

To: David Andrews (Chairman) Graham McAndrew
Chris Kennedy (Vice Chairman) Gordon Nicholson
John Bevan Paul Osborn
David Gardner Mary Sartin
Calvin Homer John Wyllie
Denise Jones

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

THURSDAY, 16 DECEMBER 2021 AT 11.30

at which the following business will be transacted:

AGENDA

Part I

1 To receive apologies for absence.

2 **DECLARATION OF INTERESTS**

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

3 **MINUTES OF LAST MEETING**

To approve the Minutes of the meeting held on 18 November 2021 (copy herewith).

4 **PUBLIC SPEAKING**

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

- 5 LONDON BOROUGH OF NEWHAM LOCAL PLAN REFRESH ISSUES AND OPTIONS STAGE CONSULTATION Paper RP/56/21

Presented by the Head of Planning

- 6 LONDON BOROUGH OF WALTHAM FOREST LOCAL PLAN SHAPING THE BOROUGH: PART 2 SITE ALLOCATIONS PROPOSED SUBMISSION REGULATION 19 CONSULTATION Paper RP/57/21

Presented by the Head of Planning

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

AGENDA
Part II
(Exempt Items)

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

8 December 2021

Shaun Dawson
Chief Executive

LEE VALLEY REGIONAL PARK AUTHORITY

REGENERATION & PLANNING COMMITTEE MINUTES 18 NOVEMBER 2021

Members	David Andrews (Chairman)	Denise Jones
In remote presence:	Chris Kennedy (Vice Chairman)	Graham McAndrew
	John Bevan	Gordon Nicholson
	David Gardner	Paul Osborn
	Calvin Horner	Mary Sartin

Apologies Received From: John Wyllie

Officers	Shaun Dawson	- Chief Executive
In remote presence:	Claire Martin	- Head of Planning
	Beryl Foster	- Deputy Chief Executive
	Stephen Bromberg	- Head of Communications
	Cath Patrick	- Biodiversity Manager
	Dan Buck	- Corporate Director
	Jon Carney	- Corporate Director
	Paul Roper	- Head of Projects & Funding Delivery
	Sandra Bertschin	- Committee & Members' Services Manager
	Lindsey Johnson	- Committee Services Officer

Also in remote presence: Chloe Saunter – Montagu Evans, Planning Agent
Helen Marrison – Montagu Evans, Heritage & Townscape Consultant
Alex Parrett – London Square Developments, Developer
Islay Walker – Kanda Consultants, Public Relations
Richard Graves – Richard Graves Associates, Ecologist
Matthew Dunigan – London Borough of Waltham Forest, Case Officer
Cella Coram – Save Lea Marshes
Vicky Sholund – Save Lea Marshes
Laurie Elks – Member of the Public

Part I

135 DECLARATIONS OF INTEREST

There were no declarations of interest.

136 MINUTES OF LAST MEETING

THAT the Minutes of the Regeneration & Planning Committee meeting held on 23 September 2021 be approved and signed.

137 PUBLIC SPEAKING

Chloe Saunter, the Planning Agent from Montagu Evans spoke to the Committee:

- I represent London Square Developments and London Borough of Waltham Forest for the planning application at Lea Bridge Road for 345 homes, 50% of which will be

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affordable. The development is in a sustainable location and opportunity area housing zone.

- Pre-application dialog has shaped the application. The development is also impacted by exceptional building costs.
- I know you have concerns over the height of the buildings, however orientation and aspects of the design ensure that longer distance views will not be interrupted and the gap between buildings ensures that only a small part of the skyline will be changed.
- Our HTVIA report states that no enjoyment of the Park will be lost, the distance between buildings means that it won't feel enclosed and the high quality of the architecture will have a visual benefit compared to what is already there, there will also be a 168% biodiversity net gain. This development will act as a gateway to Lea Bridge Station.
- We are having ongoing discussions with your officers regarding S106 payments, such as for tree planting.

Celia Coran from Save Lea Marshes spoke to the Committee:

- Save Lea Marshes have many of the same concerns as you do regarding this planning application.
- We note that you believe that some of these concerns could be relieved by S106 money, please explain what you have asked for and how you would spend this money.
- Do you think that your S106 proposals would mitigate against this development and help offset climate change in the best interests of the Park?

Laurie Elks spoke to the Committee:

- I am concerned that if you consent to this planning application it will lead to more applications of this nature, where in order to achieve housing targets, London Borough of Waltham Forest are creating tall tower blocks to pile people into.
- The developers state that this will be a landmark and gateway to Lea Bridge Station, however, I think it will stick out like a sore thumb. It is true that some large buildings can be described as 'landmark', but this is not one of them.
- If you object it is likely that you will not get as much S106 money. In the interests of being transparent you should publish what you would spend the money on. I think the money should be spent on landscape and ecology and that it should be spent locally on projects such as Middlesex Filter Beds.

The Chairman thanked the speakers for addressing the Committee and assured Laurie Elks that the Authority is committed to restoring Middlesex Filter Beds in the future.

138 **PLANNING CONSULTATION BY LONDON
BOROUGH OF WALTHAM FOREST**
Demolition of existing structures and redevelopment of three land parcels to deliver 345 x residential units (use class c3), 2427 sqm (GIA) commercial floorspace (use class e) and community floorspace (use class F2) in buildings

Paper RP/55/21

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of up to 26 storeys. Associated development including new public realm areas, tree planting and landscaping, accesses, parking and servicing facilities. At Lea Bridge Road, location as follows:

Site 1 adjoins railway overpass to southern boundary, railway to west and Argall Way to north and east.

Site 2 adjoins Orient Way to west, Lea Bridge Road to the north and rear of Elm Park.

Site 3 adjoins railway overpass to north, railway to west and Orient Way to south and east.

The report was introduced by the Head of Planning who informed Members that one of the Authority's main concerns related to the height and visual impact of the development. She informed Members that officers have been in discussion with London Borough of Waltham Forest and it is unlikely that the height of the buildings will be reduced due to it impacting on the viability of the development. The other concern is in regards to the extra footfall on sensitive sites in the Park as it offers a convenient space for types of leisure and recreation activity which isn't included as part of the development. Discussions with London Borough of Waltham Forest have offered £250,000 in S106 money, £30-50,000 of would be spent on tree planting and £50,000 on Middlesex Filter Beds. The rest could be spent on new biodiversity projects or improvements to access. Other issues such as lighting, protection to watercourses and the environment during construction should be secured under conditions. The Chairman of the Authority suggested that a report could go to Executive Committee which could itemise how we might spend the S106 money.

The Chairman of this Committee asked if we have an understanding of the significant impacts of habitats in the region. The Head of Planning replied stating that we are most concerned over Walthamstow Marshes and the Waterworks Nature Reserve, we experienced a considerable increase in footfall during lockdown and the impacts this caused to sensitive habitats.

The Chairman of this Committee asked if we are concerned over the impact on habitats during construction. The Biodiversity Manager responded stating that we would like to see planning conditions that control impacts from noise and dust. The Chairman of this Committee asked if we were concerned over the illumination of a 26 storey tower. The Biodiversity Manager responded stating that lighting adjacent to the Park is always a concern and that we would like to see a Lighting Strategy to prevent additional light spill and that this should be addressed through conditions.

A Member queried if electric charging points for vehicles is included. The Head of Planning stated that the applicant has provided detail for this, with one on each site. Members agreed that electric charging points are important even if the development is 'car-free'. A Member highlighted the fact that the Park may get used by residents for free parking. The Chief Executive responded stating that we would need to look carefully at how we manage such an eventuality, such as parking charges.

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A Member asked if grey water was being considered for the development.

The Chairman of this Committee recognised the shared discomfort of both Members and officers regarding the height of the buildings, but recognised that the viability of the development would likely be compromised if they were reduced, therefore was minded that we accept the development so long as it is offset by S106 contributions and planning conditions. He proposed a 10 minute adjournment to the meeting in order to give officers time to draft a recommendation for the Committee.

The meeting was adjourned at 12.20pm.

The meeting reconvened at 12.30pm where the Head of Planning shared her screen of the draft recommendation.

David Gardner joined the meeting.

The Chairman and Members agreed that they were happy with the recommendation that officers had drafted during the adjournment and approved the following:

- (1) that the London Borough of Waltham Forest be informed that the Authority recognises the principle of residential development on the Lea Bridge Station sites and does not object to the current application providing that:**
 - (a) Section 106 contributions can be agreed for the delivery of the enhancements, habitat works and access improvements needed for the adjacent open green spaces and designated sites of the Regional Park, which are considered necessary to mitigate for the increased recreational use of the Regional Park area;**
 - (b) further consideration is given to reducing the height of the towers proposed for Sites 1 and 3 to reflect the scale and height of recently permitted and built development in the locality;**
- (2) delegation to the Head of Planning, in consultation with the Chairman of Regeneration and Planning to finalise the wording of conditions to ensure other relevant matters, as raised in the report are covered, should the Council be minded to grant consent. These are to include matters relating to:**
 - (a) a lighting strategy;**
 - (b) further detail on the ecological corridor;**
 - (c) provision of a Construction and Environmental Management Plan;**

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18 NOVEMBER 2021**

- (d) further detail on improvements to offsite walking and cycling routes, including wayfinding to the Park from the new Station Plaza;
 - (e) detail on the interpretation to be provided to new residents about the Park and its ecological site was approved; and
- (3) a report will be presented to the Executive Committee outlining mitigation projects considered suitable for S106 funding was noted.

Chairman

Date

The meeting started at 11.33am, was adjourned at 12.20pm, reconvened at 12.30pm and ended at 12.45pm

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**LONDON BOROUGH OF NEWHAM LOCAL PLAN
REFRESH ISSUES AND OPTIONS STAGE CONSULTATION**

Presented by the Head of Planning.

SUMMARY

Newham Council are consulting on the first stage of their Local Plan Refresh – presenting a range of options and policy changes for consideration and comment. The Council’s Recovery and Reorientation Strategy, developed in response to the impact of Covid-19, has been used to set the proposed framework for creating sustainable development in Newham.

