

**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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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.

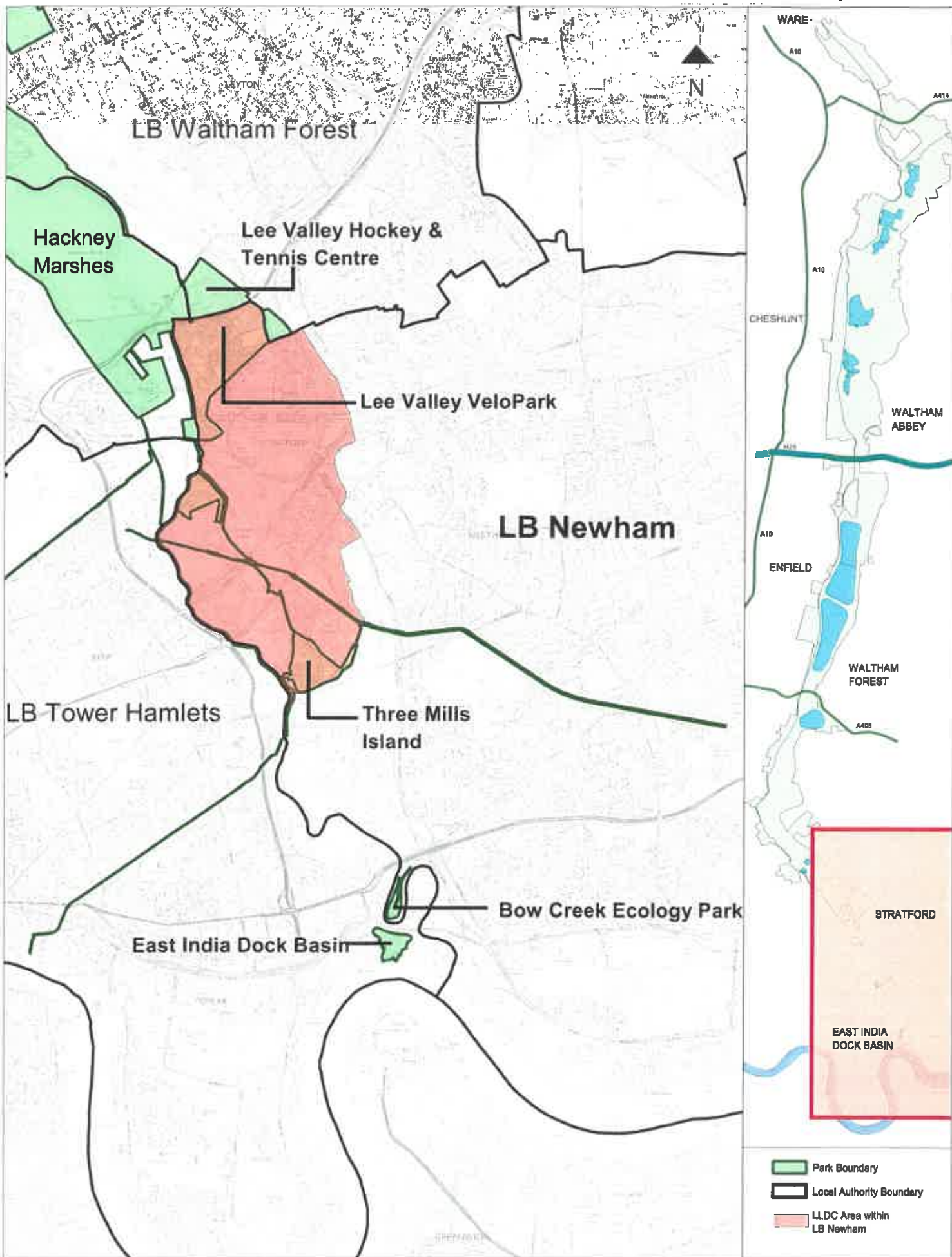
Improving links to linear routes alongside the waterways and through the Regional Park and QEOP provide alternatives to busy main thoroughfares and establishes connections between the surrounding urban environment with the Park's open spaces and leisure sites. There is also an opportunity for the VeloPark 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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Lee Valley Regional Park within London Borough of Newham

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