

To:           David Andrews (Chairman)                   Graham McAndrew  
              Chris Kennedy (Vice Chairman)       Valerie Metcalfe  
              John Bevan                               Gordon Nicholson  
              David Gardner                         Paul Osborn  
              Denise Jones                         Mary Sartin  
              Heather Johnson

A meeting of the **REGENERATION AND PLANNING COMMITTEE** (Quorum – 3)  
will be held by remote access on:

**THURSDAY, 21 JANUARY 2021 AT 12.00noon**

at which the following business will be transacted:

## **AGENDA**

### **Part I**

1       To receive apologies for absence.

2       **DECLARATION OF INTERESTS**

Members are asked to consider whether or not they have disclosable pecuniary, other pecuniary or non-pecuniary interests in any item on this Agenda. Other pecuniary and non-pecuniary interests are a matter of judgement for each Member. (Declarations may also be made during the meeting if necessary.)

3       **MINUTES OF LAST MEETING**

To approve the Minutes of the Meeting held on 3 December 2020 (copy herewith).

4       **PUBLIC SPEAKING**

To receive any representations from members of the public or representative of an organisation on an issue which is on the agenda of the meeting. Subject to the Chairman's discretion a total of 20 minutes will be allowed for public speaking and the presentation of petitions at each meeting.

5       **PLANNING CONSULTATION BY EAST HERTS  
DISTRICT COUNCIL – RYE HOUSE SPEEDWAY  
TRACK, RYE ROAD, HODDESDON, WARE,  
HERTFORDSHIRE, EN11 0EH**  
Respective Planning for the Removal of  
Speedway Track and the Formation of  
Grassed Football Pitches

Paper RP/50/21

**Presented by the Head of Planning**

- 6      **PLANNING CONSULTATION BY EPPING FOREST DISTRICT COUNCIL – OAK TREE FARM, PAYNES LANE, NAZEING, EN9 2EY**      Paper RP/48/21  
Application for Planning Permission for the Siting of 5 No. Chalet Lodges (Caravans) for Holiday Accommodation Purposes (Revised Application Epf/2983/19)

**Presented by the Head of Planning**

- 7      **PLANNING CONSULTATION BY EPPING FOREST DISTRICT COUNCIL – THE OLD WATERWORKS, GREEN LANE, NAZEING, EN10 6RS**      Paper RP/49/21  
Planning Application for Use of Employment Land as a Construction Contractors' Compound with Associated Storage, and Parking Including Ancillary Office, and Welfare Accommodation and Single and Double Stacked Containers

**Presented by the Head of Planning**

- 8      **PLANNING CONSULTATION BY LONDON BOROUGH OF HARINGEY NEW LOCAL PLAN FIRST STEPS ENGAGEMENT CONSULTATION (REGULATION 18)**      Paper RP/47/21

**Presented by the Head of Planning**

- 9      Such other business as in the opinion of the Chairman of the meeting is of sufficient urgency by reason of special circumstances to warrant consideration.
- 10     Consider passing a resolution based on the principles of Section 100A(4) of the Local Government Act 1972, excluding the public and press from the meeting for the items of business listed on Part II of the Agenda, on the grounds that they involve the likely disclosure of exempt information as defined in those sections of Part I of Schedule 12A of the Act specified beneath each item.

**AGENDA  
Part II  
(Exempt Items)**

11.    Such other business as in the opinion of the Chairman of the meeting is of sufficient urgency by reason of special circumstances to warrant consideration.

13 January 2021

Shaun Dawson  
Chief Executive

**LEE VALLEY REGIONAL PARK AUTHORITY**

**REGENERATION & PLANNING COMMITTEE MINUTES  
3 DECEMBER 2020**

Members Present: David Andrews (Chairman) Heather Johnson  
Chris Kennedy (Vice Chairman) Graham McAndrew  
John Bevan Gordon Nicholson  
David Gardner Paul Osborn  
Denise Jones Mary Sartin

Apologies Received From: Valerie Metcalfe

Officers Present: Claire Martin - Head of Planning  
Beryl Foster - Deputy Chief Executive  
Jon Carney - Corporate Director  
Dan Buck - Corporate Director  
Lindsey Johnson - Committee Services Officer

**Part I**

**106 DECLARATIONS OF INTEREST**

Name	Agenda Item No.	Nature of Interest	Prejudicial
Mary Sartin	6	Member for Epping Forest District Council and sits on the Area Planning Sub Committee West	Non-Pecuniary – will not partake in discussion or voting ✓

**107 MINUTES OF LAST MEETING**

**THAT the Minutes of the Regeneration & Planning Committee meeting held on 19 November 2020 be approved and signed.**

**108 PUBLIC SPEAKING**

No requests from the public to speak or present petitions had been received for this meeting.

**109 LONDON BOROUGH OF WALTHAM FOREST LOCAL PLAN SHAPING THE BOROUGH: PART 1 STRATEGIC POLICIES PROPOSED SUBMISSION VERSION (REGULATION 19 CONSULTATION) AND PART 2 SITE ALLOCATION (REGULATION 18 CONSULTATION)** Paper RP/45/20

The report was introduced by the Head of Planning who informed Members that the letter at Appendix A to Paper RP/45/20 welcomes the addition of Policy 84 Lee Valley Regional Park and the support it provides for the PDF. It also reinforces our previous arguments to the London Borough of Waltham Forest regarding a lack of policy support and recognition for the Park's special mix of sport, leisure and culture within their South Waltham Forest strategic location and growth areas in the Local Plan part 1 strategic policies. A leisure based site allocation is sought within the Part 2 document for the Ice Centre and the

## **REGENERATION & PLANNING COMMITTEE MINUTES 3 DECEMBER 2020**

Waterworks Centre and car park and the Council is asked to re-examine their designation as Metropolitan Open Land (MOL).

Members discussed the report and made the following comments:

- The wording of 380,000 residents on page 13 should be amended.
  - Deletions in respect of Policy 84 B and Policy 81 D were raised. It was also questioned whether in Policy 81 D the wording should be 'seek' or 'must'. The Head of Planning responded that this was because Policy 84 B was repeated in Policy 84 D. The Head of Planning would look into what the correct wording should be in Policy 81 D.
  - A Member questioned why we would wish to remove MOL designation from our land when one of our remits is to protect nature and open spaces, especially when the Ice Centre planning application has proved that we can get planning permission on MOL land when it is appropriate. The Chairman of the Authority responded that having the land re-designated was about correcting the reality of what the land is actually used for, especially the Waterworks site which is a building and a car park. It is also much more difficult to make planning applications on MOL land. The Head of Planning added that the Ice Centre needed to be looked at in context with the surrounding area which is heavily developed, this is also the point in the planning process to ask London Borough of Waltham Forest to look at its designation. Members agreed to a compromise that the letter would request only the Waterworks site have its MOL designation removed.
  - The Chairman of the Regeneration & Planning Committee stated that he considered this a good opportunity for him to send a letter to the Cabinet Member at London Borough of Waltham Forest to add to what is being said at an officer level in the letter attached as Appendix A to Paper RP/45/20.
  - A Member advised that the last paragraph on page 16 should not be written in italics and also in that paragraph 'cantre' should be changed to 'centre'. On page 17 the last line the word 'to' should be removed after 'working'. The Head of Planning advised that she would make these changes along with revising the spelling of Stuart to Stewart in the salutation on page 13.
- (1) **the comments as set out in Appendix A to Paper RP/45/20 as the Authority's formal response to the consultation by the London Borough of Waltham Forest on Part 1 and Part 2 the draft Local Plan 2020 – 2035 with the following amendments:**
- (a) **only the Waterworks site be requested as having its Metropolitan Open Land designation removed;**
  - (b) **the typing mistakes identified on pages 13, 16 and 17 be rectified; and**
- (2) **the Chairman of the Regeneration & Planning Committee to write to the Cabinet Member for Planning at London Borough of Waltham Forest regarding the comments set out in Appendix A to Paper RP/45/20 was approved.**

110 PLANNING CONSULTATION BY EPPING FOREST DISTRICT  
COUNCIL  
VALLEY GROWN NURSERIES, PAYNES LANE, NAZEING,  
ESSEX, EN9 2EX.

Paper RP/46/20

## **REGENERATION & PLANNING COMMITTEE MINUTES 3 DECEMBER 2020**

### **ADDITIONAL ACCESS ROAD FROM NAZEING ROAD TO VALLEY GROWN NURSERIES**

The Head of Planning introduced the report explaining that this development would have an impact upon the character of the area and visitor enjoyment and that there would be potential for conflict between HGVs and visitors and operational requirements. She also explained that whilst an ecology report had been submitted with the plans it contained limited information.

Members discussed the report and made the following comments:

- Members recalled a planning application which was approved in 2013 by Valley Grown Nurseries (VGM) to expand their glasshouses, they wondered why they had done this if the existing access road was insufficient.
- Members noted that the application states that there will be 12 HGV movements per day and wondered why the existing access at Paynes Lane could not be improved.
- The Chairman suggested the following amendments to the recommendations. Recommendation (1) should change to 'strongly objects to any application to build a private access road. Recommendation (1) (c) should begin with 'it is totally inappropriate for any motorised vehicular traffic' and should finish stating 'with all the challenges that represents'

The Chairman thanked the Head of Planning for the photographs supplied in the presentation and said that these help to give a better understanding of the site.

- (1) that Epping Forest District Council be informed that the Authority strongly objects to any application to build a private access road between Nazeing Road and the Valley Grown Nurseries site on Paynes Lane, for the following reasons:**
- (a) It is contrary to Park Development Framework Proposals as they relate to Area 6.A.4 River Lee Country Park;**
  - (b) It will impact negatively on visitor enjoyment and use of the Regional Park;**
  - (c) It is totally unacceptable for any inappropriate motorised vehicles to be introduced into an area set aside for recreation, leisure and the enjoyment of nature conservation; with the additional risk and negative impact of associated inappropriate vehicular and motorbike access into the Park and all the challenges that they represent; and**
  - (d) the Ecological Survey report is lacking in detail and there is insufficient ecological information upon which a decision can be made in relation to the impact of the proposed road on the Park and its ecology was approved.**

\_\_\_\_\_  
Chairman

\_\_\_\_\_  
Date

The meeting started at 1pm and ended at 2.15pm.

**This page is blank**

**PLANNING CONSULTATION BY  
EAST HERTS DISTRICT COUNCIL**

**RETROSPECTIVE PLANNING APPLICATION FOR THE REMOVAL OF  
SPEEDWAY TRACK AND THE FORMATION OF GRASSED FOOTBALL  
PITCHES AT RYE HOUSE STADIUM**

Presented by Head of Planning

**SUMMARY**

This retrospective planning application seeks to obtain permission for the creation of grassed football pitches on the site of the Rye House Speedway track at Rye House Stadium. The Authority owns the Rye House Stadium site and it is the tenant that has submitted the current application. Whilst the proposed sports pitches are considered an appropriate use in terms of the Park Development Framework (PDF) Area Proposals, Green Belt and Local Plan policy there are some concerns about disturbance to the adjoining Site of Special Scientific Interest (SSSI)/Special Protection Area (SPA) habitat and nocturnal wildlife corridors from the use of floodlighting on site and any light pollution they might cause. Conditions are suggested to overcome this matter.

**RECOMMENDATIONS**

- Members Approve:
- (1) that East Herts District Council be informed that whilst the Authority does not object to the development proposed the following conditions should be attached to any planning permission requiring that:
    - a) the use and maintenance of the existing floodlighting on site should ensure light spill beyond the immediate area of the sports pitches is minimised and that use of the floodlighting is restricted and turned off by 10pm. This is to limit disturbance to the surrounding habitats and their use by protected species (for example bats);
    - b) provision of any new floodlighting should be

accompanied by an ecological appraisal to assess any impacts on nocturnal wildlife, carried out in accordance with 'The Institution of Lighting Professionals (ILP) practical guidance note 08/18 Bats and Artificial Lighting in the UK';

c) the hours of operation are limited to a set time in the evening in order to minimise disturbance from noise pollution; this could be considered in tandem with the restrictions on night time use of the floodlights;

d) biodiversity enhancements are implemented on site, for example native tree or scrub planting along the site boundary, or the creation of wildflower meadow; and

(2) the Authority would welcome further discussion on the above matters.

## **DESCRIPTION OF SITE AND ITS HISTORY OF USE**

- 1 The application site forms part of the Rye House Stadium located in the north of the Regional Park to the east of Hoddesdon. The River Lee Navigation runs alongside the western boundary of the site and to the east lies the Rye House Showman's Caravan Park. The Rye House Gatehouse and quayside are situated opposite to the north together with the Rye Meads Nature Reserve and SSSI, part of the Lee Valley SPA which extends south of Rye Road to the east of the Stadium site. Please refer to the plan at Appendix A to this report.
- 2 Access to the site is via Rye Road with a turning off adjacent to the Rye House pub. The adjacent pub has rights reserved to use a section of the entrance car park for car parking, a large proportion of which sits adjacent to the road frontage. As Landlord, the Authority also has rights reserved to use the car park (the Authority's moorings business currently use the southern section of the car park). The Rye House Kart Raceway is located immediately to the south of the application site. Both the speedway and the karting site are located within the Green Belt.
- 3 **Site History**  
The application site consists of the speedway motorcycle track and forms part of a well-established leisure and sporting venue consisting of the Rye House Speedway Stadium and the Rye House Kart Raceway (Karting). The whole site including the application site falls within the Authority's ownership and is leased to Carter and Bailey Ltd. The Karting venue is operated under a sublease and the current owners took assignment of the sublease in July 2004 when they acquired the Karting business. Since acquiring the business and sublease in 2004 the tenant has reported that over £2million of investment has been expended in improving the Karting business. The Karting track is understood to be one of the oldest and now one of the leading tracks in the UK attracting not only race enthusiasts but also the public. It is understood that the Speedway operation, although popular well into the 1990s, encountered problems from the early 2000s onwards alongside a decline in Speedway's popularity nationwide, and the venue struggled to run meetings and races. It is reported that use of the



site for formal speedway races ended in 2018 and it was occasionally used as a motorcycle speedway test site over the course of 2019 where it varied from 8 to 10 riders on a Saturday and Sunday; this use also ceased in December 2019.

