

**LONDON BOROUGH OF NEWHAM DRAFT LOCAL PLAN
REGULATION 18 CONSULTATION**

Presented by the Head of Planning.

SUMMARY

Newham Council are consulting on the first draft of their Local Plan (Regulation 18) having considered the responses to the Issues and Options stage presented late in 2021. The draft Local Plan now includes the area of the borough that falls within the London Legacy Development Corporation (LLDC) planning authority, and will therefore be relevant to the Lee Valley VeloPark and associated Regional Park area within the Queen Elizabeth Olympic Park (QEOP) and the Three Mills Island.

This report considers the Council's response to the consultee comments including those made by the Authority as set out in the 'Local Plan Engagement Report'. It considers how far the draft policies address the matters raised by the Authority. The letter attached at Appendix A to this report comments on those draft policies relevant to the Regional Park in particular those relating to design, green space and water space, and policy for those Neighbourhoods which incorporate parts of the Regional Park within their area. Policy gaps are also highlighted in particular the lack of a policy that references the Regional Park, its remit and the Park Development Framework and policy support for major sporting venues within the Queen Elizabeth Olympic Park such as the Lee Valley VeloPark. Further discussion will be needed with officers from Newham as the draft Local Plan progresses to the next stage.

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 draft Local Plan Regulation 18 document.

BACKGROUND

1 Newham Council have produced the first draft of their new Local Plan (Regulation 18 version), informed by the responses received on the Issues and Options consultation carried out late in 2021. The draft Local Plan sets out the vision, objectives, spatial strategy and planning policy framework required to "best address the challenges, and make the most of opportunities which face

Newham". The draft Plan also takes account of policies set out in the National Planning Policy Framework (NPPF) and those set out in the London Plan (2021).

- 2 As part of the Local Plan process the Council has commissioned a series of evidence base documents to enable a better understanding of what is needed in the borough and what should be protected. Of particular relevance to the Regional Park is the interim 'Green and Water Infrastructure Strategy' currently under development. This is looking at the current and future supply of open space, and the options to increase the quantity and its quality. The strategy will also assess Newham's biodiversity and identify opportunities to improve it. Also under development are a Sustainable Transport Study and a Strategic and a Local Integrated Water Management Strategy to cover the Lea Valley corridor and Royal Docks/Beckton area. These evidence base documents will sit alongside the Sustainability Appraisal (SA), the Health Impact Assessment, Equalities Impact Assessment and a Habitats Regulations Assessment (HRA) of the draft Plan.
- 3 It should be noted that the Local Plan covers the entirety of Newham including the area in which the London Legacy Development Corporation (LLDC) is currently the Local Planning Authority. The LLDC planning powers are due to be handed back to the host boroughs in late 2024 and it is intended that the new Local Plan will be ready at the point of transition. Hence, the Council anticipates creating a Submission version (Reg 19) of the Local Plan for consultation by the autumn/winter of 2023, followed by the submission of the Local Plan to the Secretary of State for examination in the summer of 2024 with adoption anticipated by late 2024.
- 4 Newham is situated at the meeting point of the London-Stansted-Cambridge-Peterborough Corridor, centred on enterprise and innovation within emerging sectors such as digital media, life science, telecommunications and advanced manufacturing. It contains three Opportunity Areas: the Olympic Legacy (which also includes parts of the other Host Boroughs) Poplar Riverside (which crosses the boundary with Tower Hamlets) and Royal Docks and Beckton, which is also the home of London's only Enterprise Zone and Europe's largest regeneration area. The draft Local Plan identifies a requirement for 335,000sqm of industrial floorspace, a minimum of 90,000sqm of office floorspace and 25,973sqm of retail floorspace.
- 5 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 number of older residents is also growing and by 2050, Newham is predicted to have the most residents aged over 50 in all north east London boroughs. The London Plan identifies the need for Newham to deliver at least 47,600 homes between 2019/20 to 2028/29.
- 6 Green space covers 18% of Newham, (27 percent including water spaces), compared with 39 per cent for London as a whole. There are 25 public parks in Newham and numerous green spaces totalling around 254 hectares of publicly accessible green space and it has 15% 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 low around 2-

3% although it has a high public transport mode share of around 40% almost 6% higher than the inner London average. Newham has a target of 83% of all trips to be made on foot or by cycle or using public transport by 2041.

