



**LEE VALLEY REGIONAL PARK AUTHORITY**

**REGENERATION AND PLANNING  
COMMITTEE**

**19 09 2019 AT 12:30**

**Agenda Item No:**

**7**

**Report No:**

**RP/32/19**

## **LONDON BOROUGH OF WALTHAM FOREST LOCAL PLAN REGULATION 18 CONSULTATION DOCUMENT**

Presented by the Policy Officer.

### **SUMMARY**

London Borough of Waltham Forest are consulting on their Regulation 18 draft Local Plan 2020-2035 which is intended to shape and manage good growth, development and regeneration across the borough over the next 15 years.

The Authority responded to the earlier Direction of Travel consultation in 2017 and also to the accompanying 'call for sites', proposing two sites for consideration; the Waterworks building and car park, and the western portion of the Ice Centre car park. This process is still open and will be informed by the Green Belt review currently in hand.

Since 2015 Officers of the Authority have been working closely with the Council on a major project within the Borough on proposals to redevelop the Ice Centre and create a new twin-pad rink ice skating destination.

Comments on the current consultation are set out in the letter attached as Appendix A to this report. Whilst the draft Plan includes a number of positive policies in relation to the Park further discussion is required with officers under the Duty to Co-operate process to cover the Green Belt review currently underway, the outcome of the Call for Sites process and the detail of Local Plan policy in relation to the Authority's major venues and visitor facilities.

### **RECOMMENDATIONS**

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 Waltham Forest on the draft Local Plan 2020 – 2035.

## BACKGROUND

- 1 Waltham Forest is a relatively small borough at 3,880 ha in area. Approximately 27% is Green Belt or Metropolitan Open Land (MOL) concentrated on the western side. Figures set out in the draft Local Plan indicate it is also a rapidly growing and diverse borough with an increase in residents of 20% over the last decade and a 35% growth in the number of businesses since 2012.
- 2 A large area of the Regional Park (over 500ha) and several venues fall within the London Borough of Waltham Forest. These include land alongside the eastern side of the King George's and William Girling Reservoirs, Banbury Reservoir and the adjoining Folly Lane Triangle, the eastern part of Tottenham Marshes, the Walthamstow Wetlands, Walthamstow Marsh, Leyton Marsh and the Lee Valley Ice Centre, Riding Centre and Waterworks centre and the Lee Valley Hockey and Tennis Centre. A plan indicating the extent of land in the Regional Park and in the administrative boundary of the Borough is included in Appendix B to this report.
- 3 The Regional Park forms both a substantial green infrastructure resource and a major leisure and sporting attraction for the Borough's residents. In 2018/19 approximately 379,905 visits were made to the Authority's venues and parklands in the Borough by Waltham Forest residents. This figure does not include visits to other facilities within the Park including driving ranges, rugby clubs and the 400 acre Walthamstow Wetlands.
- 4 The Authority has adopted detailed proposals for those areas of the Regional Park which lie in the Borough through the Park Development Framework Area Proposals. Five sets of Area Proposals are relevant given the extent of Park in the borough: Area 2 The Three Marshes: Walthamstow, Leyton and Hackney, Area 3 The Waterlands: Walthamstow Wetlands to Tottenham Marshes, Area 4 The Waterlands: Banbury Reservoir to Picket's Lock, a small section of Area 5 The Waterlands: King George V Reservoir to Rammey Marsh and Area 1 Proposals where these relate to the Queen Elizabeth Olympic Park.
- 5 The Authority's major investment project for the Ice Centre lies within the Borough. Proposals to redevelop the existing facility and create a new state-of-the-art twin-pad ice skating destination are well advanced and a number of the pre-application requirements on the design and content of the proposal have been undertaken in consultation with officers from the Council. Public consultation and a series of exhibition events took place throughout July and August. Submission of the planning application is programmed for October.
- 6 In January 2017 (Paper A/4238/17) in response to the Council's draft vision for the Lea Bridge Eastside which covers the part of Leyton and sites around the Lea Bridge station, the Authority welcomed the importance given to the Regional Park and the inclusion of the Waterworks venue building, car park and land to the south for housing. The adopted version of the Vision document refers to this as 'a regeneration opportunity' rather than housing.
- 7 The Authority responded in detail to the previous round of consultation on the draft Local Plan – the 'Direction of Travel' document in December 2017 (Paper RP/11/17) seeking recognition of the Authority's planning functions, and the Park's contribution to the Borough's leisure and recreation needs. The Authority also responded to the accompanying 'call for sites', proposing two sites for consideration; the Waterworks building and car park, and the western portion of

the Ice Centre car park.