- 4 The tenant also owns and operates the adjacent Rye-Assic Adventure Park site which opened in 2012 and is understood to be a popular venue for families. The land was initially leased from Thames Water and its freehold was subsequently acquired in 2014.
- 5 In 2019 the owners of the Karting attraction purchased shares of Carter & Bailey Ltd and became directors and thereby took over the ownership of the lease of the Rye House Speedway Stadium. Therefore, the owners of the Karting site now hold both the head lease (lease of the whole site) and the sublease (Karting site) and are effectively the only operator of the whole site.
- 6 Carter and Bailey advised that due to the poor state of the area surrounding the race area, it was estimated that to bring the Speedway up to modern standards for paying spectators the investment needed was around £400,000. In addition, due to the reduced numbers to the Speedway motorcycle sport, and from information obtained from the tenant, the business would not be financially viable. Carter and Bailey Ltd approached the Authority with investment plans to improve the site and to bring in new viable business uses.
- 7 Unfortunately, in November 2020 the tenant started to clear material previously deposited on site and commenced works to remove the speedway track without first obtaining planning consent or Landlord's consent to the change of use. Enforcement action was initiated by East Herts District Council (EHDC) in early December 2020, although this has now been paused pending consideration of the current planning application. Change to the permitted use in the lease to allow the use of new facilities is yet to be formally considered by the Authority. In November 2020 the Authority became aware of the Rye House Action Group (RHAG), it is understood this is a group formed opposing the change of use and active in raising the profile of the Speedway venue, promoting the site as a valuable part of motor racing sporting heritage and objecting to the current application.

## **POLICY BACKGROUND**

- 8 Local Plan policy GBR1 states that applications within the Green Belt will be considered in line with the National Planning Policy Framework (NPPF). Paragraph 145 b) of the NPPF states that the construction of new buildings is inappropriate in the Green Belt except for the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation ....as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.
- 9 Local Plan policy is supportive of the Lee Valley Regional Park and the PDF, Policy CFLR51. EHDC seeks to support and work with the Park Authority and other stakeholders to deliver the PDF Area Proposals where these improve leisure and sporting opportunities for local communities, enhance access to open space and nature, and help expand educational, volunteering and health related activities.
- 10 Policy CFLR1 Open Space, Sport and Recreation offers support for proposals that provide "new open space, indoor and outdoor sport and recreation facilities

which meet identified needs". These will be encouraged in suitable locations, served by a choice of sustainable travel options and should include measures to integrate such facilities into the landscape, including the creation of features which provide net benefits to biodiversity (CFLR1 III).

**11 Park Development Framework**

Sport and Recreation Proposals for Area 8.A.1 'Rye Meads and Stanstead Abbots' identify the need to work with operators and other stakeholders to consolidate and enhance leisure activities at Rye House Stadium and the Rye House Kart Raceway with substantial environmental improvements at the road frontage.

- 12 Landscape Strategy Proposals (A2 Rye Meads) aim to conserve and enhance the area's valued qualities, particularly its value for biodiversity and recreation and its rural, tranquil character, whilst seeking opportunities to improve and re-integrate areas that are more fragmented, such as around the sewage works, depot and stadium which currently detract from the setting.

**DESCRIPTION OF DEVELOPMENT**

- 13 The applicant proposes the removal of the shale surfaced speedway track and in its place the provision of grassed football pitches to be enclosed by a 2m high chain linked fence with access gates at each corner. Moveable markers will allow pitches of variable size to be created suitable for 5 a side, 7 a side and full team football to be played. No changes are proposed to the existing pedestrian and vehicle access and no changes are being made to the existing 1000 space car parking on site. Flood lights are already present on site, presumably a left over from the speedway use and no additional site lighting is proposed. Operating hours will be from 7am through to 10pm, 7 days a week.
- 14 According to the Environment Agency (EA) flood mapping information, the application site is located in Flood Zone 3 but information supplied by the applicant states that the site is within Flood Zone 2. The applicant maintains that previous flood defence works including flood containment measures in case of flood from the River Lee give substantial protection. All ground level surfaces i.e. the pitches will be permeable and a flood warning system is in place. The EA will have been consulted on the application and the matter of flood risk and any action required should therefore be resolved through this process.
- 15 The applicant makes reference in the planning statement to the demise of the speedway business following poor spectator attendance and the fact that the business went bankrupt. The applicant states that consultation was carried out with users of the site and members of the public in the local area and that this led to the current proposal to provide football pitches on site. The applicant has included a letter of support alongside the application from Hoddesdon Town Youth Football Club (HTYFC), who consider the Rye House proposal as a 'game changer' given their lack of adequate reliable facilities. They consider the current proposal an excellent opportunity to provide a flexible facility for their club, alongside other clubs which would have considerable community benefits.
- 16 The planning statement states that the aims for the site are to make it "more accessible to the local community, provide facilities desired by the public, and to promote the venue as a family entertainment and recreational fitness centre."

## **PLANNING APPRAISAL**

- 17 Park Plan proposals identify a need to work with operators and other stakeholders to consolidate and enhance the leisure focus at the Rye House Stadium site. However, successive operators have failed over more recent years to reverse the decline of the speedway venue, and/or to reinvigorate what was a regional sporting and leisure use. This application is seeking to replace the speedway facility with another sporting use, albeit one that is more locally focused.
- 18 In terms of Green Belt policy, the proposed football pitches would be considered appropriate development, providing for outdoor sporting use and preserving openness. Local Plan policies also support the creation of new sporting opportunities where they provide for local communities and the applicant has demonstrated support for the proposed football facilities from the locally based Hoddesdon Town Youth Club. It is understood that this is part of the applicant's aim to engage with the local community and offer a range of family based sporting and leisure activities.
- 19 The site lies within close proximity to the SSSI at Rye Meads which also forms part of the Lee Valley SPA and the wildlife corridor created by the River Lee Navigation to the west. However, the change in use from Speedway circuit to football pitches is unlikely to have a negative impact on these areas providing potential issues of conflict relating to floodlighting and noise disturbance can be controlled via planning conditions and modes of operation.
- 20 The application does not propose any new floodlighting relying instead on the existing floodlights already positioned around the perimeter of the old stadium track. The use and maintenance of these floodlights should take full account of the surrounding sensitive habitats and their use by protected species (bats) and ensure light spill beyond the immediate area of the pitches is minimised and that hours of operation are restricted so that the lights are turned off by 10pm for example.
- 21 If new floodlighting is planned in the future this should be accompanied by an ecological assessment for impacts on bats carried out in accordance with The Institution of Lighting Professionals (ILP) practical guidance note 08/18 'Bats and Artificial Lighting in the UK'. Restricting the hours of operation would also help to minimise disturbance from noise pollution and should be considered in tandem with the restrictions on night time use of the floodlights.
- 22 Some biodiversity enhancements within the site or along its boundaries should also be considered; tree or scrub planting; or wildflower meadow creation for example would be appropriate and provide a net gain to the development of the site.

## **ENVIRONMENTAL IMPLICATIONS**

- 23 These are addressed in the body of the report.

## **FINANCIAL IMPLICATIONS**

- 24 There are no financial implications arising directly from the recommendations in this report.

## **LEGAL IMPLICATIONS**

- 25 Planning applications referred to this Authority are submitted under the consultative arrangements of Section 14 (4-7) of the Lee Valley Regional Park Act 1966 (the Park Act). The Park Act requires a local planning authority to consult with the Authority on any planning application for development, whether within the designated area of the Park or not, which might affect any part of the Park.
- 26 The Park Act enables the Authority to make representations to the local planning authority which they shall take into account when determining the planning application.

## **RISK MANAGEMENT IMPLICATIONS**

- 27 There are no risk management implications arising directly from the recommendations in this report.

## **EQUALITY IMPLICATIONS**

- 28 There are no equality implications arising directly from the recommendations in this report.

---

Author: Claire Martin, 01992 709885, [cmartin@leevalleypark.org.uk](mailto:cmartin@leevalleypark.org.uk)

## **BACKGROUND REPORTS**

Application Papers 20.122

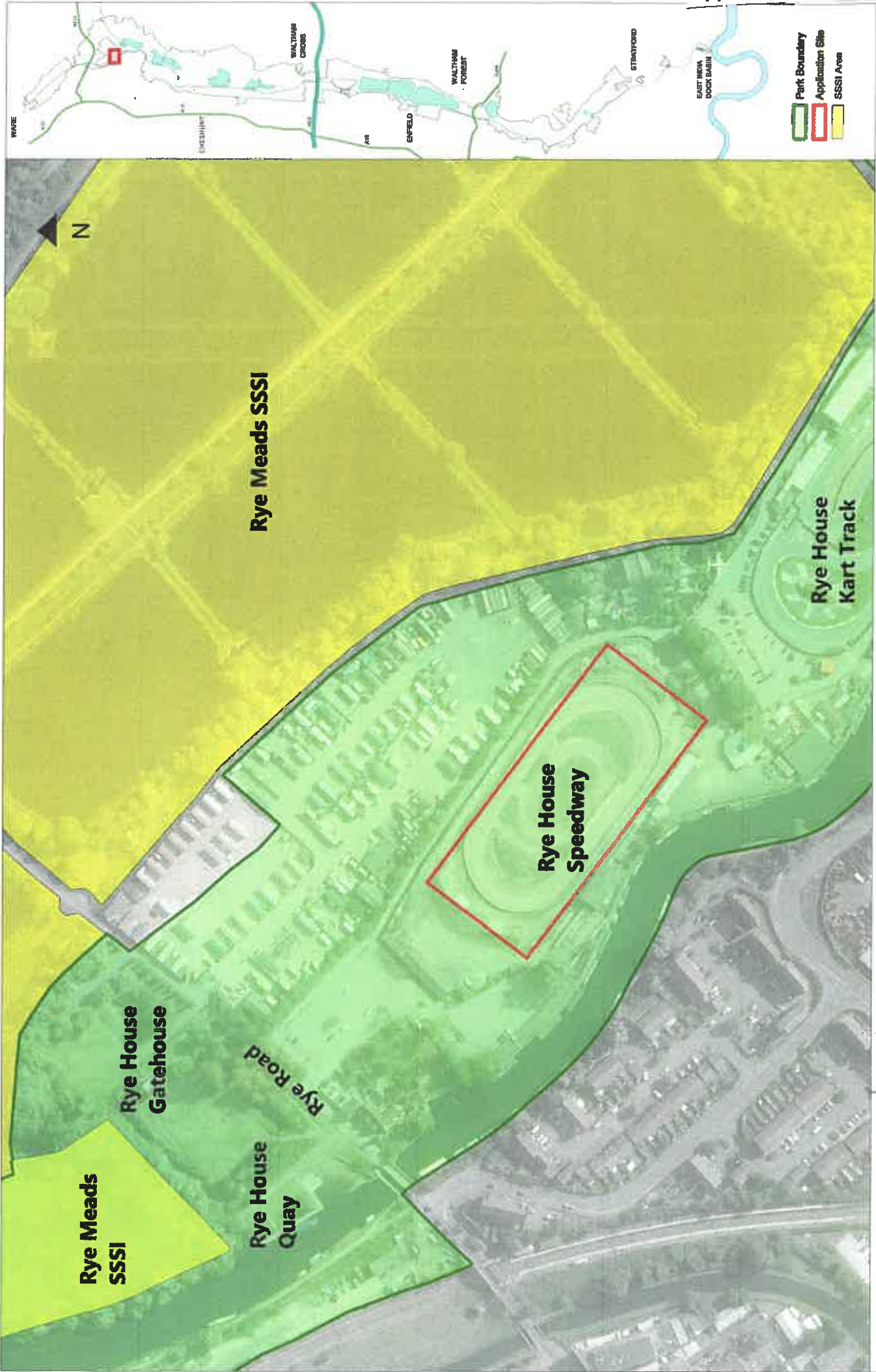
Jan 2021

## **APPENDIX ATTACHED**

Appendix A            Plan of the application site

## **LIST OF ABBREVIATIONS**

PDF	Park Development Framework
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
HTYFC	Hoddesdon Town Youth Football Club
RHAG	Rye House Action Group
ILP	Institution of Lighting Professionals
EHDC	East Herts District Council
NPPF	National Planning Policy Framework
the Park Act	Lee Valley Regional Park Act 1966



Proposed replacement of Stadium with new Football Pitches, Rye House Speedway, Rye House

1:2500 @ A4  
 06.01.21  
 Produced by: Corporate GIS (AAB)  
 M:\Cadcorp Critical Data\User Specific Maps\Crnte Maps 2017 - 2020\2021 Maps\20\_123 (AB) 06012021 - PT  
 © Crown Copyright and Database rights 2021. Ordnance Survey 100019982



**This page is blank**

**LEE VALLEY REGIONAL PARK AUTHORITY**  
**REGENERATION AND PLANNING COMMITTEE**  
**21 JANUARY 2021 AT 12:00noon**

**Agenda Item No:**

**6**

**Report No:**

**RP/48/21**

**PLANNING CONSULTATION BY  
EPPING FOREST DISTRICT COUNCIL**

**OAK TREE FARM PAYNES LANE, NAZEING EN9 2EY**

**APPLICATION FOR PLANNING PERMISSION FOR THE SITING OF 5 NO.  
CHALET LODGES (CARAVANS) FOR HOLIDAY ACCOMMODATION  
PURPOSES (REVISED APPLICATION EPF/2983/19)**

Presented by Head of Planning

**SUMMARY**

This revised application proposes the erection of 5 holiday chalets within the River Lee Country Park to the west of Paynes Lane close to Holyfield Lake. Restrictions imposed due to Covid 19 in March 2020 delayed the committee at which Members were due to consider the original application and in the interim the matter was dealt with by Epping Forest District Council (EFDC) under delegated powers and permission refused.

The applicant has now obtained an exemption certificate which allows for the stationing of 5 caravans on the application site for a period of one year without the need for planning consent. This permitted development fallback position has been taken into consideration when reviewing the revised application.

The revised application is still deficient in terms of the information supplied to fully assess the proposal in terms of its Green Belt location and in terms of its impact on the adjacent Local Wildlife Site and protected species known to be present in the vicinity. Biodiversity impacts should be a material consideration in this case and the lack of information on this matter together with other concerns requires the Authority to lodge an objection in this case.