- 7 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.**
- 8 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.
- 9 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.
- 10 The Authority responded in detail to the Issues and Options consultation (Report no. RP/56/21) 16 Dec 2021. The Council's response to all the comments made has been summarised in the Local Plan Engagement Report. This provides an insight into the Council's view on those matters raised by the Authority and the framing of relevant policies in terms of the Regional Park in Newham. **Whilst a number of the Authority's previous comments have been addressed there remain some fundamental gaps in terms of the draft policies in the current version of the Local Plan. These are considered below and the Authority's draft comments are set out in the letter at Appendix A to this report.**

COMMENTS ON THE DRAFT LOCAL PLAN POLICIES RELEVANT TO THE REGIONAL PARK

11 Vision, Objectives and Spatial Strategy

The Vision and Objectives underpinning the draft Local Plan are ambitious recognising the transformational nature of growth within Newham and the need to ensure this level of growth enables a fairer and healthier borough. The objectives recognise the importance of securing an inclusive economy to support people, to create a well-designed, and safe 15 minute neighbourhood with greener streets and public spaces, to provide homes for residents and enable people to participate in the life of the borough and the work of the Council. The spatial strategy for Newham 2023 – 2038 identifies the location, scale and types of development that will come forward in Newham and how the needs of the population will be met, directing development to all of Newham's 16 neighbourhoods to distribute the benefits of growth and create a network of

successful well connected 15-minute neighbourhoods.

- 12 The refinement of the spatial strategy and the Council's approach to growth, is supported. As the Authority's previous consultation response highlighted the Regional Park within Newham has a significant contribution to make to a healthier and fairer borough, offering valuable green and waterside spaces, leisure, sporting, and cultural facilities as well as access to nature all within close proximity to existing neighbourhoods and new communities within the Olympic Legacy and Poplar Riverside opportunity areas. **The Regional Park boundary should therefore be included on the Key Diagram as a statutory designation and policy support included within the Local Plan for the Authority's remit, the Regional Park and the Park Development Framework (PDF) Area Proposals.**
- 13 This is important because the draft Policy BFN1 'Spatial Strategy' directs significant levels of growth and the creation of new open spaces and community facilities to neighbourhoods and site allocations situated alongside the River Lea and adjacent to the Regional Park such as the Three Mills, Canning Town and Stratford neighbourhoods. This strategy has the potential to both impact upon and offer opportunities for the Regional Park within Newham. Local Plan policy will also 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. **This point was raised in the Authority's previous comments but has not as yet been addressed. Further details as to how this might be resolved are set out in the letter attached as Appendix A to this report.**
- 14 **Design**
At the Issues and Options stage the Authority supported the emphasis on the design process and the Council's proposals to include a public realm net gain requirement. The importance of design has been carried through to the draft Local Plan which includes a comprehensive overarching policy on design, Policy D1 'Design Standards'. This seeks to ensure the design of development responds to its local context and the wider natural and built surroundings. Policy D2 'Public Realm Net Gain' addresses both qualitative and quantitative requirements for public realm provision and its future management as part of major new developments, including the need to address the quality of existing public realm in the vicinity of a development site, a matter the Authority's raised in its previous comments. **These policies can be welcomed and supported.**
- 15 **Tall Buildings**
It is noted that the draft Local Plan includes Policy D4 'Tall Buildings' and Policy D5 'Living Well at High Density'. Policy D4 defines tall buildings in Newham to be at or over 21m – approximately 7 storeys measured from ground level to the top parapet. The draft Local Plan identifies the tall building zones and policy D4 describes the height ranges considered suitable for these areas, providing detail in relation to each of the site allocations. Implementation guidance is clear that master planning, townscape and skyline analysis alongside technical performance will be required to demonstrate the added value of new and further tall elements. It is noted that for the Canning Town and Stratford/Maryland neighbourhoods tall building clusters are considered to be reaching skyline saturation point due to the scale of recent development.
- 16 The detail provided in Policy D4 and the implementation section is to be welcomed. It is recognised that the Tall Building Policy includes a range of

checks and assessment stages to ensure the design and standard of any development is of the highest quality and that the site allocations include additional design guidance specific to each neighbourhood. For the Regional Park in Newham it is critical that policy ensures tall buildings are set back from the Park and that the guidance allows for the provision of sufficient scale transitions, with buildings both stepping down and set back as they approach the Park edge which in some cases in Newham will also be the waterside edge. Development close to the Regional Park needs to be of a human scale and not overwhelm the visitor with cumulative impacts considered in terms of views and skyline. **Guidance for the site allocations situated close to the Park boundary needs to be particularly clear on this point and areas of concern are raised in the Authority's comments at Appendix A to this report, under the Neighbourhoods section.**

17 **Heritage and Conservation Areas**

The Authority previously commented on the policy options for heritage seeking to ensure the inclusion of a policy both to safeguard and to promote the heritage of the Park within the Borough. Draft Policy D8 'Conservation Areas and Areas of Townscape Value' now covers this point, offering protection for Newham's Conservation Areas. It also states under D8.3 that the loss of characteristics that contribute to the significance of Conservation Areas, such as buildings, public spaces, views, vistas, mature trees and landscape will be resisted. This is welcome and will assist in safeguarding the characteristics and assets of the Three Mills and the adjacent Sugar House Lane Conservation Areas. **Reference to the industrial archaeology and cultural heritage associated with the waterways should be added to the key characteristics to be protected under the third part of the policy.**