The refresh process will be seeking to include the area of the borough that falls within the London Legacy Development Corporation (LLDC) planning authority, which includes the Lee Valley VeloPark and associated Regional Park area within the Queen Elizabeth Olympic Park (QEOP) and the Three Mills Island.

At this stage the Authority’s proposed comments, as set out in the letter attached as Appendix A to this report are fairly broad, commenting on the ‘15min neighbourhood’ spatial approach, policy options for design, heritage, visitor economy, green space and water space, climate and transport. A duty to co-operate meeting will be set up with officers from Newham to discuss some of these matters in more depth, particularly in relation to Lee Valley VeloPark and those other areas of the Park that will move back under Newham’s jurisdiction as planning authority.

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 Newham on the Local Plan Refresh.

BACKGROUND

1 Newham Council have commenced a refresh of their Local Plan (2018) in response to their own updated objectives and strategies; changes in the development context and market trends; and updated national and regional planning requirements. The Council wants to ensure the new Local Plan responds to the impact of Covid-19 on local residents and businesses and delivers an equitable recovery for Newham.

- 2 Newham is London's second most ethnically diverse borough and has the third largest population of all London Boroughs. Its projected population in 2030 is anticipated to be 465,435. It is also a relatively young borough, with 24.6% of the resident community under the age of 18 years (ONS 2018). This means demand for housing will continue to increase in future years. The borough does not have sufficient capacity within its pipeline of approved housing schemes to meet its housing target for the next five years.
- 3 The borough has had historically high unemployment, and although in recent years, official unemployment figures fell faster than the London and national average the Covid-19 pandemic has increased the levels of unemployment in Newham to around 7%, compared to the national average of 4%. There is a lack of high quality jobs offering long term security. Newham has approximately 14,000 businesses, with 94% of these businesses being micro sized enterprises employing nine or fewer staff. 2% of jobs are within retail, administration, health and education sectors. There is a steady and continued demand for industrial uses in Newham on designated industrial sites and increasing pressure for industrial land. Officer floorspace provision is largely smaller scale and ancillary supporting the function of industrial premises.
- 4 Green space covers 13.1% of Newham, compared with 39% for London as a whole. The borough's parks and green spaces total approx. 396ha of publically accessible green space and it has 10% tree cover, the second lowest in London. The parks and open spaces are popular in Newham with 43% of residents visiting at least once a week. Cycling modal share in Newham is poor around 2-3% although it has a public transport mode share of around 41% almost 6% higher than the inner London average.
- 5 This is the first of three consultations on the Local Plan, an issues and options style engagement. The comments received from this consultation will inform the next iteration; a Draft Local Plan Regulation 18 consultation programmed for Summer-Autumn 2022. This will be followed by a Submission Local Plan (Regulation 19) consultation in Spring 2023 with the examination of the Local Plan programmed for late 2023 - early 2024 and adoption potentially by Autumn 2024.
- 6 A variety of evidence base studies will inform the Local Plan Refresh including a Characterisation Study which has already commenced. An Integrated Impact Assessment (IIA) also accompanies the Plan. This fulfils statutory requirements for the Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of all plans and programmes subject to preparation or adoption by a local, regional, or national authority. The IIA also includes a Health Impact Assessment and Equalities Impact Assessment. A Habitats Regulations Assessment (HRA) for the Local Plan review will be undertaken during the different stages to consider its potential impact on significant natural habitats. The findings will be taken into account in the IIA where relevant.
- 7 The refresh process will also be seeking to include the area of the borough that falls within the London Legacy Development Corporation (LLDC) planning authority. The LLDC is due to hand back planning powers to the boroughs by 2024. Joint working is underway with the LLDC and other Host Boroughs to lobby Government to allow the Local Plan refresh to include the LLDC area.
- 8 The Regional Park within the London Borough of Newham includes Bow Creek

Ecology Park and part of the Greenway. Other sections of the Park, including Three Mills Island, significant parts of the Queen Elizabeth Olympic Park (QEOP) - the Lee Valley VeloPark and land consisting of the northern parklands lie within the 'Newham component' of the LLDC. Please refer to the Plan at Appendix B to this report which shows these areas of the Park within Newham.

- 9 The Authority's Park Development Framework Area 1 Proposals 'Tidal Reaches to Queen Elizabeth Olympic Park', aim to develop and promote the Lee Valley VeloPark as a world class cycling venue for track, BMX, road and mountain biking, increasing participation at all levels. They identify the importance of working with the LLDC, the London Borough of Newham and other stakeholders 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. This will create a network of visitor facilities and open spaces linking the QEOP with the wider Regional Park. Proposals support the use of open spaces for informal recreation and play, and seek to maintain and enhance the ecological connectivity along towpaths and linear routes such as the Greenway and the Leaway. Proposals aim to minimise the impact of new development on these routes and open spaces and seek to achieve a balance in protecting their ecological value and potential as well as promoting the recreational and leisure opportunities they provide for the wider benefit of local people and visitors to the Park.

LOCAL PLAN REFRESH ISSUES AND OPTIONS RELEVANT TO THE REGIONAL PARK

10 Vision and Spatial Approach

The Council proposes to use its Recovery and Reorientation Strategy, developed in response to the impact of Covid-19, to set the framework for creating sustainable development in Newham and to inform the Local Plan Vision and its spatial approach. This Strategy is underpinned by five principles set out below, and eight delivery pillars:

1. A Healthy, Happy and Well Newham;
2. Community Wealth Building;
3. Brighter Futures – The Best Place for Children and Young People to Thrive;
4. Tackling Racism, Inequality, and Disproportionality; and
5. Putting People at the Heart of Everything We Do.

- 11 The Council are proposing to adopt the "15 minute neighbourhood" as the spatial approach to defining neighbourhoods in Newham and the mechanism with which to deliver 'a Healthy Happy and Well Newham'. This would enable every resident to live in an accessible and inclusive neighbourhood, which provides all their social, civic and economic essentials. It would also mean looking at how new development should contribute to the role of each neighbourhood to create the places residents need.
- 12 The Council propose to follow the design-led approach to site allocations and include design principles relevant to each neighbourhood location with appropriate detail on acceptable building heights, scale, massing and indicative layouts, and the amount of floorspace to be provided for different uses. Better use of digital tools is also proposed to make the Policies Map clearer and easier to use so that policies, spatial designations (which would include the LVRPA boundaries) and site allocations are better understood.

13 Design

The Council recognise that the design process is a key aspect of delivering successful places. The whole process of design from brief development to post-delivery maintenance is under consideration. The proposed policy changes include:

- a focus delivering a network of public realm spaces that would help residents to live well within higher density neighbourhoods, enable social integration and celebrate diversity;
- the development of a network of child friendly routes and spaces throughout the borough;
- promotion of the co-design of major developments, with collaboration between developers, infrastructure providers and existing communities;
- the provision of Newham specific design guidance; and
- the application of industry standards beyond current requirements for Secure by Design and BREEAM standards.

14 Newham's Economy

The Council have identified the need for the Local Plan to focus on the relationship between employment and health. Creating an inclusive economy can have health benefits – reducing stress and financial insecurity. Community wealth building aims to “tackle poverty and address health inequalities that are related to economic inequalities such as unemployment, economic inactivity and poor working conditions”. The proposed policy changes include; the need to identify sufficient employment land in the right locations to support growth, reflecting the 15 minute neighbourhood principles in location of employment land designations, exploring provision of flexible co-working workspaces, and incentivising a greener economy.

15 Housing Provision

The Council anticipate that Newham's housing need, identified through their updated Strategic Housing Market Assessment and Housing Needs Assessment evidence, will be less than their London Plan housing target so their updated policies will need to balance national and regional requirements with local housing need and viability. The Council also seek to maximise the delivery of genuinely affordable homes that will meet the needs of their residents, including the need for family homes and specialist housing needs. Policy changes are also proposed to ensure housing developments are energy efficient, reduce fuel poverty and contribute even further towards carbon reduction targets.

16 Greenspaces and Water Spaces

The Council are proposing a wide range of policy changes under this section of the draft Local Plan. They are clear that access to nature and open space for fresh air, exercise and a quiet escape improves physical and mental health and wellbeing and that good quality open space enhances quality of life and makes Newham more attractive and safer. A Newham Open Space Standard is currently being developed which will set out the minimum open space standard per population. The Council can then use this to identify areas of deficiency and inform allocations to reduce deficits. The Council also propose to consider what ‘no net loss of functionality’ means when protecting green and blue spaces and whether all open space needs to be protected and not just its broader functions or whether it should be protected in certain locations.

17 The Council also recognise that seeking a 10% Biodiversity Net Gain (BNG) in

Newham, a predominantly urban area with limited existing biodiversity may not achieve a significant uplift in biodiversity. Therefore, the benefits of a higher BNG percentage is under consideration. Policy should also work to balance priorities for the use of the borough's water space. The Council recognise that these spaces provide important habitats for wildlife, and together with opportunities for leisure and recreation. A public realm management plan requirement to ensure blue and green spaces are designed to be attractive and accessible and maintained over time is also proposed. This requirement could be secured via a legal agreement linked to planning permission e.g. S106 agreement. Policies are also proposed for trees and play.

18 Newham's Climate

The Council are proposing to strengthen policy to reduce the impacts of light and noise pollution on existing and new residents particularly given the increased density of development and to minimise exposure to poor air quality. Further detailed guidance on flood risk reduction is also proposed. A key issue is how to encourage greater energy efficiency on site, particularly given the need to meet London Plan Zero Carbon targets by 2050. To achieve this all properties would need to be retrofitted, including many under construction and the Council want to explore how to reduce the need for future retrofitting by improving current standards. They are also proposing to explore how levels of embodied carbon in new development can be reduced.