- 8 Comments received from this consultation will inform the Proposed Submission Plan which will be consulted upon in Spring 2020. The Council is aiming to adopt a new Local Plan by the summer of 2021 at which point it will replace the existing Core Strategy 2012, Development Management Policies Document (DMPD) 2013, and the Blackhorse Lane Area Action Plan 2015.

## THE DRAFT LOCAL PLAN

- 9 The content of the draft Local Plan builds upon the Direction of Travel consultation work undertaken in late 2017 and other new evidence. It sets out a Vision for Waltham Forest built upon three components:
- a liveable Waltham Forest;
  - growing a creative, diverse and resilient economy in Waltham Forest; and
  - Waltham Forest as a place of Leisure. The latter references the Regional Park.
- 10 **Scale of Growth and Spatial Strategy**  
The Spatial Strategy outlines how significant levels of housing, employment, office and retail development will be planned for and provided (Policy 2 Scale of Growth) including net increases of 27,000 additional homes, 46,000sqm for employment purposes and support for physical, social and green infrastructure provision commensurate with the scale of growth. The Council's preferred approach to distribution of growth sees the Borough divided into three areas South, Central and North within which 'Strategic Locations' are identified as the main focus for development and investment. Policies are included for each area and the Strategic Location.
- 11 Policy 3 'Location and Management of Growth' provides an overview of the quantum of growth:
- **South Waltham Forest** – offers the largest opportunities for regeneration. A minimum of 15,000 new homes and 3,250 new jobs are planned. Included as part of this is a growth target for 2,850 new homes within the 'Lea Bridge and Church Road Strategic Location' (Policy 7), 700 new homes in the 'Low Hall Strategic Location' (Policy 8) and 6,350 new homes within the 'Leyton Strategic Location' (Policy 9).
  - **Central Waltham Forest** – 8,000 homes and 1,600 jobs with a minimum target of 1,650 new homes for the 'Blackhorse Lane Strategic Location'
  - **North Waltham Forest** – 4,000 homes and 1,940 jobs, with a minimum of 450 homes for the 'Sewardstone Road Strategic Location' (Policy 21) and 900 new homes within the 'North Circular Strategic Location' (Policy 22).
- 12 The draft Local Plan housing policy has been informed by Waltham Forest's Growth Capacity Study 2018 (which is not yet publicly available) and the Greater London Authority (GLA) Strategic Housing Land Availability Assessment Housing. These assessments provide evidence which shows that by making effective use of land, intensification and increased density the strategic locations

have significant capacity to accommodate the identified growth (Policy 23). Area Supplementary Planning Documents, Masterplans and Planning briefs are identified as the mechanisms that will be used to explore opportunities in these areas. New homes will be directed around transport hubs and accessible locations.

- 13 The Spatial Strategy is also clear on the need to protect designated sites and areas such as Green Belt and MOL, and to ensure an effective use of previously developed land, except where it is of high environmental value (Policy 3 D and E)
- 14 The Call for Sites process remains open as part of this consultation and will be used to identify the potential pool of sites to be included in the Brownfield Land Register. Site suggestions will be used to inform the Proposed Submission version of the draft Local Plan to be published Spring 2020.
- 15 **Leisure and Culture**  
As the first Mayor's London Borough of Culture the Draft Plan includes strong policy to promote culture and creativity (Policy 45) which is considered to include important outdoor space "such as Lee Valley Regional Park and the Walthamstow Wetlands" para 10.4. Policy is aimed at directing major development of arts, culture, entertainment and visitor facilities to major district centres and accessible locations in line with planning policy and the sequential test.
- 16 Similarly, Policy 48 which deals with leisure developments as well as retail and office developments directs new leisure and cultural/tourism, entertainment, hotel, community and other service users to designated centres.
- 17 **Protecting and Enhancing the Environment**  
The draft Plan recognises the value of the Borough's green and blue spaces particularly in terms of the physical and mental health and wellbeing of its residents. The Plan identifies the Lee Valley Regional Park as an important part of this resource and includes Policy 87 which relates specifically to the Regional Park and Epping Forest as key assets within the borough which should be protected and enhanced.
- 18 Policy 84 'Green Infrastructure and the Natural Environment' provides detail on development in Green Belt and MOL. The Council will support proposals that contribute to the protection of, and improved access to, Green Belt and MOL and which deliver development and regeneration principally through the use of brownfield land and buildings. Proposals can come forward under exceptional circumstances but these must meet a set of criteria relating to a high standard of design, quality of landscaping, existing open space uses, and contribution to the borough's green infrastructure network.
- 19 The Council recognise that the Borough's Green Belt and MOL includes brownfield land which has previously been in industrial use, for example in areas such as Lea Bridge and on the fringes of the North Circular. A Green Belt review is in hand to consider these areas and whether the circumstances are such that the boundaries of the Green Belt/MOL can be adjusted or the land developed. Para 17.6.
- 20 The draft Plan includes detailed policies on Open Space Sport and Recreation – Policy 85 and Biodiversity, Policy 86. The latter offers a high level of protection,

