

THE LONDON BOROUGH OF BARKING AND DAGENHAM
(VICARAGE FIELD AND SURROUNDING LAND)
COMPULSORY PURCHASE ORDER 2021 PUBLIC INQUIRY
INQUIRY DOCUMENTS LIST

Procedural and General Documents	
PG1	Pre-Inquiry Meeting Agenda
PG2	Authorising Authority's Notice in writing
PG3	Notes of the Pre-Inquiry Meeting
PG4	Schedule of Objections, 19 April 2022

Documents Submitted During the Inquiry	
INQ1	Opening Statement on behalf of the Acquiring Authority, 20 April 2022
INQ2	Slide Presentation, 20 April 2022
INQ3	Vicarage Field Business Relocation Strategy. Submitted 20 April 2022.
INQ4	London Borough of Barking and Dagenham (Vicarage Field and surrounding land) Compulsory Purchase Order 2021 (the "Order" and "Order Schedule") Word version of the CPO with modifications. Submitted 21 April 2022.
INQ5	Plans Pack (CDH.1) Corrected version submitted 21 April 2022
INQ6	Site Visit Itinerary. Submitted 21 April 2022.
INQ7	Opening Statement on behalf of NHS Property Services, 22 April 2022
INQ8	Note on s.106 Agreement provisions re Private for Sale Marketing Strategy purpose built private sector rental units. Submitted 22 April 2022.
INQ9	Plans and Drawings Errata, submitted 25 April 2022
INQ10	Shepherds Bush Market CPO and Court of Appeal Judgment, submitted 25 April 2022 on behalf of 24-34 Station Parade
INQ11	Petition submitted 25 April 2022, on behalf of Barking and Dagenham Heritage Conservation Group
INQ12	The Acquiring Authority's response note to Mrs Marwaha's evidence in relation to 13-15 Ripple Road, submitted 26 April 2022
INQ13	Mr Davies's response to part of the evidence of Mr Dimbylow in relation to 13-15 Ripple Road, submitted 26 April 2022
INQ14.1	Collaboration Agreement between the freeholders of 24-34 Station Parade, submitted 27 April 2022
INQ14.2	Funding Letters / Bank Letters of Intent, submitted 27 April 2022
INQ14.3	Evidence that LBBD are still using Barking Hotel for emergency temporary accommodation, submitted 27 April 2022
INQ14.4a	Ms Squires' Summary Meeting Notes, 8 February 2022 in Barking Hotel
INQ14.4b	Barking Hotel Layout, supplied to Ms Squires at the meeting on 8 February 2022 in Barking Hotel, submitted 27 April 2022
INQ14.4c	Last 10 years finance, supplied to Ms Squires at the meeting on 8 February 2022 in Barking Hotel, submitted 27 April 2022
INQ14.5	Signed paper petitions in support of Mr Ali's case against the CPO, submitted 27 April 2022
INQ14.6	List of all local restaurants, food-chains and cafes as well as coffee shops within a 5-minute walking distance from Barking Station, submitted 27 April 2022
INQ15	Opening Statement on behalf of the Property Owners of 24-34 Station Parade (Plots 2-10), 29 April 2022
INQ16	Withdrawal of objection on behalf of Capite (Focal) Limited, in respect of their freehold interest at Focal House, 12-18 Station Parade, Barking, 29 April 2022

INQ17	Acquiring Authority's Response to Objectors not Appearing, submitted 29 April 2022
INQ18	Email exchange regarding Barking Hotel submitted 5 May 2022
INQ19	Delivery and Servicing Plan, August 2016 (part of the Transport Assessment for the outline planning application) submitted 5 May 2022
INQ20	Statement of Truth and Declaration of Adam Pyrke, submitted 6 May 2022
INQ21	Statement of Truth and Declaration of Ian Dimbylow, submitted 6 May 2022
INQ22	Email of support for the scheme by Ryan Reynolds, local resident, submitted 9 May 2022
INQ23	Email response by Mr Sohata to Avison Young, submitted 10 May 2022
INQ24	Withdrawal of objection by Network Rail Infrastructure Limited, 11 May 2022
INQ25	Memorandum of Agreement – 13-15 Ripple Road, submitted 23 May 2022
INQ26	Comparables – Former Health Centre, submitted 24 May 2022
INQ27	Letter dated 6 May 2022 from Alison Acquires, Avison Young to Paul Burley, regarding the Former Health Centre, submitted 24 May 2022
INQ28	Email objecting to the scheme by Joan Rawlinson, submitted 25 May 2022
INQ29	Statement of Case – Valuation / 'Comparables' on behalf of NHS Property Services, submitted 27 May 2022

