



LEE VALLEY REGIONAL PARK AUTHORITY

**REGENERATION AND PLANNING
COMMITTEE**

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5

Report No:

RP/95/25

**TOWARDS A NEW LONDON PLAN CONSULTATION BY THE
MAYOR OF LONDON ON THE NEXT LONDON PLAN**

Presented by the Head of Planning.

SUMMARY

The London Plan is a blueprint for development and growth in London, and it is a legal requirement for the Mayor to produce an up to date Plan every 5 years. This consultation document 'Towards a New London Plan' is the first formal stage in this process. It sets out a range of options and proposals that the new London Plan might include for consideration and comment.

This report provides an overview of the main topics and policy areas of interest to the Regional Park and the business of the Authority including matters relating to London's housing supply, growing the economy and the role of London's infrastructure specifically its green infrastructure. Matters relating to industrial land, the green belt and Metropolitan Open Land are also discussed.

The report includes draft comments on these matters – these will need to be submitted via an online survey and Appendix A to this report reproduces the survey questions and sets out the Authority's draft formal comments and observations to be submitted in response to the consultation.

RECOMMENDATIONS

Members Approve: (1) the comments as set out in Appendix A to this report as the Authority's formal response to the Mayor of London's consultation Towards a New London Plan.

BACKGROUND

- 1 The London Plan is the strategic, spatial plan for Greater London, and must be reviewed every five years. The current plan was published in 2021. The Mayor of London (the Mayor) proposes to publish a draft new London Plan in 2026 for

consultation which once adopted in 2027 will run until 2050. The London Plan is part of the 'development plan' together with the local plan for the area and any neighbourhood plans. Planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise. Local Plans produced by the London Boroughs must be in 'general conformity' with the London Plan; local policies must not harm implementation of the London Plan.

- 2 To meet the targets set by central government the London Plan will need to identify the capacity to deliver 880,000 homes over the 10 years (88,000 new homes each year) whilst also achieving 'Good Growth', i.e. growth that is socially and economically inclusive and environmentally sustainable. The Mayor has stated that the next London Plan *"will not increase the overall burden of planning policy requirements on development under the current circumstances"* and that many other factors will need to be in place alongside the plan including funding for affordable housing and transport, and the delivery of sufficient energy, water, education and healthcare and other infrastructure capacity needed.
- 3 The current consultation Towards a new London Plan sets out a number of key ideas that the new plan might include with a range of options for consideration and comment. It does not however include all of the policy matters covered by the current London Plan. The ideas and options presented build upon a range of engagement that has been underway since 2021 although it should be noted that the options do not necessarily represent the Mayor's views or preferred direction.
- 4 There are a number of legal and procedural requirements that the London Plan must meet before it can be adopted, including the need for the plan to be 'sound', i.e. positively prepared, justified, effective and consistent with national policy. These will be tested by Planning Inspectors at an independent examination. The plan must also be agreed by the Secretary of State and the London Assembly. The London Plan will be supported by an Integrated Impact Assessment (IIA) and a Habitats Regulations Assessment (HRA).
- 5 Responses to the consultation are invited via an online survey which poses general questions in relation to each section of the document. It is not necessary to answer every question just those of interest in each case. The responses and comments will inform the next plan which will be the draft new London Plan. This is due to be launched for consultation in 2026, prior to being submitted for examination.
- 6 The Regional Park within the Greater London area lies broadly south of the M25, and includes the major venues at the Lee Valley Leisure Centre, the Lee Valley Ice Centre and Riding Centre on Lea Bridge Road, the Lee Valley Hockey and Tennis Centre and the Lee Valley VeloPark within Queen Elizabeth Olympic Park (QEOP) and the important areas of open space and biodiversity at Rammey Marsh, Tottenham Marshes, Walthamstow Marshes Site of Special Scientific Interest (SSSI), Lee Valley WaterWorks Centre and Nature Reserve, Hackney Marshes, Three Mills, East India Dock Basin and Bow Creek Ecology Park. Important areas of biodiversity are present in the form of large reservoirs at Chingford and Walthamstow. The majority of the Regional Park within London is designated as either green belt or Metropolitan Open Land - please refer to the plans at Appendix B to this report.

- 7 This report provides an overview of the key sections of the consultation document. The Authority's draft response to those consultation questions considered to be of most relevance to the Regional Park and the business of the Authority are set out as comments within the report and then reproduced at Appendix A to this report in the required survey format. Once finalised these will be submitted via the online survey to meet the 22 June deadline for responses.

TOWARDS A NEW LONDON PLAN

- 8 The following sections of the consultation document 'Towards a new London Plan' contain matters of relevance to the Authority and the future development, enhancement and protection of Reginal Park:

Section 2 Increasing London's Housing Supply
Section 3 Growing London's Economy; and
Section 5 London's Infrastructure, climate change and resilience.

It should be noted that green belt and Metropolitan Open Land (MOL) are discussed under both Sections 2 and 5 with some overlap between the topics raised.

9 Section 2 Increasing London's Housing Supply

This section discusses the governments new national requirements for the number of homes to be delivered across England and in particular the need for 880,000 new homes to be delivered in London over the next 10 years. It is acknowledged that achieving this level of housebuilding will depend on a range of other significant factors, for example, *"economic conditions, the availability of workers and materials, whether people can afford the homes once they are built, funding for affordable housing, and the delivery of the right supporting infrastructure."* The Mayor also emphasises that higher volumes of development depend upon good public transport connections and safe environments for walking and cycling.

- 10 **Paragraph 2.1 'A brownfield first approach'** states that the London Plan will, *"prioritise opportunities to plan for and deliver homes within London's existing urban extent first."* This will be achieved through the inclusion of positive policies within the plan, identifying land supply and other measures to increase the build rate and ensuring that the homes are built in the right places, supported by public transport. Higher density is also referenced as part of the solution.
- 11 The discussion on **Tall Buildings** is included within **Section 4 under Paragraph 4.2**. Tall buildings in suitable locations are considered to play an important role in delivering new homes, but it is also recognised that they raise issues and have impacts beyond borough boundaries. It is suggested that the new plan could take a more active role in identifying and defining tall building clusters and that it *"could allow more strategic consideration of tall buildings, their role and potential capacity and cross-borough issues."* This approach would require a decision about what height should be set for a tall building cluster. As explained in the consultation document the current plan includes a benchmark of seven storeys/21 metres. Alternative thresholds could be based on the heights at which planning applications are referred to the Mayor (10 storeys/30 metres dropping to eight storeys/25 metres by the River Thames) or

a higher threshold of 20 storeys/60 metres.

12 Comment on Section 2 (and Section 4 as it relates to tall buildings) – Paragraphs 2.1 and 4.2

The Authority recognises the significant challenge facing London in terms of meeting its housing and employment needs. The Regional Park within London is already experiencing considerable change along its boundaries as the redevelopment of brownfield land and industrial sites are brought forward at pace. The consultation document is clear that achieving these higher rates of housebuilding will depend upon a number of other significant factors. It is critical that green infrastructure provision, for leisure, recreation and biodiversity is included as one of these factors and considered as an integral part of meeting housing need to ensure Good Growth is achieved.