and enhancement for biodiversity resources both on site and within the vicinity of a development site. Ecological assessments must be undertaken from the earliest stages of the pre-application process and development is expected to provide biodiversity benefits in accordance with the principals of net gain.

- 21 The ecological function of the waterways within the Borough are highlighted in the Plan with specific reference to the River Lee and the Regional Park. Policy 88 'Waterways' seeks to protect and enhance the water environment whilst also ensuring proposals affecting the waterways do not inhibit their use for freight transport.

## **COMMENTS ON THE DRAFT LOCAL PLAN**

### **22 Lee Valley Regional Park and Policy 87**

Reference to the Regional Park is now included within the Spatial Strategy and across a number of the thematic policies/policy sections. In particular Policy 87 'The Lee Valley Regional Park and Epping Forest' and its supporting text is helpful. Paragraphs 17.21 and 17.23 to 17.24 make reference to the Authority's statutory role and planning functions and our adopted area proposals, as requested by the Authority in its previous comments. A minor update is needed to take account of recent work and this is shown in the attachment to the letter at Appendix A to this report.

- 23 Policy 87 largely carries forward the wording from the current Development Management Policies Document (DMPD) Policy DM12 although without reference to the detail of proposals and with some policy wording moved into the supporting text. Whilst it might be unrealistic to expect draft Policy 87 to reference the detail of all the Area Proposals that are relevant to the borough it is important that a policy statement supporting the PDF Area Proposals be retained, as part of policy. The precedent for this position was established as a result of the examination process for both the Core Strategy and DMP document and is documented in the Inspector's reports, from 2011 and 2013. The proposed policy wording to be included is set out in the letter at Appendix A to this report and will be submitted as part of the Authority's formal response.

### **24 Strategic Locations and Park Venues**

Whilst draft Policy 87 offers support to the Regional Park and the PDF Proposals there is a need to strengthen policy support for the Park's leisure and sporting venues, for example the Lee Valley Ice Centre, Riding Centre and also the Lee Valley Hockey and Tennis Centre which lies within the Borough and the Leyton Strategic Location. The Authority previously highlighted the important contribution of its venues (as well as the parklands) to the Borough's leisure needs. They form part of the offer promoted by the Council's Vision: 'Waltham Forest as a place of leisure' and will be part of the Borough's cultural legacy following its 2019 status as the London Borough of Culture.

- 25 Draft policies supporting the provision of leisure, culture, entertainment and visitor facilities direct development to major district centres and accessible locations which is in accordance with government planning policy guidance. This raises issues for the Authority when the Park's leisure and sporting venues lie largely on the periphery of major centres. Added to which most are also situated within Green Belt or MOL.
- 26 There needs to be further formal discussion with officers from the Borough as to how the Local Plan can support the Authority's future plans and investment for

enhancing the Park's leisure and sporting venues.