Statements of Case	
See CDA.9	Statement of Case of the Acquiring Authority
SOC/1	Statement of Case on behalf of Network Rail Infrastructure Limited
SOC/2	Statement of Case on behalf of NHS Property Services
SOC/3	Statement of Case of Waheed Mohammed
SOC/4	Statement of Case of Khadija Syeda, 3T Travel & Tourism LTD
SOC/5	Statement of Case of Nadia Syeda, Barking Traders
SOC/6	Statement of Case of Hamid Riaz Pachanari, HMD Unisex Hair and Beauty
SOC/7	Statement of Case on behalf of The Barking and Dagenham Heritage Group
SOC/8	Statement of Case on behalf of Samriti Marwaha, 13-15 Ripple Road

London Borough of Barking and Dagenham	
<i>Alison Squires, Negotiations to Acquire Third Party Interests</i>	
AA/AS/1	Proof of Evidence of Alison Squires, Negotiations to Acquire Third Party Interests
AA/AS/2a	Appendix 1: Summary Schedule of Leasehold interests within Shopping Centre
AA/AS/2b	Appendix 2: Summary Negotiations Schedule Re Objectors attending inquiry
AA/AS/2c	Appendix 3: Contact details on Vicarage Field Website
AA/AS/2d	Appendix 4: Negotiation letter registered interests January 2018
AA/AS/2e	Appendix 5: LBBN Negotiation Letter Acquisitions June 2021
AA/AS/2f	Appendix 6: AY Objection acknowledgment Acquisitions
AA/AS/2g	Appendix 7: GCW Offer letters
AA/AS/2h	Appendix 8: AY Negotiation letter property acquisitions
AA/AS/2i	Appendix 9: LBBN Negotiation Letter Crane Oversailing June 2021
AA/AS/2j	Appendix 10: AY Objection Acknowledgment Letter non-acquisition October 2021
AA/AS/2k	Appendix 11: Be First Negotiation Letter Crane Oversailing concerns January 2022
AA/AS/2l	Appendix 12: Be First Negotiation Letter Servicing concerns January 2022

AA/AS/2m	Appendix 13: Be First Negotiation Letter Rights to Light January 2022
AA/AS/3	Summary Proof of Evidence of Alison Squires, Negotiations to Acquire Third Party Interests
Response to Mr Ali Asghar Kadkhodayi- Kholghi, Mrs Parisa Jahanpanah, Hungerburger Limited and the Personal Representatives of Paula Mary Baker (Deceased) - 24-34 Station Parade	
AA/AS/4	Response to objection of Mr Ali Asghar Kadkhodayi- Kholghi, Mrs Parisa Jahanpanah, Hungerburger Limited and the Personal Representatives of Paula Mary Baker (Deceased) - 24-34 Station Parade
AA/AS/4	Appendices to Response to objection of Mr Ali Asghar Kadkhodayi- Kholghi, Mrs Parisa Jahanpanah, Hungerburger Limited and the Personal Representatives of Paula Mary Baker (Deceased) - 24-34 Station Parade
AA/AS/5	Summary to Response to objection of Mr Ali Asghar Kadkhodayi- Kholghi, Mrs Parisa Jahanpanah, Hungerburger Limited and the Personal Representatives of Paula Mary Baker (Deceased) - 24-34 Station Parade
AA/AS/13	Rebuttal Proof of Evidence to evidence of Mr Ali
AA/AS/14	Appendices to Rebuttal Proof of Evidence to evidence of Mr Ali
Response to Mr Sahota and Mrs Kanda 17, 17a, 17b, 19, 19a and 19b Ripple Road	
AA/AS/6	Response to objection of Mr Sahota and Mrs Kanda 17, 17a, 17b, 19, 19a and 19b Ripple Road
AA/AS/6	Appendices to Response to objection of Mr Sahota and Mrs Kanda 17, 17a, 17b, 19, 19a and 19b Ripple Road
AA/AS/7	Summary Response to objection of Mr Sahota and Mrs Kanda 17, 17a, 17b, 19, 19a and 19b Ripple Road
AA/AS/11	Rebuttal Proof of Evidence to evidence of Mr Sahota
AA/AS/12	Appendices to Rebuttal Proof of Evidence to evidence of Mr Sahota
Response to NHS Property Services, Vicarage Fields Health Clinic	
AA/AS/8	Rebuttal Proof of Evidence to evidence of Paul Burley
AA/AS/9	Appendices to Rebuttal Proof of Evidence to evidence of Paul Burley
AA/AS/10	Summary to Rebuttal Proof of Evidence to evidence of Paul Burley

