



London Borough of Barking & Dagenham, Planning Department
By email to: localplan@lbbd.gov.uk

26 November 2020

Dear Sirs,

Response to Local Plan Regulation 19 consultation

Thank you for the opportunity to respond to this important consultation. CPRE London is a membership-based charity with 2,500 members across London, concerned with planning and environment issues. We make the following comments which we ask you to take into account.

Natural Environment – Chapter 8

We are generally very supportive of all the aspirations and policies in chapter 8.

- The aspiration for the borough's green space to support a number of functions omits to mention sports in the opening paras 8.1 bullet 2. This is particularly worrying given the site allocation of the Rugby Ground (site RC) at Castle Green. ***'Sports' should be included in paragraph 8.1 bullet 2.***
- There are a number of sports fields which have been either fenced off or left to become derelict just on the border with Newham. These will be needed to support a much bigger population in Barking. ***The Local Plan should reference the need to work with neighbouring Newham to bring sports fields on the border back into use*** (see in particular Leigh Road Sports Ground as marked on Google Maps).

We strongly object to any proposals to develop Castle Green Sports Field and Padnall Lake

- While we support policies which aim to protect green space, we are very concerned about the Site Allocation RC: proposed building development on Barking Rugby Club – Goresbrook Road. We ***Strongly object to the Barking Rugby Club site being included as a Site Allocation for housing development.*** This is the only playing field within a huge radius and is likely to be the only playing field available to support the whole of the new Barking Riverside development along with all the other residents in the more immediate vicinity. This looks to be an area already deficient in open/green space.
- The site allocation RC runs counter to the policies as set out in Chapter 8 of the LP document, in particular that "playing fields should not be built on unless an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirement" – this site is very clearly NOT surplus to requirement.
- The site allocation CO (proposal to build 152 homes on Padnall Lake) also contradicts the main policy and this should not be built on. It is important green space for local residents. Also residents of any new homes build in this location would be exposed to constant loud noise and air pollution.

Town centres – policy DME 3 should include measures to remove traffic from town centres if the policy is to be effective

- The policies here do not mention roads, vehicle traffic or transport insofar as they impact on "encouraging vibrant resilient, and characterful town centres". ***This section should be revised to include measures which acknowledge that managing traffic out of town centres is fundamental to their success.***
- ***Local Plan policy for Town Centres should be based on a '15 minute city' approach*** specifically as it relates to town centres which should be re-modelled in particular to remove through traffic and reduce space allocated to road carriageway and parking. The key ingredients of a 15-minute city include:
 - large numbers of residents within walking/cycling distance of the town centre/high street
 - the presence of core local amenities (shops and services)



- good access to public transport
- an easily walkable/cyclable high street and town centre, with wide pavements without clutter, frequent crossings, low-speed single carriageway traffic and protected cycle lanes where space allows.
- In Barking and Dagenham, where roads dominate in many town centres – unnecessarily in our view – consideration should be given to getting rid of roads entirely and using the space for e.g. open space / markets / quiet space etc or including it in developments. **The Local Plan should address the need to reconfigure roads and space given to roads.** Roads have overtaken parts of the borough and the Local Plan should be looking at re-configuring it to develop a '15 minute city' approach, including reducing space given to roads and removing roads altogether to create space for housing, green space, street markets etc.

We support re-deploying space given to surface car parks – for other more useful purposes

We strongly encourage development of sites which are currently large surface car parks – these should be used for residential / commercial / community development as necessary e.g. Site CX: we strongly support development of surface car park sites like this – in this case it is clear that appropriate development would be housing as proposed; or e.g. Site WF – Sainsburys + car park – we support this though it appears currently appears too high density for the neighbourhood.

Industrial and commercial sites – conversion to mixed used neighbourhoods

On the whole CPRE London supports the redevelopment of industrial / retail parks to mixed-use as long as it does not compromise the supply of SIL in London.

Density and tall buildings

We support high density development but only support building to height in areas allocated for tall buildings. Tall building should be restricted to specific allocated areas and Site WF – Sainsburys + car park – looks as though it may be too high for the area.

Sites adjacent to rivers / river & wetland habitats

There are a number of sites in the Site Allocations which are adjacent to rivers. While these are brownfield sites so appropriate for development, any development on these sites should be sympathetic to wetlands habitat and should use the opportunity to enhance wetland habitats, move development further away from the river and improve public access to the river including by creating river paths, which will also ensure residents gain more benefits from these natural features.

Traffic noise from major roads– housing development adjacent to big road and motorways

Residential development which consigns residents to constant noise and pollution e.g. site ZZ at Dagenham Dock station should be avoided. This might be more appropriate for commercial / industrial intensification.

Parking standards and car club

- We strongly support car-free and car-lite development. Where PTALs are low, major developments should not be permitted unless public transport can be introduced and/or where the density of the development ensures public transport is financially viable.
- Additionally, in new developments parking should be made available only to people who must have a car for their job. Everyone else should be required to use car clubs and should not be able to apply for a residential parking permit.
- We strongly support policies to promote shared mobility.



Sites allocations – comments on individual sites

- Merriellands Crescent (AC) – support redevelopment of site but it is vital that it is built around sustainable transport.
- Dagenham ‘Leisure Park’ (AD) – noise from A13 is like to be an issue for housing and measures should be taken to ensure it doesn’t impact on residents and/or allocate for uses other than residential
- Gascoigne Estate (AJ) – adjacent to River Roding – we support this but any development should include riverscape / wetlands planning including access for residents / nearby workplaces.
- AK – Barking town centre, retail with car park – appropriate for development.
- AM – this looks to be too high density for the area.
- CD / HO (site CD seems to overlap with site HO) – London Road, Barking Town Centre – not clear if this would mean redevelopment of a historic town parade of shops which currently contributes to local character. More appropriate would be redevelopment of the multi-storey car park behind this site.
- CF – Castle Green SIL – on the whole CPRE London supports redevelopment of industrial / retail parks as long as it does not compromise the supply of SIL in London.
- CM – support as long as does not compromise supply of commercial / industrial land. Site is near to Roding: any development should be sympathetic and use the opportunity to create and improve wetland habitat as well as public access to the river path
- CO (proposal 152 homes on Padnall Lake) contradicts policy to protect green space. We **object to this site being allocated for development**. It is important green space for local residents. Also residents of any new homes build int this location would be exposed to constant loud noise and air pollution.
- RC – **strongly object to development at this site**: this would mean loss of green space in an area deficient of green space and in particular with no other playing fields. It is the ONLY playing field which will be available to support the new development at Barking Riverside.
- XR – proximity to Dagenham Breach – development should be sympathetic to wetlands habitat and use the opportunity to enhance it and improve public access/benefits for residents/river path.
- XV/XX – next to The Gores (river) – natural feature, development should be sensitive/ improve habitat, allow access / river path etc.
- YG – Garages. Support redevelopment of this site as garages make poor use of space and cars can be parked elsewhere e.g. on nearby roads.
- WF – Sainsburys – density looks extremely high for the area. We do not support inappropriate density.
- XC – Site development needs to be sympathetic to the wetland habitat and use the opportunity to improve the habitat and create public access via paths to ensure maximum benefits to residents.
- XD – Hepworth Gardens – **Object**. It is not clear that this site is appropriate for infill. There is a block of garages very close by which would provide a better opportunity for development, rather than (presumably) building on the greenspaces surrounding the existing housing at Hepworth Gardens.

Thank you once again for providing the opportunity to respond to this important consultation.

Yours faithfully
Alice Roberts
Head of Campaigns
CPRE LONDON