**RECOMMENDATIONS**

Members Approve:                   (1)   that Epping Forest District Council be informed that the application proposal does not meet the requirements of the Authority's Park Development Framework Area Proposals 6.A.4 River Lee Country Park which are aimed at

conserving and enhancing the rural character and high ecological value of the River Lee Country Park. Notwithstanding the exemption certificate which allows for the stationing of 5 caravans on the application site for a period of one year, the Authority therefore objects to the current application on the grounds that:

- a) insufficient information has been supplied to demonstrate the special circumstances that apply for the development of 5 holiday chalets at this isolated location in the Green Belt within the Regional Park;
  - b) there is no accompanying ecological appraisal available for this proposal and as such there is insufficient information on which to assess the application for biodiversity impacts which should be a material consideration in this case;
  - c) limited detail is provided on the associated landscape and tree planting, there is no specification for the wild flower meadow or ecological management plan and it is not clear how this would help to 'buffer' or limit the 'visual obtrusiveness' of the lodges as suggested by the applicant;
  - d) further detail is required in respect of lighting and vehicle access to the site in order to fully assess impacts on biodiversity and recreational activity;
- (2) if the District Council are minded to grant planning consent without the required ecological reports, the Authority would wish to see the following conditions attached to any permission:
- a) timing of works to avoid nesting bird season;
  - b) construction plan to include protection measures for Badgers (e.g. holes covered or escape ramps);
  - c) a lighting plan for biodiversity agreed to avoid light spill into surrounding areas which would affect sensitive species including Bats, Badgers and Otters. In particular, a dark corridor to be maintained in the woodland and scrub edge to Holyfield Lake;
  - d) a detailed landscaping and management



plan to include use of locally native species;

- e) access restrictions to ensure only the road access from Paynes Lane is used in association with the holiday lodges and the vehicular access from the track that links with Green Lane is retained for agricultural purposes only; and
- f) the Authority should be consulted on the above details and plans in due course.

## **DESCRIPTION OF SITE**

- 1 The application site is situated on the western side and at the southern end of Paynes Lane and forms part of agricultural land associated with Oak Tree Farm. It is an isolated location within the Green Belt, to the west the site is bounded by Holyfield Lake, a Local Wildlife Site and to the south are fields and Langridge Farm. Further out, to the east of the site and Paynes Lane are nurseries including the large scale Valley Grown Nursery glasshouses. However, the predominant character of the area is that of open land. Please refer to the plan at Appendix A to this report.
- 2 The site encompasses an area of a 1.53 ha broadly rectangular in shape positioned adjacent to Holyfield Lake. The site presents as a field of rough grassland and indeed in the Planning Statement is described as "improved grassland," although it is also to be noted that "the site (farm) is shortly to be dedicated to the production of lavender". Records held by Epping Forest District Council for the site have identified that it is potentially contaminated land due to former use as a landfill for soil and demolition waste.
- 3 An access track passes between the site and the bankside edge of the lake which is well vegetated throughout (woodland and scrub) and incorporates fishing stances. A hedgerow borders the western edge of the application site. The access track connects to Green Lane to the north and is a partial reinstatement of the former haul road used as part of the previous gravel extraction works which were widespread in this area. The applicant has planning permission to use this track as an agricultural access to Oak Tree Farm; although it is presumed the main access to the Farm is still via Paynes Lane. Indeed, it is this access route off from Paynes Lane, that is included in the applications' red line boundary. In the south the track continues alongside the Lake and towards Langridge Farm. This is well used by walkers to connect into the RLCP. A public right of way (PROW) runs from west to east close to the northern boundary of the application site connecting through to Paynes Lane.
- 4 Oak Tree Farm and the application site are located within the Regional Park and form part of the River Lee Country Park (RLCP). The adjacent Holyfield Lake is an important angling site within the RLCP and a number of angling clubs and societies operate on a licenced basis from the bankside. The water is also used by the Fishers Green Sailing Club who are located on the eastern bank further to the south. As a Local Wildlife site the Lake is an important wetland habitat and also acts as a refuge and alternative to the Turnford and Cheshunt Pits Site of Special Scientific Interest (SSSI) – part of the Lee Valley Special Protection

Area (SPA), providing habitat for over wintering and breeding birds.

- 5 The Authority was first consulted on proposals for 5 holiday chalets at Oak Tree Farm in early 2020. The application was due to be considered at the March Regeneration and Planning Committee when the first lockdown came into force and the meeting was cancelled. Before the matter could be considered at the April Committee EFDC dealt with the application via delegated powers and refused permission. The grounds for refusal included issues relating to flood risk (it is situated within Flood Zone 2), potential impact on the integrity of the Epping Forest Special Area of Conservation (SAC), the lack of any case being made as to the very special circumstances that would apply to overcome the inappropriateness of the development within the Green Belt and the lack of an up to date preliminary ecological survey to enable the Council to fully assess the development in terms of its impact on ecological matters.
- 6 More recently, in October 2020 the applicant obtained an exemption certificate which allows for the stationing of 5 caravans on the application site for a period of one year, providing the caravans are used by members of the exempted organisation, in this case the Woodland Champions Club, for the purposes of recreation. This is permitted under the General Permitted Development Order (GPDO) Part 5 (*Caravan sites and recreational campsites*), *Class A – use of land as caravan site*, which allows for the siting of caravans on the site in accordance with the "*circumstances mentioned in paragraphs 2 to 10 of Schedule 1 to the 1960 Act*" (the Caravan Sites and Control of Development Act 1960). The Council will be obliged to consider this permitted development position when reaching their decision on the revised application.
- 7 The Planning Statement explains that the applicant is also exempt from needing a caravan license for the site (due to the exemption certificate), although Council officers have submitted that a site licence will be required to operate the site, and that certain conditions will need to be considered in relation to the separation distances between lodges/caravans, the positioning of decking and the need for the site to meet the requirements of flood risk assessment, fire safety requirements and period of occupation of the site. It is understood that Epping Forest Council were consulted on the exemption application but did not provide any comment; the case officer has confirmed that she was unaware of this consultation.

## **POLICY BACKGROUND**

- 8 The site is designated as Green Belt and policy in both the current Local Plan (Combined Policies of Epping Forest District Local Plan 1998 and Alterations 2006) and the Submission Version Local Plan 2017 (draft Local Plan) is clear that planning permission will not be granted for inappropriate development, except in very special circumstances. This is in accordance with national policy. Construction of new buildings are considered inappropriate development unless an exception to this policy can be demonstrated on the grounds, in this case, of the "*Provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as any development preserves the openness of the Green Belt and does not conflict with the purposes of including land within it*", (draft Local Plan policy DM4 Green belt).
- 9 Policy in the adopted Local Plan seeks to preserve and enhance the biodiversity and networks of natural habitats of the area, (Core Policy 2). The draft Local Plan Policy DM1 on habitat protection and improving biodiversity seeks to

ensure development delivers net biodiversity gain in addition to protecting existing habitat and species. Development proposals should seek to integrate biodiversity through their design and layout.

- 10 Development proposals which are likely to have a negative impact on a locally designated site such as a Local Wildlife Site will only be permitted where the benefits of the proposed development clearly outweigh the value of the ecological feature adversely affected and there are no appropriate alternatives. Policy DM1 (G) also states that:

*"where there are grounds to believe that a Protected Species, Priority Species, Priority Habitat or other valuable habitat may be affected by proposed development, applicants must provide a full survey and site assessment to establish the extent of potential impact. This evidence should inform appropriately designed plans and mitigation measures."*

Ecological information must be supplied in accordance with BS 42020 2013 for all relevant planning applications.

- 11 The draft Local Plan also includes policy for the Visitor Economy E4 (1) which seeks to support the development of high quality visitor accommodation, in particular accommodation linked to outdoor sport and activity hubs in the Lee Valley Regional Park, and visitor accommodation of an appropriate scale and type that makes use of existing buildings and strengthens existing rural leisure businesses.
- 12 Area 6.A.4 Proposals from the Park Development Framework for "the River Lee Country Park" apply in this case. These include Sport & Recreation proposals to protect and improve the fisheries and to manage and promote sailing at Holyfield Lake, to improve visitor access particularly at entrance points to the RLCP along Paynes Lane and Green Lane and in terms of biodiversity to protect, enhance, and manage the mosaic of open water, scrapes, meadows floodplain grassland to improve ecological value and species diversity. Non designated waterbodies are to be managed in accordance with their role in supporting the wider SPA.
- 13 Landscape proposals seek to conserve and enhance the secluded rural character and high ecological value of the River Lee Country Park with positive conservation and management of diverse wetland habitat, balanced with the provision of recreation and enjoyment of the landscape. Visitor hubs are identified at Fishers Green, Broxbourne Riverside, Lee Valley Park Farms and at the Cheshunt Station and Pindar Visitor Gateway.

## **DESCRIPTION OF DEVELOPMENT**

- 14 The application proposes the erection of 5 single storey holiday chalets with cedar clad walls and pitched dark grey tiled roofs. From the drawings provided each chalet is approximately 4 metres in height by 19 meters in length, with 2 double and 1 single bedroom. A wide veranda wraps around the front and one side of each chalet and includes a hot tub in one corner. Each unit is capable of accommodating 4 adults and 2 children. Each chalet has been orientated out of direct line of sight from each other and look out toward the lake.
- 15 Car parking provision is provided alongside each chalet for 2 cars and a total of 30 cycle spaces are also specified although it is unclear where these would be

accommodated. An access road off Paynes Lane in the east is shown on the location plan and referred to in the Planning Statement as the means of access to the holiday chalets. No reference is made to the secondary access into the site via Green Lane and whether or not this will be closed to visitors staying on site.

- 16 The site block plan shows proposed flower meadow planting alongside and to the east of each chalet and the proposed planting of 3 or 4 oak trees in association with each plot. No other details are provided. Please see the site plan and proposed elevation drawings at Appendix B, C and D to this report.
- 17 A short section titled Preliminary Ecological Assessment is included within the Planning Statement Assessment which notes the observations of the author, following multiple site "inspections and surveys". No evidence of important species and habitats were found to be present although it is acknowledged that "a variety of bat species are likely to forage in the area". It is proposed that any external lighting will be kept to a minimum and that the applicant intends to install bat boxes and nesting boxes in boundary hedges. The competency of the author of the Planning Statement, in ecological terms is not specified. No ecological survey is included with the application.

## **PLANNING APPRAISAL**

- 18 The provision of visitor accommodation within the Regional Park is, in general an acceptable use. Opportunities for visitor accommodation are identified in the Authority's Park Development Framework, usually in association with popular visitor hubs such as the Lee Valley Park Farm, as part of the Broxbourne Gateway (Old Mill and Meadows) or as part of established sites such as Dobbs Weir Caravan Park. Most of these sites are also in the Green Belt but unlike the application site are already developed sites forming part of a wider leisure and recreation offer.
- 19 The current proposal is located on a somewhat isolated and open site in the Green Belt within the River Lee Country Park and no evidence has been supplied to demonstrate the special circumstances that might apply for this proposal in this situation. The 5 chalets, the access road and associated hard standing for car parking are situated some distance away from existing properties at the end of Paynes Lane and will introduce a new and quite stark built presence adjacent to Holyfield Lake, interrupting the more rural and open landscape character of the area. An explanation as to why this location is considered more suitable than one closer to the farm buildings is provided in the Planning Statement where it explains that the "site has been chosen specifically to avoid proximity to neighbours and to provide maximum open space and amenity benefit to visitors / users".
- 20 In addressing the Council's Green Belt/special circumstances reason for refusal, the applicant refers to the exemption certificate and provision this allows for use of the site for the stationing of 5 caravans without the need for any landscaping or buffer planting. This is described as a permitted development fallback position, which the applicant states, would give rise to greater harm to the openness of the green belt than the proposed scheme due to the lack of any planting "to limit the visual obtrusiveness of the structures". This argument serves to reinforce concerns about the impact this use would have on the openness of the Green Belt, whether under the permitted development fallback position or the current application.

- 21 Whilst the stationing of 5 caravans under the permitted development position could take place, (the road and hardstanding would likely require permission) this proposal would none the less be of a temporary nature requiring annual renewal. It could therefore be argued that this proposal would be less harmful to the openness of the green belt than the proposal for the five lodges, despite the lack of landscaping.
- 22 In terms of the current application limited detail is provided on the associated landscape, there is no specification for the wild flower meadow or ecological management plan and it is not clear how this would help to 'buffer' or limit the visual obtrusiveness of the lodges as suggested by the applicant. The lodges would form a prominent feature in the landscape, in contrast to the general openness of the immediate surroundings, for those experiencing the RLCP and walking along the lakeside track for example. The planting of standard oak trees is noted but again there are no details as to how these would be managed or replaced if they were to fail. In any event it would be preferable not to rely on landscaping to try and mitigate unattractive or 'visually obtrusive' development.
- 23 It remains a concern that there is still no ecological appraisal accompanying this application; there would have been time to commission and deliver the required surveys prior to the resubmission of the application. As such there is insufficient information on which to assess the application for biodiversity impacts which should be a material consideration in this case given its location adjacent to a Local Wildlife Site – Holyfield Lake and its proximity (under 800m) from the Lee Valley SPA/Turnford and Cheshunt Pits SSSI.
- 24 Holyfield Lake forms part of the Lee Valley South Local Wildlife Site and is important for its bird populations, aquatic invertebrates, aquatic mammals (Otters and Water Voles), wildlife corridor function and swamp communities. This extensive site provides much additional and extremely valuable habitat next to Turnford and Cheshunt Pits SSSI that are of national importance for over-wintering and breeding birds. Both the District Council and the Authority have strong policies and proposals that seek to protect and improve biodiversity, both existing habitat and species and to ensure development delivers net biodiversity gain.
- 25 There is currently informal recreational usage in this area by walkers, dog walkers and anglers. Fishing stances are provided at intervals around the Lake but this use is managed under license by the angling clubs. Park Development Framework (PDF) Area Proposals are focused on improving the fisheries, enhancing visitor access and protecting and enhancing biodiversity. With no lighting in the immediate area the woodland and scrub edge of the lake provides a dark corridor which is of benefit to wildlife.
- 26 Increases in light and noise from the proposed Chalets could have impacts on protected species such as Bats using this corridor. Other protected species known to be in the immediate area include: Otter, Water Vole, Badgers, and Grass Snakes may also be present. Several Skylarks (UK red list) were seen on the original site visit back in March 2020, over the development site and the surrounding fields which provide potential breeding habitat for these and other ground nesting birds. Very limited information about lighting is supplied with the application and there is only limited detail about the proposed wildflower meadow sections and planting of individual oak trees. It is also understood that the site has potentially contaminated land due to former use as a landfill for soil

and demolition waste. Although a matter for the Council to resolve this may impact planting proposals and public recreational use of site.