David West, Design	
AA/DW/1	Proof of Evidence of David West, Design
AA/DW/3	Summary Proof of Evidence of David West, Design
Response to Mr Ali Asghar Kadkhodayi- Kholghi, Mrs Parisa Jahanpanah, Hungerburger Limited and the Personal Representatives of Paula Mary Baker (Deceased) - 24-34 Station Parade	
AA/DW/4	Response to objection of Mr Ali Asghar Kadkhodayi- Kholghi, Mrs Parisa Jahanpanah, Hungerburger Limited and the Personal Representatives of Paula Mary Baker (Deceased) - 24-34 Station Parade
AA/DW/5	Appendices to Response to objection of Mr Ali Asghar Kadkhodayi- Kholghi, Mrs Parisa Jahanpanah, Hungerburger Limited and the Personal Representatives of Paula Mary Baker (Deceased) - 24-34 Station Parade
AA/DW/13	Rebuttal Proof of Evidence to Professor Ian Ritchie
Response to NHS Property Services, Vicarage Fields Health Clinic	
AA/DW/7	Response to Objection from NHS Property Services, Vicarage Fields Health Clinic
AA/DW/8	Appendices to Response to Objection from NHS Property Services, Vicarage Fields Health Clinic
AA/DW/14	Rebuttal Proof of Evidence to evidence of Professor Ian Ritchie
Response to Mr Sahota and Mrs Kanda 17, 17a, 17b, 19, 19a and 19b Ripple Road	
AA/DW/10	Response to objection of Mr Sahota and Mrs Kanda 17, 17a, 17b, 19, 19a and 19b Ripple Road

AA/DW/11	Appendices to Response to objection of Mr Sahota and Mrs Kanda 17, 17a, 17b, 19, 19a and 19b Ripple Road
David Harley, Council/BE Perspective	
AA/DH/1	Proof of Evidence of David Harley, Council/BE Perspective
AA/DH/2	Summary Proof of Evidence of David Harley, Council/BE Perspective
Response to NHS Property Services, Vicarage Fields Health Clinic	
AA/DH/3	Response to Objection from NHS Property Services, Vicarage Fields Health Clinic
AA/DH/8	Rebuttal Proof of Evidence to evidence of Paul Burley
Response to Mr Ali Asghar Kadkhodayi- Kholghi, Mrs Parisa Jahanpanah, Hungerburger Limited and the Personal Representatives of Paula Mary Baker (Deceased) - 24-34 Station Parade	
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AA/DH/7	Rebuttal Proof of Evidence to evidence of Professor Ian Ritchie
Duncan Kite, Market Demand and Negotiations	
AA/DK/1	Proof of Evidence of Duncan Kite, Market Demand and Negotiations
AA/DK/2	Appendices to Proof of Evidence of Duncan Kite, Market Demand and Negotiations
AA/DK/3	Summary Proof of Evidence of Duncan Kite, Market Demand and Negotiations
Response to 13-15 Ripple Road	
AA/DK/4	Rebuttal Proof of Evidence to evidence of Samriti Marwaha
Response to NHS Property Services, Vicarage Fields Health Clinic	
AA/DK/5	Rebuttal Proof of Evidence to evidence of Professor Ian Ritchie

