planning report PDU/2271/01

30 October 2008

Jetty 8, Dagenham Dock
in the London Borough of Barking & Dagenham
planning application no. 08/01006/FUL

Strategic planning application stage 1 referral (new powers)

The proposal
The siting of a mobile plant and erection of a site portacabin office on part of a safeguarded wharf site.
Change of use from a coated materials manufacturing use (Class B2) to a waste recycling site (sui generis)-using part of the existing aggregates wharf for the recovery of imported inert, construction, demolition and trench arisings.

The applicant
The applicant is Cemex UK Operations Limited, and the architect/agent is Alliance Planning.

Strategic issues
Temporary part use of a safeguarded wharf for the recovery of inert, construction/demolition waste and trench arisings for two years, after which the operation will move to phase 2 of the site (as it is described). The proposal is supported in strategic planning terms subject to the future use of the site for cargo-handling not being precluded. The applicant will need to ensure that the use is only temporary and should it exceed the operational period proposed Barking & Dagenham Council will need to be re-consulted on the wharf usage.

The proposed use is, however, appropriate in this strategic industrial location. The applicant needs to undertake further work in respect of energy demand and explore ways of reducing the operational and development carbon dioxide emissions; biodiversity, noise, air quality, and climate change. The transport aspects of the application also require further work.

Recommendation
That Barking & Dagenham Council be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 58 of this report; but that the possible remedies set out in paragraph 60 of this report could address these deficiencies.

Context
1 On 25 September 2008 the Mayor of London received documents from Barking & Dagenham Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning
Order 2008 the Mayor has until 5 November 2008 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor’s use in deciding what decision to make.

2 The application is referable under Categories 2B and 4 of the Schedule of the Order 2008:

“1. Waste development to provide an installation with capacity for a throughput of more than—
   (a) 5,000 tonnes per annum of hazardous waste; or
   (b) 50,000 tonnes per annum of waste; produced outside the land in respect of which planning permission is sought.”

“2. Waste development where the development occupies more than one hectare.”

It is also referable under Category 4 of the Schedule of the Order 2008: “Development in respect of which the local planning authority is required to consult the Mayor by virtue of a direction given by the Secretary of State under article 10(3) of the GDPO.” The site is subject to this direction as it involves development on a safeguarded wharf.

3 Once Barking & Dagenham Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The Mayor of London’s statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 The site is located adjacent to the River Thames on Thunderer Road, and the nearest section of the Transport for London Road Network (TLRN) is the A13 Ripple Road, located approximately 1.8 kilometres north of the site. It is poorly served by public transport, with the nearest railway station over 1 kilometre away, and no bus stops located within a reasonable walking distance. As such, it is estimated that that the site records a public transport accessibility level of 1a, on a scale of 1-6, where 1a is classed as being very poor.

6 Dagenham Dock is located at the southern tip of the borough Barking & Dagenham, adjacent to the River Thames. A 7.6 hectares part of the Dagenham Dock is owned by Cemex having been previously operated as an aggregate depot since before the second world war with materials being imported via the Thames. Planning permission was granted in 1997 for the erection of a road-stone coating plant; this plant is now obsolete and will be demolished if the current planning application is successful. The application site is 2.88 hectares and consists of two rectangular shaped areas to the north-west and central eastern parts of the Cemex site. (Refer to the red marked areas on the site plan below).

7 This site is within a designated opportunity area in the North East London sub-region of the London Plan. Residential properties are located to the rear of the site, approximately 800 metres to the south of the site.

8 Access to the site can be made from the A13 Ripple Road via Renwick Road, Choats Road Hindmans Way, and Thunderer Road. The site is enclosed within an existing industrial area. The plans provided for this proposal demonstrate that access into the site will be made through another company’s land in a one-way direction.

9 The CEMEX site is adjacent to some modern industrial units, which have been erected to encourage urban regeneration of the area, and some heavy industrial uses such as a concrete
crushing plant. To set the context, the Ford Motor Company Plant is located to the east of this site. The land to the west of the site is referred to as Barking Reach, which has planning consent for major residential development of approximately 11,000 homes.