19 Transport

The Council intend that their spatial strategy and approach to new transport projects will include support for the continued roll out and implementation of Low Traffic Neighbourhoods, School Streets and cycle lanes to improve the public realm and increase walking and cycling modal share. TfL projects such as electrification of the bus fleet is also to be supported. The need for electric vehicles in the future is recognised as is the need for charging points across the borough on streets and in car parks rather than just in new developments. Policy changes will also include a greater focus on reducing car use and car dominance with an emphasis on high quality cycle parking and provision of charging for E-bikes and electric scooters.

COMMENTS ON THE ISSUES AND OPTIONS DRAFT LOCAL PLAN REFRESH

20 Spatial Approach

The Regional Park within Newham can make a significant contribution to the Council's vision and spatial approach, in particular Principle 1 'A Healthy, Happy and Well Newham'. The Park's green and waterside spaces, its heritage, leisure, sporting, play and cultural facilities are within close proximity to existing and new communities and should be considered in Local Plan policy as forming part of the '15 minute neighbourhood'.

21 At the same time Local Plan policy will need to recognise that the remit of the Regional Park is to provide facilities, leisure venues and diverse open spaces that will attract visitors from across the wider London, Hertfordshire and Essex region. Understanding how this 'finer grain' neighbourhood approach and neighbourhood specific policies might work in relation to the Regional Park and the Authority's business plans will be important to help address this potential tension between the 15 minute neighbourhood concept and the Regional Park. The findings of the Characterisation Study are to inform policy in this respect and further information on this work will be requested to assist future discussions with Newham officers.

- 22 It is important that the Local Plan refresh is able to include the area of the Regional Park within Newham that falls within the LLDC planning authority. This consists of substantial areas; the Lee Valley VeloPark and northern parklands, and the open waterside green space, heritage and events spaces at Three Mills Island. Officers from the Authority are party to some of the joint working and discussions between the Host Boroughs and LLDC on this matter, but it will be necessary to liaise with policy officers at Newham to understand how the next iteration of the Local Plan will cover this issue.
- 23 In terms of the Policies Map and spatial designations, the Regional Park boundary should be included as per the current Local Plan Proposals Map. The proposal to make the Policy map clearer and easier to use is welcomed especially if this can link to the Regional Park Authority's Park Development Area Proposals.
- 24 Policy support for the Authority's remit, the Regional Park, and the Park Development Framework (PDF) Area Proposals is required as part of the Local Plan. A clear policy statement supporting the Regional Park, and its enhancement in line with the PDF Proposals, as both a local asset and a regional resource forming part of London's green infrastructure would provide developers with certainty when considering the location, design and scale of development. Further details are set out in the letter attached as Appendix A to this report.
- 25 **Design**
The emphasis on the design process in Local Plan policy is to be welcomed, particularly in relation to the 15-minute neighbourhood. Mention is made of delivering public realm spaces that would help people to live well within higher densities and this is important. Policy needs to ensure the design, the scale of development, and its recreational space and public realm provision takes full account of the impact it will have on the spaces and buildings around it, how each of these functions and how it will interface with existing open spaces, waterside environments, habitats and heritage sites such as those within the Park.
- 26 It is recognised that the Regional Park has a role to play in responding to the open space needs of local communities. However poor design and lack of adequate open space and public realm provision within high density development close to the Park, can create additional pressure for the Park's open spaces such that their quality and value is undermined. Policy will need to ensure that additional investment is secured for the Regional Park via planning obligations (CIL/S106) from those developments adjacent to or likely to impact the Park.
- 27 The Local Plan Refresh document proposes a series of policy changes in relation to design. The proposal for a public realm net gain requirement addressing both functional and quantitative gains is of interest and should be included in policy if this can help secure proportionate additional public realm and open space as part of development. A net gain in legibility and accessibility may also be of value if this can link with other areas of public green space. A public realm management plan requirement for large strategic sites is also proposed – this would help to secure the long-term maintenance that would preserve the quality of public realm, open space and habitats created as part of BNG. A management plan requirement for public realm provision may also be

appropriate as part of other types of development irrespective of the size of the sites involved.

28 Heritage

The Regional Park is a cultural asset with important industrial, built and landscape heritage and within Newham there are important assets at Three Mills Island and in relation to the waterways and associated infrastructure. Policy that can help to safeguard and promote the heritage of the Park within the Borough in support of the Authority's PDF Proposals would be welcomed, for example in terms of listed buildings at Three Mills, industrial archaeology along the Leaway south of Three Mills, and the protection of views to key landmarks within and outside the Regional Park.

29 Economy – Visitor Infrastructure and Sporting Venues

The focus on the relationship between employment and health and the concept of community wealth building should also consider the visitor economy. The attractions and sporting venues within the Regional Park and the QEOP are now considerable and growing in diversity and cultural interest. Policy support is needed for major sporting venues and cultural sites such as the Lee Valley VeloPark and Three Mills Island and their future development and diversification. They are well served by public transport providing good access for visitors from across London and further afield and will contribute to the local and London wide economy at a number of levels.

30 Greenspaces and Water Spaces

The emphasis placed on access to nature and open space and the range of benefits this provides for physical and mental health and wellbeing is to be welcomed and supported. There is an important role for the Regional Park in this respect. It performs a range of functions through its green and blue spaces, functioning both at a local and strategic level. Allocating additional open space and improving access within the network would complement the work of the Authority in maintaining a range of spaces and habitats for people to enjoy whether as a local resident or as a visitor to the Regional Park.

31 It is important that policy in the Local Plan protects and supports the enhancement of the Park and takes into consideration the different functions the Park performs, when considering the concept of 'no net loss of functionality'. This should also apply to water space which, as noted by the Council provides a number of benefits. In terms of the Regional Park, it is an important landscape feature linked to the heritage of the Park area, contributing to visual amenity and leisure opportunities, as well as providing important habitats and ecological connectivity.

32 The aim of the Council to look carefully at how policy can secure a meaningful uplift in biodiversity is to be supported. The Council also recognise that seeking a 10% BNG in Newham, a predominantly urban area with limited existing biodiversity may not achieve a significant uplift in biodiversity. Therefore, the benefits of a higher BNG percentage is under consideration. Reference to the Authority's Biodiversity Action Plan 2019 – 2039 would prove helpful.

33 Climate

The Council have identified key areas of concern for the Authority in relation to the impacts of new development on the Park's environment. Policy to reduce light and noise pollution and to minimise exposure to poor air quality would benefit the Park, its biodiversity and the quality of the visitor experience,

particularly given the increased density of new residential development within close proximity to the Park.

- 34 The open spaces and waterways within the Park can also contribute to reducing the impacts of climate change, providing green spaces and shade to help reduce the 'urban heat island' effect and improve resilience to flooding. Increasing the energy efficiency of leisure venues such as Lee Valley VeloPark may be more challenging. Joint working on policy development and delivery mechanisms would be helpful on this matter.

35 Transport

The Council's approach to transport policy can be supported. The focus on policy that will reduce car use and car dominance and place a greater emphasis on high quality cycle parking and provision of charging for E-bikes and electric scooters should benefit the Park's environment and the ability of people to enjoy the Park. The PDF Area Proposals highlight the need for collaborative working to deliver access improvements into and through the Park and to make the most of existing public transport hubs such as for example those at Stratford, Canning Town and Bromley-by-Bow. There is also an opportunity for Lee Valley VeloPark and other sites with the QEOP to contribute to the electrical charging network for the benefit of both visitors to the Regional Park and local residents and employees.

ENVIRONMENTAL IMPLICATIONS

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

FINANCIAL IMPLICATIONS

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

HUMAN RESOURCE IMPLICATIONS

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

LEGAL IMPLICATIONS

- 39 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.
- 40 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

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

EQUALITY IMPLICATIONS

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

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BACKGROUND REPORTS

The London Borough Newham Consultation on the October 2021
Newham Local Plan Refresh

APPENDICES ATTACHED

- Appendix A The Authority's draft response to the London Borough of
Newham
Appendix B Plan showing the Park area within the borough of Newham

LIST OF ABBREVIATIONS

LLDC	London Legacy Development Corporation
PDF	Park Development Framework
QEOP	Queen Elizabeth Olympic Park
HRA	Habitat Regulations Assessment
IIA	Integrated Impact Assessment
SA	Sustainability Appraisal
SEA	Strategic Environment Assessment
LVRPA	Lee Valley Regional Park Authority
BNG	Biodiversity Net Gain
the Park Act	Lee Valley Regional Park Act 1966

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16 December 2021

Dear Ellie

RE: CONSULTATION ON THE LONDON BOROUGH OF NEWHAM LOCAL PLAN REFRESH ISSUES AND OPTIONS STAGE - LEE VALLEY REGIONAL PARK AUTHORITY REPRESENTATIONS

Thank you for consulting the Regional Park Authority on the Local Plan Refresh Issues and Options stage. A report on this matter was considered by the Authority's Members, at the Lee Valley Regeneration and Planning Committee on the 16th December 2021, when the following comments were agreed.

Local Plan Refresh

Vision and Spatial Approach

The Authority welcomes this opportunity to respond to this early stage of the Local Plan Refresh. The Regional Park within the London Borough of Newham includes significant parts of the Queen Elizabeth Olympic Park - the Lee Valley VeloPark and land consisting of the northern parklands, the open spaces, film studios, natural play and important heritage contained within the Three Mills Island complex, and also the Bow Creek Ecology Park and part of the Greenway. The Lee Valley VeloPark and Three Mills fall under the planning jurisdiction of the LLDC and the Authority is therefore supportive of the Council's aim to include these areas – the LLDC area - within the Local Plan refresh. Officers from the Authority are party to some of the joint working and discussions between the Host Boroughs and LLDC on this matter but are not involved in the detail of the transition process for plan making or the discussions with the Government. It would be helpful therefore to liaise with policy officers at Newham to understand how the next iteration of the Local Plan will cover this matter and what this might mean for the Regional Park within Newham.