- 27 Clarification that the route into the site from Green Lane will not be used by visitors and the means of controlling this restriction is also required, particularly given the access track from Green Lane is used as by walkers and anglers.
- 28 Flood risk issues were cited by the Council as a reason for refusal in relation to the previous application. The site is located within Flood Zone 2 but the applicant refers to hydraulic modelling carried out in 2017 that placed the site within Flood Zone 1. Council officers however still refer to the site being within Zone 2 and have also raised the need for the site to meet the requirements of flood risk assessment as a condition of any caravan site licence.
- 29 In conclusion the resubmitted application still lacks supporting information to justify the development's location in the Green Belt, it has not provided an ecological assessment and appraisal, nor does it include a lighting plan. This means that as it stands it is not possible to adequately assess the application and an objection to the proposal would seem appropriate. Further detail on controlling access to and from the site is also required.
- 30 However, the exemption certificate and fallback position must also be considered. This allows for the stationing of 5 caravans on a temporary basis without due consideration of any of the above points other than the issue of flood risk, which might be picked up via the site license process. Would the current application therefore offer a better outcome? From the perspective of the impact on the Park, the concerns raised regarding ecological impact (a material consideration), the lack of landscape details and impact on openness are significant. Officers do not therefore consider that the current proposal meets the requirements of the Authority's PDF Area Proposals, 6.A.4 River Lee Country Park. These are aimed at conserving and enhancing the rural character and high ecological value of the River Lee Country Park, and seek positive conservation and management of the diverse habitats, balanced with the provision of facilities for recreation use and enjoyment of the landscape.
- 31 It is therefore considered appropriate to lodge a formal objection to this application notwithstanding the fallback position. Should the Council be minded to grant permission relevant conditions have been identified to assist in overcoming the concerns discussed above.

#### **ENVIRONMENTAL IMPLICATIONS**

- 32 These are addressed in the body of the report.

#### **FINANCIAL IMPLICATIONS**

- 33 There are no financial implications arising directly from the recommendations in this report.

#### **LEGAL IMPLICATIONS**

- 34 Planning applications referred to this Authority are submitted under the consultative arrangements of Section 14 (4-7) of the Lee Valley Regional Park Act 1966 (the Park Act). The Park Act requires a local planning authority to consult with the Authority on any planning application for development, whether

within the designated area of the Park or not, which might affect any part of the Park.

- 35 The Park Act enables the Authority to make representations to the local planning authority which they shall take into account when determining the planning application.

#### **RISK MANAGEMENT IMPLICATIONS**

- 36 There are no risk management implications arising directly from the recommendations in this report.

#### **EQUALITY IMPLICATIONS**

- 37 There are no equality implications arising directly from the recommendations in this report.

---

Author: Claire Martin, 01992 709885, [cmartin@leevalleypark.org.uk](mailto:cmartin@leevalleypark.org.uk)

#### **BACKGROUND REPORTS**

Application Papers 20.119

December 2020

#### **APPENDICES ATTACHED**

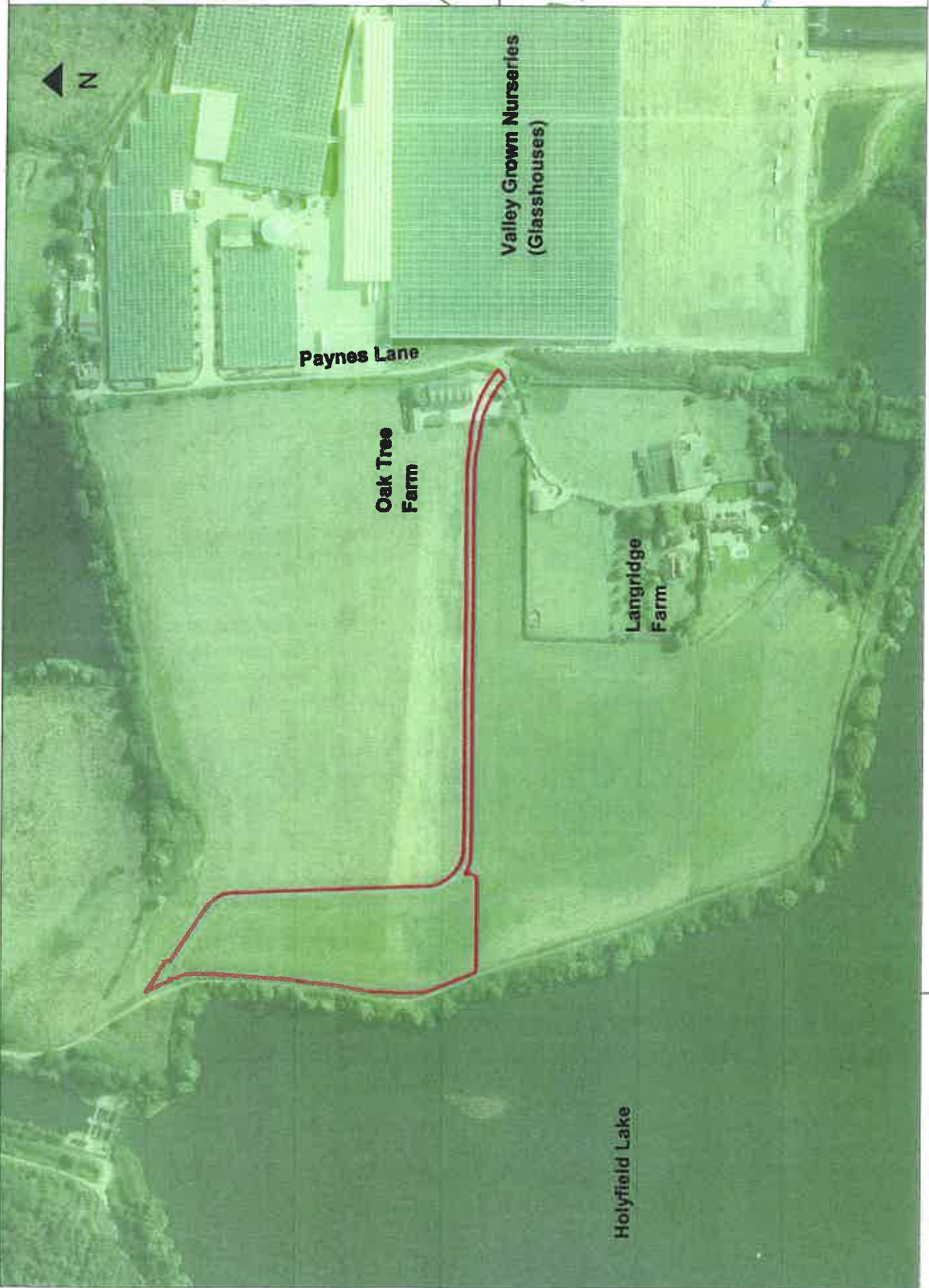
Appendix A	Plan of the application site
Appendix B	Site Block Plan showing location of chalets
Appendix C	West elevation of proposed chalet
Appendix D	Birds Eye perspective of chalet

#### **LIST OF ABBREVIATIONS**

PDF	Park Development Framework
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
RLCP	River Lee Country Park
GPDO	General Permitted Development Order
EFDC	Epping Forest District Council
PROW	Public Right of Way
SAC	Special Area of Conservation
the Park Act	Lee Valley Regional Park Act 1966

**This page is blank**





 Park Boundary  
 Application Site

**Proposed Siting of 5 No. Chalet Lodges for holiday accommodation: Oak Tree Farm, Paynes Lane, EN9 2EU**

Produced by: Corporate GIS (AAB)

© Crown Copyright and Database rights 2020. Ordnance Survey 100019982

M:\Caddcomp Critical Data\User Specific Maps\Cmle Maps 2017 - 2020\20 Maps\20.019\20\_019 (A8) 030320-PT

NTS @ A4  
03.03.20





EXISTING TREES

ONE TREE - "WINDY PINE" PLANTED AT ENTRANCE

PARKING PLAZAS RELATIVE PLAZAS

Leisure Plaza

**SITE BLOCK PLAN - PA-02**

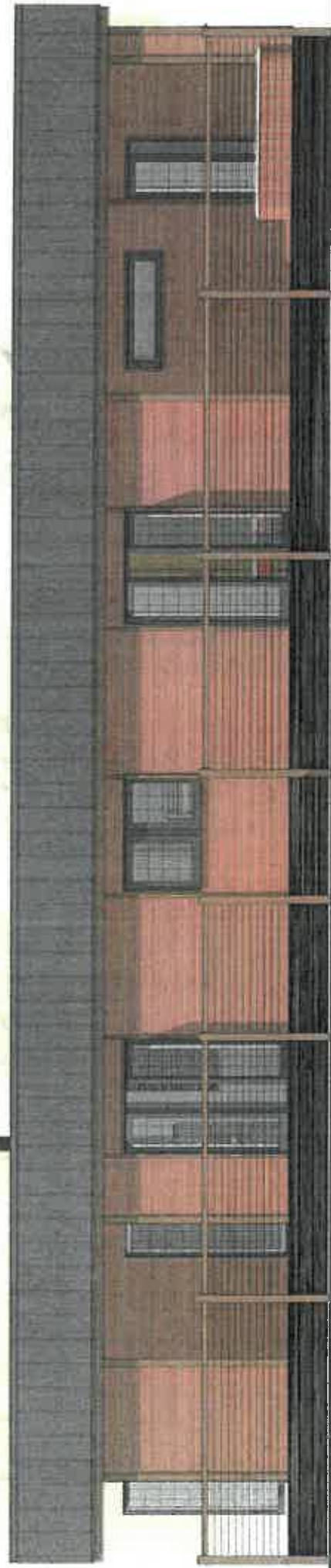
DATE: 2008.04.15

NOTES: LOCATIONS & BLOCK PLANS CORRECT WITH REVISION FROM CONSTRUCTION SHEET.  
 © 2008 Cedar Construction and its various divisions or subsidiaries & associates.  
 ALL RIGHTS RESERVED. THIS DOCUMENT IS UNCLASSIFIED FOR  
 REPRODUCTION, DISTRIBUTION, OR DISSEMINATION, IN ANY FORM OR BY ANY MEANS, ELECTRONIC OR MECHANICAL, INCLUDING PHOTOCOPYING, RECORDING, OR BY ANY INFORMATION STORAGE AND RETRIEVAL SYSTEM, WITHOUT PERMISSION IN WRITING FROM CEDAR CONSTRUCTION AND ITS ASSOCIATES.

CLIENT:	Mr. & Mrs. K. J. O'Connor	PROJECT NO.:	TL270049
PROJECT ZIP:	17000	DATE:	2008.04.15
PROJECT:	Paradise Holiday Apartments at Gateway Farm	SCALE (GRAPHIC):	1"=40'
DESIGNED BY:	STV BLOCK PLAN	DATE:	2008.04.15
SCALE (TEXT):	1"=40'	DATE:	2008.04.15
DATE:	2008.04.15	DATE:	2008.04.15

BONDSTONES

Scale 1:1000 (plan), 1:200 (elevation), 1:500 (section), 1:1000 (site plan), 1:1000 (landscape), 1:1000 (interior)



PROPOSED WEST ELEVATION



FOR CONSULTING PURPOSES ONLY - DO NOT ENLARGE. SUCH OR REPRODUCE. THIS DRAWING IS THE PROPERTY OF BONDSTONES AND SHALL REMAIN THE PROPERTY OF BONDSTONES. ANY USE OF THIS DRAWING WITHOUT THE WRITTEN PERMISSION OF BONDSTONES IS STRICTLY PROHIBITED.

NOTES:  
THE DATE OF ISSUANCE IS SHOWN ON DRAWING LIST 1 - SEE DRAWING LIST FOR PROPOSED LAYOUT  
UNITS 2-5 SHALL BE SUBJECT TO APPROVAL BY LOCAL AUTHORITIES AND CONSULT LOCAL AUTHORITIES TO OBTAIN  
PLANS AND PERMITS BEFORE ANY CONSTRUCTION COMMENCES.

LABEL: W & PINE K. J. O'CONNOR  
PROJECT: PROPOSED WILMINGTON ACCOMMODATION AT GARDNER FARM  
DRAWING TITLE: PROPOSED WEST ELEVATION  
SCALE: 1:100  
DATE: 15/05/2021  
DRAWN BY: JF  
CHECKED BY: SM

# PROPOSED WEST ELEVATION - PA-03

THIS DRAWING MAY BE  
REPRODUCED FOR  
OFFICIAL ADMINISTRATION PURPOSES



Contract Documents 1999 L70 - All Rights Reserved - December 2013 Edition



**BIRDSEYE PERSPECTIVE (PROPOSED) - PA-15**

DATE PREPARED: 08/20/2020  
 DRAWING APPROVATION: PAUL M.

NOTES: THIS AND PLANNING ARE APPROXIMATE ONLY.

DATE: 08/20/2020  
 PROJECT: PA-15  
 DRAWING TITLE: BIRDSEYE PERSPECTIVE (PROPOSED)  
 NOT TO SCALE  
 DRAWN BY: PAUL M.  
 CHECKED BY: PAUL M.  
 PROJECT LOCATION: 10000 N. 100TH AVE., SUITE 100, EDEN PRAIRIE, MN 55424



CONTRACT: 2020080001 PA-15 - ALL RIGHTS RESERVED - PROVISION: 08/20/2020

**PLANNING CONSULTATION BY  
EPPING FOREST DISTRICT COUNCIL**

**THE OLD WATERWORKS GREEN LANE, NAZEING, EN10 6RS**

**PLANNING APPLICATION FOR USE OF EMPLOYMENT LAND AS A  
CONSTRUCTION CONTRACTORS' COMPOUND WITH ASSOCIATED  
STORAGE, AND PARKING INCLUDING ANCILLARY OFFICE  
AND WELFARE ACCOMMODATION AND SINGLE AND  
DOUBLE STACKED CONTAINERS**

Presented by Head of Planning

**SUMMARY**

This application proposes the use of designated employment land as a construction contractors' compound with associated storage and parking. The site forms part of the Old Waterworks site situated just off Green Lane and is located within the northern part of the River Lee Country Park and the Green Belt. It should be noted that the proposed use has been active for many years, most recently with the Environment Agency as a tenant. The site is now leased to a civil engineering contractor.

Whilst the proposed use is acceptable in principle given its location within an existing employment site, there is concern about the visual impact of the double stacked containers currently on site; the applicants offer to discuss possible alternative arrangements regarding their location within the site should be pursued by the Council to help mitigate any negative impact on the amenity of the Park and openness of the Green Belt. Conditions should also be attached to any permission granted to protect the ditch and associated habitats which lie alongside the site boundaries. These form part of a wider interconnected habitat that may be important for the movement of and use by protected species. Disturbance to these areas, including any pollution from water runoff or lighting should be prevented.