- 27 The location of the Park's main venues either adjacent to or within the Strategic Locations identified in the Plan should be a key factor in favour of a more supportive policy approach that acknowledges leisure as part of the growth scenario. The Lee Valley Ice Centre and Riding Centre lie just outside the Lea Bridge and Church Rd Strategic Location whilst the WaterWorks Centre sits within it. All these venues are close to Lea Bridge Station. The Leyton Strategic location, (shown on the diagram at page 32 of the draft Local Plan) includes the Lee Valley Hockey & Tennis Centre (LVHTC). Please refer to the diagram at Appendix C to this report, which reproduces the Strategic Locations for South Waltham Forest.
- 28 The Area Profile text should acknowledge these leisure venues, and their contribution to the character of the area and its leisure, cultural and sporting opportunities. This would be the opportunity to reference the Authority's considerable investment in the new Ice Centre on Lea Bridge Road, and the Lee Valley Leisure Trust's plans for improving the offer at the Lee Valley Riding Centre.
- 29 Additional policy text should be added under Policy 6 'South Waltham Forest' - which covers all the main venues in the south of the borough - offering support to proposals that will improve and grow the visitor, sporting and wider cultural offer of the Lee Valley Regional Park (LVRP) and its venues, thereby ensuring their long-term sustainability. The full policy text addition is set out in the letter at Appendix A to this report.
- 30 **Strategic Locations Access and connectivity**  
Threaded throughout the Spatial Strategy are a number of policy references that seek improvements to permeability and connectivity that would benefit cycle and pedestrian access into and through the Regional Park. The policies for the Strategic Locations have identified a number of specific access improvements and linkages that are also promoted by or would complement the Park Development Framework (PDF) Area Proposals. These policies establish a framework for co-operative working between the Council, the Authority and other stakeholders to secure access improvements and links into the Park as development comes forward.
- 31 For example; PDF Area 2 Proposals have highlighted the importance of reconnecting the Low Hall area into the rest of the Park at Walthamstow Marshes. The draft Local Plan Policy 8 Low Hall Strategic Location bullet 5. States:

"Development in the Low Hall Strategic Location over the Plan period will deliver the following priorities....

- Improves accessibility, permeability and legibility from Low Hall into the Lee Valley Regional Park and Lea Bridge Station by improved bus routes, walking and cycling"...

Similarly, in the Leyton Strategic Location, Policy 9 states that development will deliver an improved public realm and walking and cycling accessibility, connectivity, permeability and legibility to the Lee Valley Regional Park, River Lee, Queen Elizabeth Olympic Park (QEOP), as well as other identified routes. Area 1 PDF Proposals identify the need for partnership working to "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” in order to establish a network of visitor facilities and open spaces linking the QEOP with the wider Regional Park, including Hackney Marshes, the Waterworks visitor hub, and Walthamstow Wetlands.

**32 Green Belt, MOL and the Call for Sites**

The outcome of the Borough’s Green Belt review could be significant for strategic locations such as Lea Bridge Road. The diverse nature of the Green Belt and MOL within the Borough does need to be considered, especially where brownfield land could offer opportunities to concentrate growth in accessible locations within the identified strategic locations. The Authority’s response to the call for site exercise suggested that two sites within the Lea Bridge Road area are de-designated from Metropolitan Open Land and considered for residential development. It is understood that the Borough is currently carrying out further work to review Green Belt/MOL land and therefore no decisions have been made on these sites at this stage.

- 33 The outcome of the Green Belt review will be significant in this respect and officers will be seeking further detail on this matter and the Call for Sites process.

**34 Biodiversity**

The manner in which Policy 86 ‘Biodiversity and Geodiversity’ is framed suggests it is only concerned with proposals that will affect biodiversity (and geodiversity). This could mean that a development where there is no impact would have no requirement to add features for biodiversity. The National Planning Policy Framework (NPPF) states that when determining planning applications local planning authorities should encourage opportunities “...to incorporate biodiversity improvements in and around development....., especially where this can secure measurable net gains for biodiversity” (para 175 d). An amendment to the opening sentence under Policy 86 should be considered as follows:

Proposals ~~affecting~~ **should seek to improve** biodiversity and geodiversity resources in the Borough ~~will~~ **and ensure that: .....**

- 35 Policy 86 B states that “All major development proposals are required to include a biodiversity survey of the site”. Whilst this is supported it is also the case that smaller scale developments could equally have an impact on biodiversity. All proposals should consider biodiversity from the outset to ensure relevant surveys are carried out. Policy 86 D could also be amended to strengthen its intent so that it states:

~~“Where opportunities arise, d-Development proposals~~ **should seek to must** provide measures to support species and habitats through the use of landscaping on or adjacent to buildings. ....”

- 36 The Council recognises the value of vacant or derelict land awaiting development to nature conservation under Policy 86 E and this is endorsed. It states that this land should be protected on a temporary basis. It would be helpful if the supporting text for this policy could explain how this might be achieved.

