



**LONDON BOROUGH OF WALTHAM FOREST CONSULTATION  
ON THE DRAFT LEYTON MILLS SUPPLEMENTARY  
PLANNING DOCUMENT**

Presented by the Head of Planning.

**SUMMARY**

The London Borough of Waltham Forest (LBWF) is consulting on a draft Supplementary Planning Document (SPD) for the new Leyton Mills neighbourhood. This covers three allocated development sites; New Spitalfields Market, Leyton Mills Retail Park, Temple Mills Bus Depot and the Lee Valley Hockey and Tennis Centre at Eton Manor. The purpose of the SPD is to ensure that the four sites are developed in a co-ordinated way to achieve the best outcomes for placemaking, economic opportunity and investment in green infrastructure.

Officers have been engaged with LBWF throughout the various consultation stages for the SPD setting out the Authority's objectives for this area of the Regional Park and North Queen Elizabeth Olympic Park (QEOP) and in particular the requirements and opportunities for the Lee Valley Hockey and Tennis Centre at Eton Manor. The SPD is a very detailed document offering both Thematic and Site-specific guidance; largely categorised as either mandatory or advisory guidance.

The Authority's comments are set out in the letter attached as Appendix A to this report and includes an annex listing a number of minor editing corrections. The breadth and detail of the SPD is to be welcomed and supported in principle. It provides helpful planning and design parameters and guidance for development proposals to follow, particularly at a site-specific level. Issues with some of the requirements placed upon Eton Manor have been raised and the changes to guidance text identified. This is to ensure the expansion and improvement of the sporting and recreational offer at the Lee Valley Hockey and Tennis Centre alongside enhanced green and biodiverse spaces remains the focus at Eton Manor.

**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 Waltham Forest on the draft Leyton Mills Supplementary Planning Document.

## BACKGROUND

- 1 The Leyton Mills neighbourhood as defined by the Supplementary Planning Document (SPD) is located within the south east of the London Borough of Waltham Forest, and includes land within the Regional Park at Eton Manor. The SPD boundary abuts the borough boundaries of Hackney and Newham. Part of the area lies also falls within the London Legacy Development Corporation (LLDC) boundary.
- 2 Leyton Mills area consists of four main sites:
  - **New Spitalfields Market**, a wholesale market hall constructed in the early 1990s, with extensive hardstanding for parking and loading. Owned by City of London Corporation
  - **the Leyton Mills Retail Park**, comprises Asda store and smaller retail units, with parking, a pedestrian route and steps to High Road Leyton Owned by Asda and Aviva
  - **the Temple Mills Bus Depot**, owned by Department for Transport leased to Transport for London and sublet to Stagecoach, and
  - **the Lee Valley Hockey and Tennis Centre at Eton Manor**, designated Metropolitan Open Land and part of the QEOP owned by the LVRPA.

It is bounded to the west and north by Hackney Marshes and the River Lea, to the south by the A12, the Lee Valley VeloPark and wider QEOP, and to the east by the railway sidings and Ruckholt Road. Please refer to the Plan at Appendix B to this report.

- 3 A Supplementary Planning Document (SPD) is a technical document produced to provide guidance on planning policies in a Local Plan. In this case the local plan is the Waltham Forest Local Plan Part 1 (LP1) and the LLDC Local Plan, as two of the sites, Eton Manor and the Temple Mills Bus Depot are located within the LLDC boundary. The planning powers held by the LLDC are due to be returned to the four Growth Boroughs, including Waltham Forest, by the end of 2024 but the LLDC Local Plan will remain a relevant adopted Local Plan for its area beyond the point at which planning powers return. Following the statutory consultation, all responses will be considered in finalising the SPD for adoption by the Council, which is programmed to happen in later in 2024.
- 4 The Leyton Mills SPD has been informed by Council-led consultation starting in 2021 when the Council engaged with landowners, stakeholders, members of the public and other interested parties seeking views on a potential vision for the Leyton Mills area. This engagement process informed the Leyton Mills Development Framework which was completed in January 2022. Further informal public consultation continued in the Summer 2023 culminating in the production of the draft SPD. A Preliminary Ecological Appraisal of Hackney Marshes (which includes the Waterworks Field area) was undertaken by the London Wildlife Trust in 2023 to inform this SPD.
- 5 It should be noted that the LBWF Local Plan LP1 which was adopted in February 2024 includes policy which supports the Regional Park and the Park Development Framework (PDF) under **Policy 82 'The Lee Valley Regional Park'**. **Policy 9 'South Waltham Forest'** specifically recognises under bullet M) that within the growth area **"proposals will be supported where they:**

**Create opportunities to improve and grow the visitor, sporting and wider cultural offer of the Lee Valley Regional Park and its venues; including the Lee Valley Ice Centre, the Lee Valley WaterWorks Centre and the Lee Valley Hockey and Tennis Centre, thereby ensuring their long-term sustainability and contribution to the visitor economy of the borough;.."**

The Authority's PDF Area Proposals for Area 2 'The Three Marshes: Walthamstow, Leyton and Hackney', and Area 1 where these relate to the Queen Elizabeth Olympic Park are relevant to the Leyton Mills SPD Area.

- 6 Officers from the Authority have been involved in the various stages of SPD consultation and engagement during 2023, contributing details in respect of the wider Regional Park and the future opportunities at Lee Valley Hockey and Tennis Centre. More recently the Authority has embarked on its own process of review and feasibility work to bring forward plans for its landholdings within the North Olympic Queen Elizabeth Park, in particular the Hockey and Tennis Centre and the VeloPark. Officers have held initial discussions with LBWF in respect of a feasibility study and future master planning process and further joint working is anticipated. A hotel development on the 'development platform' is still an aspiration for the Authority and this will be included within the master planning exercise. It is understood that for LBWF the SPD will form the basis of any future site wide masterplans for the Eton Manor site.

## **OVERVIEW OF THE DRAFT LEYTON MILLS SPD**

### **7 Vision and Aims**

The Leyton Mills SPD sets out a Vision for the new Leyton Mills Neighbourhood based on four key themes:

- Protected and enhanced biodiversity, new open spaces and climate resilience.
  - A quality place to live with new homes and accessible amenities.
  - A safe and well-connected place for walking, wheeling and cycling.
  - A vibrant neighbourhood with a strong local economy and good jobs.
- 8 The aims of the SPD are to deliver a new integrated, inclusive and mixed use 15 minute neighbourhood with up to 5,400 new homes and approximately 40,000sqm of high quality workspace and industrial/logistics/distribution uses to provide jobs for local people. High quality tall buildings are acceptable in the right locations. A new cultural destination is also proposed as part of the new neighbourhood including retail, restaurants and cafes together with a new relocated Asda store. Social and community infrastructure is also identified to meet local needs.
- 9 The ecology of Hackney Marshes and the River Lea are to be protected and new areas of green space provided that improves biodiversity and reduces flood risk. There is an emphasis throughout the document on the delivery of new publicly accessible green open spaces, including playable landscapes, and new Sustainable Drainage Systems (SuDS) with proposals to de-culvert the Dagenham Brook.