18 **Leisure, Culture and Sporting Venues**

Policy support for major sporting venues such as the Lee Valley VeloPark and cultural sites such as Three Mills Island is unclear within the draft local plan. Policy CF3 'Cultural and Leisure Facilities' appears to be the most relevant policy as it addresses both cultural activity and sports and leisure facilities, and states that the development of new or re-provided cultural and leisure facilities (including modernisation and expansion) will be supported. However, the emphasis in the policy and supporting text is on meeting local needs and ensuring facilities are affordable and provide for the community. Whilst there is recognition in the Consultation Report that some 'community facilities' will have a 'wider than local catchment area, for example large leisure centres' the policy position remains to locate these within town or local centres.

- 19 Clearly the Lee Valley VeloPark (and the other Olympic Park venues) offer a different mix of facilities and opportunities that serve both the local community but also provide a range of local, national and international sporting opportunities and events and functions as a major visitor attraction within a parkland setting. **Policy will need to support the evolution of the venue (and other Olympic venues) to meet changes in cycle sports and competition events in the coming years, both in terms of indoor and outdoor provision.**

20 **Green and Water Spaces**

Consideration of the detailed comments made by the Authority and other consultees in relation to Newham's green and water spaces at the Issues and Options stage has resulted in a suite of policies covering green and water spaces, biodiversity, urban greening and access to nature, trees and

hedgerows, play and informal recreation. An interim Green and Water Spaces Strategy 2022 has also been published alongside the Regulation 18 consultation although officers were not involved in this evidence base work despite requesting the opportunity to contribute. This interim strategy provides some initial guidance as to the location and type of additional publicly accessible greenspace that should be planned for within the neighbourhoods in order to meet demand from growing populations increasingly concentrated in high density housing, but says very little about the role and potential of the Regional Park to meet open space needs. **The opportunities for additional open space within the neighbourhood site allocations is welcomed but more could be said about how these opportunities might complement and link to the Park's spaces and waterside routes.**

- 21 A review of current Green Belt and Metropolitan Open Land site designations across Newham is being developed to inform the final Green and Water Spaces Strategy and the Reg 19 Local Plan. This will include a consideration of additional designations to protect strategically important greenspace and officers will seek involvement in this assessment as it will be directly relevant to areas of the Park within Newham.
- 22 **Policy GWS1 Green Spaces is to be supported.** It seeks to ensure development provides or helps deliver a network of high quality green spaces. Importantly it seeks to maximise opportunities for improving the functionality, connectivity, quality and accessibility of open space, and ensure development next to green space does not negatively impact on any of the above.
- 23 Similarly a dedicated and comprehensive policy for Newham's water space is included 'Policy GWS2 Water Spaces'. This seeks to ensure development delivers a network of improved high quality water space and does not harm the openness of the water space, responding positively to the wider landscape setting. The policy states that there should be no negative impacts on the existing water space network, including navigation, biodiversity, water quality, visual amenity and heritage value. There is specific mention in the implementation guidance that overshadowing reduces recreational and biodiversity value. Suitable setbacks are to be provided from the water space to mitigate flood risk and allow waterside walkways and cycle paths where possible. The implementation section suggests a minimum 8 meter buffer zone for all freshwater courses to provide an effective river corridor and improved habitat connectivity.
- 24 **Biodiversity**
A detailed policy covering biodiversity is included as part of the draft Local Plan. Policy GWS3 'Biodiversity, urban greening, and access to nature' seeks to ensure development contributes to nature recovery in Newham by protecting existing habitats and features of value, maximising improvements to existing habitats and opportunities to create new onsite habitats and deliver missing ecological links and incorporating 'living building' (e.g. green roofs/walls, bat and bird bricks bat friendly lighting design) elements as a key feature of the site and building design.
- 25 **The level of detail is to be welcomed** in particular the requirement for major development, or development in close proximity to a Site of Importance for Nature Conservation, or which is likely to have an impact on protected or priority species or habitat to submit an ecological assessment. Development will be required to deliver at least a 10% Net Gain in biodiversity to be secured in

perpetuity (at least 30 years).