10 The current site functions involve the movement of heavy plant and machinery and the site adjoins a major concrete crushing operation with stockpiles that can reach heights in excess of ten metres. The current site, plant and infrastructure include a central conveyor leading from the jetty that feeds a radial stocking out conveyor, a number of bays for the storage of materials, a mortar/concrete batching plant, a redundant coating plant, a weighbridge and office, a number of stockpiles, which vary in size according to demand and supply to the site, an asphalt plant with ancillary silos, tanks and impact crusher, 3 screens, two wheel loader shovels and four 360 degree excavators. The current operations take place within the blue areas marked on the site plan.

**Site Plan**

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**Key:**

- **The application site** - is 2.88 hectares and consists of two rectangular shaped areas to the north-west (phase 2) and central eastern parts (phase 1) of the Cemex site.

- **Current operations** – within the wider part of the site, with exception to the application site areas

11 The Gores Brook and the Ship & Shovel Sewer Site of Importance for Nature Conservation (SINC) lies to the west of the site. This SINC is characterised by a ditch and wetland habitats that connects directly to the River Thames. (The Biodiversity section of the report touches on this issue).

**Details of the proposal**
12 The applicant proposes to optimise the use of land at this site by adding to the functions of the existing aggregates wharf for the recovery of imported inert, construction, demolition and soils arisings. The materials from both these operations (recycling and trench arisings operations) will arrive at the site and be tipped at allocated stockpiles, where (1) they will be visually assessed for contaminants which, if present, will be removed; (2) a loading shovel will then load the waste materials into a recycling crusher unit; (3) the crushed material will then be transferred by conveyor to a mobile screen with a built-in dust suppression system, and (4) the screened material will be placed in stockpiles before being loaded into trucks for delivery to customers.

13 The applicant proposes to import the clean concretes, bituminous waste and trench arisings (material from excavation of roads, asphalt materials and soil) for re-use in the construction industry. The trench arisings will come from local excavations carried out around Greater London and it is expected that 500 tonnes per day will be delivered at the site to be processed and stored. The main priority of the operations at this site, subject to planning approval will be to integrate the marine, concrete, coating and recycling functions at this site, with a view to producing a range of recycled aggregate products or specification ranging from primary materials to high quality alternatives.

14 The applicant also proposes to use the road network for the delivery of the material and that no use of the River Thames for transport of the recyclate is proposed. 350,000 tonnes of construction, demolition and excavation waste will pass through the site annually.

15 The stockpile heights/levels at the site are currently under discussion. Nevertheless these should be watered to reduce the emission of dust. The recycling activities will be sheltered and screened to avoid prevailing winds causing dust emissions. Alongside the two forms of aggregate recycling proposed at the site the applicant is also proposing a new site office to the north-west corner of the site with dimensions of approximately seven metres by 2.5 metres and a height of 2.5 metres. The built form on the site would be a temporary single storey office ‘portacabin’ type structure, rectilinear in form and finished in light grey with dark, flush glazing on each elevation and a flat roof.

16 The hours of operation for both recycling facilities will be the same as the current hours of operations, which are 6.30-18.00 Monday to Friday and 6.30 to 12.00 on Saturdays.

17 The proposed site usage is to take place in two phases. Phase 1 is within the safeguarded wharf part of the site, which is a designated employment area. The use of this site will be temporary so not to preclude the permanent re-use of this safeguarded wharf in a more appropriate way.

18 Ecological and flood risk impact assessments have not been undertaken by the applicant as it is considered that the change of use at this site is for activities similar to those currently in operation, at similar intensity and appearance, and thus it has been assumed that such assessments are not necessary. However, noise, air quality and transport assessment have been provided as it is considered that these issues may differ in their impact as a result of the recycling/trench operations and development at the site.

Case history

19 None relevant.

Strategic planning issues and relevant policies and guidance
20 The relevant issues and corresponding policies are as follows:

- **Transport**  
  London Plan; the Mayor’s Transport Strategy; PPG13; Land for Transport Functions SPG
- **Biodiversity**  
  London Plan; the Mayor’s Biodiversity Strategy; Improving Londoner’s Access to Nature: Implementation Report; PPS9
- **Ambient noise**  
  London Plan; the Mayor’s Ambient Noise Strategy; PPG24
- **Air quality**  
  London Plan; the Mayor’s Air Quality Strategy; The Control of dust and emissions from construction and demolition BPG; PPS23
- **Sustainable development**  
  London Plan; PPS, PPS Planning and Climate Change Supplement to PPS1; PPS3; PPG13; PPS22; the Mayor’s Energy Strategy; Sustainable Design and Construction SPG
- **Waste/minerals**  
  London Plan; the Municipal Waste Management Strategy; PPS10
- **River Thames/flooding**  
  London Plan; Mayor’s draft Water Strategy; PPS25, RPG3B
- **Safeguarded wharves**  
  London Plan; Safeguarded Wharves on the River Thames Implementation Report

21 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Barking & Dagenham Unitary Development Plan 1995 and the London Plan (Consolidated with Alterations since 2004).