Don Messenger, Development and Regeneration	
AA/DM/1	Proof of Evidence of Don Messenger, Planning
AA/DM/2	Appendices to Proof of Evidence of Don Messenger, Planning
AA/DM/3	Summary Proof of Evidence of Don Messenger, Planning
Response to Mr Ali Asghar Kadkhodayi- Kholghi, Mrs Parisa Jahanpanah, Hungerburger Limited and the Personal Representatives of Paula Mary Baker (Deceased) - 24-34 Station Parade	
AA/DM/4	Response to objection of Mr Ali Asghar Kadkhodayi- Kholghi, Mrs Parisa Jahanpanah, Hungerburger Limited and the Personal Representatives of Paula Mary Baker (Deceased) - 24-34 Station Parade
Response to Mr Sahota and Mrs Kanda 17, 17a, 17b, 19, 19a and 19b Ripple Road	
AA/DM/6	Response to objection of Mr Sahota and Mrs Kanda 17, 17a, 17b, 19, 19a and 19b Ripple Road
Response to NHS Property Services, Vicarage Fields Health Clinic	
AA/DM/8	Response to objection from NHS Property Services, Vicarage Fields Health Clinic
AA/DM/10	Rebuttal Proof of Evidence to evidence of NHS Property Services, Vicarage Fields Health Clinic

Stuart Davies, Transport	
AA/SD/1	Proof of Evidence of Stuart Davies, Transport
AA/SD/2	Appendices to Proof of Evidence of Stuart Davies, Transport
AA/SD/3	Summary Proof of Evidence of Stuart Davies, Transport

Response to NHS Property Services, Vicarage Fields Health Clinic	
AA/SD/4	Response to objection from NHS Property Services, Vicarage Fields Health Clinic
AA/SD/5	Appendices to Response to objection from NHS Property Services, Vicarage Fields Health Clinic
AA/SD/6	Summary to Response to objection from NHS Property Services, Vicarage Fields Health Clinic
AA/SD/7	Rebuttal Proof of Evidence to evidence of Professor Ian Ritchie
AA/SD/8	Appendices to Rebuttal Proof of Evidence to evidence of Professor Ian Ritchie

Peter Cornforth, Commercial	
AA/PC/1	Proof of Evidence of Peter Cornforth, Commercial
AA/PC/2	Appendices to Proof of Evidence of Peter Cornforth, Commercial
AA/PC/3	Summary Proof of Evidence of Peter Cornforth, Commercial
Response to NHS Property Services, Vicarage Fields Health Clinic	
AA/PC/4	Response to objection from NHS Property Services, Vicarage Fields Health Clinic
AA/PC/5	Summary to Response to objection from NHS Property Services, Vicarage Fields Health Clinic
AA/PC/12	Rebuttal Proof of Evidence to evidence of Paul Burley
AA/PC/13	Appendices to Rebuttal Proof of Evidence to evidence of Paul Burley
Response to Mr Ali Asghar Kadkhodayi- Kholghi, Mrs Parisa Jahanpanah, Hungerburger Limited and the Personal Representatives of Paula Mary Baker (Deceased) - 24-34 Station Parade	
AA/PC/6	Response to objection of Mr Ali Asghar Kadkhodayi- Kholghi, Mrs Parisa Jahanpanah, Hungerburger Limited and the Personal Representatives of Paula Mary Baker (Deceased) - 24-34 Station Parade
AA/PC/7	Appendices to Response to objection of Mr Ali Asghar Kadkhodayi- Kholghi, Mrs Parisa Jahanpanah, Hungerburger Limited and the Personal Representatives of Paula Mary Baker (Deceased) - 24-34 Station Parade
AA/PC/8	Summary to Response to objection of Mr Ali Asghar Kadkhodayi- Kholghi, Mrs Parisa Jahanpanah, Hungerburger Limited and the Personal Representatives of Paula Mary Baker (Deceased) - 24-34 Station Parade
AA/PC/14	Rebuttal Proof of Evidence to evidence of Paul Burley
Response to (1) Ambareen Estates; (2) Ambareen; (3) Thomas Pharmacy	
AA/PC/9	Response to objection from (1) Ambareen Estates; (2) Ambareen; (3) Thomas Pharmacy
AA/PC/10	Appendices to Response to objection from (1) Ambareen Estates; (2) Ambareen; (3) Thomas Pharmacy
AA/PC/11	Summary to Appendices to Response to objection from (1) Ambareen Estates; (2) Ambareen; (3) Thomas Pharmacy
AA/PC/15	Rebuttal Proof of Evidence to evidence of Mr Amerdeep Sahota
Response to 13-15 Ripple Road	
AA/PC/16	Rebuttal Proof of Evidence to evidence of Samriti Marwaha
AA/PC/17	Appendices to Rebuttal Proof of Evidence to evidence of Samriti Marwaha