26 Transport

The Council's approach to transport policy retains its focus on reducing car use and car dominance and seeks to ensure development both delivers and increases sustainable transport. Development will be expected to support 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. This approach is welcomed and can be endorsed. All new development will be car free (policy T3 Transport behaviour change) with provision for car club bays and short term visitor parking. Development is expected to deliver cycle parking and storage including provisions for charging E-bikes, electric scooters and mobility scooters. The Council will also be seeking contributions from development towards wayfinding in the local area and cycle hire provision. As previously stated at the Issues and Options stage there is an opportunity for development to support improved connections via walking and cycling routes, between employment and residential locations and the Regional Park's adjoining open spaces, venues and strategic routes such as the Greenway, Leaway or Lee Valley Walk.

27 Neighbourhoods

The draft Local Plan sub divides the borough into 16 Neighbourhoods, three of which are relevant to the Regional Park:

- the 'Stratford and Maryland' neighbourhood which includes the VeloPark and part of the Greenway;
- the 'Three Mills' neighbourhood which includes Three Mills Island and two site allocations adjacent to the Island listed as Abbey Mills (7ha) site N7.SA1 and Parcelforce (19.97ha) site N7.SA2; and finally
- the 'Canning Town and Custom House' neighbourhood which includes the Bow Creek Ecology Park and two site allocations outside the Park boundary namely the Limmo site (3.66ha) site N5.SA4 and Canning Town Riverside (3.74ha) site N5.SA5, please refer to the plans at Appendix C to this report.

- 28 The Local Plan provides a vision and policies for each neighbourhood including design and development principles. More detailed policies are included for the site allocations identified within each neighbourhood. The comments set out in the letter at Appendix A to this report identify where amendments are required to the Neighbourhood Visions and policies to reference the Regional Park. **It is important that policy for each of the above neighbourhoods supports the Regional Park, particularly the potential to deliver further leisure and sporting opportunities at the Lee Valley VeloPark and safeguards its ecologically important open and waterside spaces and valuable heritage.**

ENVIRONMENTAL IMPLICATIONS

- 29 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

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

this report.

HUMAN RESOURCE IMPLICATIONS

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

LEGAL IMPLICATIONS

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

RISK MANAGEMENT IMPLICATIONS

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

EQUALITY IMPLICATIONS

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

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BACKGROUND REPORTS

The London Borough Newham Consultation on the Jan 2023
Newham draft Local Plan Regulation 18 document

PREVIOUS COMMITTEE REPORTS

Regeneration and Planning committee	RP/56/21	London Borough of Newham Local Plan Refresh Issues and Options stage consultation	16 12 2021
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APPENDICES ATTACHED

Appendix A	The Authority's draft response to the London Borough of Newham
Appendix B	Plan showing the Regional Park area within the borough of Newham
Appendix C	Site Allocations relevant to the Regional Park

LIST OF ABBREVIATIONS

LLDC	London Legacy Development Corporation
PDF	Park Development Framework
SSSI	Site of Special Scientific Interest
NPPF	National Planning Policy Framework
HRA	Habitat Regulations Assessment
QEOP	Queen Elizabeth Olympic Park
SA	Sustainability Appraisal
LVRPA	Lee Valley Regional Park Authority
CIL	Community Infrastructure Levy
BNG	Biodiversity Net Gain
SINCS	Sites of Importance for Nature Conservation
BCEP	Bow Creek Ecology Park
EIDB	East India Dock Basin
the Park Act	Lee Valley Regional Park Act 1966

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23 February 2023

Dear Ellie

RE: CONSULTATION ON THE LONDON BOROUGH OF NEWHAM DRAFT LOCAL PLAN (REGULATION 18) - LEE VALLEY REGIONAL PARK AUTHORITY REPRESENTATIONS

Thank you for consulting the Regional Park Authority on the draft Local Plan (Regulation 18) document. A report on this matter was considered by the Authority's Members, at the Lee Valley Regeneration and Planning Committee on the 23rd February 2023, when the following comments were agreed.

Draft Local Plan Regulation 18

Vision and Spatial Approach

The Authority welcomes the ambition of the Vision and objectives for Newham, and supports the Council's spatial strategy and approach to growth. As the Authority's previous consultation response highlighted the Regional Park within Newham has a significant contribution to make to a healthier and fairer borough, offering valuable green and waterside spaces, leisure, sporting, and cultural facilities as well as access to nature all within close proximity to existing neighbourhoods and new communities within the Olympic Legacy and Poplar Riverside opportunity areas. The Regional Park also functions as a significant element of the Borough's and London's green infrastructure.

It is noted that the draft Policy BFN1 'Spatial Strategy' directs significant levels of growth and the creation of new open spaces and community facilities to site allocations within the Three Mills, Canning Town and Custom House and Stratford and Maryland neighbourhoods. These neighbourhoods include significant areas of the Regional Park within their boundaries and this strategy has the potential to both impact upon the Park as a result of increased development pressure and associated environmental impacts and offer opportunities that would benefit the Park, such as investment in open spaces, improved access routes between areas and better public transport provision.