22 The following are also relevant material considerations:

- The Barking & Dagenham Core Strategy and Borough-Wide Development Policies Development Plan Documents (Preferred Options stage) and the Site Specific Allocations Development Plan Document (Issues and Options stage).
- The Joint Waste Development Plan Document for East London (Preferred Options stage)

**Waste management and safeguarded wharf**

23 London Plan policy 4C.9 states that the Mayor will and borough councils should protect safeguarded wharves for cargo handling such as inter-port or trans-shipment movements and freight related purposes and the transport of waste. It also encourages appropriate temporary uses of vacant safeguarded wharves where they do not preclude the wharf being reused in the long term for cargo handling uses. Similarly, London Plan policy 4C.8 encourages new developments to increase the use of the blue ribbon network for the purposes of transporting freight and general goods particularly during demolition and construction phases.

24 London Plan waste policies are also relevant. London Plan policy 4A.21 sets a target to achieve recycling and re-use levels in construction, excavation and demolition waste of 95% by 2020, and policy 4A.22 seeks to safeguard all existing waste management sites including wharves, unless appropriate compensatory provision is made. London Plan policy 4A.23 identifies criteria for the selection of sites for waste management and disposal, namely proximity to the source of waste, the nature and scale of the proposed activity, the environmental impact on surrounding areas, the full transport impact of all movements and maximising the potential use of rail and water transport, and primarily using sites located on Preferred Industrial Locations or existing waste management locations. It also seeks to maximise the potential use of water transport for waste collection,
transfer and disposal movements. Policy 4A.28 supports the provision of new construction, excavation and demolition waste management facilities in London.

25 The site is partly located in a safeguarded wharf, also identified in the London Plan as being within the Dagenham Dock Preferred Industrial Location (PIL), a Strategic Industrial Location (SIL) in the London Plan. The proposed development represents an appropriate use in a SIL. However, it is recommended that a condition should be secured to ensure that no other materials other than construction and demolition waste and trench arisings are managed at this site, without planning approval for any other material in the future, thereby allowing for the likely impacts of the waste processes to be known to neighbouring occupiers and residents and for the processes to be verified by the Environment Agency. The Mayor has recently published a draft Business Waste Management Strategy, which also sets out some policies in relation to managing construction, demolition and excavation waste available on: http://www.london.gov.uk/gla/publications/environment/bwms-draft.pdf

26 As the initial application phase (1) is for temporary planning permission up to a period of two years it will not compromise or preclude the re-use of the safeguarded wharf for cargo handling, in line the Policy 4C.9 of the London Plan. However, should an extension be required to this approximate timeframe, planning approval should be further sought from Barking & Dagenham Council.

27 The applicant should specify the capacity of the operations in order to demonstrate that the proposed additional functions do not represent a decrease in waste management capacity as a whole on this site as the applicant’s planning statement mentions redundant ‘coating plant’ works. Whilst the current operations are described as manufacturing activities (Class B2), they involve the processing of waste materials/types which would also classify them as waste operations as they stand. The applicant should also explain where the recycled construction material will be transported and whether any residual waste will result after the treatment operations that may need to be land filled/reprocessed elsewhere.

28 Furthermore, should there be a change in the material proposed for recycling at this site from that which has been specified (construction and demolition waste and trench arisings), the applicant should secure the approval of Barking & Dagenham Council. This is essential due to the varying impacts of waste types on the factors such as health, air quality, noise etc. The Environment Agency would also need to verify any such changes.

**Flood risk management**

*From the Blue Ribbon Network point of view*

29 The application is within flood zone 3, but it is not accompanied by a Flood Risk Assessment (FRA). This is contrary to Planning Policy Statement 25 (PPS25) Development and Flood Risk. Given the nature of land uses an FRA would be relatively straightforward for this proposal.