13 Given the level of housing required and the push for higher densities there will be an ever-increasing demand for accessible and high-quality open spaces providing a variety of recreational opportunities. At the same time there is also a need to find space for nature and to contribute to nature recovery and meet Biodiversity Net Gain (BNG) requirements as well as managing other environmental factors such as flooding, and heat risk. As a statutory consultee, the Authority has responded to a number of planning applications for mixed use residential led development adjacent, or close to the Regional Park. In many cases it has been disappointed by the layout and design of development, the positioning of tall buildings in relation to the Park, and the lack of quality open space provision included as part of the proposals, particularly where this could complement or connect into the Regional Park.

14 The impact of tall buildings on the Regional Park, its landscape character, biodiversity and visitor amenity is difficult to quantify at this stage. However, the initial views of the Authority are that in most cases tall buildings will impact negatively on the Park's sense of space, the long views out across the valley, and erode the experience of 'being in nature' and separate from the urban area. No account is being taken of the cumulative impact on the Regional Park at a strategic scale. This should be a matter that is considered in formulating policy for the new London Plan.

15 Paragraph 2.3 'Opportunity Areas'
Increased density will need to be part of the solution, although much of this potential is linked to public transport improvements which requires funding. Opportunity Areas (OA) (there are 47 OAs in the current plan including the Lee Valley) are areas where potential exists to deliver a substantial amount of new development on brownfield land both to provide homes and jobs. The status of the Lee Valley OA is proposed to change from 'Nascent' to 'Ready to Grow' with delivery identified for between 2029 and 2034 with potential development approved and infrastructure planned, (to note, Nascent signifies delivery beyond 2034).

16 Comment Paragraph 2.3

The current London Plan says very little about the statutory purpose and role of the Regional Park and this needs to be addressed in the new

London Plan. From the outset the Authority's statutory purpose (as set out in the Lee Valley Regional Park Act 1966) has been to create a Regional Park dedicated to leisure, recreation, sport and nature conservation. The Park plays a significant role in providing for the leisure needs of the capital. It sits at the heart of the Lee Valley Opportunity Area within London providing a strategic interconnected area of green and biodiverse open space and waterbodies which provide diverse opportunities for leisure, sport and biodiversity (much of which links to and complement existing local open spaces).

- 17 **The Park plays a significant role in providing for the leisure needs of the capital. Whilst around 8 million visits are made each year to the whole Park, the largest proportion is made by Londoners to its venues and parklands. It is a strategic component of the capital which will assume greater significance against the backdrop of continued and increased levels of growth and should be recognised as such in the new London Plan.**

18 Paragraph 2.6 'Industrial Land'

The current London Plan allows co-location of homes and substitution of land in some circumstances, to enable homes to come forward alongside industrial uses and land swaps to release land for housing. The consultation document notes that since 2019-20, an estimated 4,500 homes a year were given planning permission in co-location schemes. However, less than 40 percent are currently under construction or built. Views are sought on co-location and experience of implementing this as it is understood to be challenging to deliver and is usually restricted to light industrial uses alongside non-industrial space.

- 19 **There is concern about the loss of London's industrial land (18% has been lost since 2001) and the need to have sufficient industrial capacity to enable the city's economy to function and grow. Section 3 Paragraph 3.4 also considers Industrial Land and proposes different mechanisms to protect existing industrial areas by for example, prioritising areas strategically from across London that best meet industrial needs, by promoting heavier industrial, logistics and warehousing and infrastructure uses in designated industrial areas or likewise, by seeking to locate more light industrial uses in town centres and high streets. The new London Plan could also recognise those industrial locations that are particularly well suited to support specialist clusters of economic activity such as logistics or green innovation.**

- 20 **The consultation document does however (para 2.6 and para 3.4) consider there may be opportunities to provide additional, or swap, industrial capacity in low quality parts of the green belt and particularly the grey belt - especially in locations that are less suitable for housing. For example, areas with high noise levels or better connections to the road network which would be suited to industrial uses, allowing some well-connected brownfield sites to be released for housing.**

21 Comment on Paragraphs 2.6 (and 3.4)

The co-location of homes alongside industrial uses is a more recent issue for the Authority, as would be land swaps to release land for housing. The Regional Park boundary encompasses a wide range of land uses and includes sites in residential, industrial and commercial use. Some of these predate the Regional Park's designation or are well established. From

time-to-time opportunities arise to bring these areas, as a whole or in part, into a Park-compatible use (i.e. for leisure, recreation or open space and biodiversity). The Authority as a statutory consultee is also able to engage in the development management process when development is proposed within these areas to protect and enhance the Regional Park.

- 22 Land swaps that substitute new residential development for older industrial uses might be of benefit to the Regional Park if environmental and open space benefits can be secured as part of the proposals that will complement the landscape, habitats and leisure use of the Park. However, two industrial sites within the Regional Park in the London Borough of Waltham Forest are currently being proposed for the co-location of residential with industrial use. In both cases the areas identified for co-location are also being designated as suitable for tall buildings, potentially in the range of 16 to 20 storeys, (they are located adjacent to the A104 which crosses through the Park), presumably to retain the quantum of industrial land required to meet the borough's housing need.

Tall buildings in this location within the Park, as with other areas adjacent to the Park) will create a barrier effect at the Park edge and introduce a new and unsympathetic scale of development to the area.

Clear parameters would need to be set to ensure land swaps and co-location deliver development at a scale and to a design that is sensitive to its location particularly where these measures are proposed adjacent to strategic areas of open green and blue space, with biodiversity and recreational value.

23 **Paragraph 2.8 Other sources of housing supply (Green Belt)**

It is recognised that even a big increase from brownfield supply will not deliver 88,000 homes a year within London's existing urban extent. Reference is made in the consultation document to the government's change in approach to the green belt. London will be required to review and release green belt to meet housing and other development needs where those needs cannot be met in other ways, such as redevelopment within London's existing built area. The Mayor has commissioned a London-wide green belt review but paragraph 2.8 states that *"any green belt release should be based on building sustainable, liveable neighbourhoods with access to public and active travel options, making the best use of land. It must also deliver improved access to green space and nature (potentially including a new generation of enhanced or new public parks for Londoners subject to funding) and gains in biodiversity."*

24 **Paragraph 2.9 Beyond London's existing urban area (Grey Belt)**

Paragraph 2.9 states that the strategic green belt review will also identify 'grey belt' land across London. This will help understand the potential capacity from housing on London's grey belt, and other uses, as part of strategic planning for different land uses. These include industrial capacity, data centres or energy and other infrastructure. 'Grey belt' is described as *"green belt areas that have either been Previously Developed Land (PDL) or don't strongly contribute to any of the three green belt purposes:*

- *to check the unrestricted sprawl of London*
- *to stop neighbouring towns merging into one another*
- *to preserve the setting and special character of historic towns"*

25 Paragraph 2.11 'Metropolitan Open Land'

Paragraph 2.11 addresses Metropolitan Open Land (MOL), this is the strategic level of open space, designated with specific criteria in mind. Unlike green belt purposes, MOL criteria does involve environmental considerations. The Mayor is clear that MOL will continue to be protected – it has a vital role for Londoners and providing a liveable city as London grows.

