



LEE VALLEY REGIONAL PARK AUTHORITY

**REGENERATION AND PLANNING
COMMITTEE**

17 JANUARY 2019 AT 12:00

Agenda Item No:

8

Report No:

RP/28/19

**CONSULTATION BY THE LONDON BOROUGH OF HACKNEY
ON THE PROPOSED SUBMISSION (REGULATION 19) LOCAL
PLAN 2033 'HACKNEY A PLACE FOR EVERYONE'**

Presented by the Head of Planning and Strategic Partnerships

SUMMARY

Hackney has issued the Proposed Submission draft of its Local Plan 2033 (Regulation 19) for consultation. It sets out the Council's growth strategy, place policies, site allocations and planning policies to guide and manage development in the borough for the next 15 years through to 2033.

The Authority's comments on the earlier, Consultation Draft of the Local Plan 2033, were largely supportive although further detail was sought on proposals for renewal and intensification within the 'Lea Valley Edge' growth corridor.

This report presents the outcome of the Authority's comments on the earlier, Consultation Draft of the Local Plan which were largely supportive, noting those areas of policy where changes have been made.

The letter at Appendix A to this report sets out the Authority's final representations. These seek changes, mainly to the supporting text, relating to the new policy on Enhanced Corridors and the Lee Valley edge/corridor, the importance of biodiversity surveys for all development proposals and the need to reinstate references to the Regional Park and Olympic Park under policy for the arts, culture and entertainment facilities.

These comments were submitted as an officer level response in advance of this committee to meet the consultation deadline.

RECOMMENDATIONS

- Members Approve:
- (1) the draft comments included in Appendix A to this report as the Authority's response to the London Borough of Hackney's consultation on the Proposed Submission Version (Regulation 19) Local Plan 2033.

BACKGROUND

- 1 The Proposed Submission Local Plan 2033 (LP33) follows two previous rounds of formal consultation, first in the autumn of 2016 and more recently on the Draft LP33 in the autumn of 2017. The Authority responded (Paper RP/10/17). This consultation is the final opportunity to comment before the Plan is submitted to Government and the Examination in public. Comments are sought on the 'soundness' of the Plan i.e. has it been positively prepared, is it justified, effective and consistent with national policy.
- 2 The Proposed Submission LP33 responds to a series of issues and opportunities, most notably:
 - significant population growth, projected to reach 320,000 by 2033 and which requires the delivery of 26,250 additional homes including an increase in affordable home;
 - a sustained period of economic growth and a diverse economy to accommodate 23,000 new jobs, with a need for more affordable workspace by 2033;
 - a growth in the leisure and evening economy sectors;
 - Opportunities to improve capacity and accessibility in and via the transport network; and
 - Climate change challenges and the need for resilience to increased temperatures, and flood risk.
- 3 The Proposed Submission LP33 includes a vision, objectives, and a growth strategy. It also now includes a series of 'place policies' and updated site allocations followed by planning policies on: housing, jobs, employment areas, community facilities, town centres, transport, open spaces, design and heritage, climate change and the environment. A revised Policies Map now shows all the land designations necessary to support Plan implementation. This version of the LP33 has been published just as the new London Plan commences the Examination in Public and in advance of the GLA's revisions to the Upper Lea Valley Area Opportunity Planning Framework.
- 4 The Regional Park forms an important element of the Borough's green infrastructure adjacent to major residential and business populations, with significant open spaces, leisure and ecological resources, and strategic pedestrian and cycle routes. These include Hackney Marshes, the River Lee and Lea Navigation, parts of the Queen Elizabeth Olympic Park, Middlesex Filter Beds nature reserve, Millfields and Springfield Park and the Lee Valley Pathway and Lea Valley Walk, (a total of approximately 197 hectares, or 487 acres), please refer to the plan at Appendix B. This area includes developed areas including one employment site 'Here East'. These open spaces in turn connect with and provide access to a continuous network of open space and habitats, waterways, paths and cycle routes that open up the wider Regional Park to local residents and visitors.
- 5 Park Development Framework (PDF) Area 2 Proposals, The Three Marshes: Walthamstow, Leyton and Hackney cover the Park within Hackney. The main focus of these is the delivery of pedestrian and cycle access improvements into the Park, linking with adjacent residential areas, and transport hubs, and support for work being undertaken by Hackney to protect and enhance the

ecological value of the area and improve access to nature. Proposals also support enhanced visitor facilities and water based recreational and sporting activity on the River Lee Navigation, providing this can be achieved without detriment to the waterside ecology and habitats. The draft Landscape Strategy, (Dec 2018) is also relevant, which highlights the importance of maintaining and continuing positive management of valued landscape resources such as the open grasslands, woodland margins, waterways and varied habitats.