## **ENVIRONMENTAL IMPLICATIONS**

37 There are no environmental implications arising directly from the recommendations in this report but the draft Local Plan for Waltham Forest 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**

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

## **HUMAN RESOURCE IMPLICATIONS**

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

## **LEGAL IMPLICATIONS**

40 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.

41 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**

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

## **EQUALITY IMPLICATIONS**

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

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## **BACKGROUND REPORTS**

The Waltham Forest Consultation Draft Local Plan Shaping the Borough 2020- 2035 Habitats Regulations Assessment	July 2019
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## **PREVIOUS COMMITTEE REPORTS**

Regeneration & Planning	RP/11/17	Consultation by London Borough of	14 Dec 2017
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Committee

Waltham Forest on  
the draft Local plan  
Direction of Travel  
document

**APPENDICES ATTACHED**

- |            |  |
|------------|--|
| Appendix A | The Authority's draft response to the London Borough of Waltham Forest |
| Appendix B | Plan showing the Park area within the borough of Waltham Forest        |
| Appendix C | Diagram showing Strategic Locations                                    |

**LIST OF ABBREVIATIONS**

PDF	Park Development Framework
SSSI	Site of Special Scientific Interest
LVB&TC	Lee Valley Hockey & Tennis Centre
HRA	Habitat Regulations Assessment
QEOP	Queen Elizabeth Olympic Park
MOL	Metropolitan Open Land
DMPD	Development Management Policies Document
GLA	Greater London Authority
LVRPA	Lee Valley Regional Park Authority
NPPF	National Planning Policy Framework
SAC	Special Area of Conservation



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19th September 2019

Dear Jane

**RE: CONSULTATION ON REGULATION 19 DRAFT LOCAL PLAN DOCUMENT - LEE VALLEY REGIONAL PARK AUTHORITY REPRESENTATIONS**

Thank you for consulting the Regional Park Authority on the Draft Local Plan Regulation 18 consultation document.

A report on this matter was considered by the Authority's Members at the Lee Valley Regeneration and Planning Committee on the 19 September 2019 when the following comments were agreed. Officers would welcome further discussion on the detail of comments as part of the Duty to Co-operate process, particularly in relation to the Green Belt review, the Call for Sites process and the Local Plan policy in respect of support for the Authority's major venues and visitor facilities.

**Lee Valley Regional Park Policy 87**

The Authority welcomes the recognition given in the draft Local Plan to the Regional Park as a defining characteristic of the Borough and its role as a significant asset providing valuable benefits to local communities.

The Regional Park is a significant part of the Borough's green infrastructure comprising over 500ha. Key sites include Banbury Reservoir, the eastern part of Tottenham Marshes, the Walthamstow Wetlands, Walthamstow Marsh, Leyton Marsh, and Essex Filter Beds and major leisure and sporting venues at the Lee Valley Ice Centre, Lee Valley Riding Centre, Waterworks Centre

and Lee Valley Hockey and Tennis Centre. Over 380,000 of the Borough's residents visit these sites.

The Vision statement acknowledges the Lee Valley Regional Park as part of its leisure and recreation offer. It would be helpful if under the Vision statement section 'Waltham Forest as a Place of Leisure' (page 12), the importance to the Borough of the Authority's diverse visitor facilities could also be highlighted, for example the Lee Valley Ice Centre and the Lee Valley Riding Centre.

The references to the Regional Park that are now included within the Spatial Strategy and across a number of the thematic policies are supported.

Inclusion of Policy 87 'The Lee Valley Regional Park and Epping Forest', and its supporting text, carries across key elements of policy from the Development Management Policies Document (DM12), that will assist in protecting and enhancing the Park. Paragraphs 17.23-24 also set out the statutory role of the Park Authority and its planning functions. These inclusions are welcomed and supported.

However, the current policy reference supporting the Park Development Framework (currently DM12 H) has been moved to supporting text under para 17.21. The Authority wishes to see this reinstated as part of Policy 87.

It is important that a policy statement supporting the Park Development Framework Area proposals is included, particularly as all the PDF Area proposals which relate to the Park within Waltham Forest have been adopted. This would fulfil the requirements of the Park Act Section 14 (2) (a), a matter that was previously covered in both the Examination of the Core Strategy 2011 and in the 2013 Examination of the Development Management Policies Document, please refer to the detail in the following Inspector's Reports [http://static.walthamforest.gov.uk/sp/documents/core\\_strategy\\_inspector\\_s\\_report\\_final-lr.pdf](http://static.walthamforest.gov.uk/sp/documents/core_strategy_inspector_s_report_final-lr.pdf)

<http://static.walthamforest.gov.uk/sp/Documents/DMP-Local-Plan-Inspector-Final-Report-7-Aug-13.pdf>

Suggested proposed amendments to Policy 87 and minor changes to the supporting text are included as an Appendix to this letter.