**RECOMMENDATIONS**

Members Approve: (1) that Epping Forest District Council be informed that the Authority has no objection in principle to the contractor's compound use within an existing

employment site but would wish to see the following conditions attached to any permission covering:

- a) the lowering or repositioning of the double stacked containers away from the southern boundary of the site in order to minimise the visual impact on the adjoining Regional Park areas;
  - b) a site management and safety plan and a drainage strategy to be agreed to avoid pollution and debris impacting the boundary ditch and its associated habitats;
  - c) a landscape condition to ensure the retention of the vegetation buffer along the boundary of the site with Green Lane;
  - d) a requirement that any existing lighting on site and any plans for future lighting of the site be designed so as to avoid light pollution and spill into surrounding areas and habitats and be submitted to the Council for approval in order to ensure adjacent habitats remain as dark as possible. In particular, a dark corridor to be maintained along Green Lane and the ditch habitat; and
- (2) the Authority should be consulted on the above details and plans in due course.

## **DESCRIPTION OF SITE, ITS PROPOSED AND CURRENT USE**

- 1 The application site is situated on the eastern side of Green Lane south of the ribbon of residential properties that form part of Nazeing. It consists of an existing commercial compound which itself is part of a much larger well established commercial site known as the Old Waterworks site. It is located within the Regional Park and the Green Belt where it forms part of the River Lee Country Park. Please refer to the plan at Appendix A to this report.
- 2 The application site encompasses an area of 1635.00sqm and sits adjacent to the entry point into the wider site, sharing a boundary with Green Lane on its western side. Immediately to the south there is an open grassed paddock or field with areas of scrub and tree planting beyond and to the north and east lies the remainder of the Old Waterworks site, which contains a number of commercial sites and activities with a mix of buildings and structures. The site is predominantly laid to hardstanding with boundary vegetation along Green Lane offering some screening to the site. A thick belt of trees and scrub lie between the wider Old Waterworks site and the River Lee Flood Relief Channel to the east and this vegetated belt wraps round to the south beyond the open paddock.

- 3 Access to the application site is down Green Lane which forms a junction with Old Nazeing Rd to the north. Green Lane continues south past the site at which point it narrows to a rough track and also becomes a public right of way (PROW) providing access to the northern edge of Holyfield Lake and Kings Weir. It is well used by walkers and cyclists as an access route into the River Lee Country Park.
- 4 Opposite the application site is an access track leading to 2 angling lakes, Green Lane Pits. Further to the south, Holyfield Lake is also an important angling site within the River Lee Country Park (RLCP); all the lakes are used by a number of angling clubs and societies operating on a licenced basis from the bankside. Holyfield Lake is also used by the Fishers Green Sailing Club.
- 5 A Local Wildlife Site EP5 Lee Valley Central wraps around the Old Waterworks site in the east (known as Nazeing Meads) and to the south incorporating Nazeing Marsh. It comprises part of a regionally important chain of wetland habitats along the lower lee valley, including Holyfield Lake. As such this chain of sites are of importance for over-wintering wildfowl and other wetland birds, and wildlife in general which utilises the mosaic of terrestrial habitats as a wildlife corridor through an otherwise intensively used and built-up landscape. Holyfield Lake is an important wetland habitat and also acts as a refuge and alternative to the Turnford and Cheshunt Pits Site of Special Scientific Interest (SSSI) – part of the Lee Valley Special Protection Area (SPA), providing habitat for over wintering and breeding birds.
- 6 A drainage ditch runs along the eastern side of Green Lane and passes along the frontage of the application site. Access to the site bridges over the ditch which then continues south following the edge of the Lane before it connects into Holyfield Lake. In the other direction the ditch eventually connects with the southern end of Nazeing Meads South Lagoon. The Authority has records of Otter as well as previous records of Water Vole within the ditch at its southern end and it is likely the ditch is an important linking habitat between the Holyfield Lake and the South Lagoon.
- 7 The application site is situated within the Environmental Agency (EA) Flood Zone 3 and described as an area with a high probability of flooding that benefits from flood defences. The boundary ditch is also identified as a main river on the EA website.
- 8 **Description of Development and Current Use**  
The application site is already in use as a commercial contractors' compound and has been for over 30 years, most recently, according to the Planning Statement, by the Environment Agency. The application form specifies the start date for the construction contractors' compound use as Jan 1990. Evidence is provided in the Planning Statement which indicates this long term use, although no case is currently being put forward for lawful use.
- 9 The site is currently leased to a civil engineering contractor, Construction Muzzy Limited and is being used as a compound to store civil engineering plant, materials and machinery. It contains a mix of open material storage, container storage, including some that are double stacked and an ancillary site office and welfare accommodation. These structures are all described as temporary buildings. The Planning Statement describes the proposed use as "no different to what has occurred on site for over 30 years albeit that the current tenant is using the site more intensely". 53 people are employed on site and hours of

operation are 6 and half days a week.

## **POLICY BACKGROUND**

- 10 The current Local Plan (Combined Policies of Epping Forest District Local Plan 1998 and Alterations 2006) identifies the application site as part of the Green Belt, although in the emerging Local Plan Submission Version 2017, (draft Local Plan), it is designated as an Employment Site NAZE.E1. Policy E1 applies and it seeks to retain and enhance existing employment sites; proposals for the redevelopment, renewal and intensification of existing employment areas/uses will be encouraged.
- 11 Green Belt policy in both the current Local Plan and the draft Local Plan 2017 is clear that planning permission will not be granted for inappropriate development, except in very special circumstances. This is in accordance with national policy which considers the construction of new buildings to be inappropriate development within the Green Belt. Exceptions to this policy include; the limited infilling or partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings) which would: - not have a greater impact on the openness of the Green Belt than the existing development (NPPF Para 145 (g))
- 12 The Council's biodiversity policy seeks to preserve and enhance biodiversity and networks of natural habitats (CP2 Combined Policies), and in the draft Local Plan states that all development should seek to deliver net biodiversity gain, in addition to protecting existing habitat and species integrating biodiversity within the development, (draft policy DM1).
- 13 Development proposals which are likely to have a negative impact on a locally designated site such as a Local Wildlife Site will only be permitted where the benefits of the proposed development clearly outweigh the value of the ecological feature adversely affected and there are no appropriate alternatives. Policy DM1 (G) also states that *"where there are grounds to believe that a Protected Species, Priority Species, Priority Habitat or other valuable habitat may be affected by proposed development, applicants must provide a full survey and site assessment to establish the extent of potential impact. This evidence should inform appropriately designed plans and mitigation measures."* Ecological information must be supplied in accordance with BS 42020 2013 for all relevant planning applications.
- 14 Area 6.A.4 Proposals from the Park Development Framework for "the River Lee Country Park" apply in this case. These include proposals to improve visitor access particularly at entrance points to the RLCP along Green Lane and Paynes Lane for cyclists and pedestrians. Sport & Recreation proposals aim to continue to protect and improve the fisheries within the RLCP as regional leisure and sporting venues and to manage and promote sailing at Holyfield Lake. Biodiversity proposals seek to protect, enhance, and manage the mosaic of open water, scrapes, meadows floodplain grassland to improve ecological value and species diversity. Non designated waterbodies are to be managed in accordance with their role in supporting the wider SPA.
- 15 Landscape proposals seek to conserve and enhance the secluded rural character and high ecological value of the River Lee Country Park with positive conservation and management of diverse wetland habitat, balanced with the provision of recreation and enjoyment of the landscape.



## **PLANNING APPRAISAL**

- 16** The applicant appears to be seeking permission to regularise a use that has been undertaken on this application site for potentially 30 years – albeit previously used in a less intensive way than currently. There are two main issues arising in respect of the current proposal; these relate to its impacts upon the visual amenity and the ecology of the Park.
- 17** In Green Belt terms the applicant is reusing part of an existing developed commercial site as a contractor's compound, which the Council has now designated in the draft Local Plan as an Employment site NAZE.E1 in recognition of its long term use for commercial purposes. In green belt terms the applicant's proposal to reuse a previously developed site would be acceptable and the fact that only temporary structures are proposed means these are by their very nature considered to have limited impact on the openness of the Green Belt as they can be removed at any time.
- 18** Nonetheless the double height containers as currently arranged on site do have a visual impact on the adjoining open areas of the Regional Park and green belt land particularly the open space to the south, even though there is screening provided by existing boundary vegetation along Green Lane and the wider wooded areas further to the east and south. As a well-established commercial site partial views of large containers, open storage and equipment when seen from Green Lane may not be too surprising for regular walkers and users of the Park, but they do appear at odds and as visually intrusive in relation to the wider semi-rural character of the Regional Park, its wooded tracks, scrub and wetland habitats.
- 19** The applicant recognises in the Planning Statement that the double stacked containers may be a concern and is willing to consider alternative positioning, or a reduction in the number of containers, or other mitigation if this is deemed appropriate given the site is a designated employment location. Officers have raised this matter with the case officer at Epping Forest District Council (EFDC) as discussion on this point would be useful, especially if the double stacked containers could be avoided or repositioned away from the site's southern boundary where there is minimal effective screening. Additional boundary screening might help to mitigate the impact but would take time to establish.
- 20** There are also ecological issues relating to the application site that need to be considered. These relate to the ditch and the associated habitat that lies on the boundary and immediately adjacent to the application site. This forms part of an interconnected wildlife corridor and records/evidence indicates that this is used by protected species at its southern extent, adjacent to and potentially in association with Holyfield Lake. The nearby Local Wildlife site may also be important in terms of wildlife connectivity.
- 21** Potential impacts from the current/proposed use in terms of wildlife and habitats in the vicinity, including use by protected species would include disturbance and any changes to or removal of vegetation alongside Green Lane; water pollution caused by contaminated runoff or debris falling into the ditch; and night time illumination which would disrupt the dark corridor effect of the Lane and associated areas where wildlife such as Bats might forage or commute through. No lighting information is supplied with the application.

- 22 It is also noted that officers at EFDC from Environmental Protection and Drainage have raised a holding objection on the grounds that the applicant needs to provide a flood risk assessment, and a drainage strategy for the proposal to ensure it is policy compliant.
- 23 Although the contractors compound is already on site and has been for many years, the current use is more intense and could change further in the future. It is therefore important to protect the existing habitats that are on and adjacent to the site boundary in order to prevent disturbance to wildlife. In conclusion therefore, although the principle of the contractors' compound use within an existing employment site is acceptable, conditions are required on any grant of consent to ensure the visual amenity and wildlife habitats within the Regional Park are protected.

### **ENVIRONMENTAL IMPLICATIONS**

- 24 These are addressed in the body of the report.

### **FINANCIAL IMPLICATIONS**

- 25 There are no financial implications arising directly from the recommendations in this report.

### **LEGAL IMPLICATIONS**

- 26 Planning applications referred to this Authority are submitted under the consultative arrangements of Section 14 (4-7) of the Lee Valley Regional Park Act 1966 (the Park Act). The Park Act requires a local planning authority to consult with the Authority on any planning application for development, whether within the designated area of the Park or not, which might affect any part of the Park.
- 27 The Park Act enables the Authority to make representations to the local planning authority which they shall take into account when determining the planning application.

### **RISK MANAGEMENT IMPLICATIONS**

- 28 There are no risk management implications arising directly from the recommendations in this report.

### **EQUALITY IMPLICATIONS**

- 29 There are no equality implications arising directly from the recommendations in this report.

---

Author: Claire Martin, 01992 709885, [cmartin@leevalleypark.org.uk](mailto:cmartin@leevalleypark.org.uk)

### **BACKGROUND REPORTS**

Application Papers 20.114

November 2020

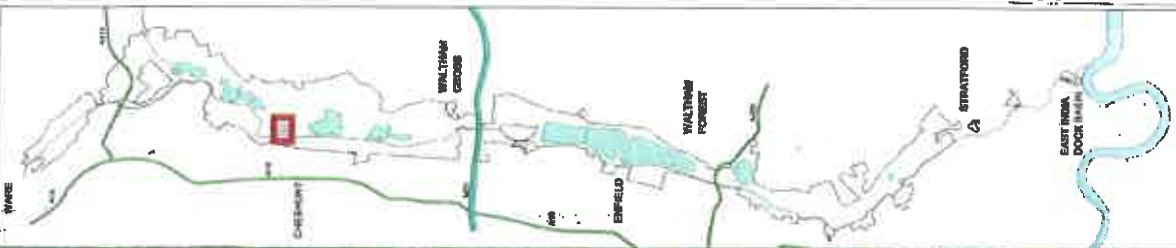
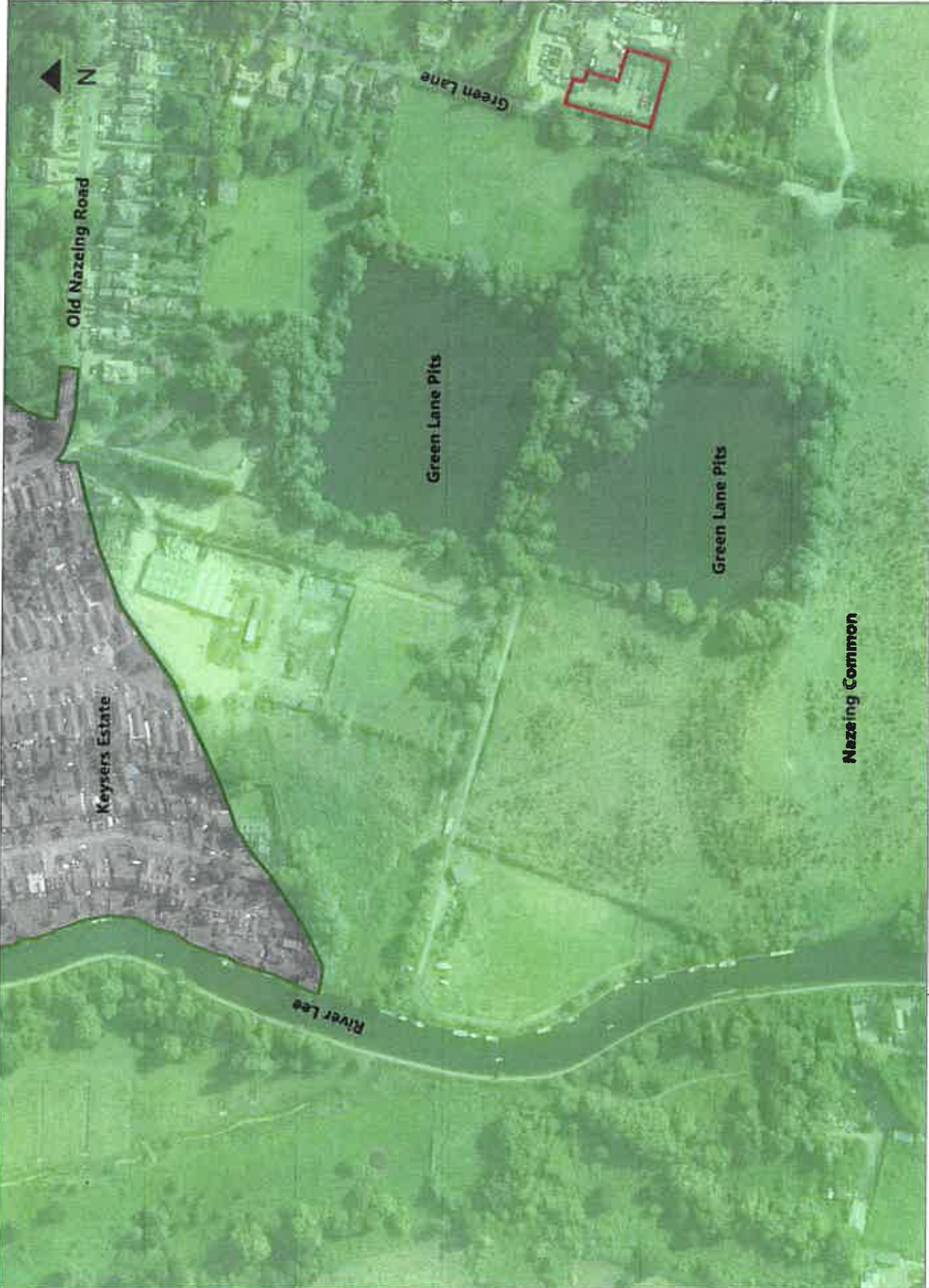
**APPENDICES ATTACHED**