The Regional Park boundary should therefore be identified as a statutory designation on the Key Diagram.

Lee Valley Regional Park Policy

The inclusion of the Regional Park boundary on the Policies Map is welcomed but this should be supported by a Lee Valley Regional Park specific policy statement in the Local Plan.

With the return of planning powers back to Newham Council from the LLDC in 2024 significant areas of the Regional Park will fall within the jurisdiction of the Local Plan and require policy support in accordance with the remit of the Authority and the Park Development Framework. These areas will include 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.

The Authority raised this matter at the issues and options stage. In response to this point the Engagement report notes that draft policy for the Three Mills neighbourhood (N7) *“supports the vision of the Lee Valley Park Development Framework Area, including the conservation and enhancement of the neighbourhood’s waterway and heritage character and its heritage assets”*.

It is important however that a Lee Valley Regional Park specific policy statement is included in the Local Plan supporting the Authority’s remit, the Regional Park and referencing the Park Development Framework Area proposals as they apply to the entirety of the Park area within Newham. This would fulfil the mandatory requirements of the Park Act Section 14 (2) (a) as it relates to the riparian authorities such as Newham. This would provide context for the Regional Park’s spatial designation included on the Policies Map.

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. Such a policy would also 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 text below is carried over from the Authority’s previous comments at the Issues and Options stage as an example of the supporting text needed to cover the above requirement. It can be adapted to suit the style of the Local Plan document and officers from the Authority would be happy to discuss this further.

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 supports policy D1 'Design Standards' and D2 'Public Realm Net Gain' which set out detailed requirements for how development should respond to both its local context and the surrounding environment. It is important that the interface between new development and existing open spaces, waterside environments, habitats and heritage sites such as those within the Park is taken into account from an early stage in the development process.

The proposal to secure an increase in the quantity of public realm on site allocations through the delivery of new open space is particularly relevant to the Regional Park as a number of site allocations sit adjacent to open spaces within and managed by the Park Authority. Whilst the Regional Park has a role to play in responding to the open space needs of local communities it is important that the design of high density development adjacent to the Park and provision of associated public realm and open space caters for the needs of new residents rather than placing additional pressure on the Park's open spaces such that their quality and value is undermined.

The Authority welcomes the focus within the policy implementation section placed on facilitating the movement of people – pedestrians and cyclists. This will be helpful in terms of enhancing the connections between new development and the Regional Park. Policy BFN4 'Developer contributions and infrastructure delivery' seeks to obtain contributions from developers to fund affordable housing, improvements to infrastructure and the environment as appropriate, to achieve sustainable development. It will be important to secure additional investment for the Regional Park via planning obligations (CIL/S106) from those developments likely to impact the Park, and which place additional pressure on its open and waterside spaces, biodiversity and heritage sites.

The requirement under Policy D2 for a Public Realm Management Plan to be submitted alongside applications is endorsed. It is noted this also encourages smaller residential development proposals to include contributions to the improvement of the wider public realm network. It is important to ensure maintenance of the public realm is secured through development and that as previously stated it preserves the quality of public realm, open space and habitats created as part of BNG.

Tall Buildings

The policy on tall buildings set out under Policy D4 is noted and the range of implementation assessment stages welcomed. The Design Guidance on the location of tall buildings and the range of building heights provided for each site allocation should take into consideration the open space, heritage and ecological assets of the Regional Park.

The Authority's concerns relate to those sites allocated under N7 the Three Mills Neighbourhood, in particular N7.SA1. Abbey Mills and N7.SA2 Parcel Force Site which lie adjacent to the Regional Park at Three Mills. Guidance set out for the Abbey Mills site proposes building heights of 6 to 12 storeys stepping down towards the west to manage the impact on heritage assets. This is supported although clearly the overall design and placement of buildings will have to be sensitively planned given the need to retain views of the Abbey Mills Pumping Station Grade II* and the wider heritage features of the area specifically those on Three Mills Island.

There is greater concern regarding the Parcel Force site where guidance currently proposes building heights in a range from 3 to 30 storeys, although the guidance also suggests the buildings should step down towards the listed gasholders. The Authority would wish to see the guidance specify a set back from the riverside edge on the western side of the site, which is opposite a linear extension to the Regional Park along the River Lee Navigation towpath, and that building heights should not block or interrupt views through the site to the Clock House Grade II and House Mill Grade I listed.

Similar concerns are relevant in terms of site allocations further south on the Limmo site (N5.SA4) and Canning Town Riverside (N5.SA5). Although both of these sites are located further away from the Park boundary the implications of the tall building policy, and the allocation of buildings between 10 and 19 storeys on the Limmo site and up to 15 storeys on the Riverside site, should also ensure the cumulative impact of tall buildings are taken into consideration in terms of the Regional Park at Bow Creek Ecology Park and also at East India Dock Basin which sits just over the boundary in Tower Hamlets.