- 10 Improvements to cycle and pedestrian connections are a key feature of the SPD, particularly connections to the High Road Leyton, Eton Manor and the Queen Elizabeth Olympic Park and Lee Valley Regional Park. The construction of a new green bridge linking the Leyton Mills Retail Park and Eton Manor is a key part of the infrastructure requirement for the SPD area as is safeguarding land for and the promotion of a new rail station at Ruckholt Road. A more efficient bus depot at Temple Mills is to be retained that supports an electrified fleet.
- 11 The SPD aims to support enhancements to sporting facilities at Eton Manor which maximise "inclusivity and accessibility to the wider community, as well as improvements to the open spaces, including play spaces, recreation and urban greening."
- 12 **Thematic Guidance** – Part C of the SPD sets out Thematic Guidance for development within the area which covers:

**Climate Resilience and Biodiversity** – guidance focuses on the need to protect existing habitats and wildlife and ensure development enhances these through sensitive design, biodiversity rich landscaping, improved waterways and sustainable drainage systems, thereby also making the neighbourhood resilient to climate change over the long term. Guidance covers the need for ecological surveys, set-backs for tall buildings, avoidance of light spill and shading and protection of river corridors as well as a requirement to achieve at least the mandatory 10% Biodiversity Net Gain (BNG) on site. Specific guidance is included in relation to providing Suitable Alternative Natural Green Space (SANGS) at Eton Manor and the Leyton Mills Retail Park.

**A Safe and Well Connected Place** – provides detail on improvements that development should deliver for walking, cycling and wheeling, please refer to Fig 23 at Appendix C to this report. The guidance highlights the improvements needed to the A106 Eastway and Ruckholt Road with space re-provisioned away from vehicular traffic to sustainable and active modes. Reference is also made to forthcoming improvements at Leyton Underground Station to increase capacity and accessibility. It is understood that £13.7m in Levelling Up funding combined with up to £9m in development contributions secured from housing growth by Waltham Forest Council has been committed for this project.

**A Quality Place to Live** – guidance requires development to come forward with site wide masterplans and design codes setting out the parameters for the various elements of the built form, open spaces and landscaping. These will also set out the composition of building heights which should step down towards Hackney Marshes and the Old River Lea with taller buildings at Leyton Mills Retail Park and focused around Eastway and the potential new station.

**A Strong Local Economy** – guidance aims to ensure no net loss of industrial floorspace on Spitalfields Market and Temple Mills Bus Depot sites (both designated as Locally Significant Industrial Sites) and encourages co-location with residential and other uses.

- 13 **Site Specific Guidance** - drawing on the thematic guidance, Section D of the SPD sets out Site-Specific Guidance for each of the three development sites and Eton Manor. Guidance is phrased in three different ways:

- A **'must'** is mandatory and represents an essential requirement to be met in order to comply with policy;
- A **'should'** is advisory or requirement that is strongly encouraged to be met in order to comply with policy; and
- A **'could'** is indicator that represents an opportunity above and beyond the mandatory and advisory requirements.

**14 SPD Guidance for Eton Manor**

The site specific guidance for Eton Manor recognises there are opportunities to enhance the sporting facilities and to make better use of the space on site by consolidating buildings and parking in the centre to preserve openness. This 'consolidation' together with maintaining or reducing the current built footprint (including parking/hardstanding) would help to meet the policy test for development in Metropolitan Open Land. Guidance also proposes that green space can be enhanced around the edge, to provide biodiversity, Suitable Alternative Natural Green Space (SANGS) and to mitigate surface water flooding.

- 15 Fig 37 'Illustrative masterplan and key opportunities for Eton Manor' shows the location of the proposed new 'green' bridge connecting Leyton Mills Retail Park to Eton Manor, please refer to Appendix D. Guidance states that development proposals must make provision for this bridge, including safeguarding land for bridge footings and access ramps. A key arrival point is identified in the north where Eastway intersects with Temple Mills Lane, North Wall Road and the VeloPark

- 16 Development proposals will be expected to enhance biodiversity value of the site, provide SANGS, be car free and facilitate improved walking and cycling connectivity into and around the site. Any development proposals would also be expected to include Community Use Agreements.

**17 Delivery and Implementation**

Comprehensive, site wide masterplans, site-specific infrastructure delivery strategies and design codes will be key tools for the Council in achieving the vision and aims of the SPD and ensuring a co-ordinated approach to development, in particular for both the New Spitalfields site and the Leyton Mills Retail Park site. Once approved at an outline planning application stage these will provide the parameters against which reserved matters applications can come forward. The Council is also keen to use Development Performance Agreements (DPAs) to manage the full development cycle of major development applications, from strategic planning and feasibility to delivery, completion and post completion review.

**18 Infrastructure Requirements**

An extensive list of infrastructure requirements are included in the draft SPD, covering provision for the cycling and walking network, strategic transport, public open space, green and blue infrastructure and other requirements within the wider Leyton area. It is understood that many of these requirements will also be mirrored in the site-specific policy requirements for each development site in the future Local Plan Part 2 Site Allocations.

**19 Hackney Marshes Mitigation and Governance Structure**

The SPD also includes specific requirements relating to Hackney Marshes. Development proposals of the key sites within the SPD area will be expected to

mitigate and manage additional recreational pressure on Hackney Marshes associated with the planned growth on these sites, to avoid indirect adverse impacts on its ecology. Mitigation would include providing on-site open space to meet needs, contributing to a new paved cycling and walking path from the New Spitalfields Market site onto existing routes in Hackney Marshes (subject to agreement with London Borough of Hackney), and creation of biodiverse green buffers between development and the Marshes and River Lea.

- 20 A formalised governance structure (consisting of the London Boroughs of Hackney and Waltham Forest, the Lee Valley Regional Park Authority, and the Canal & River Trust), together with a management strategy is also suggested to direct and monitor this mitigation process, and to identify and coordinate investment. The SPD proposes that "The strategy could also include reviewing the purpose and function of the Waterworks Visitor Centre and the Hackney Marshes Centre to ensure the two facilities are complementary".