Responses by all Witnesses to Unrepresented Objectors	
AA/ALL/1	Proof of Evidence in response to objection of Mr Muzaffar Ali Shah, 32 Station Parade
AA/ALL/2	Appendices to Proof of Evidence in response to objection of Mr Muzaffar Ali Shah, 32 Station Parade

AA/ALL/3	Proof of Evidence in response to objection of Hamid Riazi Pachenari, 34, 34A and 34B Station Parade
AA/ALL/4	Appendices to Proof of Evidence in response to objection of Hamid Riazi, 34, 34A and 34B Station Parade
AA/ALL/5	Proof of Evidence in response to objection of Paul Scott, Barking and Dagenham Heritage Conservation Group
AA/ALL/6	Proof of Evidence in response to objection of Alireza Hamidein
AA/ALL/7	Proof of Evidence in response to objection of Wahed Mohammed 32 Station Parade
AA/ALL/8	Appendices to Proof of Evidence in response to objection of Wahed Mohammed 32 Station Parade
AA/ALL/9	Proof of Evidence in response to objection of Mr Zahoor Ahmad (Al-Madina Hajj and Umrah Services)
AA/ALL/10	Proof of Evidence in response to objection of Thi Le Thu Bui trading as 'Rose nails' 26 Station Parade
AA/ALL/11	Appendices to Proof of Evidence in response to objection of Thi Le Thu Bui trading as 'Rose nails' 26 Station Parade
AA/ALL/12	Proof of Evidence in response to objection of Mohammed Mazumder and Kamruzzaman shakil (Radial House)
AA/ALL/13	Appendices to Proof of Evidence in response to objection of Mohammed Mazumder and Kamruzzaman shakil (Radial House)
AA/ALL/14	Proof of Evidence in response to objection of Safi Husaini (13-15 Ripple Road)

NHS Property Services	
NHSPS/PB/1	Proof of Evidence of Paul Burley, Town Planning
NHSPS/PB/2	Summary of Proof of Evidence of Paul Burley, Town Planning
NHSPS/IR/1	Proof of Evidence of Professor Ian Ritchie, Architecture and Urban Design
NHSPS/IF/1	Proof of Evidence of Ignus Froneman, Heritage
NHSPS/IF/2	Appendices to Proof of Evidence of Ignus Froneman, Heritage
Appendices	
NHSPS-1a	Titles EGL241840 and EGL100871 – Title Plan
NHSPS-1b	Titles EGL241840 and EGL100871 – Title Register
NHSPS-1c	Titles EGL241840 and EGL100871 – Official Copy (Title Plan)
NHSPS-1d	Titles EGL241840 and EGL100871 – Official Copy (Register)
NHSPS-2	NHS Estate code – Health Building Note 00-08 (Part B)
NHSPS-3	Floorplan of the Health Centre
NHSPS-4a	Abbey and Barking Town Centre Conservation Area Appraisal - Introduction
NHSPS-4b	Abbey and Barking Town Centre Conservation Area Appraisal (pages 25-48)
NHSPS-4c	Abbey and Barking Town Centre Conservation Area Appraisal (pages 49-61)
NHSPS-4d	Abbey and Barking Town Centre Conservation Area Appraisal (pages 62-76)
NHSPS-4e	Abbey and Barking Town Centre Conservation Area Appraisal – (Appendices)
NHSPS-5	NHS PS Correspondence Bundle
NHSPS-6	Overlay of Order Scheme on NHS PS site
NHSPS-7	Planning Statement for 19/01450/REM
NHSPS-8	BeFirst Housing Evidence Topic Paper, September 2021
NHSPS-9	LBBD Cabinet Report 22 March 2022