Heritage and Conservation Areas

The Authority supports policy on protecting Conservation Areas and their heritage assets set out under Policy D8 in particular the importance of protecting views to key landmarks such as the Grade I listed House Mill and the landscape within which these areas are set.

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. A minor addition to Policy D8 'Conservation Areas and Areas of Townscape Value' bullet point 3 is therefore proposed to ensure it includes as a characteristic of Conservation Areas "the value of promoting the important industrial archaeology associated with the waterways along the Leaway south of Three Mills".

Leisure, Culture and Sporting Venues

The draft Local Plan is missing a policy that supports the growth and diversification of major sporting venues and visitor attractions such as the Lee Valley VeloPark and Three Mills Island and the role they can play in growing the visitor economy. Sport and leisure activities have an important role to play in creating a sense of place and

improving health and well-being. As previously stated the Authority regularly reviews the future of the outdoor sporting provision at the VeloPark and its programme of events to identify where improvements are required. Policy that supports the evolution of the venue to meet changes in cycle sports and competition events in the coming years should be incorporated into the Plan.

The current LLDC Local Plan includes a statement (set out within Sub Area 2 North Stratford and Eton Manor) supporting the Lee Valley VeloPark and the work of the Authority as it seeks to improve and grow the offer associated with the venue and thereby ensure its long term sustainability. The LLDC Local Plan recognises the world class status of the sports facilities at the VeloPark and its importance as a national leisure and sporting venue hosting local, national and international events, together with its role in delivering a sporting legacy for local communities.

A similar level of policy support should be incorporated into Newham's Local Plan to enable the Authority to continue to improve and grow the sporting offer at the VeloPark both as an international/national leisure and sporting venue and as a sporting venue for the local community. Regional/national venues such as the Lee Valley VeloPark bring wider social and economic benefits to the Borough that need to be supported and promoted through the Local Plan.

It should also be noted in the draft Local Plan that the Regional Park's offer for Newham's communities extends beyond the borough boundary and is wider than just those sites and attractions within Newham. The Regional Park offers a range of walking and cycling routes through to adjoining areas and venues to the north, and the opportunity for people to enjoy venues 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.

Greenspaces and Water Spaces

The Authority supports the comprehensive policy for green and water spaces (GWS1 and 2). These policies seek to protect and enhance the varied and multiple functions provided by green and water spaces and maximise opportunities to improve their quality, accessibility and connectivity. There is however a policy gap in terms of clarifying the priorities for blue (or water) space. Water spaces within the Park in Newham are a fundamental part of the landscape linked to the heritage and biodiversity of the area but which seem to face increasing pressure due to the location of high density development. This is mentioned under implementation text GWS2.3 which states: "*Water spaces provide significant habitats for wildlife, as well as a unique visual amenity which gives many parts of Newham a specific identity. There are also opportunities for leisure use and recreation activities both on and around the water. The balance of these uses will be managed by directing an appropriate intensity and type of activation to the right water space locations*". It would be helpful if this point, underlined above, could be covered in the policy text.

The detailed work undertaken as part of the interim Green and Water Spaces Strategy 2022 is welcome, although it would have been helpful if there had been some engagement with officers at the Authority so that the function of the Park's spaces and the opportunities they provide for the borough could be factored into the findings, particularly given large areas of the Park will soon revert to Newham in planning terms. The Regional Park is an important part of the borough's green and blue infrastructure linking through and providing access to green spaces and waterways beyond borough boundaries. Its spaces perform a range of functions both at a local and a strategic

level. Officers would welcome an opportunity to engage with the proposed review of Metropolitan Open Land site designations as these relate to the Regional Park to help guide policy refinement for the Regulation 19 Local Plan.

Biodiversity

The Authority supports the detailed policy provisions for biodiversity, access to nature and urban greening set out under policy GWS3 particularly the emphasis on the need for ecological assessments set out within the policy and the implementation guidance. GWS3 f) refers to the need for development to demonstrate *“through a Management Plan how existing and new areas of biodiversity value will be maintained”*. Ensuring adequate funding is allocated for new areas of biodiversity will be an important part of the development. It is suggested that the sentence is amended to read *how existing and new areas of biodiversity value will be funded and maintained* include will be funded and maintained

A significant area of the Regional Park within Newham, particularly the waterways are designated as Sites of Importance of Nature Conservation (SINCS) and development within the site allocations adjacent will need to carefully assess the ecological value and interconnectivity of these biodiversity assets, particularly if access to nature is to be widened within the Borough. Policy GWS3 bullet 2, references the impacts of major developments on SINCS and priority or protected species and the need to submit an ecology statement. Potential impacts on the wider Lee Valley SPA should also be considered particularly in terms of the relationship between development and potential impacts to the migratory route through the Lee Valley.