*Safeguarded wharf*

30 The development is on part of the RMC Roadstone Safeguarded Wharf as designated in the London Plan Implementation Report: Safeguarded Wharves on the River Thames, January 2005). However, the applicant is not proposing to use water transport for these operations. This is contrary to London Plan policy 4C.9, which seeks to ensure that safeguarded wharves are utilised for waterborne freight cargo.
31 The use of a safeguarded wharf for non-river cargo uses may be permitted on a temporary basis provided that it does not preclude the wharf being restored to a waterborne freight use.

**Energy**

32 The London Plan climate change policies as set out in chapter 4A collectively require developments to make the fullest contribution to the mitigation of and adaptation to climate change and to minimise carbon dioxide emissions (policy 4A.1).

33 London Plan policies 4A.4-11 require a reduction in a development’s carbon dioxide emissions through the use of passive design, energy efficiency and renewable energy measures. The London Plan requires developments to make the fullest contribution to tackling climate change by minimising carbon dioxide emissions, adopting sustainable design and construction measures and prioritising decentralised energy, including renewables.

34 In strategic planning terms this is a relatively small-scale development for a portacabin office and recycling and trench operations. The energy requirements of the proposed development relate to the use of the office and operational activities at the site, which amount to 7.6 hectares of land/site usage.

35 Given the nature of the proposed development, it is accepted that options to incorporate the full range of passive design, energy efficiency and renewable energy measures are limited. However, as a minimum the applicant needs to assess the energy demand associated with the use of the office building and operations, and explore ways of reducing carbon dioxide emissions. Further work to this effect should be undertaken before the application is referred back to the Mayor at stage two.

**Climate Change**

36 The planning application should demonstrate how it meets the essential, and where possible, preferred standards as listed in the London Plan sustainable design and construction SPG relating to energy efficiency, water efficiency, waste, biodiversity and other issues.

37 The applicant should investigate the use of a green walling system or landscaping buffer at this site for the inherent visual, noise attenuation, biodiversity and climate change adaptation benefits. This would most likely need to be on the boundary wall of the site up which suitable climbing plants could grow. This would also present a sustainable screening and boundary treatment option at the site.

38 Opportunities for grey water recycling should be explored for washing the wheels of the heavy goods vehicles, plant equipment and for toilet flushing.

**Biodiversity**

39 The Gores Brook and Ship & Shovel Sewer Site of Borough Importance for Nature Conservation (SINC) lies to the west of this site. It is characterised by a central watercourse and associated wetland habitats that connects it directly with the River Thames. Whilst the applicant’s planning statement acknowledges that there is a breeding water vole population (a statutory protected species (Wildlife & Countryside Act Schedule 5), and UK Biodiversity Action Plan priority species). and interesting invertebrate communities at the sewer, the applicant takes the view that the proposed development would not be of detriment to this biodiversity interest, as it is only maximising the use of the existing wharf, with no greater intensity of wharf usage. Consequently, the applicant has not submitted an ecological assessment.
The GLA Biodiversity officers were consulted on this case. They are concerned that there is sufficient risk to the adjacent SINC to justify a more detailed assessment and the submission of a strategy to buffer sensitive habitats and species from the development site. London Plan policy 3D.14 states that ‘boroughs should resist development that would have a significant adverse impact on the population or conservation status of protected species or priority species identified in the UK, London and borough Biodiversity Action Plans.’ Greater London’s vole populations, especially those associated with remaining Thames Estuary wetland sites, are amongst the most important in the country.

Policy 3D.14 is clear on the expectation of boroughs to identify and protect Borough SINCs. The approach to avoid adverse impacts on the biodiversity interest of the neighbouring site has not been adequately addressed.

**Noise**

London Plan policy 4A.20 on reducing noise requires that the potential adverse noise impacts from development proposals should be minimised.

The Noise Assessment provided with the application proposes that site should meet a noise standard that is at the upper limit of what BS4142 indicates as acceptable and it allows for a higher level of noise than is often required by local authorities for industrial developments. As such, it is not a good standard. However, the predictions of noise from the site may be slightly pessimistic, since it is assumed that all the items of plant will be in operation at all times. Noise levels in practice may therefore be a little lower than calculated. Coupled with the fact that the site is already in use as an aggregates wharf, it is unlikely that major noise problems will arise at existing noise sensitive locations, although residents may well notice the new noise sources on the site and the additional lorry movements.