- 26 Under Paragraph 5.6 London's open spaces** the Mayor is proposing that the London Plan should be redrafted to distinguish between MOL and green belt, in order to protect MOL from green belt reviews. The consultation document makes reference to some areas of MOL which are not accessible to the wider public and which have limited biodiversity value thereby undermining the purpose of the designation. There may be very specific circumstances where certain MOL, golf courses are cited as an example, could be considered for release for housing, given the challenging housing target. Golf courses are often not publicly accessible and offer limited biodiversity value. They could also provide new accessible open spaces and parks alongside housing and other development. At the same time, they could improve biodiversity through landscape-led redevelopment. The Mayor is seeking views about where the right balance might lie.

27 Comment on Paragraphs 2.8, 2.9, 2.11 and 5.6

It is noted that the Mayor is undertaking a London-wide green belt review to inform the draft London Plan but that this review will not apply to MOL (as discussed under par 5.6). Whilst there are clear differences in the roles performed by green belt and MOL the Regional Park is a statutory designation that encompasses both, most of the Park within London is designated as either green belt or MOL and the Authority's statutory remit to create a Regional Park dedicated to leisure, recreation, sport and nature conservation applies across both green belt and MOL. Indeed, the Regional Park includes award winning and internationally regarded venues, diverse and popular nature reserves, (many of which are SSSIs) and a range of visitor facilities and infrastructure associated with the waterways, walking and cycling. These facilities contribute to good growth across the London Region but require ongoing investment, improvement and eventually redevelopment (as in the case of the Lee Valley Ice Centre).

- 28 It would be appropriate for the draft plan to recognise that an exception to the standard green belt and MOL policy is required or a reference included in supporting text to the Authority in pursuit of its statutory purpose to allow for the redevelopment and or expansion of its venues so they can continue to serve both the extended London region and local neighbourhoods. This would align with the Mayor's requirement that any green belt release should deliver improved access to green space and nature and gains in biodiversity.**
- 29 The strategic green belt review will provide the opportunity to identify grey belt land and this is welcomed. It is noted that this land is likely to be considered for housing and potentially other uses with industrial, data centres or energy and other infrastructure mentioned. Whilst this approach is understood, within the Regional Park grey belt land will have value in relation to leisure development, in accordance with the Authority's remit.**

- 30 **Whilst recognising the importance of the Regional Park for recreation and leisure, we also recognise that in some cases under-used land in the Regional Park (green belt or MOL) could support growth opportunities with appropriate mitigation to improve access and protect nature conservation, the Lee Valley Special Protection Area and Ramsar. Working collaboratively with the London Boroughs will be important in bringing these sites forward.**

31 **Section 3 Growing London's Economy**

The consultation document states that London's economy was worth almost £500bn in 2022, accounting for around 25 per cent of UK economic output. It has strengths in many different sectors including finance, professional services, sciences, innovation, tech, health, education, social care, hospitality, creative and green industries. Latest forecasts suggest employment could grow by around 800,000 jobs by 2050. London's economic activity takes place in a range of locations, with the Central Activities Zone of key importance. However, its economy should also be supported by economic growth across its Opportunity Areas, town centres and industrial locations. This enables jobs, services, and business opportunities near to people's homes.

- 32 Reference is made to the need for a new policy approach to reflect changes made to the planning use classes which introduced a new and more flexible planning use called Class E, covering a range of commercial, business and service uses. These include shops, cafes and restaurants, indoor sport, health centres, nurseries, offices, research facilities and light industrial. Class E uses can change to any other use within this class without planning permission.

33 **Paragraph 3.6 Culture and creative industries**

The consultation document recognises the importance of culture and the creative industries (which contribute around £50bn to London's economy every year and account for one in five jobs in the capital) and the contribution this makes to health and wellbeing. It is considered important to make space for it in all parts of the capital. It includes a range of uses and activities such as music and performance venues, visual arts, fashion, film, design, crafts and making, cinemas and museums. Many Londoners and visitors also experience culture through London's public spaces and diverse communities.

- 34 It is also recognised that London's cultural venues and creative spaces face a range of threats. These include the loss of premises and venues to alternative uses such as housing and affordability concerns in terms of rents and housing costs for workers. There is also the issue of managing the impact of nuisances such as noise from existing uses on any new development proposed close by such as housing (agent of change). Cultural uses need both audience-facing spaces such as art galleries and theatres, and production spaces, where culture is rehearsed, fabricated, and made.

35 **Paragraph 3.7 Visitor economy**

The consultation document states that *"in 2023, there were 20.3 million international visits to London spending £16.7bn and 15.1 million domestic visits spending £4.8bn. A range of purpose-built visitor accommodation is key to support this."* However, it is noted that the current London Plan only supports purpose-built visitor accommodation in very limited circumstances. It is proposed that the next plan could extend this support much more widely across

the Central Activities Zone, in town centres and high streets and more broadly in other locations with good public transport accessibility

36 Comment on Paragraphs 3.6 and 3.7

The points raised in relation to culture and the creative industries apply equally to the leisure and sports events industry. They also make an important contribution to London's economy and the health wellbeing of Londoners. The current consultation does not touch on this as a topic but as with cultural venues, spaces should be made available across the capital for leisure and sporting venues, including within the green belt and MOL.

- 37 The Regional Park is a major venue for sporting and cultural events which last year attracted around 125,000 spectators at 500 events. Each venue and large areas of parklands are used for international, national and local events. Since opening in 2014, our two legacy venues within London, the Lee Valley Hockey and Tennis Centre and the Lee Valley VeloPark have hosted 34 major international events, attracting 700,000 spectators. Last year they hosted the FIH Women's Hockey World Cup and the UCI Track Cycling World Cup, attracting 40,000 spectators, with the Hockey Pro League being hosted this year. The Regional Park will continue to play a significant role in meeting London's leisure needs during the plan period. This should be referenced explicitly in the new plan.**

38 Section 5 London's Infrastructure, climate change and resilience

This section of the consultation document looks at the range of infrastructure needed to support London's growth. This includes critical energy, water, and waste capacity and the green and social infrastructure that are so important to health and quality of life. It considers how to plan for the infrastructure and utilities capacity that London needs including land and development capacity to support growth and the drive to net zero and local energy planning. The climate emergency will also require infrastructure that is resilient to severe weather, that protects the health and livelihoods of Londoners and promotes self-sufficiency.

- 39 It is also important to consider how this infrastructure will be funded as development has a finite capacity to fund public benefits. Providing infrastructure through the planning process cannot fund all the infrastructure needed and competes with other social benefits such as affordable housing.**

40 Paragraph 5.5 Green and open spaces

Paragraph 5.5 recognises that as London's population continues to grow and the capital's neighbourhoods become denser, this increases the demand for, and importance of, green and blue spaces. Green infrastructure provides multiple benefits for physical and mental health and plays an important role in reducing health inequalities. London's green spaces will also play a major part in helping to protect against the worst effects of climate change such as overheating and flooding. It is therefore the Mayor's ambition to increase access to green space and tree cover across London.