The five principles identified through the Council's Recovery and Reorientation strategy provide a sound framework for developing a Local Plan Vision and Spatial Approach and are supported by the Authority. In particular, the objective to deliver "A Healthy, Happy and Well Newham based on the '15 minute Neighbourhood' is endorsed. The Regional Park offers a variety of open and waterside spaces, heritage,

leisure, sporting, play and cultural facilities located within close proximity to existing and new communities. These provide opportunities for physical and outdoor activity, relaxation, enjoyment of nature and cultural events all of which contribute to healthy lifestyles and the well-being of residents, at all stages of life.

Policy in the Local Plan will however need to consider how to resolve the potential tension between the 15 minute neighbourhood concept and the Regional Park's remit to provide leisure facilities, venues and open spaces that attract and meet the needs of visitors from across the wider region (London, Hertfordshire and Essex). The findings of the Characterisation Study are to inform neighbourhood specific policy and further information on this work would be helpful to understand how these policies might also support the Regional Park.

It is important that a Lee Valley Regional Park specific policy statement supporting the Authority's remit, the Regional Park and the Park Development Framework Area proposals is included in the Local Plan, to fulfil the requirements of the Park Act Section 14 (2) (a). This would provide context for the Regional Park's spatial designation included on the Policies Map and could form part of an area based policy or area wide site allocation within the new Local Plan. A clear policy statement supporting the Regional Park, its leisure and sporting opportunities, open space and biodiversity as both a local asset and a regional resource forming part of London's green infrastructure would provide developers with certainty when considering the location, design and scale of development. The following is an example of the supporting text used to cover the above requirement and can be adapted to suit the style of the Local Plan document once this has progressed to the next stage.

The Lee Valley Regional Park Authority (LVRPA) is a statutory authority created by the Lee Valley Regional Park Act 1966 (The Park Act). It has a statutory responsibility to either provide directly or work with partners to provide facilities for sport, recreation, leisure, entertainment and nature conservation throughout the Park. Section 14 (1) of the Park Act requires the Authority to prepare a plan setting out proposals for the future management and development of the Regional Park. Riparian authorities such as Newham are required to include those parts of the plan affecting their area within their own relevant planning strategies and policies (Section 14(2) (a)) although inclusion does not infer that the planning authority necessarily agrees with them (Section 14(2) (b)). The Park Development Framework Area Proposals are relevant in terms of Section 14 (2) of the Park Act and are formal statements of the Authority's position in respect of development within the Regional Park.

Further, sections 14 (subsections 4-7) of the Park Act requires local planning authorities to consult with the LVRPA on applications for planning permission which they consider could affect the Park. Section 14 (subsections 8-9) allows the LVRPA to refer the decisions of the riparian authorities to the Secretary of State if it is considered by the LVRPA that the decision taken materially conflicts with the proposals of the Authority for the development of the Park.

Addition to Glossary

Lee Valley Regional Park Development Framework – a suite of documents setting out the Lee Valley Regional Park Authority's plan of proposals for

the development and use of the Regional Park including the Vision, Aims Principles document, Area Proposals, Landscape Strategy, and Park Development Framework Strategic Policies

Design

The Authority welcomes the emphasis in the Local Plan Refresh document on the design process and that this should start with the brief development and continue to post-delivery maintenance.

Policy needs to focus on the totality and detail of the design, the scale and mass of development, and its provision of open recreational space and public realm. Design needs to consider the impact development will have on the spaces and buildings around it, how it will interface with existing open spaces. In terms of development close to the Park this includes the heritage and biodiversity value of open spaces, the openness of the waterside spaces, views out from and into the Park and how these areas are used. Proposals to include a public realm net gain requirement for larger scale developments, addressing both functional and quantitative gains is of interest to the Authority and should be explored further. It may also be relevant to smaller scale sites depending on their location.

The Regional Park has a role to play in responding to the open space needs of local communities. This can however be exacerbated by new, high density development close to the Park where open space provision is inadequate and does not meet the requirements of new residents, or is poorly designed with no provision made for management over the longer term. Policy will need to ensure that additional investment is secured for the Regional Park via planning obligations (CIL/S106) from these developments adjacent to the Park.

A public realm management plan requirement for large strategic sites is also supported, as this would help secure long-term maintenance to preserve the quality of open space and habitats created as part of BNG. Policy on design within the Local Plan will need to ensure the Regional Park is enhanced and buffered from development by the creation of new open and biodiverse space delivered as an integral part of development. This will be critical as part of the Council's emphasis on creating public realm spaces that enable people to live well at higher densities.

Heritage

Policy options for heritage should be considered as part of the Local Plan refresh, both to safeguard and to promote the heritage of the Park within the Borough.

The Park Development Framework Area 1 Proposals seek the conservation and interpretation of historical features of interest within the landscape and associated with the waterways. They also identify the need to protect views to key landmarks both within and outside the Park boundary and highlight the value of promoting the industrial archaeology along the Leaway south of Three Mills. The heritage interest and value of built structures such as the Grade I House Mill, the Grade II listed Clock Mill and the waterside spaces within the Three Mills and the adjacent Sugar House Lane Conservation Area are key assets to be both safeguarded and promoted as visitor attractions. Policy that addresses the future of these assets at the neighbourhood scale or on a borough wide strategic scale would be supported.

Visitor Economy and Sporting Venues

There is limited mention of the visitor economy within the Local Plan refresh document and no reference to major sporting venues such as the Lee Valley VeloPark. Both the Lee Valley Regional Park and the QEOP offer considerable scope to grow the visitor

economy, particularly given the Authority's continued investment in the Lee Valley VeloPark, the associated parklands and the heritage and open space sites such as Three Mills Island and Bow Creek Ecology Park. The Regional Park's offer is also wider than just those sites and attractions within Newham. It provides walking and cycling routes through to adjoining areas and venues to the north, such as Lee Valley Hockey and Tennis Centre, the open spaces of Hackney and Walthamstow Marshes Nature Reserve and the soon to be completed new Lee Valley Ice Centre, one of only three Olympic-sized twin rinks in the UK.

The Authority would wish to see the inclusion of policy that supports the growth and diversification of major sporting venues and visitor attractions such as the Lee Valley VeloPark and Three Mills Island. Sport and leisure activities have an important role to play in creating a sense of place and improving health and well-being. The Authority will be considering the future of the outdoor sporting provision at the VeloPark and where improvements are required and policy that supports the evolution of the venue to meet changes in cycle sports and completion events in the coming years would be helpful.

Greenspaces and Water Spaces

The Authority supports the emphasis the Council has placed on access to nature and open space and the recognition of the range of benefits this provides, in terms of physical and mental health and wellbeing. The Regional Park is a significant part of the Borough's green infrastructure providing valuable benefits to local communities.

The Regional Park has an important role in this respect given it performs a range of functions through its green and blue spaces, functioning both at a local and strategic level. The allocation of additional open space whilst also improving public access within the network would complement the work of the Authority in maintaining a range of spaces and habitats for people to enjoy whether as a local resident or as a visitor to the Regional Park. Policy should also seek to support the positive joint working between the Authority, and the London Boroughs of Newham and Tower Hamlets in relation to green infrastructure provision along the River Lea/Bow Creek as part of the Lee River Park which is linking up open spaces such as Bow Creek and East India Dock Basin.

The Authority would wish to see policy in the Local Plan that protects and supports the enhancement of the Park and that takes account of the different functions the Park performs when considering the concept of 'no net loss of functionality'. The Park is an important element of the borough's green and blue infrastructure linking through and providing access to green spaces beyond borough boundaries. Policy that also clarifies priorities for blue (or water) space would be supported. Within the Regional Park the waterways are a fundamental part of the landscape linked to the heritage of the area. Policy will need to achieve a difficult balancing act across its many functions from leisure use, wildlife habitat, visual identity and recreational space.

The aim of the Council to look carefully at how policy can secure a meaningful uplift in biodiversity is welcomed and the aim to seek a higher BNG percentage is supported, although some urban habitats are of considerable value. The Authority's Biodiversity Action Plan 2019 – 2029 should be referenced in this respect. The Authority would wish to be involved with the proposed Green Infrastructure Strategy and Local Nature Recovery Plan evidence base work as they progress.

Climate

The Authority supports the Council's proposed policy changes, which aim to encourage greater energy efficiency on sites, reduce the impacts of light, noise and air pollution

and provide more detailed guidance on reducing flood risk from all sources. The approach to design policy and the impact this can have on light, air and water quality and pollution will be a key factor in meeting the many challenges of climate change. Policy to reduce light and noise pollution and to minimise exposure to poor air quality would benefit the Park, its biodiversity and the quality of the visitor experience, particularly given the increased density of new residential development within close proximity to the Park. It is important in a very urban borough such as Newham that policy secures investment in localised enhancement schemes to help tackle issues such as flooding, pollution, air quality and lack of connectivity in terms of biodiversity. Policy that addresses the issues of water quality would also be welcomed, as this is fundamental to the Park's biodiversity and environment.

The Authority will be examining measures to increase the energy efficiency of its leisure and sporting venues, such as the VeloPark; but this will be a challenge given the requirements for the performance of the building. Further dialogue and joint working on how the open spaces and waterways within the Park can contribute to reducing the impacts of climate change would be of benefit.

Transport

This topic is closely linked to issues of climate change and the future design and layout of neighbourhoods, as highlighted by the Council in their policy support for the 15 minute neighbourhood. The Authority supports the policy focus on reducing car use and the emphasis instead on high quality cycle parking and provision of charging for E-bikes, and electric scooters. The quality and safety of walking routes is of equal importance and policy will need to address improvements to both cycling and walking provision. Reference to the Authority's Lee Valley Regional Park Cycling Strategy may be appropriate.

The PDF Area Proposals highlight the need for partnership working to deliver access improvements into and through the Park and to make the most of existing public transport hubs which serve the Regional Park such as those at Stratford, Canning Town, and Bromley-by-Bow. Policy will need to consider how routes between these public transport hubs and major venues or event spaces such as the VeloPark can be safeguarded for spectator access as designated safe pedestrian routes. The Authority has faced issues in the past, with disruption to key pedestrian routes (such as the Last Mile from Stratford through to the VeloPark) due to major development and the construction of new buildings and the closure of roads.