NHSPS-10	Note prepared by Howard Williams MRICS
NHSPS-11	GLA Report for Vicarage Field Shopping Centre, 17 October 2016
Network Rail Infrastructure Limited (Objection withdrawn)	
NRIL/1	Statement of Evidence on behalf of Network Rail Infrastructure Limited

24-34 Station Parade (Plots 2-10)	
AAKK/PB/1	Proof of Evidence of Paul Burley, Town Planning
AAKK/PB/2	Summary of Proof of Evidence of Paul Burley, Town Planning
AAKK/IR/1	Proof of Evidence of Professor Ian Ritchie, Architecture and Urban Design
AAKK/BB/1	Proof of Evidence / Expert Report of Bruce Brunson, Deliverability
AAKK/1	Personal Statement of Mr Ali Asghar Kadkhodayi-Kholghi (Owner of the Barking Hotel)
Appendices	
AAKK-1	Titles Entries for Plots 2-10
AAKK-2	Correspondence Bundle
AAKK-3	Planning Statement for Reserved Matters Application
AAKK-4	Overlay drawing
AAKK-5	LPA's pre-application response dated 20 December 2018
AAKK-6	Pre-application scheme
AAKK-7	LBBD Cabinet Report 22 March 2022
AAKK-8	Lindhill Presentation
AAKK-9	Objection to CPO 14 July 2021
AAKK-10	Letters Regarding Temporary Accommodation
AAKK-11	Letter from Ilford Building Supplies
AAKK-12	GLA Report 17 October 2016

30-32 Station Parade	
PMBD/1	Letter from the Personal Representative of Paula Mary Baker (deceased), 19 April 2022

34 Station Parade	
POK/1	Proof of Evidence of Alireza Hamidein, Port of Knowledge

38-38 Station Road	
ZA/1	Submission by Zahoor Ahmed

38-38 Station Road	
DAB/1	Proof of Evidence of Siraj Deane, Deane and Brothers Ltd

17 and 19 Ripple Road and 19a and 19b Ripple Road	
ASTP/1	Proof of Evidence of Mr Sahota and Ms Kanda
ASTP/1a	Appendix 1 – Staff Testimonials
ASTP/1b	Appendix 2a – Letter of Support, Andrew Kerr, Metro
ASTP/1c	Appendix 2b – Activity Data, Metro
ASTP/1d	Appendix 3a - Barking & Dagenham Participation Opportunity and Wellbeing C-Card report: Q3 October –December 2021
ASTP/1e	Appendix 3b - Barking & Dagenham Participation Opportunity and Wellbeing C-Card report: Q4 Jan-March 2021
ASTP/1f	Appendix 4 – Testimonial

ASTP/1g	Appendix 5 – Letter from North-East London Local Pharmaceutical Committee
ASTP/1h	Appendix 6 – Testimonial
ASTP/1i	Appendix 7 – Press Article
ASTP/1j	Appendix 8 – Time-Line of Events/Negotiations
ASTP/1k	Appendix 9 –Correspondence

13-15 Ripple Road	
SM/1	Proof of Evidence of Ian Dimbylow, Transport (withdrawn)
SM/2	Proof of Evidence of Adam Pyrke, Planning
SM/3	Statement of Samriti Marwaha

38-38 Station Road	
PCL/1	Written Representation by Jelena Oblikova, Post Centre Ltd

41 Vicarage Field	
MM/1	Written Representation by Mr Manikandan

Barking and Dagenham Heritage Conservation Group	
BDHCG/1	Response to the Response by the Acquiring Authority by Barking and Dagenham Heritage Conservation Group
BDHCG/2	Submission on the Right to Light by Barking and Dagenham Heritage Conservation Group