In future, it is expected that a major housing development (11,000 homes) will be built immediately to the west of the site at Barking Reach. As this will be much closer to the site than the existing houses, it could result in complaints about noise from the new residents, unless the housing development is specifically designed to protect residents from the noise. Complaints could lead to restrictions being imposed on the recycling operations or the need to add substantial noise mitigation measures. This should be considered if the site is likely to remain in operation when the housing development takes place.

**Air quality**

The London Plan air quality policy 4A.19 and the Mayor’s Air Quality Strategy set the framework for managing air quality within London. The applicant is advised that relevant mitigation should be put in place in light of the fact that new residential development is proposed to take place west of the site in the near future. Appropriate precautionary measures are required for the likely dust emissions that can add to health problems.

Barking and Dagenham Council designated the properties along the A13 as an air quality management area (AQMA) in 2002 as the UK national air quality standards (NAQS) for PM10 (fine particulate matter) and for nitrogen oxides were likely to exceed. The nearest AQMA to the proposed site is approximately 1 kilometre to the north of the site. To monitor compliance against the NAQS, Barking & Dagenham Council has installed monitoring for PM10 approximately 1 kilometre to the north of the site (Scrattons Farm Social Club on Morrison Road), and the results show that there are up to 20 daily exceedences of the NAQS PM10 level every year.
47 In order to reduce the likely occurrences of dust emissions from the site it is recommended that the Council condition the applicant to ensure that the mitigation proposed is undertaken. The stockpiles at the site should not exceed ten metres in height as suggested in the applicant’s air quality strategy. The site should be watered/hosed to prevent dust particles from being blown away. Contingency measures should be demonstrated should the dust suppression facility break down. This will be particularly important in dry and windy weather conditions. Air quality monitoring and a management plan for this should also be provided to the Council.

48 The loading and unloading of material will take place in an enclosed/dust-suppressed system and the vehicles will be sheeted.

49 It is also anticipated that approximately 50 heavy goods vehicles (HGV) operation movements will take place each day along with the heavy machinery and tippers. In total it is expected that these additional operations will lead to 200 extra lorry movements at this site per annum. The effect of these movements has not been considered in the applicant’s air quality assessment. However, the site is located within the London Low Emissions Zone (LEZ), which requires all vehicles to meet the Euro III lorry emissions standard for particulate matter. Vehicles entering the site should therefore be conditioned to meet the LEZ emissions standards.

London Development Agency

50 The Agency supports the principle of the proposal within the Phase 2 site, and the temporary use of the Phase 1 site for the proposed operations, provided the council ensures that adequate mechanisms are in place for the temporary use of Phase 1, through a planning condition and/or s106 Agreement.

Transport for London

51 Although the site records a low public transport accessibility level, the current level of car parking proposed for the site, at over one space per employee, appears to be excessive, and justification for this level of provision is therefore required before it can be considered acceptable, and in accordance with the London Plan policy 3C.23 (parking strategy). The development should also make provision for secure cycle parking spaces on site. These should provided in accordance with TfL’s cycle parking guidance and the London Plan policy 3C.22 (improving conditions for cycling).

52 In accordance with the London Plan policy 3C.25 (freight strategy) TfL recommends that a delivery and servicing plan be produced, to help limit heavy goods vehicles movements to and from the site to outside of the peak periods. Consolidation of loads is also encouraged where feasible. As part of the delivery and servicing plan, TfL would welcome a commitment from the applicant that firms working on regular contracts would need to be registered with TfL’s Freight Operator Recognition Scheme. This would help to improve safety and reduce environmental impacts through driver training and high standards of maintenance and load security. Alongside this, and as stated by the Port of London Authority, the site is situated at a safeguarded wharf, and therefore any future water freight operations should not be hindered by this development. Given its location, TfL also recommend that consideration is given to the transportation of materials by River, as this would help to keep the number of vehicle trips to the site to a minimum.