- 41 Reference is made to the new requirements in the Environment Act 2021 for producing Local Nature Recovery Strategies (LNRS) and for developments to achieve BNG. The Greater London Authority (GLA) is developing an LNRS for London and a London Green Infrastructure Framework (LGIF). These will**

provide important data about the location of existing greening, and where there are issues that new or enhanced greening can help tackle. This includes, for example, alleviating flood risk or heat risk or supporting a particular habitat or species.

42 Paragraph 5.6 London's open spaces

To understand and mitigate for areas of open space deficiency it is suggested that the next London Plan assess the quality, use and the level of demand, as well as the distances to open spaces, para 5.6. It could also include actions that take account of areas where demand is greatest (as well as where open spaces are further away). Smaller green areas and linear green spaces could also be taken into account, including for example, healthy streets and the publicly accessible open spaces created in larger housing schemes. These newly created open spaces could then be designated in local plans recognising their contribution to addressing open space deficiencies. This would provide greater opportunities to extend the network of green infrastructure and provide open space benefits. However, it would require clear criteria to ensure these spaces provide meaningful open space for people to use. Policy could be changed to address issues related to management, access, and inclusiveness of open spaces in the next London Plan. This will help ensure that all Londoners can enjoy and benefit from these essential spaces.

43 Comment on Paragraphs 5.5 and 5.6

The Authority would support measures to ensure provision of new green and open spaces is provided as an integral part of new development including the redevelopment of brownfield sites in order to meet existing and future demand. Development proposed adjacent to existing areas of open space such as the Regional Park should still be required to provide sufficient open space to meet all the recreational and leisure demands of its new residents so that provision within an area is robust and complementary to open spaces that already exist. The consultation document refers to the *"Mayor's ambition to increase access to green space and tree cover across London"* but the aim should be to increase the provision of green space and tree cover and ensure this complements and connects with existing green infrastructure such as the Regional Park.

44 The Authority supports the proposal to undertake further work to understand and mitigate for areas of open space deficiency and to assess the quality, use and the level of demand, to inform the next London Plan. This is fundamental given the multiple roles and functions now expected from green space and to some degree water spaces; it is expected to provide for recreation and leisure, to provide space for wildlife and nature, help mitigate for the effects of climate change such as overheating and flooding and improve physical and mental well-being. Ensuring all these functions can be successfully delivered and maintained over the long term requires careful consideration of the type of open space needed in each case and how access can be managed so that for example disturbance from recreational use does not undermine the wildlife value of habitat provided as part of the open space or that using land for flood mitigation can also benefit both wildlife and public access.

45 Visitor pressure and increased footfall within the open spaces that the Authority manages has led to the disturbance and destruction of habitats, noise and light pollution, vandalism, and anti-social behaviour, despite

ongoing and increasing investment by the Authority to establish a robust and attractive leisure landscape for all to enjoy. Providing the appropriate type of open space and level of access to it must be considered as part of development and Green Infrastructure provision.

- 46 The Authority is involved with the current work to produce the LGIF and the LNRS and welcomes the role of the London Plan in recognising the area-wide priorities and opportunities that will be identified in the LGIF and LNRS. As stated in the consultation document this should help - *"prioritise where greening should be protected, enhanced and/or connected to help nature recover and maximise other benefits for Londoners, including new MOL designations and, parkland where appropriate, where development comes forward on land that is currently green belt. It should also include other strategic opportunities for rewilding and nature restoration"*.

The London Plan should ensure that any loss of green belt that is offset through development does not result in a significant loss of connectivity for biodiversity. The high density of development coming forward could make this difficult to achieve but policy should ensure features to provide connectivity for biodiversity are included and protected over the long term. For example, biodiverse roofs, and protected areas for biodiversity that are separate and in addition to open space provision, although biodiversity features should be integrated into open space provision.

- 47 Paragraph 5.7 Green Infrastructure and biodiversity refers to the Urban Greening Factor (UGF) a tool used in London to set greening targets for developments and asks whether it can be improved and how it can work with other requirements such as the mandatory BNG.

- 48 Comment on Paragraph 5.7

The Authority has limited experience of the UGF but it is clear that ongoing management and monitoring should be mandatory and conditioned by the Local Planning Authority. Biodiversity including Biodiversity Net Gain has not been included as a separate topic in the consultation document. The Lee Valley Biodiversity Action Plan is a key document in terms of information and discussion of the importance of key habitats and species in relation to the Lee Valley Regional Park. This can be found on the Authority's website as follows:

[Biodiversity Action Plan | Lee Valley Regional Park Authority](#) It would be helpful to understand how BNG is working across London and how provision for BNG is being accommodated, particularly where provision is made on the development site and forms part of the open space provision.

- 49 Paragraph 5.9 The strategic importance of London's waterways
London's waterways are considered vital assets, covering 2.5% of the city. They provide essential social, environmental and economic benefits, including cooling and managing flood risk. The consultation document proposes that the London Plan could stress that any strategic waterways plans should focus on improving water quality, not just considering it. This includes practical actions for enhancing the water quality across London's waterways. This would support the Mayor's aim for better water quality and swimmable rivers, access, wellbeing, and opportunities for walking and cycling.

50 5.10 Flood Risk Management

A new London Surface Water Strategy is being prepared, which aims to address the biggest flood risk challenges facing London. This will sit alongside the updated Thames Estuary 2100 (TE2100) plan, ensuring that upgrading flood defences forms part of London's strategic development plan. Questions are posed about whether development should be required to achieve Green Runoff Rates (GRR) ensuring runoff matches natural levels and whether permeable surfaces should be required when sites are redeveloped.

51 Comment on Paragraphs 5.9 and 5.10

It is agreed that there is an urgent need to tackle water quality, and whilst this is the responsibility of the water companies it should be acknowledged that housing developments put increased pressure on an already struggling system. The waterways are of strategic importance for nature conservation (which is not referenced under section 5.9) and this needs to be considered as part of policy that seeks to improve access to blue infrastructure. For example, there should not be a blanket aim for swimmable rivers – as this would not be suitable for all areas and would be of detriment to the biodiversity of some key sites. Likewise, many waterways such as the River Lee Navigation are an important heritage asset which needs to be considered when formulating policy.

52 From the Authority's position achieving Green Runoff Rates should be a requirement that is met by development in order to protect the Park and its sensitive biodiverse spaces from flooding and pollution risk. Measures are needed to ensure water quality is protected and water management considered as an integral part of development. A new London Plan could also require use of permeable surfaces when sites are redeveloped or when impermeable surfaces are proposed to reduce flood risk.

53 Transport

Paragraph 5.13 Sustainable transport networks to support growth

The link between housing and transport is already well established in London and the consultation document proposes para 5.12 that the next plan will use existing and new transport infrastructure to unlock significant development capacity. There is also an emphasis on the need for action beyond the London Plan to unlock tens of thousands of homes from large-scale rail projects. This includes government commitments and funding or financing to support their delivery. Medium-scale actions such as new or upgraded stations can also unlock thousands of homes.