COMMENTS ON THE DRAFT LOCAL PLAN 2033

- 6 The letter at Appendix A to this report contains the Authority's officer comments on the draft Local Plan. It was submitted as an informal officer level response to meet the 7th January 2019 consultation deadline. Comments build on the previous points raised and the Council's response as detailed in the 'Consultation Statement'. The changes made are largely supportive, only a few matters remain where further detail is sought and minor changes to policy identified in order to improve the effectiveness of the Local Plan.
- 7 A new Place Policy 'PP5 Enhanced Corridors' has been added to the Local Plan. This includes major roads and streets running through the Borough and the River Lee corridor, (para 4.39 to 4.43). The Council consider this will address the Authority's previous comments on the lack of detail relating to the growth corridor identified as the 'Lea Valley Edge' which covers land adjacent to the Regional Park. The new Policy PP5 includes Strategic Principles for the Lee Valley Corridor which are largely focused on access and improving connections. Whilst these Principles are to be welcomed there needs to be a closer tie in to the elements of the River Lee Corridor which make it different from the other road and street corridors included within the Enhanced Corridors policy. This is described in the supporting text which highlights the importance of the River Lee Corridor for walking, cycling, and wildlife, for river communities and leisure and recreation (para4.43).
- 8 Whilst it is recognised that the new 'PP1 Public Realm' policy is to be read alongside the place policies it is not clear whether this offers guidance that is specific enough in respect of the River Lee Corridor. Guidance is needed for example, on how mixed use housing led development at increased densities can incorporate open spaces and biodiversity that would complement the adjacent water corridor and waterside open spaces, conserving high quality mature landscapes in the area and protecting valuable leisure, heritage and ecological assets. An amendment to the supporting text is suggested to set out the relationship between this policy, PP5 and those others that are relevant such as policy LP46 G) which references the Regional Park, policy LP52 which covers development alongside waterways and canals, and LP1 Design Quality and Local Character.
- 9 The attached letter also recognises the changes made to the Local Plan in relation to the Authority's comments on biodiversity. The revision to Objective 8, to include a greater emphasis on biodiversity is welcomed. This now reads: *"To protect and enhance existing open spaces and biodiversity, develop and improve green links between these spaces and support the creation of new open spaces and vertical gardens"*, (page 8 in the LP33).
- 10 The added reference to the 'Lee Valley Biodiversity Action Plan 2017' alongside the Park Development Framework Proposals under Policy LP46 G, (page 135) is welcomed. However, as a revised version of this document is due to be

adopted by the Authority in early in 2019, a minor amendment is sought to remove the date '2017'. Policy LP46 G should be amended to read as follows:
"G ii) The Council will work cooperatively with the Lee Valley Regional Park Authority to deliver the Lee Valley Park Development Framework Area proposals and the Lee Valley Biodiversity Action Plan. "

- 11 Finally, whilst the Authority has noted and supports the strengthening of Policy LP47 'Biodiversity and Sites of Importance for Nature Conservation' in order to achieve a net gain in biodiversity there is still concern that it is only major development proposals that will be required to include a biodiversity survey of the site, Policy LP47 C). If the Council is to achieve its aim for a net gain in biodiversity all development will need to enhance biodiversity and create opportunities for wildlife. This will require ecological surveys from the outset of the planning and application process. This would be in line with the National Planning Policy Framework (2018).
- 12 The Council has deleted reference to Strategic Cultural Areas from supporting text under Policy LP10 Arts Culture and Entertainment Facilities. This aligns with changes to the draft London Plan. However, reference to the important role of both the Regional Park and the Olympic Park in terms of providing opportunities for the arts, culture and entertainment to the local and London wide community should be reinstated in the supporting text. This could sit either under Policy LP10 Arts Culture and Entertainment Facilities (para 6.11), or under PP5 Enhanced Corridors. It should also include an additional reference, to the Lee Valley Ice Centre, Lea Bridge Road - an important community asset located on the borough boundary with Waltham Forest which attracts a large number of residents from the Borough and which the Authority is seeking to redevelop to deliver a new and enhanced ice centre venue.

ENVIRONMENTAL IMPLICATIONS

- 13 There are no environmental implications arising directly from the recommendations of this report but the draft Local Plan for Hackney once adopted will contain policies 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

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

HUMAN RESOURCE IMPLICATIONS

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

LEGAL IMPLICATIONS

- 16 Planning applications referred to this Authority are submitted under the consultative arrangements of Section 14 (4-7) of the Lee Valley Regional Park Act 1966. The Act requires a local planning authority to consult with the Authority on any planning application for development, whether within the designated area of the Park or not, which might affect any part of the Park.