## **COMMENTS ON THE DRAFT LEYTON MILLS SPD**

### **21 SPD Vision, Aims and Joint Working**

The draft SPD is broadly supportive of the Authority's ambitions for Eton Manor and reflects the joint working between officers of both the London Borough of Waltham Forest and the Park Authority. A key stated aim of the SPD is to support enhancements to sporting facilities at Eton Manor which maximise inclusivity and accessibility to the wider community, and secure improvements to the open space, including play spaces, recreation and urban greening. New and improved sports, leisure and recreation facilities delivered within the Lee Valley Regional Park are identified as a key component of creating a 'quality place to live' one of the four themes underpinning the Leyton Mills Vision. The Vision and aims have also recognised the importance of protecting and enhancing the open spaces and ecology of the SPD area and ensuring it is accessible and well connected for walking wheeling and cycling.

- 22 It is disappointing that there is no mention of the Authority's proposals for accommodation on the northern part of the site as the Council is aware of the Authority's ambitions in this respect and the matter has been discussed during the SPD engagement. However, it is also understood that a visitor accommodation proposal would fall outside the type of development considered acceptable in terms of the sites designation as Metropolitan Open Land (MOL) and would require a case of 'very special circumstances' to be made to justify an exception to planning policy in this case. This would need to be considered as part of the wider master planning of the Eton Manor site and the feasibility work currently underway.

### **23 Thematic Guidance**

The Thematic Guidance is helpful in setting out planning and design parameters and the detailed guidance that development proposals will be expected to follow. This guidance will need to be considered alongside the site-specific guidance.

### **24 Biodiversity**

In terms of the Regional Park the expectation that ecological surveys will be carried out as part of all development proposals including any relevant off site habitats is helpful; this is often a matter the Authority comments on as a statutory planning consultee. The detail provided within the SPD on BNG is welcome and should ensure a complementary approach to habitat creation and

enhancement across the SPD area and the 4 sites. The requirement to achieve the mandatory 10% BNG on site within each development as a minimum without the use off-site land is supported. It is also welcome that guidance is provided on providing sustainable water systems, flood resilient development and lighting design with the requirement for light spill onto areas of nature conservation value to be avoided including within the green buffer to the River Lea.

**25 Open Space Play and SANGS**

This section of the thematic guidance seeks to ensure that site masterplans and development proposals provide for the open and play space needs of development on-site. Guidance is clear that there should not be reliance on off-site provision (4.3.4) and this is to be supported. Clearly the Regional Park due to its proximity to the development sites and the inclusion of Eton Manor within the SPD area will have a role to play in terms of satisfying local recreational needs. Eton Manor however is part of the Lee Valley Hockey and Tennis Centre, and is managed as a sporting and leisure venue with a remit to provide a regional offer. It is therefore important that the SPD ensures the recreational needs of new residents can be delivered and met on and within each of the development sites over the long term.

**26 SANGS**

The SPD Guidance, both Thematic and Site Specific requires provision for Suitable Alternative Natural Green Spaces (SANGS) at Eton Manor, in line with the Councils SANGS Strategy, (this will in due course form part of the Council's Green and Blue Spaces SPD). Whilst the SANGS Strategy can in principle be supported there is concern about its delivery at Eton Manor.

**27** The SANGS strategy seeks to offset the recreational impacts of the Local Plan on the integrity of the Epping Forest Special Area of Conservation (SAC) part of which lies within Waltham Forest, by demonstrating the capacity, quality and deliverability of SANGS in the borough. Council officers engaged with Authority officers, as well as Natural England, on the SANGS strategy during the period of the Local Plan Part 1 Examination. This joint working produced a suite of investment opportunities for green infrastructure across Waltham Forest, including in the Lee Valley Regional Park, and a commitment for LVRPA and LBWF to continue to work together to review and agree the details of these opportunities as they come forward over the life of the Plan.

**28** The Authority was clear at that time that the projects identified for Eton Manor could only be considered as indicative given that the Authority's plans for investment at Eton Manor and the Lee Valley Hockey & Tennis Centre were at an early stage with feasibility work required. Some of the SANGS proposals for Eton Manor may be difficult to accommodate as currently outlined (public access through the middle of the site/venue, new public garden etc) and it was understood that these proposals would be revisited as part of the master planning and development process over the 15 year Local Plan timeframe, not least due to the 80 year maintenance requirement associated with any SANGS project funding. SPD Guidance should clarify that the projects currently identified in the SANGS strategy are indicative only where they refer to Eton Manor and will need to be considered as part of the Authority's feasibility work for the site.

**29 Connectivity**

Thematic Guidance set out under the 'A safe and well connected place' highlights the many opportunities to improve connectivity and provide safer

routes for walking, wheeling and cycling. In particular improvements to the A106 Ruckholt Rd/Eastway to provide a segregated route for cyclists linking with High Road Leyton, Eton Manor and the QEOP is supported. The concept of a comprehensive improvement scheme along this route incorporating landscaping and greening is endorsed and aligns with the Authority's PDF Area Proposals to promote and enhance both routes into the Regional Park and those between the Regional Park and the areas of the QEOP and Stratford that lie just outside the boundary.

### 30 **Building Heights**

Tall buildings appropriately located and designed are considered acceptable within the SPD development sites; these are identified as 'transformational sites' in the Local Plan Part 1. In relation to the Regional Park the building heights strategy proposes building heights step down towards the River Lea and Hackney Marshes with lower heights of between 5 to 9 storeys. This is to be supported as it will help minimise impacts on the Park. Guidance also requires development to be set back and a green buffer of at least 30m to be provided from the river bank.

- 31 Opportunities for tall buildings 10 to 17 and 18+ storeys are indicated alongside Eastway and the new Ruckholt Road station and associated public plaza. The guidance proposes master plans focus tall buildings here to address key routes and define open spaces and the new station square 'whilst avoiding canyons' or 'unacceptable shadowing'. This would potentially create a cluster of tall buildings at the northern corner and entrance point to Eton Manor and the Hockey and Tennis Centre opposite the development platform area, the location identified for potential visitor accommodation. There is an opportunity here to define a new gateway into the Regional Park and the wider QEOP, as originally proposed in the PDF Area Proposals, through the design and layout of development. The site specific guidance highlights the importance and need for exceptional design and the site specific master planning process will be important to achieving this gateway.