It is not clear if reference has been made to the Authority's Biodiversity Action Plan 2019 – 2029 in respect of this section of the Plan or in relation to the work underway as part of the interim Green and Water Spaces Strategy. The Authority would wish to be involved with the detail of this work as it considers the biodiversity baseline and opportunities to reduce areas of deficiency in Newham.

Transport

The Authority supports the policy on transport in the draft Local Plan and the inter-relationship with policy on the design of development and public realm provision. Policy that assists in shifting behaviour towards public transport and active travel will benefit the Regional Park and help to improve walking and cycling access to the Park that connects with public transport hubs and the surrounding communities. This policy will also assist in the delivery of PDF Area Proposals which emphasise 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. Given the transition of planning powers from the LLDC back to Newham Council it will be important to ensure policy in the Local Plan assists in the safeguarding routes for spectator access as designated safe pedestrian routes, between these public transport hubs and major venues or event spaces such as the Lee Valley VeloPark. As previously stated major development and the associated closure of roads during construction can disrupt key pedestrian routes (such as the Last Mile from Stratford through to the VeloPark).

Neighbourhoods

The Authority notes the new section within the draft Local Plan focused on the Neighbourhoods. Three of the neighbourhoods incorporate parts of the Regional Park within their areas; namely 'Stratford and Maryland', 'Three Mills', and 'Canning Town

and Custom House'. The vision section for each of the above should include a reference to the Regional Park.

Stratford and Maryland

The following would be appropriate for the Stratford and Maryland neighbourhood vision policy section:

"Support the ongoing development and enhancement of the Lee Valley VeloPark on the QEOP as a world class cycling venue for track, BMX, road and mountain biking and as a venue for major events".

This would sit alongside the existing vision policy under bullet 17 which states: "*retain existing mature trees and maximising the provision of new open space and green infrastructure and the opportunities to increase biodiversity and improve access to the Olympic Park*" and under bullet 18 which states: "*Improving exiting access points and creating new access points to the Greenway*" both of which are endorsed by the Authority.

Three Mills

The following additions should be included for the Three Mills Neighbourhood given it includes a large section of the Regional Park. Under the Vision policy section an additional bullet point should be added as follows to reflect the Authority's objectives for Three Mills Island as set out in the PDF Area Proposals:

"Support the delivery of a visitor hub at Three Mills Island as part of the Lee Valley Regional Park, with historical features of special interest within the landscape and associated with the waterways to be conserved and interpreted and views to key landmarks within and outside the Regional Park protected. In particular protect 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 Areas. Protect views to the House Mill and Clock House and to the Abbey Mills Pumping Station (Grade II listed) on Mill Meads".

Whilst it is recognised that the Vision policy does include statements supporting the restoration and conservation of buildings at Three Mills there needs to be reference to the importance of the specific heritage assets given their status and their role in relation to the Regional Park and its recreational and leisure offer, both for the local community and visitors.

The Authority welcomes the Design Principles set out for the Abbey Mills and Parcel Force site allocations (N7.SA1 and N7.SA2 respectively) which require development to conserve and enhance the Three Mills Conservation Area and listed buildings.

The Authority supports the proposal for a significant area of the Abbey Mills site adjoining the waterway (on the western part of the site) to be set aside for open space and that the development of both sites should address open space deficiency by providing new open space and a local park. This should be designed to cater for the needs of future residents and offer a variety of recreational and play spaces.

The Authority also supports the requirement that for both allocations, the future layout of development should protect the Site of Importance for Nature Conservation, increase access to nature and enable the continuation of the Leaway Walk through the sites.

Canning Town and Custom House

The Canning Town and Custom House neighbourhood includes two site allocations that are outside the Regional Park boundary but could have an impact on the Park at Bow Creek Ecology Park (BCEP) and potentially East India Dock Basin, (EIDB) which lies within the LB of Tower Hamlets on the boundary with Newham. These sites are N5.SA4 Limmo situated to north east of EIDB and N5.SA5 Canning Riverside situated to the north of Bow Creek Ecology Park.

The site allocation plan for the Limmo allocation indicates a setback for development from the southern edge of the site. Taller buildings proposed for the site (up to 19 storeys) are to be concentrated adjacent to the railway line in the northern portion of the site and the infrastructure requirements identify the need for new open space provision to be concentrated on the south of the site. These measures are supported as they would ensure a degree of openness alongside the waterways and might assist in protecting some views out from EIDB although existing development within the area on sites within Tower Hamlets already dominates the skyline from EIDB. The proposal for a riverside walk which links to the Ecology Park in the north west is welcomed and should be discussed further with the Authority to ensure an appropriate link can be delivered as part of development.