54 It is also proposed that the London Plan could require local plans to set out clearly mapped transport interventions to enable and underpin sustainable growth. These could include:

- improved walking infrastructure
- safe cycle networks
- strategically important bus corridors offering attractive services
- kerbside management
- accessibility improvements such as step-free access at stations and
- other Healthy Streets measures.

Identifying these interventions at a borough level will make it easier to take

funding opportunities as they arise (including via development where relevant). It will also help coordinate with neighbouring authorities to create coherent transport networks.

55 Paragraph 5.14 Car parking, cycle parking and deliveries

The Mayor intends to continue the approach in the current London Plan to limit the amount of new car parking. Reference is made to residential development, and the costs and land take associated with car parking. The current London Plan also sets standards for minimum amounts of good-quality cycle parking to continue to increase cycling rates. However, the Mayor is aware that these requirements can have significant costs and are not always well used. The consultation document proposes that these standards will be reviewed, and consideration given to the increasing use of e-scooters, e-cycles, dockless cycle hire and cargo cycles. This will help to achieve the right combination of quantity and quality.

56 Comment on Paragraphs 5.13 and 5.14

The Mayor's policy on limiting the amount of new car parking is noted. The consultation document also states however that account must continue to be taken of how well connected a site is and how to better reflect local circumstances. The consultation document focuses on residential development, but it would be useful if this could be expanded to consider other forms of development particularly leisure and sports venues and the parking needs they require. Some venues within the Regional Park are relatively well served by public transport but for others significant car parking provision is required. Unlocking funding for new or upgraded rail stations is key to improving accessibility within the Regional Park, both its leisure venues and open spaces. The potential for a new rail station at Ruckholt Road within the London Borough of Waltham Forest proposed as part of major investment in the Leyton Mills area would greatly enhance the accessibility of the Lee Valley Hockey and Tennis Centre and the northern Queen Elizabeth Park.

ENVIRONMENTAL IMPLICATIONS

- 57 There are no environmental implications arising directly from the recommendations in this report but the London Plan once adopted will contain policies that guide and control development that could have an impact on the protection, enhancement, and development of the Regional Park.

FINANCIAL IMPLICATIONS

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

HUMAN RESOURCE IMPLICATIONS

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

LEGAL IMPLICATIONS

- 60 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 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.

- 61 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

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

EQUALITY IMPLICATIONS

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

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BACKGROUND REPORTS

Towards a New London Plan consultation by the Mayor 9 May 2025
of London

APPENDICES ATTACHED

- | | |
|------------|---|
| Appendix A | The Authority's draft response to the Mayor's consultation
Towards a new London Plan |
| Appendix B | Plans showing the Regional Park area within the Greater London
area and the green belt and MOL designations. |

LIST OF ABBREVIATIONS

SSSI	Site of Special Scientific Interest
IIA	Integrated Impact Assessment
HRA	Habitat Regulations Assessment
QEOP	Queen Elizabeth Olympic Park
OA	Opportunity Areas
LVRPA	Lee Valley Regional Park Authority
PDL	Previously Developed Land
BNG	Biodiversity Net Gain
MOL	Metropolitan Open Land
LNRS	Local Nature Recovery Strategies
GLA	Greater London Authority
UGF	Urban Green Factor
LGIF	Local Green Infrastructure Framework
GRR	Green Run Off Rates

Appendix A to Paper RP/95/25

Towards a New London Plan

Relevant Survey Questions Extracted from the Online Survey

All fields marked with an asterisk (*) are required. Note also additional information can be uploaded for example, maps or graphics?

Section and Survey Question No.	Paragraph Heading and number from Consultation Document	Proposed LVRPA Comments
Section 2 Question 1	Increasing London's housing supply	The Authority's response to Section 2 is set out below
Question 3	Paragraph 2.1: A brownfield first approach: If you have any comments, please add them here Also paragraph 4.2: Tall buildings	The Authority recognises the significant challenge facing London in terms of meeting its housing and employment needs. The Regional Park within London is already experiencing considerable change along its boundaries as the redevelopment of brownfield land and industrial sites are brought forward at pace. The consultation document is clear that achieving these higher rates of housebuilding will depend upon a number of other significant factors. It is critical that green infrastructure provision, for leisure, recreation and biodiversity is included as one of these factors and considered as an integral part of meeting housing need to ensure Good Growth is achieved. Given the level of housing required and the push for higher densities there will be an ever-increasing demand for accessible and high-quality open spaces providing a variety of recreational opportunities. At the same time there is also a need to find space for nature and to contribute to nature recovery and meet BNG requirements as well as managing other environmental factors such as flooding, and heat risk. As a statutory consultee, the Authority has responded to a number of planning applications for mixed use residential led development adjacent, or close to the Regional Park. In many cases it has been disappointed by the layout and design of development, the positioning of tall buildings in relation to the Park, and the lack of quality open space provision included as part of the proposals,

		particularly where this could complement or connect into the Regional Park. The impact of tall buildings on the Regional Park, its landscape character, biodiversity and visitor amenity is difficult to quantify at this stage. However, the initial views of the Authority are that in most cases tall buildings will impact negatively on the Park's sense of space, the long views out across the valley, and erode the experience of 'being in nature' and separate from the urban area. No account is being taken of the cumulative impact on the Regional Park at a strategic scale. This should be a matter that is considered in formulating policy for the new London Plan.
Question 7	Paragraph 2.3: Opportunity Areas: If you have any comments, please add them here	Comment 2.3 The current London Plan says very little about the statutory purpose and role of the Regional Park and this needs to be addressed in the new London Plan. From the outset the Authority's statutory purpose (as set out in the Lee Valley Regional Park Act 1966) has been to create a Regional Park dedicated to leisure, recreation, sport and nature conservation. The Park plays a significant role in providing for the leisure needs of the capital. It sits at the heart of the Lee Valley Opportunity Area within London providing a strategic interconnected area of green and biodiverse open space and waterbodies which provide diverse opportunities for leisure, sport and biodiversity (much of which links to and complement existing local open spaces). The Park plays a significant role in providing for the leisure needs of the capital. Whilst around 8 million visits are made each year to the whole Park, the largest proportion is made by Londoners to its venues and parklands. It is a strategic component of the capital which will assume greater significance against the backcloth of continued and increased levels of growth and should be recognised as such in the new London Plan.
Question 13	Paragraph 2.6: Industrial land: If you have any comments, please add them here	Comment on 2.6 (and para 3.4) The co-location of homes alongside industrial uses is a more recent issue for the Authority, as would be land swaps to release land for housing. The Regional Park boundary encompasses a wide range of land uses and includes sites in residential, industrial and commercial use. Some of these predate the Regional Park's designation or are well established. From time-to-time opportunities arise to bring these areas, as a whole or in part, into a Park-compatible use (i.e. for leisure, recreation or open space and biodiversity). The Authority as a