### **Strategic Locations**

The Authority previously highlighted the important contribution of its venues (as well as the parklands) to the Borough's leisure needs. They form part of the offer promoted by the Council's Vision: 'Waltham Forest as a place of leisure' and will be part of the Borough's cultural legacy following its 2019 status as the London Borough of Culture. Whilst the draft Local Plan includes policy that supports the provision of leisure, culture and visitor facilities these are focused on directing development to major district centres and accessible

locations. These policies would not then necessarily apply to the leisure and sporting venues located within the Park and this leaves a policy gap.

The location of the Park's main venues either adjacent to or within the Strategic Locations does however offer the opportunity to include a supportive policy approach, one that recognises leisure as a key component of the growth agenda and the need to support their long-term sustainability and growth.

The majority of the Authority's venues are located within 'South Waltham Forest' Area, which according to the Local Plan, offers the greatest potential for regeneration and good growth. Both the Lee Valley Ice Centre and Riding Centre lie just outside the Lea Bridge and Church Rd Strategic Location whilst the WaterWorks Centre sits within it. With the reopening of Lea Bridge Station this is an accessible location. The Leyton Strategic location as outlined in the diagram on page 32, includes the Lee Valley Hockey & Tennis Centre.

The Area Profile text should acknowledge these leisure venues, and their contribution to the character of the area and its leisure, cultural and sporting opportunities. The supporting text could reference the Authority's considerable investment in the new Ice Centre on Lea Bridge Road, its popularity as a leisure facility amongst a range of different groups, residents and visitors, and the Lee Valley Leisure Trust's plans for improving the offer at the Lee Valley Riding Centre and Lee Valley Hockey & Tennis centre.

The following policy text is proposed under Policy 6 to sit as bullet L

***Policy 6 South Waltham Forest***

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

***L. Improve and grow the visitor, sporting and wider cultural offer of the Lee Valley Regional Park and its venues, and thereby ensure their long-term sustainability and contribution to the growing visitor economy ....***

Officers of the Authority would welcome the opportunity to discuss this matter further as part of the Duty to Co-operate process.

**Access and Connectivity**

The Authority supports the policy references throughout the spatial strategy that seek improvements to permeability and connectivity that would benefit cycle and pedestrian access into and through the Regional Park and linkages with other open spaces and visitor attractions.

Policy 84 'Green Infrastructure and the Environment' also promotes the need to ensure proposals improve the connectivity and accessibility of the

Borough's green and blue infrastructure including the Green Belt and MOL. Given the substantial area of the Park within the Borough and the range of landscapes and leisure experiences it provides this emphasis on accessibility is important:

The Authority notes that policy for the Strategic Locations identifies a number of specific pedestrian and cycle access improvements and connections that are also promoted by or would complement the PDF Area Proposals:

These policies establish a framework for co-operative working between the Council, the Authority and other stakeholders to secure access improvements and links into the Park as development comes forward.

Officers are in the process of drawing up a range of Park wide projects, (as part of the PDF delivery process), directed at landscape, access and environmental improvements to better connect visitors and local people with the Park and enhance the visitor offer. Section 20 of the Local Plan - 'Delivering the Local Plan' should include a statement supporting partnership working to ensure funding and delivery of these 'access projects' and setting out the role of the Borough in facilitating this process, including through developer contributions where appropriate.

### **Accommodation for Gypsies and Travellers**

Policy 35 Gypsies and Travellers seeks to protect the existing site in the Park at Folly Lane and supports the intensification of this site (along with another site, Hale Banks North) to provide extra pitches. Whilst the Authority acknowledges that the site at Folly Lane is a well established site in the Park it would expect any intensification to be contained within the existing site boundary.

### **Green Belt**

It is positive that the diverse nature of the Green Belt and MOL within the Borough has been recognised in the draft Local Plan. As the Park boundary includes parts of Lea Bridge Road and the fringe of the North Circular there are sites within the Regional Park that could potentially be released from Green Belt and MOL in the future.