- 32 There is concern however about the impact of tall buildings proposed within the Temple Mills Bus Depot site – this shows two areas adjacent to Temple Mill Lane, close to the north east boundary of Eton Manor as areas suitable for buildings of 18+ storeys. Although the Site Specific Guidance for building heights states that "Buildings should be appropriate to the surrounding context including the setting of the Eton Manor site which is MOL" (para 10.5.2) and that they must be acceptable "to existing and future occupiers and open spaces, including the sporting facilities and open space at Eton Manor" there is no upper limit provided on the height of development. 18 storeys plus could have a considerable impact on the Park enclosing the open spaces within Eton Manor. Guidance should include a requirement that development step down towards the open spaces of the Park to minimise adverse impacts.

### 33 **Eton Manor Site Specific Guidance**

Eton Manor is introduced as the site of the Lee Valley Hockey and Tennis Centre a world class sports facility owned and managed by the Park Authority. Guidance text states "Enhanced sporting and recreation facilities on the site are supported in principle" (11.3.2) and this is to be welcomed. It is recognised that in planning terms the MOL designation sets parameters for the type and location of development within the site i.e. that it should relate to the use of land for outdoor sports and recreation and preserve the openness of the site. The SPD reflects this with a series of guidance points on how development



- should come forward in line with MOL policy tests. Officers are engaged in early feasibility work to inform a future site wide masterplan (a requirement of the guidance (11.3.1)) which will help to address this matter but are also cognisant of the fact that proposals for the site as a whole may require a case for 'very special circumstances' to be made, similar to that presented for the Ice Centre redevelopment. There have been early discussions with officers at LBWF to understand the master planning process and the requirements for any future planning application.
- 34 It is also the case that other Local Plan policy applies to the Eton Manor site and these should be referenced in the SPD as part of the guidance framework for Eton Manor. The Local Plan Part 1 South Waltham Forest Policy 9 M. in particular supports proposals where these "create opportunities to improve and grow the visitor, sporting and wider cultural offer of the Lee Valley Regional Park and its venues; ....including the Lee Valley Hockey and Tennis Centre, thereby ensuring their long-term sustainability and contribution to the visitor economy of the borough". Policy 82 Lee Valley Regional Park supports the Authority's PDF Area Proposals in which Eton Manor forms part of a zone of sporting excellence to be supported by a diverse range of events serving the local, national and international community.
- 35 **Open Space Biodiversity and Water Management**  
The SPD Guidance for Eton Manor on open space, biodiversity and water management potentially raises some issues for the Authority. Introductory text to this section suggests there is potential for significant increases in open space and biodiversity at Eton Manor and that there is space to provide sustainable urban drainage systems (SUDS) on site to help resolve surface flood water issues. The Authority's proposals for Eton Manor would seek to increase the biodiversity value of the site as a matter of course however there is only a finite area of open space available and a number of demands for its use. These matters are explained in detail in the Authority's formal comments attached at Appendix A. It is recommended, in accordance with the SPD conventions for the weight to be applied to guidance text, that Guidance point 11.4.4 should be amended to read as an 'advisory' rather than "mandatory" requirement by substituting the word should for must as follows:
- Development proposals, and the proposals for public open space and landscaping, ~~must~~ should seek to achieve the expectations of the Councils SANGS Strategy**
- 36 **Access and Movement**  
Both Thematic and site specific Guidance requires development proposals to make provision for a new green bridge in the south east of the SPD area which would pass over the extensive Lea Bridge Lines Temple Mills Branch railway, connecting Eton Manor with the Leyton Mills Retail Park. It is understood this is one of a number of key infrastructure requirements identified by LBWF to unlock development within the area and is derived from policy in the Local Plan. It is also identified in the SANGS Strategy as "Opportunity for a new bridge link to Leyton Mills Retail Park".
- 37 The provision of this bridge can be read as a mandatory requirement linked to development proposals at Eton Manor (as well as proposals for the development at Leyton Mills Retail Park). Whilst measures to enhance access and connectivity between the Park and local communities is to be supported, the provision of a new green bridge does not form part of the proposals for Eton

Manor and will not be provided by the Authority. Feasibility work will consider the Council's need for land within the Authority's ownership to accommodate bridge footings and access ramps and how any land take will impact space required for sporting use and biodiversity enhancements. It is proposed that the guidance text as it relates to Eton Manor in respect of the Green Bridge is reworded to clarify this matter, please refer to the letter at Appendix A to this report.

**38 Delivery and Implementation**

The detail provided in the delivery and Implementation section of the SPD is to be welcomed. The listed infrastructure requirements for public open space and public realm, cycling and walking network and green and blue infrastructure are comprehensive. The level of delivery in terms of the SANGS requirements for Eton Manor will as previously stated be a matter for future negotiation and discussion once the Authority has made progress with its feasibility work and site wide master plan. The Authority is recognised as a key stakeholder and delivery partner and it will be important for officers to continue to engage with the Council on the masterplan process for Eton Manor as it evolves.

**ENVIRONMENTAL IMPLICATIONS**

- 39 There are no environmental implications arising directly from the recommendations in this report but the Leyton Mills SPD once adopted will set out planning guidance for the delivery of development within the Regional Park at Eton Manor and key development sites adjacent to the Park's boundary.

**FINANCIAL IMPLICATIONS**

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

**HUMAN RESOURCE IMPLICATIONS**

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

**LEGAL IMPLICATIONS**

- 42 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.
- 43 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**

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

## **EQUALITY IMPLICATIONS**

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

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

## **BACKGROUND REPORTS**

The London Borough Waltham Forest Consultation on 4 March 2024  
the draft Leyton Mills Supplementary Planning  
Document

## **APPENDICES ATTACHED**

Appendix A	The Authority's draft response to the London Borough of Waltham Forest
Appendix B	Plan showing the Leyton Mills area in relation to the Park
Appendix C	Fig 23 from SPD routes for walking cycling and wheeling
Appendix D	Figure 37 from SPD Illustrative Masterplan for Eton Manor

## **LIST OF ABBREVIATIONS**

PDF	Park Development Framework
LVRPA	Lee Valley Regional Park Authority
SUDs	Sustainable Drainage Solutions
BNG	Biodiversity Net Gain
QEOP	Queen Elizabeth Olympic Park
MOL	Metropolitan Open Land
LBWF	London Borough of Waltham Forest
LLDC	London Legacy Development Corporation
SANGS	Suitable Alternative Natural Green Space
SPD	Supplementary Planning Document
SAC	Special Areas of Conservation
LVRPA	Lee Valley Regional Park Authority
DPA	Development Performance Agreements
the Park Act	Lee Valley Regional Park Act 1966

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Sarah Parsons  
Assistant Director Place and Design  
Regeneration, Planning and Delivery  
Place Directorate  
London Borough of Waltham Forest  
Town Hall complex  
Forest Road  
LONDON  
E17 4JF

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

25 April 2024

Dear Sarah

**RE: CONSULTATION ON THE DRAFT LEYTON MILLS SUPPLEMENTARY PLANNING DOCUMENT - LEE VALLEY REGIONAL PARK AUTHORITY RESPONSE**

Thank you for consulting the Regional Park Authority on the Draft Leyton Mills Supplementary Planning Document. A report on this matter was considered by the Authority's Members at the Lee Valley Regeneration and Planning Committee on the 25 April 2024 when the following comments were agreed.