		statutory consultee it also able to engage in the development management process when development is proposed within these areas to protect and enhance the Regional Park. Land swaps that substitute new residential development for older industrial uses might be of benefit to the Regional Park if environmental and open space benefits can be secured as part of the proposals that will complement the landscape, habitats and leisure use of the Park. However, two industrial sites within the Regional Park in the London Borough of Waltham Forest are currently being proposed for the co-location of residential with industrial use. In both cases the areas identified for co-location are also being designated as suitable for tall buildings, potentially in the range of 16 to 20 storeys, (they are located adjacent to the A104 which crosses through the Park), presumably to retain the quantum of industrial land required to meet the borough's housing need. Tall buildings in this location within the Park, as with other areas adjacent to the Park) will create a barrier effect at the Park edge and introduce a new and unsympathetic scale of development to the area. Clear parameters would need to be set to ensure land swaps and co-location deliver development at a scale and to a design that is sensitive to its location particularly where these measures are proposed adjacent to strategic areas of open green and blue space, with biodiversity and recreational value.
Question 17	Paragraph 2.8: Other sources of housing supply	Comment on 2.8, 2.9, 2.11 and 5.6 It is noted that the Mayor is undertaking a London-wide green belt review to inform the draft London Plan but that this review will not apply to MOL (as discussed under par 5.6). Whilst there are clear differences in the roles performed by green belt and MOL the Regional Park is a statutory designation that encompasses both, most of the Park within London is designated as either green belt or MOL and the Authority's statutory remit to create a Regional Park dedicated to leisure, recreation, sport and nature conservation applies across both green belt and MOL. Indeed, the Regional Park includes award winning and internationally regarded venues, diverse and popular nature reserves, (many of which are SSSIs) and a range of visitor facilities and infrastructure associated with the waterways, walking and cycling. These facilities contribute to good growth across the London Region but require ongoing investment, improvement and eventually
Question 19	Paragraph 2.9 Beyond London's existing urban area	
Question 23	Paragraph 2.11 Metropolitan Open Land	
Section 5 Question 13	Paragraph 5.6 London's Open Spaces If you have any comments, please add them here	

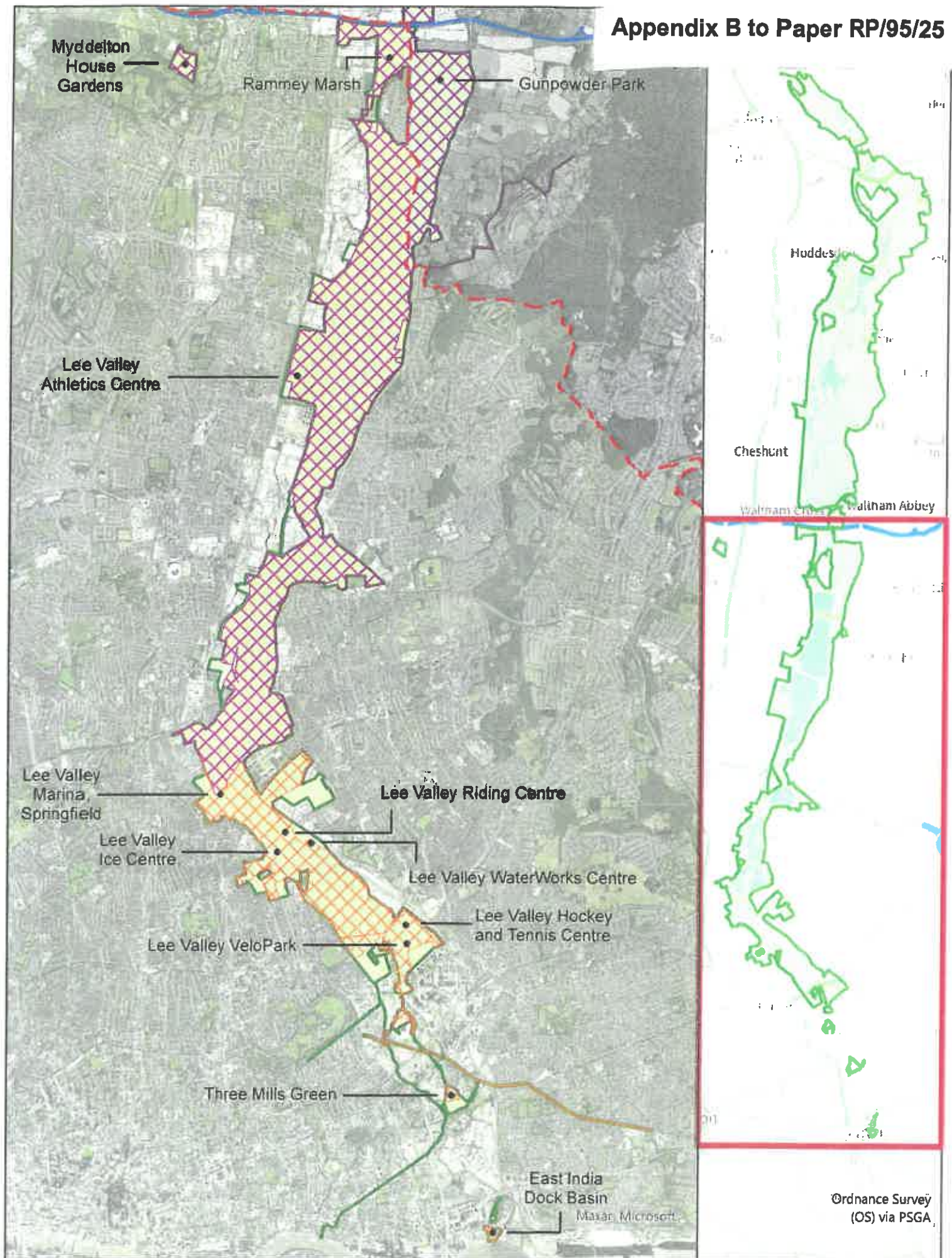
		redevelopment (as in the case of the Lee Valley Ice Centre). It would be appropriate for the draft plan to recognise that an exception to the standard green belt and MOL policy is required or a reference included in supporting text to the Authority in pursuit of its statutory purpose to allow for the redevelopment and or expansion of its venues so they can continue to serve both the extended London region and local neighbourhoods. This would align with the Mayor's requirement that any green belt release should deliver improved access to green space and nature and gains in biodiversity. The strategic green belt review will provide the opportunity to identify grey belt land and this is welcomed. It is noted that this land is likely to be considered for housing and potentially other uses with industrial, data centres or energy and other infrastructure mentioned. Whilst this approach is understood, within the Regional Park grey belt land will have value in relation to leisure development, in accordance with the Authority's remit. Whilst recognising the importance of the Regional Park for recreation and leisure, we also recognise that in some cases under-used land in the Regional Park (green belt or MOL) could support growth opportunities with appropriate mitigation to improve access and protect nature conservation, the Lee Valley Special Protection Area and Ramsar. Working collaboratively with the London Boroughs will be important in bringing these sites forward.
Section 3	Growing London's Economy	The Authority's response to Section 3 is set out below.
Question 13	Paragraph 3.6 Culture and creative industries: If you have any comments, please add them here	Comment on 3.6 and 3.7 The points raised in relation to culture and the creative industries apply equally to the leisure and sports events industry. They also make an important contribution to London's economy and the health wellbeing of Londoners. The current consultation does not touch on this as a topic but as with cultural venues, spaces should be made available across the capital for leisure and sporting venues, including within the green belt and MOL.
Question 16	Paragraph 3.7 Visitor economy: If you have any comments, please add them here	The Regional Park is a major venue for sporting and cultural events which last year attracted around 125,000 spectators at 500 events. Each venue and large areas of parklands are used for international, national and local events. Since opening in 2014, our two legacy venues within London, the Lee Valley