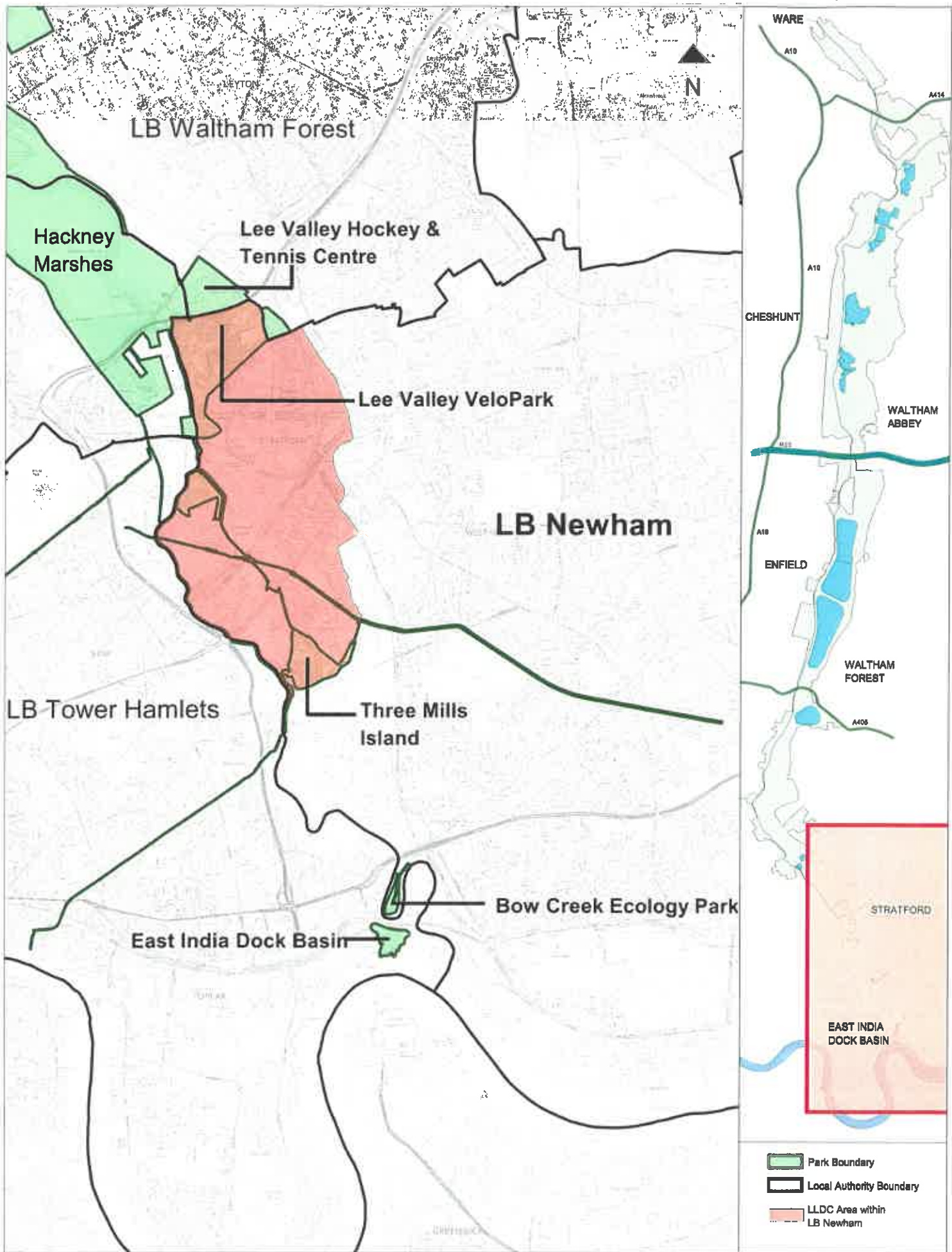
Improving links to linear routes alongside the waterways and through the Regional Park and QEOP provide alternatives to busy main thoroughfares and establishes connections between the surrounding urban environment with the Park's open spaces and leisure sites. There is also an opportunity for the VeloPark and other sites with the QEOP to contribute to the electrical charging network, including for E-bikes and electric scooters, for the benefit of both visitors to the Regional Park and local residents and employees.




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

Yours sincerely

Claire Martin
Head of Planning

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-  Local Authority Boundary
-  LLDC Area within LB Newham

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**LONDON BOROUGH OF WALTHAM FOREST LOCAL PLAN
SHAPING THE BOROUGH: PART 2 SITE ALLOCATIONS
PROPOSED SUBMISSION REGULATION 19 CONSULTATION**

Presented by the Head of Planning

SUMMARY

The London Borough of Waltham Forest are consulting on the final stage of the Site Allocations Local Plan Part 2 (LP2) – the Proposed Submission version. Part 1 Strategic Policies (LP1) is currently under examination.

The Authority responded to the previous stages of the Local Plan, including the Regulation 18 Local Plan consultation for the Part 2 Site Allocations and proposed that both the Ice Centre and the WaterWorks Centre and car park be included as Site Allocations within the Part 2 Local Plan document. Comments were also made in relation to three other site allocations within the Regional Park at Low Hall Depot and at sites on Sewardstone and Lea Valley Road, principally about securing the delivery of green space provision as part of any future redevelopment and the need for improved pedestrian and cycle connectivity. Comments on the New Spitalfields Market Site Allocation, which is outside the Park sought provision for substantial areas of open spaces to cater for the needs of the new residents, to be located and designed to complement the adjoining Lee Valley Hockey & Tennis Centre.

The Authority's draft representations on the Proposed Submission version of LP2 are attached as Appendix A to this report. These include a representation asking the Council to reconsider its position regarding the Ice Centre and the WaterWorks Centre and car park, which have not been included as site allocations. A leisure based site allocation for these two sites would demonstrate that the Plan has been 'positively prepared' enabling the Authority to improve and grow the visitor, sporting and wider cultural offer of the Regional Park for the benefit of local people within the South Waltham Forest strategic growth area and the wider region.

Further comments and representations are made in relation to content of site allocations where they are located within the Regional Park, in particular the need to identify the Regional Park as a relevant Planning Designation and to ensure site requirements and development guidelines for each site take account of the sensitive nature, visitor amenity and environmental requirements of the Park.

Further discussions will be held with the London Borough of Waltham Forest to try and resolve these issues but making formal representations at this stage of the consultation process allows for the matter to be considered at the Examination stage.

RECOMMENDATION

- Members Approve:** (1) the comments as set out in Appendix A to this report as the Authority's formal response to consultation by the London Borough of Waltham Forest on the Proposed Submission version Local Plan Part 2 Site Allocations.

BACKGROUND

- 1 The Local Plan for the London Borough of Waltham Forest (LBWF) is in two parts. This current consultation concerns the final stage or Proposed Submission version of the Local Plan Part 2 Site Allocations (LP2). It follows the public consultation last year on the draft version of the Local Plan both the Part 1 Strategic Policies document (LP1) and an earlier version of the Part 2 Site Allocations. The LP1 Strategic Policies document has been submitted, alongside a suite of proposed modifications, to the Planning Inspectorate for independent examination. It contains the strategic and development management policies for delivering development across the borough.
- 2 The LP2 document has been set out to complement the Strategic Policies document allocating land for a range of uses to deliver the Council's spatial vision, objectives and development requirements. It identifies land allocations that will help address the needs of the local community over the next 15 years including key sites with the potential for redevelopment to provide circa 19,000 new homes. The LP2 document allocates 75 sites. It does not allocate all sites appropriate for development in the borough – it focuses on strategic sites (100 or more new homes) and key sites (considered critical to the delivery of the vision for the area but under 100 units).
- 3 Sites included have been through a selection process that accords with national planning policy and builds upon the Council's Call for Sites exercises undertaken 2017- 2019, together with the findings of the Growth Capacity Study 2018 which reviewed all sites and assessed whether they were achievable and deliverable. The Council's Industrial Land Audit was completed early 2021 and this has informed the process in relation to the suitability of the borough's industrial land for various uses and the scope for co-location and intensification. The representations received through the earlier Regulation 18 consultation stage have also informed the current site allocations.
- 4 Each site allocation includes supporting text on the planning designations relating to each site, indicative development capacity according to the type of use proposed, and estimated delivery or phasing timescales. Also specified for each site are the 'Site Requirements' and 'Development Guidelines' together with a 'Placemaking' Plan. This Plan is intended to provide a vision for how new development will be guided on the site; for example identifying key frontages, sensitive edges, locations for buildings of height, patterns of movement and retained trees. In determining planning applications, the provisions of the whole Local Plan will apply including the Council's Strategic Policies and policies within the London Plan.
- 5 The Authority responded in detail to the previous rounds of consultation on the draft Local Plan (Paper RP/13/19 and RP/45/20) and to the accompanying 'call for sites', proposing two sites for consideration; the WaterWorks Centre and car park, and the western portion of the Ice Centre car park, please refer to

Appendix B to this report. Both these areas are within Metropolitan Open Land (MOL). The Council's position as presented at that time in their Growth Strategy, made clear that sites within MOL and Green Belt (GB) were excluded from consideration for allocation. Notwithstanding this position and in response to the previous draft LP2 Site Allocations consultation (Regulation 18), the Authority sought to make a case that a leisure based site allocation for both the Lee Valley Ice Centre and the Waterworks Centre and car park would be appropriate.