The outcome of the Council's Green Belt review is critical in respect of the sites identified by the Authority through the Call for Sites process which identified sites on Lea Bridge Road. Accordingly, if exceptional circumstances exist in these areas and are confirmed by the Council's Green Belt Review, paras 136 to 138 of the NPPF (Feb 2019) sets out the circumstances in which the boundaries of these parcels may be adjusted or the land developed. It is understood that further work is in hand to review Green Belt/MOL land and the Authority would wish to be involved in the next stages of this process.

## **Biodiversity Policy 86**

A large area of the Regional Park within the borough is of high biodiversity value such as the Walthamstow Marshes SSSI, and Walthamstow Reservoirs SPA, and the Site of Metropolitan Importance for Nature Conservation (along the River Lee Navigation) or is land that supports these designated areas by offering 'buffer' habitat. Supporting text for Policy 86 Biodiversity and Geodiversity should therefore, under paragraph 17.11, make reference to partnership working with the Lee Valley Regional Park Authority as well as Natural England and the Conservators of Epping Forest. Paragraph 17.12 should reference the Authority's new Lee Valley Biodiversity Action Plan which was recently adopted and includes contributions from borough officers.

As it currently reads the opening statement under Policy 86 'Biodiversity and Geodiversity' suggests it is only concerned with proposals that will affect biodiversity (and geodiversity). This could mean that a development where there is no impact would have no requirement to add features for biodiversity. Local planning authorities are guided by the NPPF when determining planning applications to encourage opportunities "...to incorporate biodiversity improvements in and around development...., especially where this can secure measurable net gains for biodiversity" (para 175 d). It is considered that an amendment to the opening sentence under Policy 86 would be appropriate as follows:

***Proposals affecting should seek to improve biodiversity and geodiversity resources in the Borough and will ensure that. ....***

Policy 86 B should also be amended. It states that "All major development proposals are required to include a biodiversity survey of the site". Whilst this is supported it is also the case that smaller scale developments could equally have an impact on biodiversity. All proposals should consider biodiversity from the outset to ensure relevant surveys are carried out and this should be clarified in the policy. The supporting text under para 17.11 that ecological assessments must be developed from the earliest stages of the pre-application process is welcomed, this will help to ensure timely assessments of biodiversity value and well planned mitigation..

A further amendment is suggested in relation to Policy 86 D to strengthen its intent so that it states:

***~~"Where opportunities arise, d~~ Development proposals should seek to must-provide measures to support species and habitats through the use of landscaping on or adjacent to buildings. ...."***

It is noted that the Council has recognised that transitional vacant or derelict land can have ecological value and that under Policy 86 this land 'should be protected on a temporary basis'. It would be helpful if the supporting text for this policy could explain how this might be achieved.

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

**Yours Sincerley**

**Claire Martin  
Policy Officer, Lee Valley Regional Park Authority**

## **Appendix Policy 87**

### **Section 17 Protecting and Enhancing the Environment**

#### **Proposed Amendments to Policy 87 The Lee Valley Regional Park and Epping Forest**

Proposals which affect the Lee Valley Regional Park and/or Epping Forest will ensure that:

- A. Development proposals include measures for the protection, enhancement and where possible, the extension of the borough's network of Green Corridors.
- B. Development proposals affecting the Lee Valley Regional Park or Epping Forest should be sensitive and proportionate, delivering enhancements where possible and must not contribute to adverse impacts on ecological integrity, amenity or visitor enjoyment.
- C. Development proposals in proximity to the Lee Valley Regional Park should improve access and links to the park and its waterways.
- D. Development proposals in proximity to the Epping Forest Special Area of Conservation (SAC) should improve access and biodiversity enhancements in line with any requirement of Natural England and the Epping Forest Conservators

**The Council supports the Lee Valley Regional Park Authority's Park Development Framework. The contents of the Lee Valley Park Development Framework will be a material consideration in the determination of planning applications.**

**17.21 The Lee Valley Regional Park and Epping Forest are major assets for Waltham Forest providing valuable benefits to local communities in terms of access to nature and to healthy outdoor recreation. The Council supports Epping Forest's long term management objectives and Lee Valley Regional Park Authority's Park Development Framework. The Council will work cooperatively with the Lee Valley Regional Park Authority and the Epping Forest Conservators.**

**17.23 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 and riparian authorities such as Waltham Forest are required to include those parts of the plan affecting their area within their own relevant planning strategies and policies (Section 14(2)**