- 17 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

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

EQUALITY IMPLICATIONS

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

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BACKGROUND REPORTS

Draft Local Plan 2033 Regulation 18 consultation – October 2017
London Borough of Hackney

PREVIOUS COMMITTEE REPORTS

Regeneration & Planning	RP/10/17	Consultation by the London Borough of Hackney on the draft (regulation 18) Local Plan 2033 'Hackney A Place For Everyone'
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APPENDICES ATTACHED

Appendix A	Draft response letter
Appendix B	Plan of areas of the Regional Park within the administrative boundary of the LB Hackney

LIST OF ABBREVIATIONS

PDF	Park Development Framework
SINC	Site of Importance for Nature Conservation
LP33	Local Plan



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7th January 2019

Dear Natalie

Consultation - Proposed Submission Local Plan 2033 Hackney A Place for Everyone November 2018

Thank you for consulting the Regional Park Authority on the Proposed Submission version of the Local Plan 2033 'Hackney A Place for Everyone'. This document is due to be considered by the Authority's Members at the Regeneration and Planning Committee on the 17 January 2019. The following is therefore an officer level response to meet the 7th January deadline. A final formal response will be issued as soon as possible after the committee.

Consideration has been given to the responses and changes made in relation to the Authority's previous comments many of which are positive and helpful. A few matters remain however where it is considered that the addition of further detail and minor changes to policy would improve the effectiveness of the Local Plan; these are set out below.

Spatial Objectives

The Authority remains supportive of the revised Local Plan spatial objectives. As a significant part of the Borough's green infrastructure adjacent to major residential and business populations, the Regional Park can make an important contribution to a number of these objectives particularly those associated with the promotion of good health and wellbeing (objective 2), and the creation of liveable and accessible neighbourhoods (objective 6).

The revision to Objective 8, as proposed by the Authority, to include a greater emphasis on biodiversity is welcome. This now reads:

“To protect and enhance existing open spaces and biodiversity, develop and improve green links between these spaces and support the creation of new open spaces and vertical gardens”, (page 8).

The added reference to the ‘Lee Valley Biodiversity Action Plan 2017’ alongside the Park Development Framework Proposals under Policy LP46 G, (page 135) is also welcomed. A fully revised version of this document is due to be adopted by the Authority in early in 2019. A minor amendment is therefore sought to remove the date ‘2017’ so that policy text reads as follows:

G ii) The Council will work cooperatively with the Lee Valley Regional Park Authority to deliver the Lee Valley Park Development Framework Area proposals and the Lee Valley Biodiversity Action Plan.

Enhanced Corridors and the Lea Valley Edge

In your ‘Consultation Statement’ a new place policy ‘PP5 Enhanced Corridors’ is identified as the response to the Authority’s original concerns about a lack of detail on the ‘Lea Valley Edge’ proposal, – a corridor of land adjacent to the Regional Park identified as suitable for renewal and intensification, including previously developed land.

The Authority welcomes the addition of this policy but seeks the inclusion of further detail and clarification under the associated Strategic Principles. Supporting text for PP5 Enhanced Corridors (Para 4.43) recognises the River Lee Corridor as different from the other road and street corridors and highlights its importance for walking, cycling, and wildlife, for river communities and leisure and recreation. A clear reference within the policy is required to make clear that this corridor forms part of the Regional Park and therefore enables access to a continuous network of venues, open space and habitats, waterways, paths and cycle routes that open up the wider Regional Park to local residents and visitors.

The Strategic Principles for the Lee Valley Corridor should correspond more closely to the important elements of the Corridor identified in supporting text mentioned above. Whilst it is recognised that the new PP1 Public Realm policy is to be read alongside the place policies it is not clear whether this offers guidance that is specific enough in respect of the River Lee Corridor. Guidance is needed for example, on how mixed use housing led development at increased densities can incorporate open spaces and biodiversity that would complement the adjacent water corridor and waterside open spaces, conserving high quality mature landscapes in the area and protecting valuable leisure, heritage and ecological assets.

Supporting text should be amended to set out the relationship between this policy, PP5 and those others that are relevant such as policy LP46 G) which references the Regional Park, policy LP52 which covers development alongside waterways and canals, and LP1 Design Quality and Local Character.

Arts Culture and Entertainment Facilities

It is noted that reference to Strategic Cultural Areas has been deleted from supporting text under Policy LP10 Arts Culture and Entertainment Facilities,

presumably to align with the revised wording in the draft London Plan. It is not clear however why reference to the important role of the Regional Park and the Olympic Park in terms of providing opportunities for the arts, culture and entertainment to both the local and London wide community has also been removed. Supporting text either for LP10 (para 6.11), or under PP5 Enhanced Corridors should include an additional reference, to the Lee Valley Ice Centre, Lea Bridge Road. This is an important community asset located on the borough boundary with Waltham Forest which attracts a considerable number of residents from your Borough, a large proportion of whom are female and drawn from BAME communities which historically have low rates of sports participation. The Authority intends to announce plans for its redevelopment as a twin pad comprising two Olympic sized rinks later this year.