**Draft Leyton Mills Supplementary Planning Document**

**Vision and Aims**

The Authority welcomes the scope and detail of the Leyton Mills SPD and the process of joint working with officers and other stakeholders that has helped to shape this document.

The four themes underpinning the Vision and Aims of the SPD are supported, particularly the recognition that "New and improved sports, leisure and recreation facilities delivered within the Lee Valley Regional Park" are an integral part of creating a "quality place to live". Leisure and sporting provision at Eton Manor will also contribute to the Council's aim to deliver a new "cultural destination that will put the new Leyton Mills neighbourhood on the map and benefit the local economy". The Authority also endorses the emphasis within the Vision on protecting open spaces and biodiversity and improving accessibility for walking, wheeling and cycling to enhance connectivity both throughout the area and its immediate surroundings.

**Thematic Guidance**

The area wide Thematic Guidance is supported in principle in terms of setting planning and design parameters and guidance for development proposals to follow,

alongside the site specific guidance. In relation to the Regional Park this should assist in co-ordinating the protection and enhancement of assets such as existing habitats and areas of nature conservation importance, important views out from and into the Park, open and waterside spaces and opportunities to improve pedestrian and cycle connectivity and provision of improved public transport hubs and services.

#### **Climate Resilience and Biodiversity**

The level of detail set out within the thematic guidance for Climate Resilience and Biodiversity is welcome. The emphasis on the importance of ecological surveys, the protection of sites of importance for nature conservation, and the incorporation of habitat provision at the early stages of design is supported, as is the requirement to achieve the mandatory 10% BNG on site as a minimum, within each development without the use off-site land.

#### **Biodiversity Net Gain and Nature Conservation Value**

In particular the Authority endorses the requirement for site-wide masterplans and Outline Planning Applications to be accompanied by a 'Biodiversity Net Gain Design Stage Report' and BNG Strategy that shows how individual plots or phases will deliver a predetermined proportion or percentage of the habitat provision for BNG.

The inclusion of specific guidance under this section to ensure that the layout, heights and massing of buildings avoid shading, disturbance, light spill or pollution that might degrade existing nature conservation value and water quality is endorsed as is the additional detail provided on the need for lighting design, which is to be informed by the Institution of Lighting Professionals and the Bat Conservation Trust. These are all matters upon which the Authority regularly makes comment when considering development proposals that might impact upon the Regional Park and which are likely to be relevant to the proposals for the 3 development sites adjacent to the Park within the Leyton Mills area.

#### **Green Buffer to Hackney Marshes**

Specific mention is made in the guidance (para 4.1.7) to the need to safeguard a section of the River Lea river corridor alongside the western edge of the New Spitalfields Market site and make this inaccessible to the public at ground level to ensure a significant stretch of the river corridor is free from disturbance. It is noted this would be in association with a 30m green buffer to the Old River Lea and these proposals are supported; they will help to maintain the ecological value of an important wildlife corridor within the Park. It is recommended that as part of the detailed master planning for the New Spitalfields Site enhancements for wildlife are included such as Kingfisher Banks and Otter Holts. Brown roofs are also an important resource and could be included as part of the thematic guidance (under section 4.2.7).

#### **Open Space, Play and Recreation**

The Authority supports the requirement that site masterplans and development proposals should provide for the open spaces and play space needs of development on-site and not rely on off-site provision (4.3.4). As noted in the SPD the Leyton Mills area is partially within the Lee Valley Regional Park (para 4.3) and although the adjacent areas of the Regional Park will have a role in terms of meeting some of the local recreational open space needs of development and the 'new neighbourhood', the remit of the Authority is much wider.

The Authority's aim is to invest in and promote the Regional Park as an accessible, must visit destination for regional, national and international visitors with open spaces and venues designed and managed to enable communities across the region to be

more active and healthier. Guidance both thematic and site specific must therefore ensure the provision of a variety of multifunctional open spaces that are accessible and substantial enough to cater for the informal recreation, sport, play, and amenity needs of new residents.

#### **SANGS Requirement at Eton Manor**

The Authority notes the requirement placed on the Regional Park at Eton Manor to provide for Suitable Alternative Natural Green Spaces in line with the Councils SANGS Strategy (SPD guidance 4.4.1.). The SANGS strategy was produced as part of the Local Plan Part 1 Examination. Officers were clear at that time that whilst Eton Manor was recognised as a key site in the growth plans for Waltham Forest which presented both a significant opportunity for future investment in regional sports and leisure facilities as well as open space enhancements, there was further work to be undertaken by the Authority before these opportunities could be fully realised and the detail finalised. As you are aware the Authority is currently engaged in feasibility work to bring forward a new phase of investment focused on the Hockey and Tennis Centre and the wider Eton Manor area as part of a master planning process which will also encompass an accommodation offer on site, improvements to the VeloPark and north QEOP. Early discussions have been held with LBWF on this subject.

Therefore whilst the Authority is supportive in principle of the SANGS requirement for Eton Manor the projects currently identified in the SANGS Strategy to provide the necessary uplift in visitor numbers must be considered indicative only; it is unlikely they will all be delivered in their current form. This should be clarified in the SPD under both the thematic and site specific guidance.

#### **Connectivity – Walking, Wheeling and Cycling New Stations**

Thematic Guidance set out under the 'A safe and well connected place' highlights the many opportunities to improve connectivity and provide safer routes for walking, wheeling and cycling. In particular improvements to the A106 Ruckholt Rd/Eastway to provide a segregated route for cyclists linking with High Road Leyton, Eton Manor and the QEOP is supported. The concept of a comprehensive improvement scheme along this route incorporating landscaping and greening is endorsed and aligns with the Authority's PDF Area Proposals to promote and enhance both routes into the Regional Park and those between the Regional Park and the areas of the QEOP and Stratford that lie just outside the boundary. The planned accessibility improvements to Leyton Tube Station will hopefully provide an opportunity to set the standard for future public realm and transport related projects, including the potential new station at Ruckholt Road.