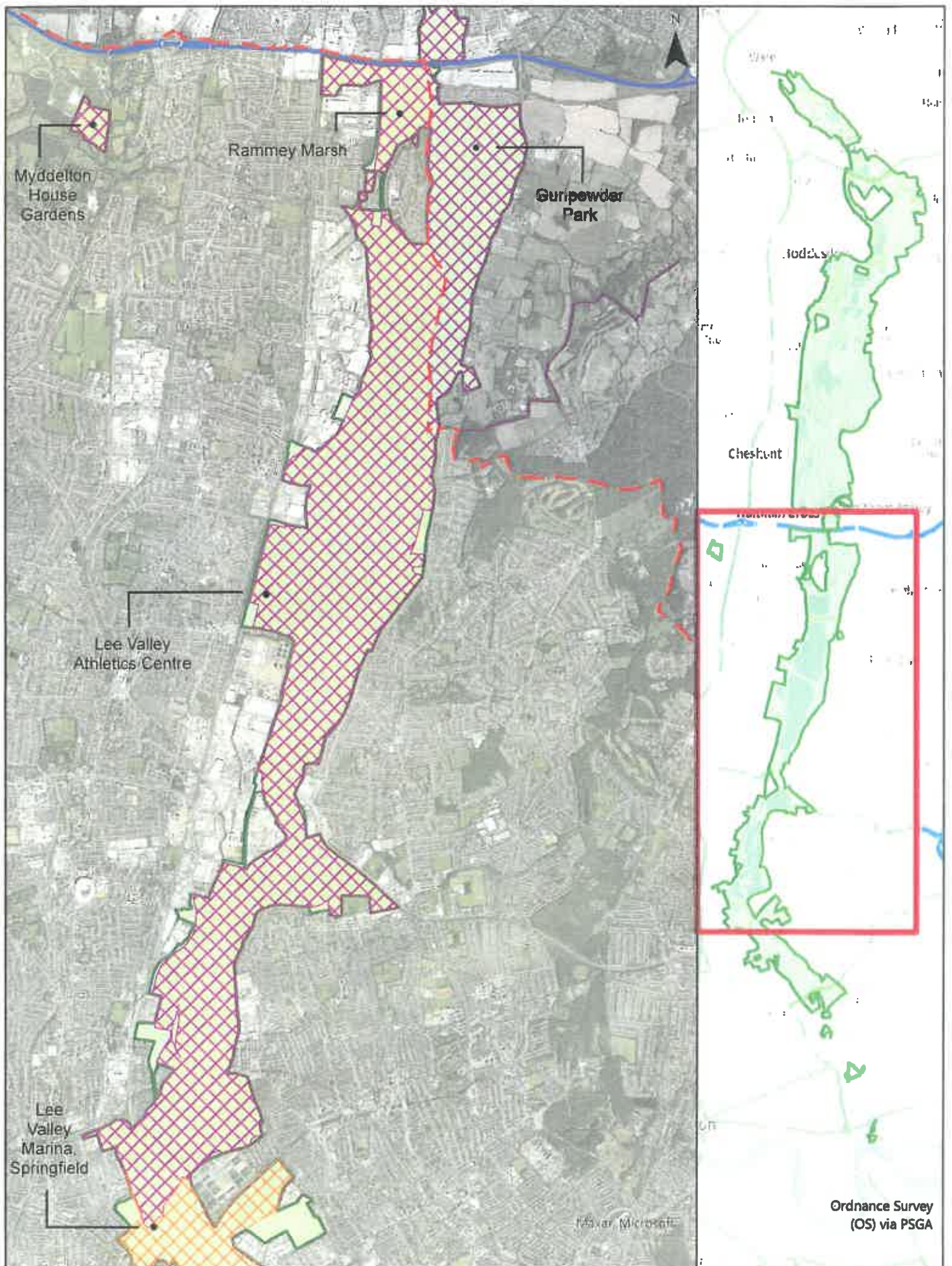
		Hockey and Tennis Centre and the Lee Valley VeloPark have hosted 34 major international events, attracting 700,000 spectators. Last year they hosted the FIH Women's Hockey World Cup and the UCI Track Cycling World Cup, attracting 40,000 spectators, with the Hockey Pro League being hosted this year. The Regional Park will continue to play a significant role in meeting London's leisure needs during the plan period. This should be referenced explicitly in the new plan.
Section 5	London's Infrastructure, climate change and resilience	The Authority's response to Section 5 is set out below
Question 11	Paragraph 5.5 Green and open spaces: If you have any comments, please add them here	Comment on 5.5 and 5.6 The Authority would support measures to ensure provision of new green and open spaces is provided as an integral part of new development including the redevelopment of brownfield sites in order to meet existing and future demand. Development proposed adjacent to existing areas of open space such as the Regional Park should still be required to provide sufficient open space to meet all the recreational and leisure demands of its new residents so that provision within an area is robust and complementary to open spaces that already exist. The consultation document refers to the <i>"Mayor's ambition to increase access to green space and tree cover across London"</i> but the aim should be to increase the provision of green space and tree cover and ensure this complements and connects with existing green infrastructure such as the Regional Park. The Authority supports the proposal to undertake further work to understand and mitigate for areas of open space deficiency and to assess the quality, use and the level of demand, to inform the next London Plan. This is fundamental given the multiple roles and functions now expected from green space and to some degree water spaces; it is expected to provide for recreation and leisure, to provide space for wildlife and nature, help mitigate for the effects of climate change such as overheating and flooding and improve physical and mental well-being. Ensuring all these functions can be successfully delivered and maintained over the long term requires careful consideration of the type of open space needed in each case and how access can be managed so that for example disturbance from recreational use does not undermine the wildlife value of habitat provided as part of the open space
Question 13	Paragraph 5.6 London's open spaces: If you have any comments, please add them here	

