation section "other uses will be assessed on their merits but all schemes should support and contribute towards the success of the establishment of a creative and cultural industries complex	Partially accepted. B1 offices have been added as an acceptable use in BTCSSA 9 of the pre-submission version but they are required to be associated with and ancillary to cultural and creative uses
<b>Issues and Options Consultation</b>		
<b>Vision</b>	LTGDC welcomes the draft vision for the Plan area, noting that it envisages significant improvements in economic, environmental and social conditions. The Corporation particularly welcomes the acknowledgement in the Vision that, Barking Town Centre has, in addition to its important local role, a key part to play in the development of Thames Gateway. Similarly the objectives appear to be wide ranging and well set, reflecting the Vision and providing the context for the policy issues and options set within them.	Noted
<b>Issue 3: Edge of Town Retailing</b>	<p>LTGDC support Option 1 for identifying a site for a superstore since it is more proactive and there is a distinct possibility that a central site can be identified.</p> <p>In terms of the Abbey Retail Park, LTGDC consider Option 1 for a retail/residential redevelopment to be the best option, provided that any retail expansion meets need, capacity and sequential tests and the need for expansion of primary schools being satisfactorily dealt with elsewhere in the AAP area.</p>	<p>Noted</p> <p>Rejected. The preferred Option is a hybrid of Options 1 and 2 of the Issues &amp; Options Report. Option 1 was unsatisfactory in both suggesting an expansion of retail warehouse floor space on the site and in ruling out the need to</p>

		provide a new primary school on the site. Retail expansion would again raise PPS6 sequential test and LDF policy implications
<b>Issue 4: Office Development</b>	<p>LLTGDC supports Option 2 for the encouragement of office development in the Town Centre. Whilst we acknowledge that the current demand for suburban centre commercial office space is low, we believe that Barking's proximity to, and excellent public transport links with, the City can foster some growth. Early indications from the Economic Development Strategy for Barking Town Centre and from the work on developing the Master Plan for the Barking Station area support this view.</p> <p>Office development will provide local jobs, improve the image of Barking Town Centre and be the impetus for the provision of lunchtime and early evening informal leisure uses which will further assist the economic and environmental regeneration of the Town Centre.</p>	Noted
<b>Issue 5: Hotel Development</b>	<p>LTGDC supports Option 1 since, as with offices, it regards hotel development as a potential driver for economic and environmental regeneration of the Town Centre and as a boost for the image of the town. There is an obvious synergy with the growth of commercial office floor space and also with the potential growth of heritage tourism which is explored elsewhere in the Report. Despite this, LTGDC would not wish this to mean a restriction on the growth of the existing A406 hotels. They are successful and their wish to expand is reflected in the proposals of the River Roding Master Plan.</p>	Noted
<b>Issue 7: The Evening Economy</b>	<p>LTGDC would be strongly opposed to Option 1 of making no provision for additional evening economy uses. Whilst we support Option 3 and the Council's desire to avoid the antisocial behaviour impacts that can come with a vibrant evening economy, the detailed planning and licensing regime needs to ensure some scope for further bars and entertainment venues.</p> <p>We strongly support option 2 to allow evening economy uses in the Town Quay and River Roding area as well as in the Town centre. We regard such uses as an essential component of the mixed use</p>	<p>Accepted. The preferred option is a hybrid of Options 2 and 3 of the Issues &amp; Options Report.</p> <p>Noted</p>