The proposed improved route network illustrated at Figure 23 should align well with the Authority's plans for Eton Manor and North Wall Road in that the walking and cycling routes shown connecting into Eton Manor use existing routes and open up new connections through to the QEOP and avoid crossing through the middle of the site where sporting activities and development is planned and access may need to be restricted.

#### **Building Heights**

The SPD provides detailed guidance on building heights, both under the thematic section and through site specific guidance for the three development sites and this is welcomed. It is noted that the SPD area includes sites identified as suitable for tall buildings in accordance with Local Plan Policy 54 Tall Buildings. The Authority recognises the potential for tall buildings to assist in defining new spaces and the interconnection of key routes and transport infrastructure such as the proposals for

tall buildings along Eastway and at the intersection with Temple Mill Lane and the new Ruckholt Road station entrance and plaza.

### **Gateway into the Regional Park**

There is also a role here through exemplar design and build quality and consideration of visual impact, to use a mix of building heights to announce and define a new gateway into the Regional Park and QEOP at the northern corner of Eton Manor where it meets with the Spitalfields Market site on Eastway, and Temple Mill Lane.

The SPD guidance should assist in bringing this forward and it is suggested that a reference is included to the need to for tall buildings to address the gateway concept as part of their design and layout so that views into and out from the Park are enhanced and development set back from the Park edge. This would align with the PDF Area Proposals which seek the development and promotion of a primary gateway into the Regional Park and QEOP from the north east (1.A.1 Visitors). The site specific master planning process will be important to the achievement of this gateway.

### **Proximity of Tall Buildings**

The potential for tall buildings of 18+ storeys as proposed within two areas of the Temple Mills Bus Depot site adjacent to the north east boundary of the Park is of concern. Although the Site specific guidance requires tall building proposals to be considered in relation to their surrounding context, including the setting of the Eton Manor site, and to be acceptable to its open spaces, and sporting facilities, there is no upper limit provided on the height of development. 18 storeys plus could have a considerable impact on the Park enclosing the open spaces within Eton Manor and creating a canyon effect that other thematic guidance seeks to avoid (6.3.5). Proposals for the Temple Mills Bus Depot which consist of a re-provided depot for new electric buses with residential development above should specify a building layout which steps down towards the boundary opposite the Park so that lower building heights are positioned nearer the open spaces at Eton Manor.

The Authority endorses the building heights strategy proposed alongside the boundary of Hackney Marshes in the north west of the SPD area where building heights are to step down towards the Old River Lea and Hackney Marshes. The requirement for buildings to be set back and a green buffer of at least 30m from the river bank to be provided as part of any development is supported as this will help minimise impacts on the Park and the ecology of the wildlife corridor along the Old River Lea.

### **Site Specific Guidance for Eton Manor**

The Authority notes and welcomes the statements and guidance in support of enhancing sporting and recreational facilities on site, (guidance text 11.3.2).

The illustrative Masterplan for the Eton Manor site Figure 37, should include a notation identifying the Lee Valley Hockey and Tennis Centre. This could sit under Key Opportunity 1. Potential for MOL- compliant enhanced sports provision. This would support references in the SPD to Eton Manor as the site of the Lee Valley Hockey and Tennis Centre 'a world class sports facility', an important emphasis in the context of the site as a whole and the requirements placed upon the open spaces as part of a sporting complex/venue.



### **Metropolitan Open Land and Sporting Provision**

It is recognised that the SPD reflects the MOL designation and policy that applies to the Eton Manor site and that guidance has been worded accordingly, for example in terms of consolidating built sporting provision and facilities including parking towards the centre of the site. These references to consolidation of built provision should ensure that **the provision of new facilities** is included, for example on page 91 and under section 11.3.

There is however a layering of designations for this site including policy within the Local Plan Part 1 which should be recognised by the guidance.

For example **Policy 9. 'South Waltham Forest' point M.** supports proposals where they "create opportunities to improve and grow the visitor, sporting and wider cultural offer of the Lee Valley Regional Park and its venues; ....including the Lee Valley Hockey and Tennis Centre, thereby ensuring their long-term sustainability and contribution to the visitor economy of the borough". **Policy 82** also supports the Lee Valley Regional Park and the Authority's PDF Area Proposals in which Eton Manor forms part of a zone of sporting excellence within the Park and QEOP to be supported by a diverse range of events serving the local, national and international community.

As you are aware from previous discussions in relation to the SPD and Eton Manor, the Authority intends to bring forward proposals for expanding and improving the current sporting use of the site in accordance with Local Plan policy and the PDF Proposals as part of a site wide feasibility and masterplan. It is this master planning process that will be key to identifying the scale, location and design of development on site in relation to the MOL position, the priorities for good growth as set out in Policy 9 for South Waltham Forest and other matters in respect of making better use of the open space on site and enhancing its biodiversity value. The site specific guidance should offer a more balanced position with reference to the Local Plan policy position for sporting and cultural provision in this area of the Borough.

### **Open Space and Biodiversity**

The SPD Guidance for Eton Manor on open space, biodiversity and water management potentially raises some issues for the Authority. It is based upon the premise that the Eton Manor site offers an opportunity for a significant increase in open space and biodiversity value and can contribute to resolving surface flood water issues in the wider area by providing sustainable urban drainage systems (SUDS) on site.

Whilst the Authority will be looking to increase the biodiversity value of the site as a matter of course there is only a finite area of open space available – some of this will form part of the biodiversity offer where public access may need to be restricted to protect habitats, and some will be needed for sporting, events and venue related activities. Hence officers are concerned with the SPD emphasis on the need for Eton Manor to achieve the expectations of the Council's SANGS Strategy. The SUDs requirement is also an extra 'ask' for the site and unless this can work as part of the habitat requirement identified through the Authority's master planning and future ecological assessment work, it is unlikely to be achievable. Guidance point 11.4.4 should be amended to read as an advisory requirement as follows:

**Development proposals, and the proposals for public open space and landscaping, must ~~must~~ **should** seek to achieve the expectations of the Councils SANGS Strategy**

### **Access and Movement**

The site specific guidance on access and movement is generally in accordance with the Authority's proposals for the site in terms of improving walking and cycling routes into and around the site and connections through to the rest of the Regional Park and Olympic Park.

Both Thematic and site specific Guidance requires development proposals to make provision for a new green bridge in the south east of the SPD area connecting Eton Manor with the Leyton Mills Retail Park. It is understood this is one of a number of key infrastructure requirements identified by LBWF to unlock development within the area and is derived from policy in the Local Plan. It is also identified in the SANGS Strategy as "Opportunity for a new bridge link to Leyton Mills Retail Park".