Appendix A	Plan of the application site
Appendix B	Site photos internal

**LIST OF ABBREVIATIONS**

PDF	Park Development Framework
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
RLCP	River Lee Country Park
PROW	Public Right of Way
EA	Environment Agency
EFDC	Epping Forest District Council
the Park Act	Lee Valley Regional Park Act 1966

**This page is blank**



Park Boundary  
 Application Site

**Proposed contractors compound and associated structures. Old Waterworks, Green Lane, Nazeing**

NTS @ A4  
17.12.20

Produced by: Corporate GIS (AAB)

M:\Cadcorp Critical Data\User Specific Maps\Crms Maps 2017 - 20\2020 Maps\20\_114\20\_114 (AB) 171220-PT

© Crown Copyright and Database rights 2021. Ordnance Survey 100019982



Photographs supplied by the applicant - views from within the application site, first looking southwards and the second along the boundary with Green Lane.



**LONDON BOROUGH OF HARINGEY NEW LOCAL PLAN FIRST  
STEPS ENGAGEMENT CONSULTATION (REGULATION 18)**

Presented by the Head of Planning

**SUMMARY**

Haringey Council are consulting on their new Local Plan 'First Steps Engagement' Regulation 18 draft. This document sets out the key issues to be addressed by the New Local Plan, and asks a series of questions about the issues and challenges facing the future planning of the borough, seeking views on options to address them. The Council intend this document to start a conversation about the direction of New Local Plan and as such it does not contain draft policies.

Comments on the First Steps Engagement are set out in the letter attached as Appendix A to this report.

The Council has captured a number of the issues that are relevant to the Park in terms of the importance of design and the public realm and the challenges involved in optimising densities to meet housing need whilst also creating an attractive, accessible and inclusive borough where the multiple health and well-being benefits of natural assets are protected and improved and due recognition is given to their intrinsic environment and eco-systems benefits. This is important to the Authority because policy will need to recognise the existing and future contribution that the Park's open and waterside spaces, its visitor attractions and biodiversity can make in relation to the Lee Valley Opportunity Area and Tottenham Hale in particular. It will be important to ensure full reference is included to the Regional Park, its remit and the Park Development Framework (PDF) Proposals as they relate to Haringey.

**RECOMMENDATION**

Members Approve: (1) the comments as set out in Appendix A to this report as the Authority's formal response to the consultation by the London Borough of Haringey on the First Steps Engagement New Local Plan November 2020.

**BACKGROUND**

1 Haringey Council is looking to develop a new Local Plan covering the period up

to 2037. This is required in order to help deliver the new Borough Plan adopted in 2019 which established a set of priorities based on four themes:

**Housing – a safe, stable affordable home for everyone, whatever their circumstances**

**People – strong families, strong networks and strong communities nurture all residents to live well and achieve their potential**

**Place – strong, resilient and connected communities where people can lead active and healthy lives in an environment that is safe, clean and green**

**Economy – a growing economy which provides opportunities for all our residents and supports our businesses to thrive.**

Policy topics to be considered for inclusion within the Local Plan are grouped under these priority themes.

- 2 The new Local Plan will reflect recent changes in national legislation, and the new London Plan (to be published shortly) together with the housing targets it sets for Haringey. It will be a key tool for the Council to use in tackling the climate emergency which was declared in March 2019. The Council also intend for the Local Plan to guide recovery and change in response to the Covid 19 pandemic.
- 3 This First Steps Engagement version of the Local Plan seeks public input from the outset as well as discussions with statutory partners via the more formal Duty to Cooperate processes. The Local Plan is accompanied by an Integrated Impact Assessment (IIA) which brings together three types of assessment; sustainability, an equalities impact and a Health Impact Assessment to ensure that the effects of its policies, the need for any mitigation and reasonable alternatives are all adequately considered. A Scoping Report for the IIA is being consulted on alongside the First Steps document. A Habitats Regulation Assessment will also be undertaken as a parallel process to the IIA. A wide range of other evidence base studies are also anticipated including an Infrastructure Delivery Plan and Funding Statement.
- 4 The Council are aiming to adopt the New Local Plan by end of 2022. It will then replace the 2017-2026 Local Plan which consists of four documents; the Strategic Policies Development Plan Document (DPD), the Development Management DPD, the Site Allocations DPD and the Tottenham Area Action Plan.
- 5 Approximately 77 hectares or 1.9% of the Regional Park lies within Haringey, located within the eastern section of the borough. It includes the large open recreational spaces of Tottenham Marshes, Hale Wharf, now the site of Hale Village, the waterways of the River Lee, the Navigation and Pymmes Brook Flood Relief Channel and the Waterside Centre at Stonebridge Lock, the Paddock Community Nature Reserve and Markfield Park. Please refer to the Plan at Appendix B to this report.
- 6 The Park area forms part of the Lee Valley Opportunity Area which, within Haringey, focuses around the North Tottenham and Tottenham Hale areas. As such significant change has taken place over recent years with major high rise residential development clustered around the mainline station at Tottenham Hale and further waterside sites now under construction at Hale Village. As part of these developments new pedestrian bridges and cycleways are being constructed which will link across the waterways providing new visitor routes



through the various sites and into the Park connecting into the station and other Park areas to the north and south.

- 7 **Park Development Framework Area 3 Proposals 'The Waterlands'** cover this part of the Park and were adopted in April 2013. Those that are relevant include the Visitor Proposals; these seek to establish an enhanced visitor hub at Stonebridge Lock and the existing Waterside Centre, with café facilities, cycle hire and improved public realm (3.A.4), and support the ongoing enhancement of visitor facilities at Markfield Park and the Markfield Beam Engine and Museum, including improvements to pedestrian and cycle links between the site and adjoining areas of the Regional Park (3.A.2). Proposals also aim to increase recreational use of the waterways and a rationalisation of existing moorings along the Lee Navigation. Sport & Recreation Proposals are focused on active recreational use of the open spaces on Tottenham Marshes and exploring options with stakeholders to create a high quality waterside park. Clendish Marsh is to be managed for events and local festivals with key stakeholders.
- 8 Biodiversity proposals seek to protect Tottenham Marshes as an important urban wildlife habitat and nature reserve with further work undertaken to improve biodiversity and enrich the wildlife value. At the Paddock Community Nature Reserve proposals identify the importance of protecting and enhancing habitats to complement the adjoining Walthamstow Reservoirs. The good quality of the landscape is to be protected and enhanced and improvements undertaken adjacent to major roads and around allotment boundaries. Proposals seek to safeguard views out across the Regional Park.
- 9 Comments received from this consultation will inform the next iteration, later in 2021 of the draft Local Plan, (a further Regulation 18 consultation) before the preparation and consultation on a Proposed Submission Local Plan (Regulation 19). This will then be submitted for examination by an Independent Planning Inspector before final adoption by the council.

## **THE FIRST STEPS DRAFT LOCAL PLAN – KEY ISSUES**

- 10 The range of issues facing the new Local Plan are discussed in the IIA with the headlines presented in the First Steps document. These issues include the importance of addressing the needs of a growing and diverse population; both the borough's comparatively young population as well as a growing older population. 2018 figures estimate the boroughs population at almost 283,000 and the IIA projections show this increasing by 9% to 295,162 by 2037. There is an urgent need for housing of all types in the borough, particularly housing that is genuinely affordable to local residents. Since 2011 housing delivery has fallen short of targets and figures show that as of 2018 most residents live in a rented property. The Council now propose to plan for the ten-year minimum housing target to 2029 of 15,920 homes, which has been set by the London Plan.
- 11 In 2017 Haringey had 92,000 jobs which is below that of statistical neighbours and London averages. The industrial estates in the eastern part of the borough along the Lee Valley corridor are the most significant employment location in the borough although Haringey also has strong sectors in public services, retail, arts and entertainment, accommodation and food. Although three quarters of Haringey's working age population were economically active before Covid 19 the pandemic has badly impacted the local economy due to high numbers of

employees in sectors adversely affected by social distancing. The Local Plan will need to include policies that can secure sustainable economic growth and business development through increasing and diversifying employment opportunities, meeting the needs of different sectors of the economy and facilitating new land for business development.

- 12 The Council propose that the new Local Plan will support the “good growth” agenda set out in the London Plan where growth is “socially and economically sustainable and is focused on sustainable development”. For Haringey this will mean making the best use of land whilst having regard to the varied character of the borough, a local interpretation of high quality design, and a focus on reducing carbon emissions and mitigating climate change.
- 13 The IIA has also highlighted the need to deliver a network of high quality accessible open spaces across Haringey, especially in those areas deficient in access to open space. It also notes that whilst the borough has decent access to the wider natural environment this will need to be enhanced whilst securing the most open space viable from redevelopment plans, including pocket parks, civic spaces and play space.
- 14 The projected increases in population and housing will put considerable strain on transport and other infrastructure particularly in the growth areas of Tottenham and Wood Green. Local Plan policy will need to encourage a shift towards more sustainable modes of transport and further enhance the existing good provision of public transport links and capitalise on the recent investment in cycling infrastructure.

#### **COMMENTS ON FIRST STEPS DRAFT LOCAL PLAN**

- 15 **Area 2: Northumberland Park, Tottenham Hale and South Tottenham**  
The new Local Plan seeks to address the issues and challenges as well as the opportunities presented by the different areas within the Borough; 7 areas are identified and the Regional Park is located within Area 2: Northumberland Park, Tottenham Hale and South Tottenham. Area 2 includes the Tottenham Hale housing zone where the development of 5000 units is well advanced. The Council states it will offer further support in order to establish a mixed use District focused around the Tottenham Hale station. The ecologically significant spaces of the Regional Park are identified as part of Area 2.
- 16 The opportunities identified in the First Steps document for Area 2, in relation to ‘Place’ could bring benefits to the Regional Park. The Council has highlighted the need to improve the quality of the green spaces and enhance the biodiversity of the Park, to support the delivery of green links through to open space, to reconnect to the lost history of the area via heritage trails, signage and educational material, and ensure new development supports more walkable and cycle friendly layouts. These are all issues that the Authority has also previously highlighted when commenting on new development proposals within the Tottenham area, particularly in relation to the quantum and proximity of development taking place and the pressure this brings to bear on the Park. Policy in the new Local Plan will need to secure the delivery of these improvements.
- 17 A greater emphasis will also need to be placed on protecting, re-creating and enhancing the ecology of the area, for example the grassland or water based habitats. This will need to be addressed in policy, particularly given the

significant increased pressure all habitats and wildlife will be experiencing from higher numbers of people living and working in close proximity.

- 18 **Commentary under this section also refers to the requirement for a review of green belt boundaries; to assess whether they remain appropriate in line with national planning policy and the London Plan. Further explanation of this point will be sought.**

19 **Borough Priorities**

These are set out under the four headings of Housing, People, Place and Economy. The First Steps consultation asks a series of questions about what the Plan could do to address a range of issues and opportunities in relation to each topic. The Regional Park is part of Haringey's environment and as such is important in terms of its residents, businesses/employers and as a key attraction of the borough. The 'Place' theme and future policy formulated to address the issues and opportunities raised in this section is the most relevant to the Authority and the Regional Park.

20 **Design**

The Place theme highlights the importance of design and the challenge involved in achieving "design excellence in building architecture and the public realm" whilst also "optimising densities" and designing a "safe, accessible, healthy and inclusive borough". The First Steps document recognises the multiple health and well-being benefits of natural assets, as well as the intrinsic environment and eco-systems benefits. This is important to the Authority because of the existing and future contribution that the Park's open and waterside spaces can make in relation to the Lee Valley Opportunity Area and Tottenham Hale in particular.

- 21 **Policy and design strategies incorporated within the Local Plan will need to ensure the Regional Park is protected and enhanced and also buffered by the creation of new open and biodiverse space delivered as an integral part of development. This is critical given the Council's push to optimise density and deliver tall buildings in appropriate locations. The outcome of the higher density and tall buildings provided on Hale Wharf is as yet unknown in terms of its impact on the Park. The Authority has expressed concerns at each of the application stages on this matter, despite acknowledging the benefits achieved in terms of new bridge links and access improvements to the Park.**

22 **Heritage & Culture**

The Regional Park is a cultural asset with important industrial, built and landscape heritage. Within Haringey the changes to, and use of the open spaces and waterways have a history and meaning to past and current communities and sites such as Markfield Park and the Markfield Beam Engine and Museum are important heritage assets, one of a number that exist throughout the Park. A strategic approach with a clear vision for heritage and culture should underpin policy in the Local Plan and the Authority would support targeted heritage policies. The Authority's parklands also make an important contribution to cultural activity and the PDF Proposals envisaged further use of Clendish Marsh in this respect. Policy will however need to consider the balance to be struck between encouraging outdoor events and cultural gatherings whilst also protecting sensitive sites from disturbance and unsustainable pressure.

**23 Green Infrastructure and Natural Environment**

The Council is proposing a raft of new studies to assist with policy development for green infrastructure and the natural environment; these include a Parks and Open Spaces Strategy, a Biodiversity Action Plan (BAP), a Watercourse and Flood Risk Management Plan and a Natural Capital Account. Account should also be taken of the Authority's PDF Area 3 Proposals, the Landscape Strategy as it relates to the borough, the Authority's recent revised BAP 2019-2029 and the Lee Valley Regional Park Cycling Strategy 2017. This point is raised in the Authority's response attached as Appendix A to this report.