Biodiversity

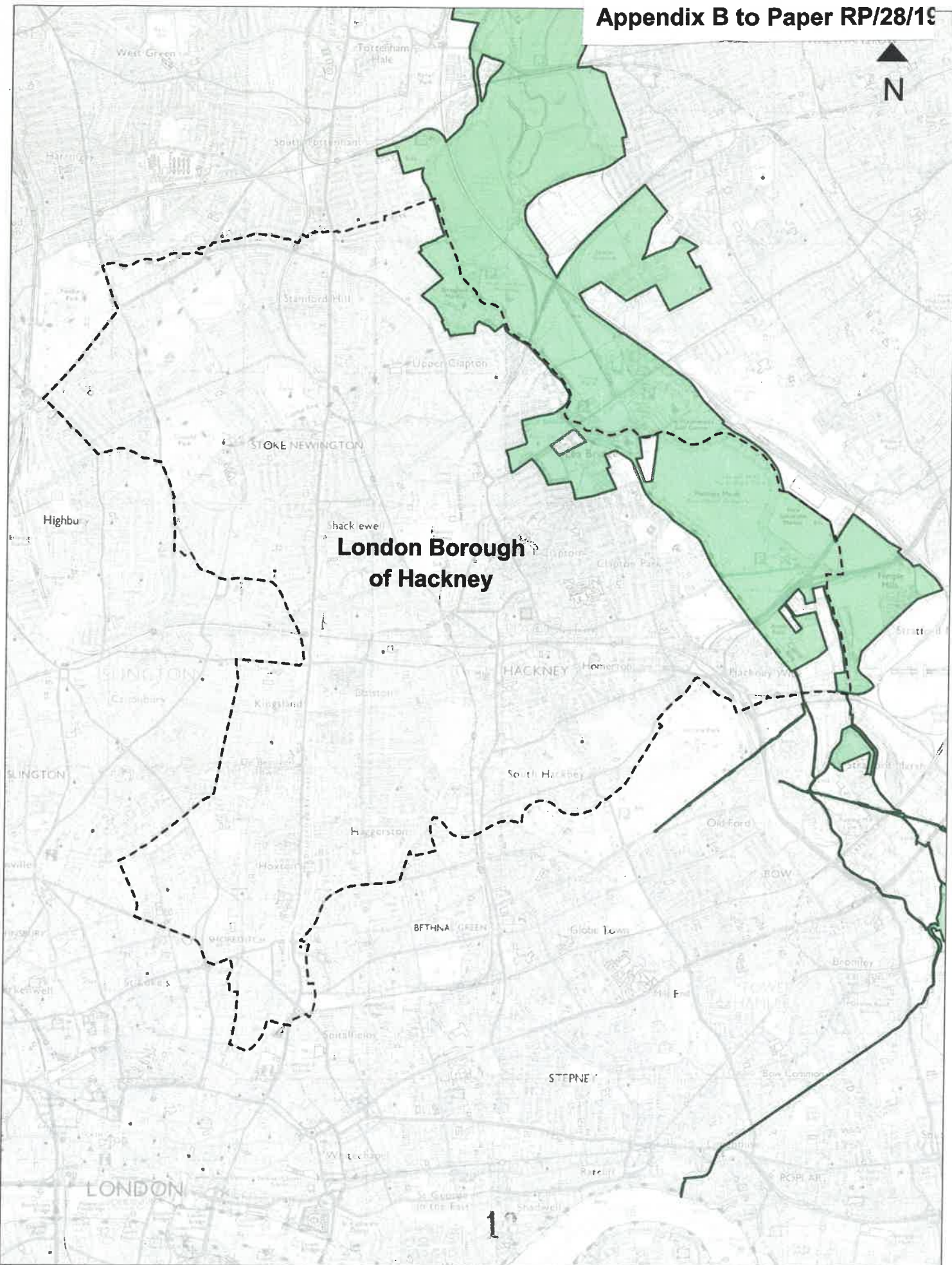
The strengthening of policy in order to achieve a net gain in biodiversity is supported - Policy LP47 'Biodiversity and Sites of Importance for Nature Conservation'. However the Authority still questions why it is only major development proposals that will be required to include a biodiversity survey of the site, LP47 C). It is important that all development seeks to enhance biodiversity and create opportunities for wildlife, particularly if the Council is to achieve its aim for a net gain in biodiversity. This will require proposals to demonstrate how the development improves biodiversity which is likely in most cases to require ecological surveys as part of the planning and application process.

The Authority would be happy to discuss any of the matters raised above in due course.

Yours sincerely

Stephen Wilkinson
Head of Planning and Strategic Partnerships
Lee Valley Regional Park Authority


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**London Borough
of Hackney**



Park area within Hackney

 **LB of Hackney
Boundary**

 **LVPRA Park
Boundary**

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