Whilst the Authority would be supportive of measures to enhance access and connectivity between the Park and local communities, the provision of a new green bridge over the extensive Lea Bridge Lines Temple Mills Branch railway does not form part of the proposals for Eton Manor and will not be provided by the Authority. It is of concern that this is a mandatory requirement linked to development proposals at Eton Manor as currently worded in the site specific guidance and as shown on the illustrative master plan for Eton Manor. Feasibility work will consider the Council's need for land within the Authority's ownership to accommodate bridge footings and access ramps and how any land take will impact space required for sporting use and biodiversity enhancements. The guidance text as it relates to Eton Manor under point 11.5.3 should be reworded as follows and as advisory rather than mandatory:

~~Development proposals must make provision for a new 'green bridge' for walking, wheeling and cycling, connecting the Eton Manor with the Leyton Mills Retail Park site. This includes safeguarding land for bridge footings and access ramps."~~

**Development proposals at Eton Manor should safeguard land for the bridge footings and access ramps to accommodate infrastructure provision identified in Section 12.4 'Infrastructure Requirements' for a new 'green bridge' for walking, wheeling and cycling, connecting the Eton Manor with the Leyton Mills Retail Park site.**

### **Community Facilities**

Guidance on community use of facilities at Eton Manor is advisory but seeks the inclusion of Community Use Agreements as part of development proposals. This will be a matter for the Authority to consider as part of its more detailed viability work. Reference is also made under 11.6.2 to delivering play facilities on site. The guidance text should be amended to refer to 'natural play' which would be more in keeping with the site as follows:

**Enhanced public open space and natural play facilities should be delivered on the site. These should be fully accessible to the public, and designed to meet the needs of the wider community.**

### **Delivery and Implementation**

The Authority welcomes the detail provided for the delivery and implementation of the SPD. Officers hope to engage further with the Council on the feasibility work for Eton Manor as this evolves and moves forward to a master planning stage.

It is helpful to understand the infrastructure requirements for the SPD area as a whole and to understand the level of investment the Council are seeking to secure. The listed infrastructure requirements for public open space and public realm, cycling and walking network and green and blue infrastructure are comprehensive. The level of delivery in terms of the SANGS requirements for Eton Manor will as previously stated be a matter for future negotiation and discussion once the Authority has made progress with its feasibility work and site wide master plan.

**Hackney Marshes Mitigation and Governance Structure**

The requirement to mitigate recreational pressure on Hackney Marshes is welcome but should also apply to the Waterworks Field area which formed part of the ecological assessment undertaken by the London Wildlife Trust to inform the SPD. This area of the Park shares a boundary with the River Lea and Hackney Marshes and is a short walking/cycling distance away from the Leyton Mills area. The same recreational pressures are encountered such as illegal gatherings, unregulated use of the river for swimming and general anti-social behaviour. Officers from both Hackney Council and the Authority have in the past shared solutions to try and manage these issues across the whole area. The proposal to bring together land owners in this area to help manage and monitor the mitigation for the marshes (and Waterworks Field) is therefore supported provided the appropriate resources are set in place to enable this to happen. The suggestion that this work also include a review of the purpose and function of the WaterWorks Centre and Hackney Marshes Centre is noted. However, the Authority will be addressing this matter in due course.

The Authority notes the Council's progress to date on the delivery of Ruckholt Road Station which has been confirmed as technically feasible. Proposals for a new station plaza opposite Eton Manor will be a major boost to improving public transport choices for those visiting the venue and sporting events.

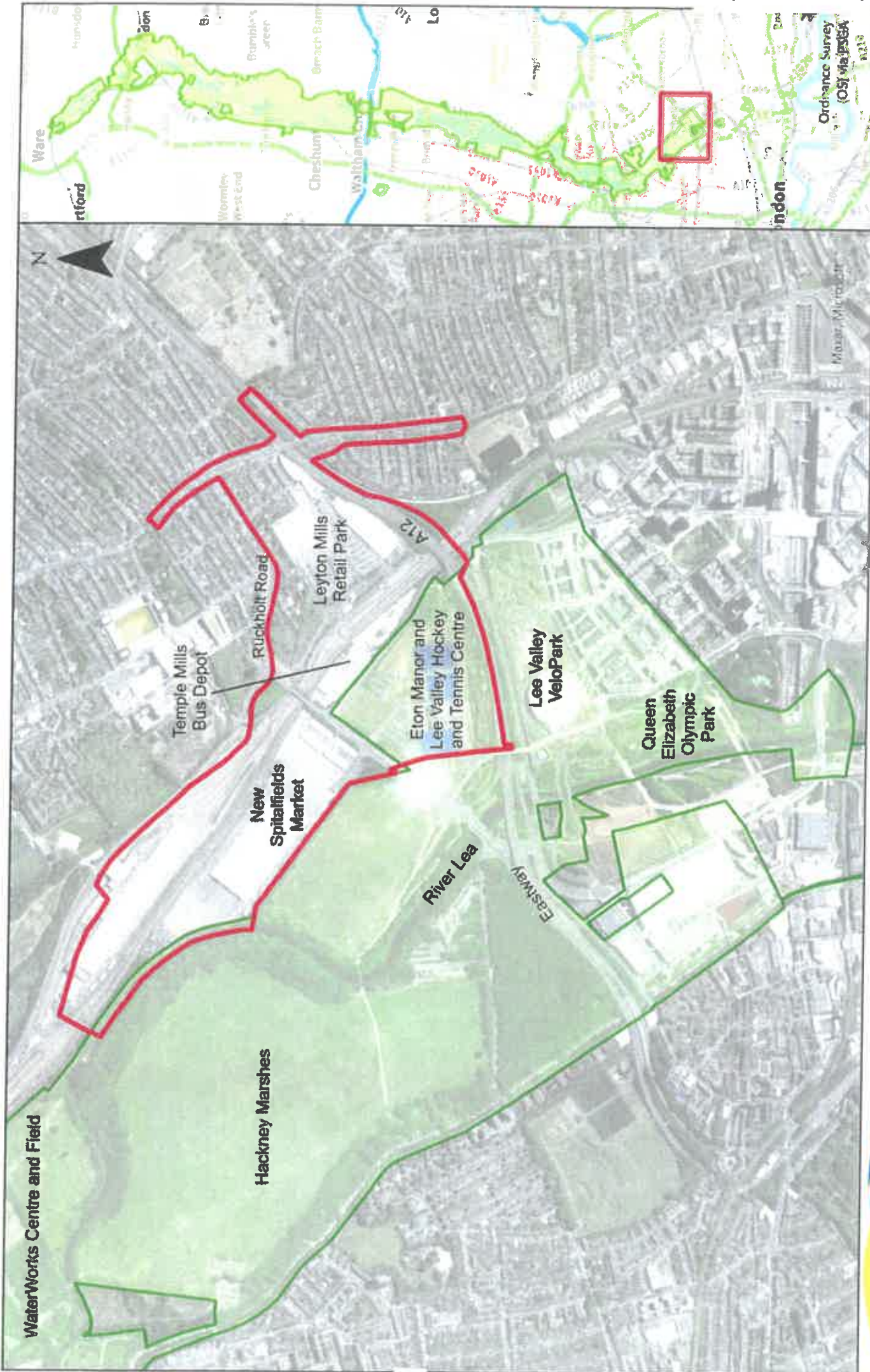
Finally a number of minor editing amendments are proposed – attached as Table A to this letter. These seek to correct minor inaccuracies in the text or on the accompanying maps and figures.