**24 The discussion under this section identifies important policy objectives which are relevant for the Park; the Council propose to:**

- continue to protect and enhance biodiversity at designated and non-designated sites with an emphasis on net gains;
- provide opportunities to improve access to nature and diverse green spaces through policy to enhance cycling and walking routes and establishing green links between existing open spaces; and
- explore the delivery of new open spaces in areas of deficiency such as in the east of the borough.

The Council recognise the value of open space to address health inequality, and its contribution to mitigating climate change, addressing overheating and offering solutions for flood management. There is also recognition of the important role open space played in the current Covid 19 crisis and why additional open space provision is so urgent.

**25 Policy support for the Authority's remit, the Regional Park, and the PDF Area Proposals is required as part of the Local Plan. A clear policy statement supporting the Regional Park, its biodiversity and its enhancement in line with the PDF Proposals, as both a local asset and a regional resource forming part of London's green infrastructure would provide developers with certainty when considering the location, design and scale of development. Further comments are set out in the letter attached as Appendix A to this report.**

**26 Active Travel**

The discussion under this section raises relevant issues in relation to the Park and how people are able to move through and into the open spaces. Reference to improving the balance of space given to people to dwell, walk and cycle so that space is used more efficiently, is important as development densities increase. The PDF Area 3 Proposals seek to tackle improvements for pedestrians and cyclists in respect of key movement routes such as Ferry Lane in order to change the emphasis from a main road through the Park, to a 'Park Road' where people can move safely on foot or cycle between Park sites. Officers will need to engage with the Council's Walking and Cycling Action Plan with this in mind.

**27 Economy – Visitor Infrastructure**

Support for visitor accommodation and infrastructure should be covered by policy but needs to extend to include the Regional Park. The Tottenham Hale area of the Park (within the Lee Valley Opportunity area) is well served by public transport and walking and cycling routes and although the main site with potential for visitor accommodation or other associated visitor infrastructure at Hale Wharf is now no longer available, other opportunities may come forward

over the life of the Local Plan. Consideration could be given to how visitor facilities might be improved at Stonebridge Lock for example in association with water based visitor accommodation and land based cultural activity.

- 28 The Council is also carrying out a 'Call for Sites' exercise as part of the Local Plan engagement to establish what sites are potentially available in the borough for development for housing, economic development and other uses. Officers will review the Authority's landholdings in relation to this process and initiate discussion with Haringey as appropriate and as part of a wider Duty to Co-operate meeting.

#### **ENVIRONMENTAL IMPLICATIONS**

- 29 There are no environmental implications arising directly from the recommendations in this report but the First Steps engagement draft Local Plan for Haringey will, once adopted contain policies that guide and control development and the use of land within the borough that could have an impact on the protection, enhancement, and development of the Regional Park.

#### **FINANCIAL IMPLICATIONS**

- 30 There are no financial implications arising directly from the recommendations in this report.

#### **HUMAN RESOURCE IMPLICATIONS**

- 31 There are no human resource implications arising directly from the recommendations in this report.

#### **LEGAL IMPLICATIONS**

- 32 Planning applications referred to this Authority are submitted under the consultative arrangements of Section 14 (4-7) of the Lee Valley Regional Park Act 1966 (the Park Act). The Park Act requires a local planning authority to consult with the Authority on any planning application for development, whether within the designated area of the Park or not, which might affect any part of the Park.

- 33 The Park Act enables the Authority to make representations to the local planning authority which they shall take into account when determining the planning application.

#### **RISK MANAGEMENT IMPLICATIONS**

- 34 There are no risk management implications arising directly from the recommendations in this report.

#### **EQUALITY IMPLICATIONS**

- 35 There are no equality implications arising directly from the recommendations in this report.

---

Author: Claire Martin, 01992 709885, [cmartin@leevalleypark.org.uk](mailto:cmartin@leevalleypark.org.uk)

## **BACKGROUND REPORTS**

The New Local Plan First Steps Engagement November 2020  
consultation.  
Integrated Impact Assessment (IIA) Draft Scoping November 2020  
Report

## **APPENDICES ATTACHED**

Appendix A	The Authority's draft response to the London Borough of Haringey
Appendix B	Plan showing the Park area within the borough of Haringey
Appendix C and attachment to the Letter at Appendix A	PDF Area 3 Proposals Walthamstow Wetlands to Tottenham Marshes

## **LIST OF ABBREVIATIONS**

AAP	Area Action Plan
PDF	Park Development Framework
SSSI	Site of Special Scientific Interest
IIA	Integrated Impact Assessment (IIA) Draft Scoping Report
HRA	Habitat Regulations Assessment
DPD	Development Plan Document
AAP	Area Action Plan
SPA	Special Protection Area
the Park Act	Lee Valley Regional Park Act 1966



Mr. Bryce Tudball  
Planning Policy Team Manager  
Haringey Council  
6<sup>th</sup> Floor, River Park House  
Wood Green  
LONDON  
N22 8HQE17

Email: [cmartin@leevalleypark.org.uk](mailto:cmartin@leevalleypark.org.uk)  
Direct Dial: 01992 709885

21 January 2021

Dear Bryce

**RE: CONSULTATION ON HARINGEY'S NEW LOCAL PLAN FIRST STEPS  
ENGAGEMENT CONSULTATION (REGULATION 18)  
LEE VALLEY REGIONAL PARK AUTHORITY COMMENTS**

Thank you for consulting the Regional Park Authority on the New Local Plan First Steps Engagement consultation.

A report on this matter was considered by the Authority's Members at the Lee Valley Regeneration and Planning Committee on the 21 January 2021 when the following comments were agreed. Officers would welcome further discussion on the detail of comments as part of the Duty to Co-operate process, particularly in relation to how the Local Plan can support the Regional Park and its function as both a green infrastructure and leisure asset for the borough and the wider London region.

**Lee Valley Regional Park and Statutory requirements of Lee Valley Regional Park Act in relation to Local Plan documents**

The Lee Valley Regional Park is a significant leisure and environmental asset to the Borough providing valuable benefits to local communities. Located within one of the Borough's key regeneration areas, the Lee Valley Opportunity Area, the Park's recreational open spaces and waterside sites and biodiverse landscape can assist the Council in meeting the challenges and opportunities identified in the new Local Plan document; for example by providing green space to support active and healthy lifestyles, and as an environmental resource that can help combat the effects of climate change and create attractive local environments rich in culture and biodiversity. Existing cycle and walking routes within the Park connect with the local urban areas and public transport nodes in the east of the borough linking Haringey residents and visitors to the rest of the Regional Park and its leisure sites and venues to the north and south.

The Regional Park should be acknowledged as a key part of the Council's Vision for 2037 – part of the “unique natural, physical and cultural assets” that the Council states will be enhanced and celebrated. It includes the large open recreational spaces of Tottenham Marshes, Hale Wharf, now the site of Hale Village, the East Hale Allotments and the waterways of the River Lee, the Navigation and the Pymmes Brook Flood Relief Channel. Key visitor attractions are present at the Waterside Centre at Stonebridge Lock, the Paddock Community Nature Reserve and Markfield Park (in total approx. 77 hectares or 1.9% of the Regional Park lies within Haringey).

The Authority supports the need to refine the London Plan “good growth” objectives to take account of the specific local circumstances found within Haringey. The meaning of good growth in relation to the Regional Park and the Lee Valley Opportunity Area should be considered in this respect; development within the Tottenham Hale area has to date brought considerable change to land within and adjacent to the Park much of it considered by the Authority to be to the detriment of the Park both in terms of visual and landscape impacts. As sites are completed there will be further impacts on the ecology, recreational enjoyment, tranquillity and other benefits usually associated with the general use of the Park and policy will need to ensure future development does not erode further these benefits, but rather achieves a net improvement.

It will be important going forward that the Local Plan recognises the statutory requirements of the Lee Valley Regional Park Act 1966 (the Park Act) and that policy includes full reference to the Authority's Park Development Framework and the proposals contained within as they relate to the Regional Park within Haringey. In the ‘First Steps’ document the Council highlights the importance of compliance with statutory requirements (page 10). Although the Authority is not a planning authority it has a range of powers which relate to the statutory planning process. Section 14 of the Park Act enables the Authority to prepare proposals for the future management and development of the Regional Park. Riparian planning authorities are required to include these into their relevant planning strategies and policies even though inclusion does not infer that the planning authority accepts these. For the purposes of the Park Act the London Borough of Haringey is a riparian Authority.

The Authority's Proposals for **Area 3 ‘Walthamstow Wetlands to Tottenham Marshes’** (adopted in 2013) cover the Park within Haringey and are relevant to the Local Plan consultation documents. By virtue of Sn 14 of the Park Act they should form part of the new Local Plan. The Area Proposal are included as an attachment to this letter.

The evidence base for the new Local Plan will also need to take account of the Authority's Landscape Character Assessment and Landscape Strategy April 2019, the Lee Valley Regional Park Cycling Strategy 2017 and the Lee Valley Regional Park's Biodiversity Action Plan 2019 - 2029. Further discussion between officers as part of the Duty to Co-operate process would be helpful to progress these points and to ensure collaboration in respect of future evidence base work. For example, the Authority would be interested in the details of the Council's Action Plan for Walking and Cycling and proposals to produce an Infrastructure Delivery Plan. The HRA will also be important in relation to



adjoining sites; Walthamstow Wetlands SSSI part of the Lee Valley SPA/Ramsar site. Likewise, the Parks and Open Spaces Strategy, the Haringey BAP, the Watercourse and Flood Risk Management Plan and the Natural Capital Account are all of interest to officers.

**Area 2: Northumberland Park, Tottenham Hale and South Tottenham.**

The Authority welcomes the recognition given to the Park's ecological assets as part of the key characteristics of Area 2. The Opportunities identified are also recognisable to the Authority in terms of its own PDF Area 3 Proposals for the Tottenham Hale section of the Regional Park.

Greater emphasis should be placed on safeguarding, recreating and enhancing what remains of the ecological assets in this area and how policy can improve the robustness and longevity of these fragile assets going forward given the significant pressure that will be brought to bear on what currently exists, through increased use and disturbance. The need to continue improving the quality of the green spaces of the Regional Park alongside improved access to open space and nature is supported as is the need to ensure development supports the creation of a walkable and cycle friendly environment. Policy will also need to ensure future development or changes of use within the industrial estates in Area 2 provide sufficient on site green space, for both recreation and biodiversity, to complement what exists within the Regional Park.

The Authority seeks further detail about the Council's statement that a review of green belt boundaries is proposed in order to assess whether they remain appropriate, in line with national planning policy and the London Plan. An early indication as to whether the review will consider green belt land within the Regional Park would be helpful, particularly if this includes the Authority's landholdings.

**Borough Priorities**

Many of the points made above are relevant to discussion presented in the First Steps document under the section on Borough Priorities – Place (5.3), in particular the Authority wishes to comment on matters relating to Design, Heritage and Culture, Green Infrastructure and Natural Environment, and Active Travel.

**Design**

The Authority welcomes the emphasis placed on the importance of protecting and enhancing natural assets because of their multiple health and well-being benefits as well as the intrinsic environment and eco-systems benefits for the borough, in the section on Design (5.3.1).

The Authority would support the inclusion of Policy in the Local Plan that could reinforce protection for these areas – such as the Regional Park, and help to create and protect a network of additional sites and corridors with recreational and biodiversity values as part of the design strategy for the borough. These would need to be substantial areas especially if sites of biodiversity value are

to thrive alongside more active spaces. Policy will need to address the balance between achieving these design objectives and the objective of 'optimising densities' with all the challenges that tall buildings bring in relation to a valley corridor such as the Regional Park.

The impacts on the Park areas resulting from the current scale and density of development has yet to be understood. Now that those sites identified in the Tottenham AAP and considered as suitable for tall buildings have been developed out, policy should ensure that any further development adjacent to the Park and its waterside environment is of a moderate, low rise and appropriate scale.

### **Heritage & Culture**

The Authority would support a clear vision for heritage and culture as part of the New Local Plan. The Park area within Haringey is defined as an Archaeological Zone and there are important heritage assets associated with Markfield Park and the waterways. The Authority has limited expertise in this area and would welcome joint working to unlock the heritage potential of the Park's assets and open spaces both for local communities to engage with and as another element of its visitor attractions and site management.

Cultural activity on open spaces if sensitively managed can encourage a greater use and connection with the environment, but policy will need to ensure sensitive sites are protected from noise and other disturbance.

### **Green Infrastructure and natural environment**

Recognition of the Regional Park as a significant recreational asset within the Borough and as part of the Lee Valley Opportunity Area is welcomed. Local Plan Policy will need to support the Regional Park and its recreational role in association with the many other roles it performs, some of which are mentioned in the First Steps consultation. In particular, the combination of the Park's open spaces, waterside sites, heritage and biodiversity contribute to addressing health inequalities. They also assist with mitigating climate change; in relation to flood and water management and addressing overheating (the urban heat island effect), and of course more recently have provided a vital resource for people to enjoy during the current Covid 19 crisis.

The Authority is seeking an overarching policy for the Regional Park and the Authority's remit as detailed above, and this might sit within a Local Plan section on Green Infrastructure. However, there is also a need to ensure that policy within other sections of the Local Plan identifies opportunities and mechanisms to protect and enhance the Regional Park and the many roles it performs. For example, Policy that covers the Area 2 Northumberland Park, Tottenham Hale and South Tottenham, and Policy in relation to Design, will need to consider how the future potential adverse effects on the Regional Park of higher density development and growth targets can be prevented and where benefits can be delivered – such as new open spaces, and the creation of new habitats.

The continued protection and enhancement of biodiversity on both designated and non-designated sites is supported. This will become increasingly important as the development densities increase and people live their lives further removed from open spaces and the semi-natural environment. Ecological links between these sites i.e. through provision of street trees, green/brown roofs, pocket parks will also need to be considered. Robust policy will need to ensure biodiversity net gain is achieved – the Park may offer opportunities for off-site provision in this respect, although on site provision is preferred in the first instance especially where it can complement and buffer habitats within the Park. Ecological assessments will be important in this respect and policy must ensure these are undertaken from the earliest stages of the pre-application process to ensure provision of biodiversity benefits in accordance with the principals of net gain. Opportunities to improve access to nature and diverse green spaces should also be considered.

Policy should consider the ecological function of the many waterways that exist within the Park in the eastern part of the Borough and the issue of the water environment and water quality more generally. Reference to the Authority's BAP may be helpful in this respect.