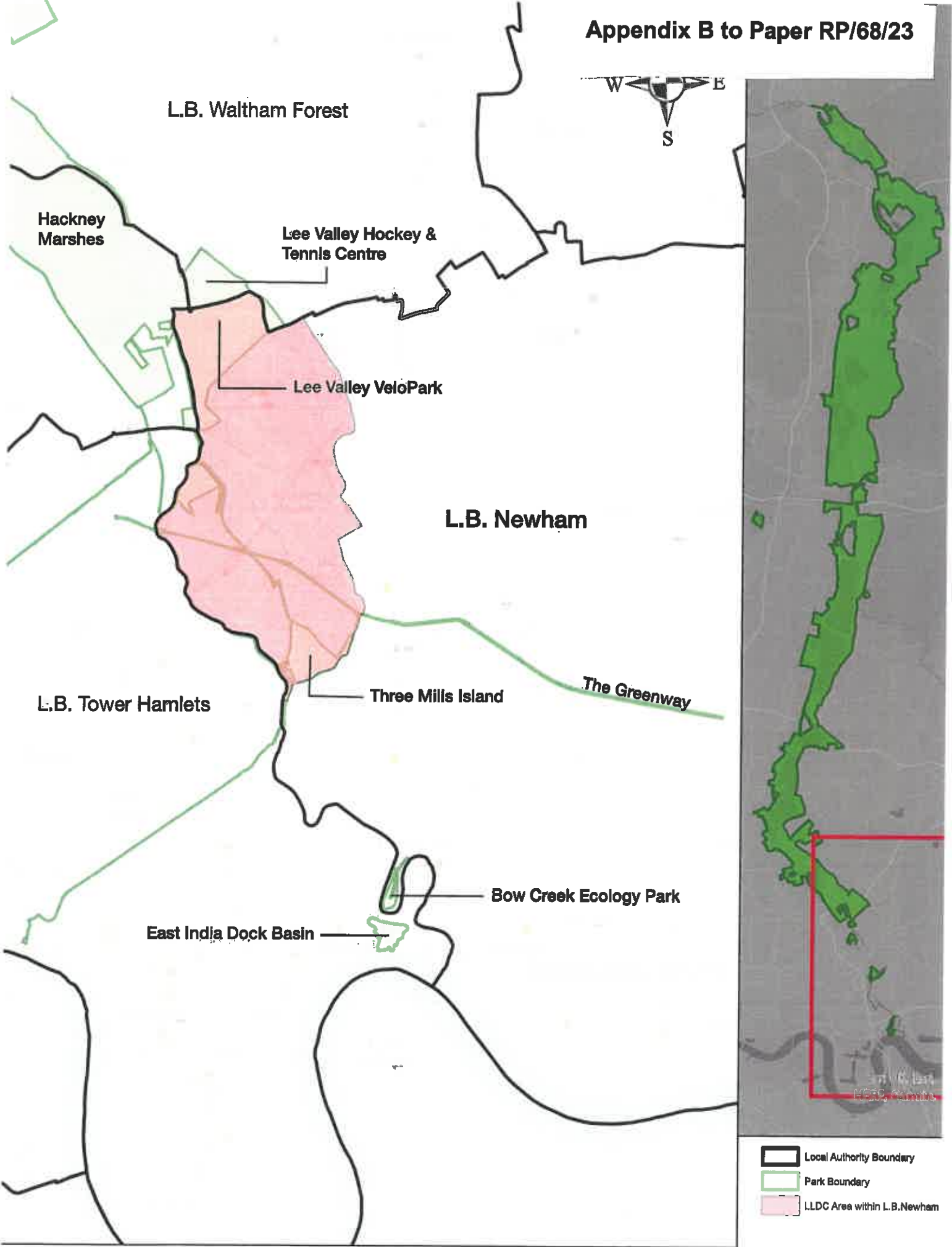
The Canning Town Riverside site is of interest to the Authority as it offers opportunities to provide new open space and a walkway along the edge of the River Lee that could connect to the Bow Creek Ecology Park. These points are included in the Design Principles and Infrastructure requirements and therefore supported by the Authority.

For all the above site allocations the Regional Park should be listed in the pro-forma as a relevant site designation with reference to the PDF to ensure future development can take into account the provisions of the PDF.

The Authority looks forward to engaging further with Borough officers on the matters raised above prior to the next stage of the Local Plan process.

Yours sincerely

Claire Martin
Head of Planning



- Local Authority Boundary
- Park Boundary
- LLDC Area within L.B. Newham

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-  Site Allocations
-  Park Boundary

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