Yours sincerely

**Claire Martin**  
**Head of Planning**

**Table A - Minor Amendments to SPD text and Figures Identified by LVRPA**

<b>Draft SPD Reference</b>	<b>Issue</b>	<b>Change required</b>
Page 9 Figure 1	Eton Manor incorrectly labelled as no.1	Eton Manor should be labelled as no. 4
Figure 9 Context plan showing green assets in and around the area.	Mapping notation shows both Thames Water Depot and the Lee Valley Ice Centre as part of the 'Marshlands and woodlands' category	Thames Water Depot needs to be removed from Marshlands and woodlands notation  Lee Valley Ice Centre needs to be identified, and taken out of the Marshlands and woodlands notation
Section 3.2 Habitats and Species	First sentence states "A Preliminary Ecological Appraisal of Hackney Marshes and the Waterworks Meadow was undertaken by the London Wildlife Trust In 2023..."	Change Waterworks Meadow to WaterWorks Field – the same amendment is needed on Fig 9
Page 33, 2 <sup>nd</sup> para	This notes <i>the Epping Forest and Lee Valley RAMSAR and SPA</i>	This needs to be corrected to read <i>the Epping Forest SAC and the Lee Valley SPA and Ramsar site.</i>
Page 38, Issues	4 <sup>th</sup> bullet references sites of nature conservation	This should be amended to read 'sites of importance for nature conservation'
Page 47	Section 4.4, 2 <sup>nd</sup> para refers to SANGS as 'sustainable alternative...'	Amend text to read 'Suitable Alternative ....'
Page 91, para 11.1	First sentence of 11.1 refers to BMX trails instead of MTB trails	Amend text to read MTB trails instead of BMX
Preliminary Ecological Assessment (PEA) for Hackney Marshes (also covered Waterworks Field area)	This report mentions that the consultants did not obtain data from Greenspace Information for Greater London (GiGL)	All the Authority's ecological survey data went to GiGL so this is a large amount of data that has been missed. A further discussion with LVRPA officers is proposed regarding the PEA report.



WaterWorks Centre and Field

Hackney Marshes

New Spitalfields Market

Temple Mills Bus Depot

Ruckholt Road

Leyton Mills Retail Park

Eton Manor and Lee Valley Hockey and Tennis Centre

Lee Valley VeloPark

Queen Elizabeth Olympic Park

River Lea

Eastway

A12

A12



Consultation on the Leyton Mills Supplementary Planning Document

1:20,000 @ A4  
08.04.24

Produced by Corporate GIS (HH)

M:\ESRI System Management NEWM10 Workspaces Maps and Projects\10a User Specific Maps\Committee Maps\2023 PDFs\PLN24\_006 © Crown copyright and database rights 2023 OS AC0000806208



Leyton Mills SPD Area
  Park Boundary

Figure 23. Routes for walking, cycling and wheeling.



**1** A new station at Ruckholt Road, with an entrance at Marehall Road and public square off Ruckholt Road. Potential new walking and cycling connection over the railway

**2** New and improved key routes for walking, wheeling and cycling through the Leyton Mills development sites, as shown by the dark green arrows. Other connectors are shown by thinner blue arrows.

**3** A central segregated cycle route on A106 Ruckholt Road / Eastway, connecting High Road Leyton, Eton Manor, Hackney, the Queen Elizabeth Olympic Park and on to Stratford. This should be designed with generous, physically protected cycle lanes, landscaping and greening.

**4** Improved public realm around Leyton Underground Station alongside improvements to the station.

**5** Investing and improving routes into and through Hackney Marshes, whilst preserving and enhancing biodiversity, subject to agreement with LB Hackney

- New bus stops (indicative location)
- ↔ Primary routes for walking, wheeling and cycling
- ↕ New & improved walking, wheeling and cycling connections
- = Potential new walking, wheeling and cycling bridge over railway, connecting Leyton Mills Retail Park and Eton Manor and the QEOP
- ↔ Existing walking, wheeling and cycling infrastructure
- ↔ Existing vehicular access
- ↔ Potential new access for goods vehicles
- ↔ Primary walking and cycling route through Eton Manor except during major events
- ↔ Alternative walking and cycling route during major events
- Leyton Mills SPD Area boundary
- Borough boundaries
- - - LLDC boundary

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Key

## 11.2 Key opportunities

- 1 Potential for MOL-compliant enhanced sports provision. Any built form, parking and hardstanding should be consolidated and focussed towards the centre of the site.
- 2 Opportunities for MOL-compliant public open space, play-space, biodiversity, greening and flood mitigation around the site in various locations.
- 3 New 'green' bridge connecting Leyton Mills to Eton Manor and south to Queen Elizabeth Olympic Park.
- 4 New green circular walking route and improvements to create a SANGS.
- 5 Key arrival point, allowing for protected cycle provision at junction and improved crossings. Links to the proposed new Ruckholt Road station.
- 6 Areas of existing parking and hardstanding reduced and consolidated within the centre of the site to preserve openness biodiversity, urban greening and runoff.



Figure 37. Illustrative masterplan and key opportunities for Eton Manor

1:4,000 @ A3  
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 Ordnance Survey (AC0000050979)

**Key**

↔ Key routes for walking and cycling, including circular SANGS walk

↔ Potential new landscaped pedestrian and cycle bridge (between Leyton Mills and Eton Manor to Queen Elizabeth Park)

Green open space area to be kept free from built development including hardstanding and parking

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