### **Active Travel**

The Council's work on Active Travel and emphasis on improving walking and cycling infrastructure is supported. Ensuring that sufficient space within development sites is set aside for walking and cycling in association with facilities such as pocket parks, cycle parking and safe crossings will increase the attractiveness of these modes of travel especially where these routes connect with the Regional Park and other green infrastructure.

The PDF 3 Area Proposals also sought to improve the quality of Ferry Lane for pedestrians and cyclists and to reduce its impact on the openness of the Regional Park. Policy should address key movement routes such as Ferry Lane in terms of improving the public realm, strengthening landscape planting, safeguarding views – in this case across the Park – and the creation of pedestrian reserves to facilitate safe access across the road and onto strategic off road routes such as the Lee Valley Pathway. Officers would welcome engagement on the Councils Walking and Cycling Action Plan – this will need to take account of the Authority's recent Cycling Strategy.

### **Economy - Visitor Infrastructure**

The Authority would welcome the inclusion of policy within the Local Plan that supported the provision of visitor facilities including accommodation and associated infrastructure. This policy should consider the Regional Park as an 'accessible location' in this regard, together with its role as a tourist or visitor attraction. The Park area associated with the Lee Valley Opportunity area and Tottenham Hale is well served by public transport, walking and cycling routes and there are opportunities to be explored in association with sites within the Regional Park, such as improving the visitor facilities at Stonebridge Lock for example, in association with water based visitor accommodation and land based cultural activity. Opportunities might also come forward during the life of

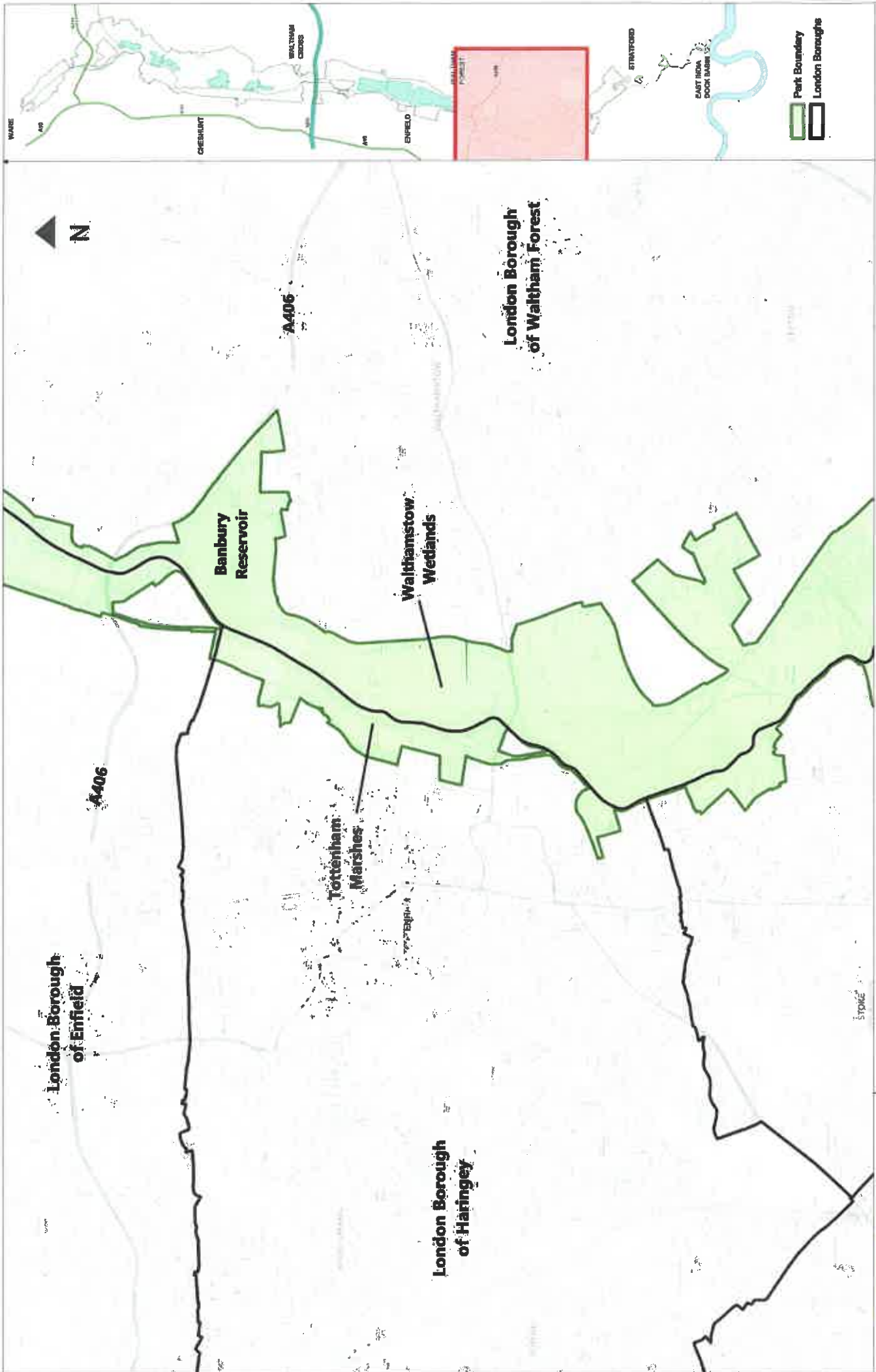
**the Local Plan within existing residential and industrial sites that are located within or adjacent to the Park. Visitor facilities in these locations would offer a good base from which to explore the other parts of the Regional Park.**

**The Authority looks forward to engaging further with Borough officers on the matters raised above as part of the Duty to Co-operate process to help inform the next stage of the Local Plan process.**

**Yours sincerely**

**Claire Martin  
Head of Planning  
Lee Valley Regional Park Authority**

**Enc.**



**Lee Valley Regional Park within London Borough of Haringey**

1:35000 @ A4  
 23.12.20  
 Produced by: Corporate GIS (AAB)  
 M:\Caddcorp Critical Data\User Specific Maps\Crite Maps 2017 - 20\Area Action Plans\2016 LA within LVP Maps\LB Haringey 2020 (AB) 231220-PT  
 © Crown Copyright and Database rights 2020. Ordnance Survey 100019982



**This page is blank**

**Park Development Framework Area 3 Proposals – Walthamstow Wetlands and Tottenham Marshes Adopted April 2013**

**Area 3 Proposals relevant to land within the London Borough of Haringey.**

Visitors	Sport & Recreation	Biodiversity	Community	Landscape & Heritage	Environment
<b>3.A.2</b>	<b>Markfield</b>				
<p>Support the ongoing enhancement of visitor facilities at Markfield Park and the Markfield Beam Engine and Museum.</p> <p>Improve pedestrian and cycle links between the site and adjoining areas of the Regional Park. In particular explore options with the Walthamstow Wetlands Partnership and other stakeholders for a pedestrian crossing of the River Lee Navigation to create a link into the Walthamstow Wetlands area that also connects through to Walthamstow Marshes in the south.</p> <p>Opportunities for heritage trails linked to other heritage interests within and outside the Regional Park to be explored</p> <p>Support existing sport and recreational use and enhancement of the open spaces at Markfield Park.</p> <p>The ecological value of Markfield Park and its role as a green wildlife corridor linking into the wider Regional Park to be protected. Opportunities to improve access to nature in accordance with the site management plan are supported.</p> <p>Community based recreational, sporting, play and educational facilities and activities to be promoted and community facilities maintained as required by the site Management Plan.</p> <p>Site management and improvement works to protect and enhance existing strong landscape character and identity. Support the ongoing protection, refurbishment and interpretation of existing buildings and features of heritage interest.</p>					

<p><b>3.A.4 Tottenham Marshes, Hale Wharf &amp; the Paddock</b></p>	<p>Enhanced visitor hubs to be established at two locations:</p> <p><b>1) Stonebridge Lock</b></p> <p>Stonebridge Lock to be developed as a visitor node based around the existing Waterside Centre. The Authority intends to work with the Canal and River Trust and other stakeholders to establish a café within the Waterside Centre with outdoor seating and improved public realm. Cycle hire facilities for Park visitors to be provided at the Waterside Centre potentially linked to other cycle hubs elsewhere within the Park including where feasible the London hire schemes operated by Transport for London.</p> <p>Enhance pedestrian and cycle routes and the associated environment into Tottenham Marshes from the adjoining communities to the west, building on existing improvements on Watermead Way and at the entrance to Stonebridge Lock. Enhance and promote the southern access into the Marshes from Ferry Lane and along the towpath south of Ferry Lane.</p> <p>Work with TfL and other partners to improve access from Tottenham Hale Station and bus interchange and Hale Village into the Park via an attractive, safe and well signed route.</p> <p><b>2) Hale Wharf</b></p> <p>Work with the London Borough of Haringey, the Canal and River Trust and other stakeholders to identify options for development on Hale Wharf that will bring this site into a Park compatible leisure use whilst also meeting its designation as a Regeneration Area within the London Borough of Haringey's Core Strategy. Appropriate uses would include (but are not restricted to) one or more of the following:</p> <ul style="list-style-type: none"> <li>• New recreational or sporting facilities, based on the sites waterside location</li> <li>• Accommodation serving visitors to the Park</li> <li>• Waterside visitor facilities and facilities for clubs with a community emphasis, incorporating leisure uses for example café, cycle and canoe hire/club facilities.</li> </ul> <p>The type, scale and design of development would need to be appropriate in terms of the sites location within the heart of the Park adjacent to internationally and nationally important biodiversity sites and its waterside environment.</p>
---	---



		<p>Any development of the site would be expected to support and complement existing leisure and nature conservation activity and facilities in the area in particular the Walthamstow Wetlands project. It should also enhance landscape quality and visual permeability, the ecological values of the environment and adjoining waterways and support waterside habitat creation. Design should allow views through the site from the towpath to the reservoirs and wider Park.</p> <p>Development on the site should encourage sustainable modes of transport, making full use of the Tottenham Hale Station and bus interchange, with improved pedestrian and cycle links between this hub, Blackhorse Road station to the east and strategic pedestrian and cycle links within the valley.</p> <p>A new southern gateway into the Regional Park and Tottenham Marshes from Ferry Lane via Hale Wharf and a new pedestrian link across the waterways should form part of the regeneration of Hale Wharf.</p> <p>Development of the site which is not appropriate under the terms of the Park Act 1966 and the Park Authority's remit and does not accord with the proposals set out in the Park Development Framework will be resisted.</p> <p>Work with the Canal and River Trust to ensure existing moorings along the Lee Navigation, especially between Stonebridge Lock and Ferry Lane are rationalized and associated structures removed. Provide practical support where feasible to the Canal and River Trust in their remit to enforce against unauthorized moorings and manage mooring compounds effectively so that they do not detract from the amenity of the Park.</p> <p>Opportunities for a visitor water taxi service to be explored with the Canal and River Trust and other stakeholders.</p>
		<p>Support increased recreational use of the waterways. Work with stakeholders to reinstate canoe/kayak hire facilities at Stonebridge Lock and develop a flat water canoe trail as part of the route between the White Water Centre in Broxbourne and Old Ford in Tower Hamlets.</p> <p>Cycle hire facilities to be developed including facilities for the Lee Valley Cycle Ability Club with adapted bikes available for hire.</p> <p>Promote active recreational use of the open spaces, including orienteering, through improved signage and site management. Options to further enhance these spaces for informal recreation and create a high quality waterside</p>

		park to be explored with stakeholders.
		<p>Tottenham Marshes to be protected as an important urban wildlife habitat and nature reserve with further work undertaken to improve biodiversity and enrich the wildlife value. Watercourses that pass through the area and south of Ferry Lane to be safeguarded and enhanced as part of the ecological landscape and to improve wetland connectivity.</p> <p>The potential to redevelop part of Wild Marsh West to provide for flood alleviation whilst enhancing and promoting biodiversity and community access to nature will be explored with the London Boroughs of Enfield and Haringey and local user groups as part of the Meridian Water development</p> <p>The Paddock Community Nature Park to be safeguarded as a local access to nature site. Existing habitats to be protected and enhanced to complement the adjoining Walthamstow Reservoirs. Improvements to the entrance off Ferry Lane to be supported. Opportunities to create a new controlled pedestrian bridge link as part of a nature trail, between The Paddock and Walthamstow Wetlands to be explored.</p>
		<p>Glendish Marsh to be managed for events and local festivals with key stakeholders. Continue to explore and develop volunteer opportunities.</p> <p>Enhanced management of the East Hale Community Allotments to continue.</p>
		<p>The good quality of the landscape to be protected and enhanced and improvements undertaken in the southern part of Tottenham Marshes, adjacent to major roads and around allotment boundaries. Views out across the Regional Park to be safeguarded.</p> <p>New planting to be located to reduce the visual impact of neighbouring land uses, to provide structure within the area and to enhance the overall environmental quality.</p>
		<p>Management of sustainable food growing at East Hale community allotments to continue. There should be a focus at this site and the Marsh Lane allotments, on initiatives for community led food production where these deliver social and biodiversity benefits, for example Living Under One Sun Community Allotment.</p>
		<p>Work with the Environment Agency and other stakeholders and user groups to improve the biodiversity value of</p>

		<p>Pymmes Brook through the design and development of naturalised channels. Support work to substantially improve and maintain water quality in accordance with targets set under the Water Framework Directive.</p> <p>Work with Canals and River Trust and other stakeholders on options for securing the Lee Navigation as a route for waterborne transport.</p>
--	--	---

<p><b>3.R.1</b></p>	<p><b>Ferry Lane &amp; Forest Road</b></p>	<p>Work with stakeholders to significantly improve the quality of Ferry Lane and Forest Road as a focus for entry to the Park by:</p> <ul style="list-style-type: none"> <li>• Reducing the impact of the road on the openness of the Park by <ul style="list-style-type: none"> <li>- improving its public realm,</li> <li>- partially removing the wall on the southern side to open up views and</li> <li>- strengthening landscape belts</li> </ul> </li> <li>• Creation of a new pedestrian crossing to provide safe access into the main entrance for the Walthamstow Wetlands</li> <li>• Enhancing existing pedestrian and cycle routes adjacent to the road to include pedestrian reserves to facilitate safe access across the road and onto strategic off road routes such as the Lee Valley Pathway</li> <li>• Improving bus services and provision including new bus stops/shelters close to Park entrances</li> <li>• Ensuring access from Blackhorse Road Station into the Park via Forest Road is clearly signed and promoted</li> <li>• Implementing a co-ordinated signage strategy for the road frontage including directional and entrance signage that reflects the range of facilities available.</li> </ul>
---------------------	--	---