- 6 The earlier draft LP2 document included proposed allocations by the Council for new and replacement leisure developments as a component part the residential and other types of land use allocations, although these sites were outside MOL/GB designations. The Authority argued that the redevelopment of Lee Valley Ice Centre, given the recent positive decision for the new twin pad development, should also be recognised via allocation, or designation for solely leisure development. This would support the Ice Centre in its location long term as a key cultural asset for the borough. A similar allocation was also sought for the Waterworks Centre and car park to recognise its leisure use and potential, particularly for visitor accommodation. It was suggested that both sites could be shown on the same Placemaking Plan to highlight their location within the Regional Park and discussions were held with relevant officers at Waltham Forest on this matter.
- 7 It should be noted that the Submission version LP1 Strategic Policies document currently under examination includes draft Policy 84 Lee Valley Regional Park. This provides support for the Authority's Park Development Framework and Area Proposals as they apply to the Park within Waltham Forest and seeks to ensure development affecting the Regional Park does not contribute to adverse impacts on amenity, ecological integrity or visitor enjoyment. Amendments to Policy 9 South Waltham Forest proposed by the Authority have also been included in the proposed Modifications to the Plan submitted as part of the examination documents for consideration. The amendment is reproduced below in bold and states:

Policy 9 South Waltham Forest

As the priority area for regeneration and good growth, proposals will be supported where they:....

N: 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.

8 Next Stage

Comments are now sought on the revised site allocations contained within the submission version of LP2. After the consultation period, this document will be submitted to the Secretary of State for independent examination. Representations made to this version must consider whether the LP2 Site Allocations document is 'sound'; has it been 'positively prepared', and is it 'justified' and 'effective' and consistent with national policy. All representations received will be submitted to the Secretary of State for consideration at the examination. No updated timescale is provided for this last stage but it is likely that an examination would take place in late Spring early Summer 2022 with adoption by the Autumn/Winter 2022. The Council hopes to have the Local Plan Part 1 Strategic Policies adopted by Spring/Summer 2022. Once fully adopted

the new Local Plan will replace the existing Core Strategy 2012, Development Management Policies Document (DMPD) 2013, and the Blackhorse Lane Area Action Plan 2015.

- 9 The following paragraphs focus on the extent to which the Authority's previous comments have been taken on board in the Proposed Submission version of LP2 and consider the new site allocations relevant to the Park. The letter at Appendix A to this report sets out the Authority's draft formal response and representations. Reference has been made to the Council's Consultation Report produced earlier in the summer, which details the Council/officer response to each comment made.

COMMENTS ON THE SITE ALLOCATIONS LOCAL PLAN PART 2 PROPOSED SUBMISSION VERSION DOCUMENT

10 Lee Valley Ice Centre and the Waterworks Centre and Car Park

No leisure based site allocations have been included for the Ice Centre site or the WaterWorks Centre and car park as requested by the Authority. The Council's stance does not appear to have changed from the previous consultation when it was reported that the Growth Capacity Study had excluded sites in the GB and MOL and the Council had therefore not considered these due to their policy designation. It is understood that the Council see the focus for LP2 as providing housing allocations to meet the Council's housing targets, identifying the most efficient use of land on existing sites to provide housing, including through colocation. Where leisure sites are included these lie outside MOL/GB and the allocations have sought to enhance provision in addition to the residential element.

- 11 It is proposed that the Authority maintains its position that allocating the Ice Centre and WaterWorks centre and car park as leisure sites would provide an effective mechanism to protect the long term future of these sites. These allocations would demonstrate that the Plan has been 'positively prepared' enabling the Authority to improve and grow the visitor, sporting and wider cultural offer of the Regional Park for the benefit of local people with the South Waltham Forest strategic growth area and the wider region.

12 Site Allocations Previously Identified as of Relevance

In response to the previous round of consultation, the Authority commented on five sites allocated within the borough due to their location in relation to the Regional Park. The main concerns at that time related to the content of the development guidelines and Placemaking plans particularly in relation to:

- improving boundaries between the Park and adjoining sites;
- enhancing connectivity with the Park;
- ensuring development sites provide sufficient open and amenity space to provide for the needs of new residents; and
- the need to consider the visual and ecological impacts of future development in relation to the Park.

- 13 A number of the above matters have been addressed in the revised site allocations but key areas of concern remain. These include a need to recognise the Regional Park as a 'planning designation' where sites sit either wholly or partially within the Park, (for example sites SA52 and SA53 on Lea Valley Rd – please refer to Appendix C to this report). There is also a requirement for a stronger emphasis to be placed on the provision of green space and ecological enhancements as well as pedestrian and cycle connections rather than leaving

these as matters to 'be explored'.

- 14 Detailed comments were provided in relation to the Site Allocations for SA01 the Leyton Mills Retail Park and SA02 New Spitalfields Market. Although outside the Park boundary, these sites are located opposite and to the north of the Lee Valley Hockey & Tennis Centre, and immediately east of Hackney Marshes, please refer to Appendix D to this report. The Council have commissioned work on a development framework for a new mixed use neighbourhood 'New Leyton' which includes the above sites together with the Temple Mills Lane Bus depot and the Lee Valley Hockey & Tennis Centre. The latter two are both currently within the London Legacy Development Corporation (LLDC) jurisdiction and therefore not included in the Site Allocation document. Officers from the Authority have been involved in discussions with the Council and other stakeholders on the content and detail of the development framework. It is understood this work will now be used to produce a Supplementary Planning Document (SPD) for the New Leyton area with detailed guidance for development. A report on this SPD will be brought to a future committee in due course when it is issued for consultation.
- 15 Amendments have been made to both the Leyton Mills Retail Park and New Spitalfields Market Site Allocations and the changes proposed are largely positive and can be supported. They address the Authority's previous comments about the need to reference strategic cycle and pedestrian connections between both sites and the adjoining open spaces and public transport nodes. New guidelines have also been included for open green space provision and measures to enhance and create biodiversity as part of the development.
- 16 **New Site Allocations**
Six new site allocations are included in the LP2 Proposed Submission version. These all relate to existing Strategic Industrial Locations. Three of these sites are located adjacent or close to the Regional Park and three are situated within or partially within the Park; Argall Avenue, Rigg Approach and Lammas Rd, please refer to Appendices E and F to this report. It is important that those site allocations within the Park identify the Lee Valley Regional Park as a relevant Planning Designation; draft Policy 84 The Lee Valley Regional Park will apply to the development of these sites. This policy supports the Park Development Framework (PDF) Area Proposals and states that "*Development proposals affecting the Lee Valley Regional Park, must not contribute to adverse impacts on amenity, ecological integrity or visitor enjoyment; and will be expected to deliver enhancements where possible.*"
- To ensure the Plan is effective the planning designations for these sites will need to be amended to reference the Regional Park.
- 17 Inclusion of the Rigg Approach and Lammas Road industrial sites within the LP2 document provides an opportunity to secure long term enhancements to the Regional Park environment and the frontage of Lea Bridge Rd. It also enables the Council, landowners and other stakeholders such as the Authority to plan for and work co-operatively to secure the investment required for major green infrastructure and access improvements such as pedestrian and cycle links between sites, across or under main roads, over railway lines and watercourses. The master planning process referenced in the site allocations would be a means of securing this joint working on more detailed schemes.
- 18 The future of the Lammas Road industrial estate is particularly relevant to the

Authority given its longer term plans to bring forward the Waterworks centre and car park for visitor accommodation and related leisure uses. The draft comments attached as Appendix A to this report welcomes the guidelines set out in the Site Allocation but seek to ensure sufficient space is provided within the Site Allocation to provide for new green infrastructure and buffer habitat.

ENVIRONMENTAL IMPLICATIONS

- 19 There are no environmental implications arising directly from the recommendations in this report but the draft Local Plan for Waltham Forest, both Parts 1 and 2, once adopted will contain policies and allocations that guide and control development and the use of land within the borough that could have an impact on the protection, enhancement, and development of the Regional Park.

FINANCIAL IMPLICATIONS

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

HUMAN RESOURCE IMPLICATIONS

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

LEGAL IMPLICATIONS

- 22 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.
- 23 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

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

EQUALITY IMPLICATIONS

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

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BACKGROUND REPORTS

The London Borough Waltham Forest Local Plan Part 2 November 2021
Proposed Submission version Site Allocations
Document

PREVIOUS COMMITTEE REPORTS

Regeneration & Planning Committee	RP/11/17	Consultation by London Borough of Waltham Forest on the draft Local plan	14 December 2017
Regeneration & Planning Committee	RP/32/19	Consultation by London Borough of Waltham Forest on Regulation 19 draft Local Plan document	19 September 2019
Regeneration & Planning Committee	RP/45/20	London Borough of Waltham Forest Local Plan Shaping the Borough: Part 1 Strategic Policy Submission Version (Regulation 19 Consultation) and Part 2 Site Allocation (Regulation 18 Consultation)	3 December 2020

APPENDICES ATTACHED

Appendix A	The Authority's draft response to the London Borough of Waltham Forest
Appendix B	Plan showing proposed Ice Centre and WaterWorks Centre and car park
Appendix C	Plan showing sites allocated within Park on Lea Valley Rd
Appendix D	Plan showing Low Hall area and Spitalfields New Market site allocations
Appendix E	Plan showing industrial site allocations adjacent to the Park at North Circular and Blackhorse Lane
Appendix F	Plan showing industrial site allocations within the Park at Rigg Approach, Argall Ave, Lammas Rd and Orient Way

LIST OF ABBREVIATIONS

LBWF	London Borough of Waltham Forest
PDF	Park Development Framework
SSSI	Site of Special Scientific Interest
LVH&TC	Lee Valley Hockey & Tennis Centre
HRA	Habitat Regulations Assessment
QEOP	Queen Elizabeth Olympic Park
MOL	Metropolitan Open Land
GB	Green Belt
LLDC	London Legacy Development Corporation
SPD	Supplementary Planning Document
SIL	Strategic Industrial Location
the Park Act	Lee Valley Regional Park Act 1966

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16 December 2021

Dear Stewart

RE: CONSULTATION ON THE PROPOSED SUBMISSION LOCAL PLAN SHAPING THE BOROUGH: PART 2 SITE ALLOCATIONS DOCUMENT (REGULATION 19 CONSULTATION) - LEE VALLEY REGIONAL PARK AUTHORITY REPRESENTATIONS

Thank you for consulting the Regional Park Authority on the Local Plan Proposed Submission Version Part 2 Site Allocations Document Regulation 19 consultation. A report on this matter was considered by the Authority's Members at the Lee Valley Regeneration and Planning Committee on the 16th December 2021 when the following representations were agreed.