53 Adequate facilities need to be provided in order to safely accommodate vehicles manoeuvring around the site, and rigid and articulated heavy goods vehicles should be able to access and egress the site safely at all times. The applicant’s TA makes reference to the provision of back loading, and this is welcomed as it will help to improve the efficiency of trips both to and from the site, thus reducing the number of vehicle movements needed. Reference is also made to
10% of trips being made by articulated heavy goods vehicles, and TfL questions whether this number could be increased in order to further reduce the overall number of trips needed to service the site.

54 In conclusion, while TfL is satisfied that the proposed development is unlikely to have a negative impact on the strategic highway network, additional information, as detailed above, is required in order for TfL to be satisfied that the application fully complies with the London Plan policies 3C.22, 3C.23 and 3C.25.

Local planning authority’s position

55 As yet unknown.

Legal considerations

56 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor’s statement and comments.

Financial considerations

57 There are no financial considerations at this stage.

Conclusion

58 London Plan policies on waste, safeguarded wharfs, strategic industrial locations, contaminated land, energy, climate change, air quality, noise, and transport are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- **Waste**: use of the application site for waste recycling, trench operations and ancillary office use complies with London Plan policies 4A.21, 4A.22, 4A.23 and 4A.28.

- **Safeguarded wharves**: use of the safeguarded wharf for construction and demolition waste recycling and trench arisings operations are acceptable on the basis that these operations will shift after two years to phase 2 of the site. The initial operation on phase (1) is for temporary planning permission up to a period of two years and therefore does not compromise the re-use of the safeguarded wharf for cargo handling, in line the Policy 4C.9 of the London Plan. In addition, the application does not comply with Policy 4C.9 as it does not utilise waterborne freight cargo.

- **Energy**: the applicant has not given consideration to energy demand or explored ways of reducing the operational and development’s carbon dioxide emissions. As such the application does not currently comply with London Plan policies 4A.1, 4A.3 and 4A.4-11.
• **Biodiversity**: The applicant’s planning statement acknowledges that there is a breeding water vole population and interesting invertebrate communities at the sewer however no ecological assessment has been submitted.

• **Noise**: In light of the fact that major housing development of 11,000 homes will be built immediately to the west of the site at Barking Reach, further robust mitigation measures should be presented at stage 2.

• **Air quality**: The applicant should confirm the stockpile heights/levels and their likely visual and air quality impacts.

• **Transport**: Wharves can allow for sustainable transportation of London’s waste though modes other than road, and this has not been considered by the applicant amongst other transport issues raised in the report.

59 On balance, the application does not comply with the London Plan.

60 The following changes might, however, remedy the above-mentioned deficiencies, and could possibly lead to the application becoming compliant with the London Plan:

• **Waste**: The applicant should confirm that the throughput capacity of waste materials to be processed at this site is not reduced as specified in paragraph 28 of the report.

• **Safeguarded wharves**: Should an extension be required to the approximate timeframe of two years for the operations to take place at phase 1 (on the safe guarded wharf), further planning approval should be sought from Barking & Dagenham Council and the Mayor. The applicant should demonstrate that the feasibility of transportation of materials by River has been considered.

• **Energy**: The applicant should assess energy demand associated with the office and site operations and should explore ways of reducing the site’s carbon dioxide emissions. London Plan policies 4A.1, 4A.3 and 4A.4-11 should be considered in the applicant’s resubmission at stage 2.

• **Biodiversity**: The applicant should demonstrate that the proposed development and operations at the site would not be of detriment to the biodiversity interest of the neighbouring site. The applicant should submit an ecological assessment as requested in paragraph 40 of the report and to comply with London Plan policy 3D.14.

• **Noise**: Policy 4A.20 of the London Plan is applicable to this case. Demonstration of noise mitigation will be required. Sensitive design and operation measures should be presented in more detail in light of the fact that major housing development (11,000 homes) will be built immediately to the west of the site at Barking Reach in the near future.

• **Air Quality**: Air quality monitoring of the operations at the site and a management plan for this should also be provided to the Council to demonstrate that the mitigation measures proposed, and those conditioned are effective and sufficient in reducing dust emissions that can affect public health.

• **Transport**: The application should consider water transport as a means of transporting waste material to and from the site to comply with London Plan policy 3C.25. The development should also make provision for secure cycle parking spaces on site and these
should be provided in accordance with TfL’s cycle parking guidance and the London Plan policy 3C.22 (improving conditions for cycling).

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