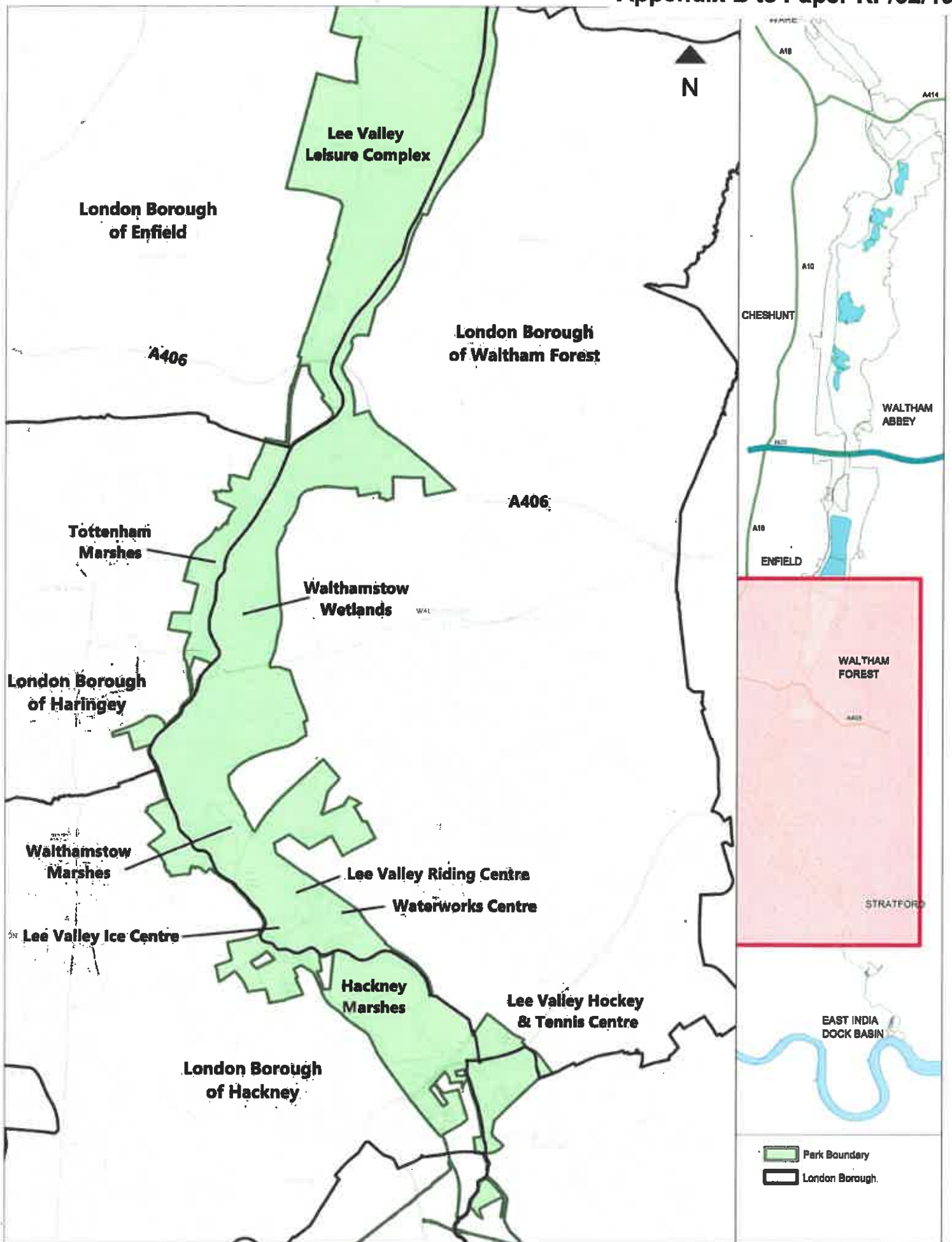
(a) although inclusion does not infer that the planning authority necessarily agrees with them (Section 14(2) (b)). ~~Both the Park Plan 2000 and The Park Development Framework~~ **Area Proposals** are relevant in terms of Section 14 (2) of the Park Act and are formal statements of the Authority's position in respect of development within the Regional Park.

17.24 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**

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Lee Valley Regional Park Authority within London Borough of Waltham Forest

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Appendix C

Strategic Locations South Waltham Forest