Proposed Submission Version Local Plan Part 2 Site Allocations Document

Lee Valley Ice Centre site and the Waterworks Centre and Car Park

The Authority maintains its position that both the Ice Centre and the WaterWorks Centre should be included as Site Allocations within the Part 2 Local Plan Site Allocations document. Including allocations for these sites would provide an effective mechanism to protect the long term future of these sites and their inclusion should be reconsidered. These allocations would demonstrate that the Plan has been 'positively prepared' enabling the Authority to improve and grow the visitor, sporting and wider cultural offer of the Regional Park for the benefit of local people within the South Waltham Forest strategic growth area and the wider region.

It is recognised that the above sites do not fit the usual template/proforma in that they are leisure sites and designated as MOL. It is also understood that the focus for LP2 is on allocating sites for housing to meet the Council's housing targets. However, the Lee Valley Ice Centre is a major leisure designation and community asset within the Lea Bridge Strategic Location contributing to the local and regional visitor economy, providing opportunities for ice sport, training and leisure activity. The WaterWorks Centre and car park is also a leisure site with potential for redevelopment for other leisure uses in particular visitor accommodation, in line with the Park Development Framework Area proposals.

Further comments on the proposed Site Allocations currently included in the Local Plan Part 2 Proposed Submission document are set out below and relate to sites located both within the

Regional Park and adjacent to its boundary. A number of new sites have been included in LP2 which are of relevance to the Regional Park and these have generated a number of comments. For ease of reference, key points are highlighted as representations for consideration.

South Waltham Forest

Sites SA01 Leyton Mills Retail Park and SA02 New Spitalfields Market

The Authority notes and welcomes the additional detail included as part of the site allocations and Placemaking plans for both SA01 and SA02, sites that lie outside the Regional Park but opposite the Lee Valley Hockey and Tennis Centre (LVH&TC). This detail has been informed by the recent work on the 'New Leyton' Development Framework with which officers have been involved. The framework also includes the LVH&TC and the Temple Mills Bus Depot, sites that which fall within the LLDC area. It is understood the Framework document will inform a New Leyton Supplementary Planning Document and this will provide more detailed guidance for development. The Authority would wish to be consulted on this document in due course.

The strengthening of proposed site requirements for strategic cycle and pedestrian connections between both sites and the adjoining open spaces and public transport nodes is endorsed, as is the requirement for development to support delivery of a new station at Ruckholt Rd. A new station in this location would significantly improve public transport accessibility for the Lee Valley Hockey and Tennis Centre. The Authority also supports the proposal to "explore a new pedestrian and cyclist bridge link over the railway lines connecting to Eton Manor" from the south of the Leyton Mills retail park. It should be clarified however, that all these measures will improve connectivity to the wider Regional Park as well as the QEOP. **Reference to the Lee Valley Regional Park has been dropped from the current text and should be reinserted.**

The Authority supports the requirement within the Development Guidelines for SA02 that significant public realm and green open space should be provided as part of development, including a new public park with an ecological focus. Given the quantum of development coming forward it is important that each new development is able to provide all the open space, amenity and recreational/leisure needs required by new residents and employees. Whilst the Lee Valley Hockey & Tennis Centre opposite includes areas of public open space and areas of valuable habitat the Authority's primary objectives in relation to the site are to ensure it continues to serve a regional, national and international sporting and leisure market, as well as serving local sporting need in relation to tennis and hockey. It forms part of the QEOP's zone of sporting excellence.

The Authority also welcomes the inclusion of Planning Guidelines which highlight the opportunities for onsite ecology and biodiversity including green buffers, daylighting the culverted river, improving the River Lea habitat, 'wild' public amenity and tree planting. These green and ecological spaces should be located and designed to complement the adjoining Lee Valley Hockey & Tennis Centre to the south and Hackney Marshes to the west. **The guidellnes should specify a 'dark corridor' along the sensitive western edge of the site where it boards with the Regional Park and Hackney Marshes in order to enhance the existing wildlife corridor and ecological connectivity.**

Further detail on what the 'potential for height' as noted in the Placemaking Plan might mean would be helpful, given the proximity of these sites to the Regional Park. The Placemaking Plans should also consider views through into both the Regional Park (including views to the north 'up the valley') and the QEOP; maintaining views south through to the VeloPark will be important for example.

Site SO09 Low Hall Depot

The Low Hall Depot allocation sits partially within the Park to the north east of Walthamstow Marshes. **The Regional Park reference should be included as one of the Planning Designations in the site allocation.** This will relate to draft Policy 84 in the Local Plan Part 1 Strategic Policies.

It is noted that the site capacity has increased from 440 new homes to 700 with 16,400sqm of industrial floorspace (previously 2,500sqm of non-residential floorspace). **Provision of open space, urban greening and tree planting should be a requirement of development.** Currently the development guidelines only state that provision is to "be explored". The Placemaking Plan indicates proposed green space and pedestrian and cycle connectivity and specifies a strategic public connection between Low Hall Sports Ground and Low Hall Flood meadows. Providing pedestrian and cycle links to the rest of the Regional Park in line with the PDF Area 2 Proposals is missing however. The Area 2 Proposals highlight the importance of reconnecting the Low Hall area into the rest of the Park at Walthamstow Marshes and improving the provision of facilities for visitors.

The Authority supports the requirement for development to deliver improvements to Low Hall Flood Meadows, provided these safeguard existing ecological value. **Stronger guidance is required to realise the potential of the Dagenham Brook. As previously commented a river restoration scheme should be considered.**

North Waltham Forest

SA52 Motorpoint and SA53 Lea Valley Motor Company Lea Valley Rd

The Authority is concerned that although both these sites are located within the Regional Park this fact is not specified within the Planning Designations for the site allocations. **Both sites sit adjacent to an important east west route through the Park and any development should seek to enhance its quality and accessibility.** The Authority's previous comments highlighted the importance of delivering improvements to this area of the Park in accordance with the PDF Area 5 Visitor proposals. These would include provision of gateway features, combined with traffic calming, the setting back of fencing and the creation of broad pedestrian boulevards to be linked to the Lea Valley Walk and the Pathway Corridor (proposal 5.A.1). These points do not appear to have been addressed. As in the previous version the Placemaking Plan for SA52 retains a reference to the potential for tall buildings on site. **The development guidelines should therefore also recognise the proximity of the King George's and William Girling Reservoirs and their SSSI status.** These areas sit within the key north south route for bird migration in the Lee Valley and this will need to be considered in relation to any tall buildings and overlooking of the reservoirs.

New Site Allocations

SA63 North Circular SIL2 and SA69 Blackhorse Lane SIL3

Both the above site allocations relate to Strategic Industrial Locations (SIL) situated outside but adjacent to the Regional Park boundary. The Authority supports the inclusion of Site Requirements that identify the delivery of green infrastructure and open green space alongside the shared boundaries with the Park. SA69 is located adjacent to Walthamstow Reservoirs SSSI which forms part of the Lee Valley SPA and Ramsar. Future masterplanning for this site will need to ensure the inclusion of substantial open and green space as a buffer to development as well as measures to prevent impacts from noise, light, air and water pollution. Draft Local Plan Part 1 Policy 84 Lee Valley Regional Park states under bullet point F) that **"Planning applications for development at Blackhorse Lane will need to be**

accompanied by a project level HRA to ensure the development will not generate adverse urban effects on the integrity of the Lee Valley SPA and Ramsar. "

The Authority welcomes the inclusion of development guidelines for SA63 that promotes the delivery of strategic cycle and pedestrian connections through the site to link with the wider area including land within the Park and within Meridian Water. **Reference to the Regional Park should be included so it is clear that these connecting routes will provide access to strategic recreational routes such as the Lea Valley Walk and Lee Valley Pathway and to major leisure sites such as the Lee Valley Leisure Complex at Pickett's Lock.** The Authority's PDF Area Proposals 4.A.1 include a proposal to develop a linear waterside park around Banbury Reservoir as part of a new visitor hub. The development guidelines identify potential for development to include a circular loop around Banbury Reservoir connecting to William Girling Reservoir so there is scope to explore the potential of this project as part of any future development proposals on this site.

SA70 Argall Avenue SIL 4 and SA71 Rigg Approach SIL5

The north east portion of the Argall Avenue SIL site and all of the Rigg Approach SIL are located within the Regional Park. The Planning Designations section of both Site Allocations should reflect this position. The Authority's PDF Area 2 Proposals (2.A.3 and 2.A.6 respectively) therefore apply. **For both sites the emphasis for the development guidelines and Placemaking Plans should be to improve pedestrian and cyclists routes, their quality and safety, enhancing and establishing links between sites and through into the Park to the south and west.** The Authority supports the Council in seeking to resurrect ancient routes such as the Black Path where it enters the Park from the north east and passes through the Argall Avenue site and to then establish a route alongside the eastern boundary of the Flood Relief Channel within the Rigg Approach site. This would, as stated need to include improvements to the existing footbridge crossing of the railway to the north of the Rigg Approach site.

Both Placemaking Plans identify the boundary with the Park as a sensitive boundary. The development guidelines need to be clear that improvements along this boundary should secure a scheme to enhance the Flood Relief Channel, its biodiversity value, its landscape and water quality and its recreational amenity as part of a green route through into the rest of the Park.