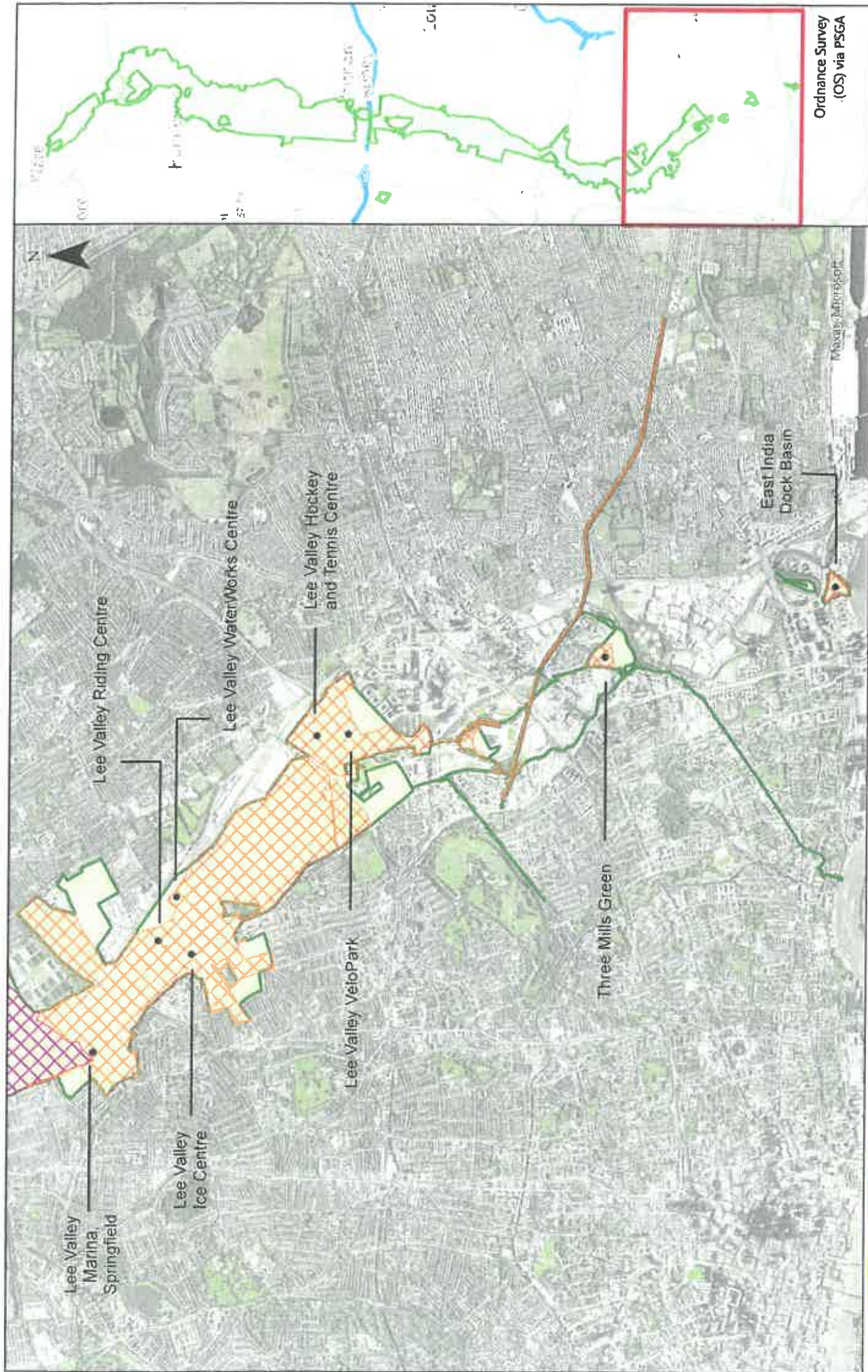
		or that using land for flood mitigation can also benefit both wildlife and public access. Visitor pressure and increased footfall within the open spaces that the Authority manages has led to the disturbance and destruction of habitats, noise and light pollution, vandalism, and anti-social behaviour, despite ongoing and increasing investment by the Authority to establish a robust and attractive leisure landscape for all to enjoy. Providing the appropriate type of open space and level of access to it must be considered as part of development and Green Infrastructure provision. The Authority is involved with the current work to produce the LGIF and the LNRS and welcomes the role of the London Plan in recognising the area-wide priorities and opportunities that will be identified in the LGIF and LNRS. As stated in the consultation document this should help <i>"prioritise where greening should be protected, enhanced and/or connected to help nature recover and maximise other benefits for Londoners, including new MOL designations and, parkland where appropriate, where development comes forward on land that is currently green belt. It should also include other strategic opportunities for rewilding and nature restoration"</i>. The London Plan should ensure that any loss of green belt that is offset through development does not result in a significant loss of connectivity for biodiversity. The high density of development coming forward could make this difficult to achieve but policy should ensure features to provide connectivity for biodiversity are included and protected over the long term. For example, biodiverse roofs, and protected areas for biodiversity that are separate and in addition to open space provision, although biodiversity features should be integrated into open space provision.
Question 15	Paragraph 5.7 Green Infrastructure and biodiversity: If you have any comments, please add them here	Comment on 5.7 The Authority has limited experience of the UGF but it is clear that on-going management and monitoring should be mandatory and conditioned by the Local Planning Authority. Biodiversity including Biodiversity Net Gain has not been included as a separate topic in the consultation document. The Lee Valley Biodiversity Action Plan is a key document in terms of information and discussion of the importance of key habitats and species in relation to the Lee Valley Regional Park. This can be found on the Authority's website as follows: https://www.leevalleypark.org.uk/biodiversity-action-plan

		It would be helpful to understand how BNG is working across London and how provision for BNG is being accommodated, particularly where provision is made on the development site and forms part of the open space provision.
Question 19	Paragraph 5.9 The strategic importance of London's waterways: If you have any comments, please add them here	Comment on 5.6 and 5.10 It is agreed that there is an urgent need to tackle water quality, and whilst this is the responsibility of the water companies it should be acknowledged that housing developments put increased pressure on an already struggling system. The waterways are of strategic importance for nature conservation (which is not referenced under section 5.9) and this needs to be considered as part of policy that seeks to improve access to blue infrastructure. For example, there should not be a blanket aim for swimmable rivers – as this would not be suitable for all areas and would be of detriment to the biodiversity of some key sites. Likewise, many waterways such as the River Lee Navigation are an important heritage asset which needs to be considered when formulating policy.
Question 21	Paragraph 5.10 Flood Risk Management: If you have any comments, please add them here	From the Authority's position achieving Green Runoff Rates should be a requirement that is met by development in order to protect the Park and its sensitive biodiverse spaces from flooding and pollution risk. Measures are needed to ensure water quality is protected and water management considered as an integral part of development. A new London Plan could also require use of permeable surfaces when sites are redeveloped or when impermeable surfaces are proposed to reduce flood risk.
Question 27	Paragraph 5.13 Sustainable transport networks to support growth: If you have any comments, please add them here	Comment on 5.13 and 5.14 The Mayor's policy on limiting the amount of new car parking is noted. The consultation document also states however that account must continue to be taken of how well connected a site is and how to better reflect local circumstances. The consultation document focuses on residential development, but it would be useful if this could be expanded to consider other forms of development particularly leisure and sports venues and the parking needs they require.
Question 29	Paragraph 5.14 Car parking, cycle parking and deliveries: If you have any comments, please add them here	Some venues within the Regional Park are relatively well served by public transport but for others significant car parking provision is required. Unlocking funding for new or upgraded rail stations is key to improving accessibility within the Regional Park, both its leisure venues and open spaces. The potential for a new rail station at Ruckholt Road within the London Borough of Waltham Forest

		proposed as part of major investment in the Leyton Mills area would greatly enhance the accessibility of the Lee Valley Hockey and Tennis Centre and the northern Queen Elizabeth Park.
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Green Belt and Metropolitan Open Land designations within Lee Valley Regional Park

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