	regeneration that will be undertaken within the area and a significant factor in achieving the objective of reuniting Barking Town Centre with the historic riverfront. Evening economy uses in the Town Quay/River Roding area are a component of the River Roding Master Plan	
<b>Issue 8: Employment Land</b>	<p>LTGDC strongly supports Option 2 for the release of part of the Fresh wharf estate for mixed use development. We agree that this will not have an adverse effect on employment levels across the site and believe that the approach will not only offer significant numbers of new homes but also provide for the environmental regeneration of a key site on the riverfront and the consequent boost to the image and perception of Barking. We also strongly support the creative /cultural industries option because it has the potential, not only for significant environmental improvement of the area, but also to promote local distinctiveness and diversify the economic base of Barking.</p> <p>We also strongly support the option to accommodate the LEGI Business Centre on the Lintons. Accessibility to Barking Station makes this a better site.</p>	Noted
<b>Issue 9: Sustainable Local Transport</b>	<p>LTGDC considers that all of the measures put forward have merit and can contribute to the objective of creating a more sustainable local transport system. We would, however, suggest that the improvement of servicing the commercial uses in the town centre should be part of the Preferred Options Report since this can offer benefits to traffic flow, the pedestrian environment and the economic functioning of Town Centre shops and offices.</p> <p>We particularly and strongly support the options of supporting East London Transit and providing a more effective public transport interchange at Barking Station. We would stress our support not only for Phase 1a through the Town Centre but also for Phase 2 which we regard as critical for linking Barking to the wider Thames Gateway area and also improving PTAL levels on the fringes of the Action Plan area.</p>	<p>Accepted. Improving the servicing for shops in East Street is shown in Site Specific Allocation 1 as one of the design and implementation issues that the developer for the North Street/London Road scheme must successfully address</p> <p>Noted</p>
<b>Issue 10: Off Street Parking</b>	LTGDC recognises the tensions between the need to reduce car parking as part of a sustainable transport policy and the wish to ensure that the vitality and viability of Barking Town Centre is not	Noted. A review of Town Centre car parking is currently underway.

	<p>compromised. In the light of this, the Corporation considers that the choices between the options presented for the level of car parking provision should only be made in the light of an up to date assessment of parking need and any necessary reassessment of the town centre parking strategy.</p>	
<p><b>Issue 11: Housing Supply</b></p>	<p>LTGDC supports Option 1 and recognises the significant contribution that such provision will make to not only meeting the Borough's housing targets set out in the London Plan but also to meeting the target of 40,000 new homes by 2016 which we have set ourselves in our 2007/08 Business Plan.</p> <p>Whilst we support this option, we would not wish to see the 7,150 seen as a rigid collar and would urge that as windfall sites come forward, their appropriateness for housing is assessed even though this could lead to an excess of the housing target figure.</p> <p>Whilst we welcome the overall housing target for the plan period as a whole and we recognise the difficulty of accurately predicting (particularly further into the plan period) when housing sites will be developed, we consider that the AAP should try to give some indication of a housing supply trajectory. This will be useful in not only indicating when housing will be come available but also to assist in identifying the timescales</p>	<p>Noted</p> <p>Accepted. If environmentally acceptable schemes which exceed the currently identified capacity are brought forward on particular sites, they will be approved and a total figure in excess of the currently estimated capacity will be achieved.</p> <p>Accepted. The Preferred Options Report attempts to give an indicative housing delivery trajectory within which associated social infrastructure will need to be provided</p>
<p><b>Issue 13: Affordable Housing</b></p>	<p>Whilst LTGDC fully understand and sympathise with the Council's wish to give greater housing choice and create a more balanced community, it considers that the need for affordable housing as a key issue for East London. For this reason and because we are concerned about the potential London Plan compliance issues of a 35% target, the corporation supports the 50% target of Option 1.</p> <p>We do consider, however, that the Council's housing aims can, to some extent, be attained through the type of affordable housing to be provided. Accordingly, in noting that the GLA recognise the need to be flexible in the application of this standard, we support the 60%/40% affordable housing tenure split.</p>	<p>Noted</p> <p>Noted</p>

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<b>Issue 19: Access to open space</b>	The protection of informal open space, its biodiversity importance and the maintenance/enhancement of public access are key elements of the River Roding Master Plan. Accordingly, we strongly support Option 1.	Noted
<b>Issue 20: Abbey Green</b>	With the significant regeneration activity which the Corporation and others are promoting in the Town Quay and the River Roding area, strong linkages with the Town Centre are essential. LTGDC regard Abbey Green as a key space and its improvement as a significant factor in achieving the objective of reuniting Barking Town Centre with the historic riverfront. For these reasons we support Option 2.	Noted
<b>Issue 24: Community Benefits and Section 106 Agreements</b>	We have no comment to make on the options presented in this Issues and Options Report but would take the opportunity to reiterate that any Section 106 Policy within Barking & Dagenham's LDF should make reference to LTGDC as the determining authority for many of the S106s and our proposed discounted 'tariff' of £6000 per residential units, as well as requirement for affordable housing, subject to financial appraisal.	Noted