The Site Requirements should identify improvements to the Lea Bridge Road frontage of the Rigg Approach site under the Site Allocation. The Placemaking Plan indicates Lea Bridge Rd is a 'key frontage' but it is unclear what would be required as part of any future redevelopment. Reference to the PDF Area 2 Proposals for Lea Bridge Rd would be of benefit. These seek to improve the landscape quality of the road and to strengthen the awareness of crossing the park/valley, establishing selective visual connections to the open spaces of the valley to the north and south. **The Authority would wish to ensure the Site Requirements secure the delivery of a co-ordinated landscape treatment for the road frontage as part of any redevelopment, including directional and entrance signage that creates an entrance point to the regional park and the Borough.**

SA72 Lammas Rd SIL6 and SA73 Orient Way SIL7

The Lammas Road industrial estate is located within the Regional Park adjacent to the Lee Valley WaterWorks centre and Nature Reserve. **The Site Allocation should be amended to include the Lee Valley Regional Park as a Planning Designation relevant to this site.** The draft Local Plan Part 1 Policy 84 'The Lee Valley Regional Park' would therefore apply.

The Authority acknowledges that this is a Strategic Industrial location and that development would be expected to provide replacement SIL compliant floorspace capacity. The masterplan process identified as a site requirement should however look to address the relationship of this site to the Regional Park and consider how new industrial development, including the requirement to widen Lammas Road itself, can be delivered that also secures significant improvements to the amenity, ecological integrity and visitor enjoyment of the Regional Park.

The Placemaking Plan and Development Guidelines highlight the sensitive nature of the adjoining parklands and nature reserve. They include a requirement for improved green infrastructure, green space and planting along the boundary with the WaterWorks site. This is welcomed but **the Authority would wish to see sufficient space provided within the Site Allocation to achieve this new green edge and buffer habitat.** Green infrastructure principles should also be applied throughout the site given its location within the Park.

The Authority supports the principle of strategic cycle and pedestrian connections through the site linking to the Rigg Approach and the WaterWorks Centre and parklands together with the enhancement of the quality and safety of existing bridge crossings over the railway. **However, the detail of these routes and connections into existing pathways would need to take account of the Authority's own proposals for the Park and future plans for the WaterWorks Centre.**

The Orient Way SIL Site Allocation is set back some distance from the Regional Park behind Lammas Rd and Orient Way itself. **However, the development guidelines should ensure that the creation of green and biodiverse corridors along the site boundaries with Orient Way connect with similar provision and green infrastructure on the adjacent Lammas Rd site and link through to the Regional Park.**

The Authority has raised a number of detailed points above in relation to those site allocations within or adjacent to the Park, particularly the new industrial locations. It is hoped that these detailed comments can be addressed through modification to the Proposed Submission version of LP2 in consultation with officers and as part of preparing the documents for examination. It is important to note however that the Authority would consider the LP2 document unsound if it does not reference the Regional Park as a Planning Designation within the Site Allocations that are situated within the Park. This would improve the effectiveness of the LP2 Site Allocations in delivering the Council's objectives for each area and the Regional Park.

The Authority looks forward to engaging further with Borough officers on the final stages of preparing the LP2 Site Allocations document for examination as part of the Duty to Co-operate process.

Yours sincerely

Claire Martin
Head of Planning

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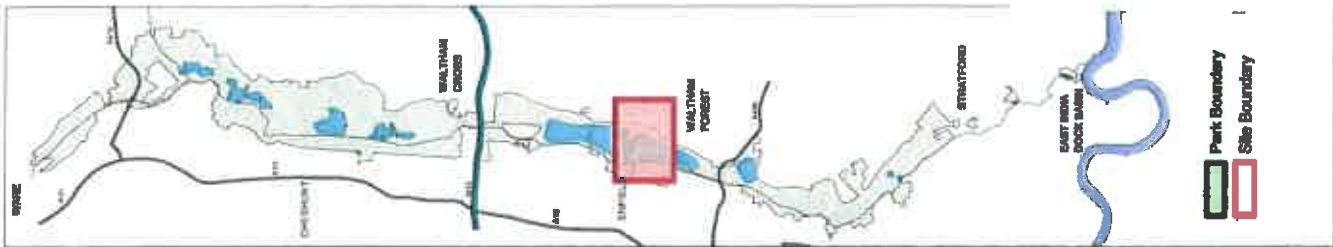
London Borough Waltham Forest Local Plan: Plan 3 - Site Allocations for Leisure (Lea Bridge Road)

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London Borough Waltham Forest Local Plan: Plan 1 - Call for Sites (Sewardstone Area)

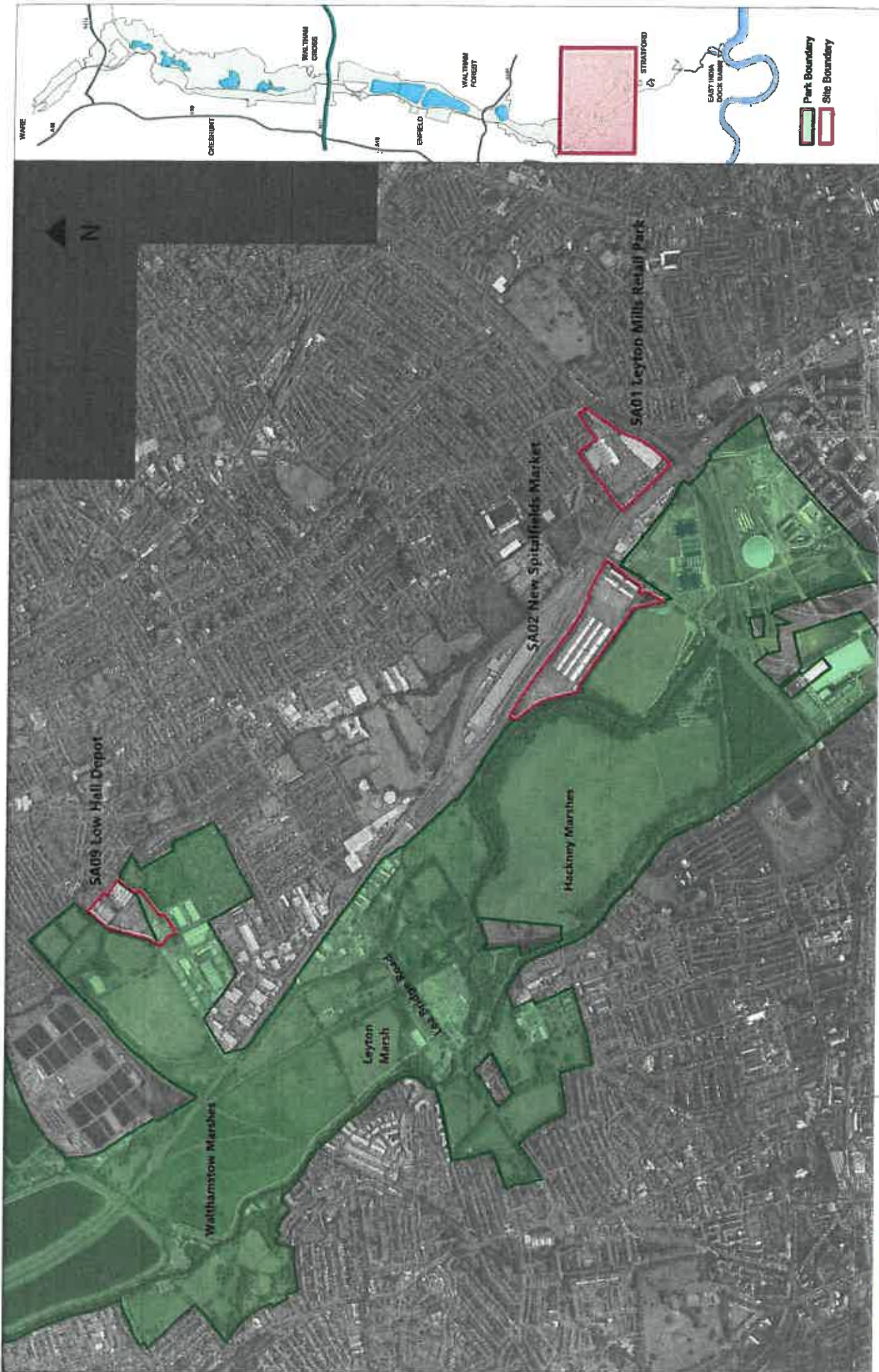
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London Borough Waltham Forest Local Plan: Plan 2 - Call for Sites (Leyton and Low Hall Area)

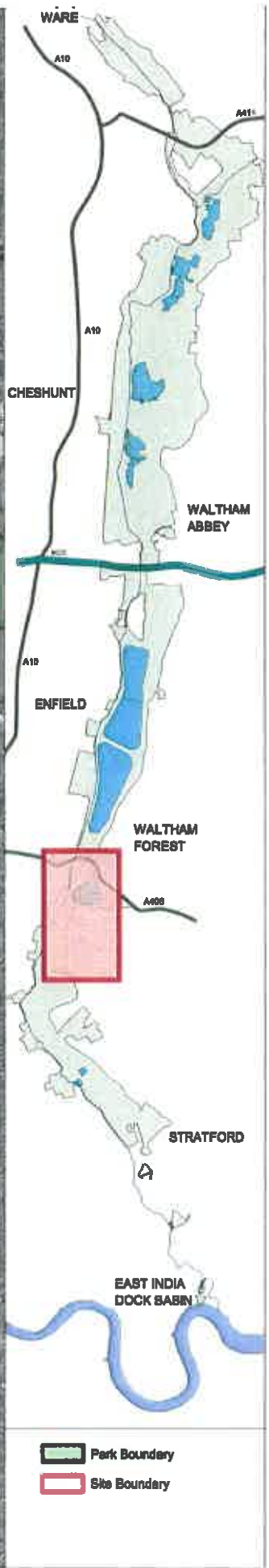
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Park Boundary
 Site Boundary

London Borough Waltham Forest Local Plan: Plan 4 - Call for Sites (Walthamstow Area)



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London Borough Waltham Forest Local Plan: Plan 4 - Call for Sites (Lea Bridge Road Area)

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